

## GHAI Industry Alert No. 2 | Industry Alerts 2022 Series

# Unhealthy ultra-processed foods and beverages: Insidious marketing to children

### I. Introduction

The ultra-processed food and beverage product (UPP) industry continues to use advertising, promotion, and sponsorship tactics to attract children and adolescents, despite growing evidence showing the harmful effect of unhealthy-foods-and-beverages marketing on children's health. This is why international human rights treaties protect the vulnerability of this young audience from marketing practices of all kinds.

Children and adolescents receive special protection from commercial interests to benefit their health and well-being. The use of advertising, promotion, and sponsorship tactics by the UPP industry has greater implications than just increasing the consumption of unhealthy products among this population; these practices also promote addictive behaviors and expose youth to diverse forms of exploitation, like access to their data, use and abuse of their images, and the compromise of their developmental vulnerabilities<sup>1,2</sup> Young peoples' cognitive capacities are in a period of evolution, development, and growth, which means they cannot always distinguish messages with persuasive intent – such as marketing content – from other types of narratives or information.

These “predatory commercial practices”<sup>3</sup> give the UPP industry **close connections with childhood and youth** in different ways. For example, corporations use cultural and educational initiatives to bring brands into schools and other places where children gather or spend a lot of time, helping shape their life, social, environmental, and health values. This proximity to children helps the UPP industry build early brand loyalty and guarantees long-term customers who will purchase their products over a lifetime.

Another troubling global trend is how the UPP companies position themselves as **children's protectors**. These actions serve a dual purpose: preserving the image and reputation of their brands, businesses, and products, while also hampering and avoiding regulatory processes that promote mandatory marketing regulations.



To counter mandatory marketing regulations, the UPP industry deceives the public and decisionmakers by imposing their own weak standards or self-regulatory initiatives of voluntary compliance; these let them define who qualify as “children,” what “responsible marketing practices” are, and other discretionary, ineffective standards, all under the narrative of protection. These actually undermine effective safeguards for children’s health and appropriate nutrition. For instance, many companies set the age limit for “children” at 12-13 years old, pledging to not direct unhealthy food and beverage marketing to them; yet this age group is being marketed to by influencers, like athletes or celebrities.

## **II. Industry Practices: A Snapshot**

### **A. A look “behind the curtain” of marketing directed at children**

1. Industry narratives about children’s protection
2. Industry strategies to protect their brands and products against regulation

### **B. Self-regulation: Voluntary initiatives and agreements to protect children... or companies?**

## **III. Industry Practices: Examples**

### **A. A look “behind the curtain” of marketing directed at children**

#### **1. Industry narratives about children’s protection**

UPP companies and their allies brag about their efforts to protect children and adolescents. Some of their corporate statements include being involved in the nutritional education of children, promoting healthy lifestyles and safe environments for them, promising responsible marketing practices, reformulating products for children’s safety, and even engaging in childrearing. This positioning poses public health risks, as it helps companies create a positive image for themselves in relation to children’s nutrition with both governments and the general population. It also obscures the fact that most UPPs are associated with higher risk of non-communicable diseases (NCDs) at younger ages.<sup>4</sup>



**Central America:**

Nestlé launched the “[protect them and win with NIDO](#)” campaign, which awards more than 1,000 prizes to parents. The company states that “in addition to caring for and contributing to the nutrition of children, we want to reward mothers and fathers for their trust in us, for being the protectors of children and the youngest of the house.”



**Chile:**

A public-private partnership between Nestlé brand Chocapic, the municipality of Santiago, the Ministry of Cultures, Arts, and Heritage, and the Olivo Foundation inaugurated the first Latin-American children’s and youth interactive library. Nestlé financially supported the project, and a company representative stated that “[this initiative promoted by Chocapic is part of our shared value-creation model, which seeks to contribute to the communities where we are present, seeking to improve the quality of life of children and young people through the promotion of culture and reading.](#)”



**Colombia:**

As part of Nestlé’s campaign for healthy children, the company stated that “[for almost five years, we have fulfilled the objective of helping families in our country to raise happy and healthy children, both through the educational program developed in schools, and through our digital platform aimed at parents and caregivers.](#)”



**Ivory Coast:**

[Ferrero](#) partnered with [Save the Children](#) to strengthen child protection systems in order to expand access to quality education and nutrition, support community development, and empower women and adolescents in cocoa-growing communities.



**Mexico:**


The [Bimbo group](#) and [Televisa Foundation](#) launched the “[Seedbed of Values](#)” (Semillero de Valores), a digital learning space for children and families, designed to make great people from a young age.




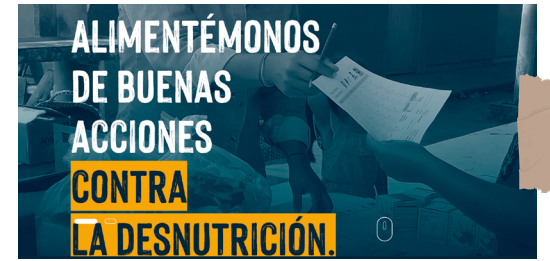


PepsiCo brand Quaker, together with Un Kilo de Ayuda, introduced a comprehensive program to combat childhood malnutrition in Mexico. The company developed a specialized product that could help overcome child malnutrition, offering Mexican children from vulnerable communities the opportunity to obtain the necessary nutrients to improve their health.

Nestlé created an Instagram post inviting families to “enjoy the product Nesquik Letritas,” the company’s children’s cereal, “reduced in sugar, with no labels” – referring to a reformulation practice that has let the product fall out of the scope of the country’s mandatory front-of-package labeling regulation.

 **Spain:** Nestlé launched its new NAT cereals, “pecially designed so that the little ones in the house can enjoy them.” The company explained the cereals are carefully baked, their main ingredient is whole oats – which makes them a source of fiber, and they are made without artificial colors or flavors, and without palm oil. Nevertheless, NAT cereals remain a UPP, marketed under the Nutri-Score halo.

 **Global:** Nestlé claims to be responsibly marketing to children to promote healthy diets through education, sharing nutritional science and other initiatives, while also contributing to voluntary marketing commitments of the International Food & Beverage Alliance (IFBA). Bimbo has committed to ensuring that, by the end of 2022, 81% of its best-selling products aimed at children comply with one of the following: portion control; line extensions with improved nutritional profiles or compliance with the maximum levels of nutrients to limit in the diet; consideration of alleged different nutrition requirements between children and adults; or pledge to define stricter standards in those products aimed at children. These types of practices let companies reformulate unhealthy products in order to be allowed to market them under “healthy halos.”







A [study](#) found that front-of-package claims and marketing messages used to promote fruit-flavored drinks and toddler milk with added sugars “contribute to [parents’ misperceptions about product nutrition and benefits for their young children.](#)” These assertions form a “[healthy halo](#)” that makes parents believe they are healthy. Similarly, an [investigative journalism piece](#) explained how popular brands in Latin America – like Kellogg’s Corn Flakes, Oreo cookies, and Coca-Cola – use specific packaging strategies to capture young audiences.

### **Promotional claims on baby foods are ‘misleading’ parents: study**

By [Oliver Morrison](#)   
01-Mar-2022 - Last updated on 01-Mar-2022 at 14:43 GMT



## **2. Industry strategies to protect their brands and products against regulation**

As highlighted in [GHAI Industry Alert No. 1](#), the UPP industry actively pursues advertising, promotion, and sponsorship strategies to build and maintain brand loyalty from consumers, with many strategies specifically targeted at children. To reach children and their caregivers, the industry chooses online and offline spaces where children grow, develop, learn, and play as key spaces for promoting the consumption of unhealthy products from early childhood. Schools – which should be safe spaces where children are specially protected from commercial exploitation – are the UPP industry’s favorite spaces to infiltrate. Through a variety of corporate social responsibility initiatives, companies sell themselves as essential actors in the advancement of children’s rights and their communities’ interests, masking vested interests and deteriorating impacts on environmental health and children’s wellbeing, while at the same time using advantageous governmental relationships to avoid mandatory regulations, discouraging appropriate nutrition and traditional diets, and promoting corporate diets that put early childhood at enormous risk.



### **Malaysia:**

Nestlé joined with a non-governmental organization to reach out to more than 2,000 schoolchildren across the nation as part of its [Back-2-School initiative](#). With contributions totaling RM650,000 (~ \$146,000 USD), the program gave kids packs that included items like new school attire, backpacks, stationery sets, drink tumblers,





and food containers, all showing off the Nestlé brand in educational facilities. For UPP companies, having a commercial presence or influence in schools is key to targeting kids.

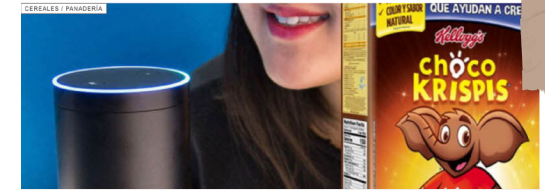


**Mexico:**

Leveraging technology to maximize consumption, Kellogg’s introduced a “voice service” with Melvin (Choco Krispies character), in partnership with Amazon’s Alexa, as an innovative way for children to have fun at home while consuming their products.

Kellogg’s lanza la primera skill de Choco Krispis® en Alexa®

EDITOR / PRODUCTOS / 30 MARCH 2022



**United Kingdom:**

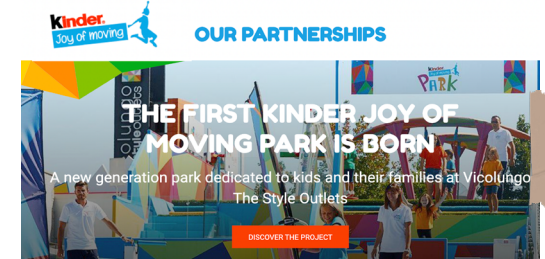
A new educational program from Nestlé Waters aimed to inspire young people to become recycling ambassadors.

The initiative urged students aged 7-14 to develop their skills and passion for making positive change in their school communities, at home, and beyond, via sustainable action plans encouraging them to become active citizens. The program also included “virtual school trips” to explore a dairy farm, a factory, and a wind farm. The company surrounded children with its brands, with the alleged purpose of protecting them.



**Global:**

The “Kinder Joy of Moving” program is expanding around the world, with the intention of helping children enjoy physical activity. The initiative is argued to be absolutely noncommercial and not aimed toward profit; however, its implementation includes a strong presence in schools, partnerships with governments, and connections with parents, teachers, and children.

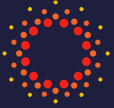


Fast-food companies, such as McDonald’s, are targeting their marketing to low-income countries, using social media and other digital media platforms to aim particularly at young consumers worldwide.

**McDonald’s es señalado por atender contra la salud de niños en pobreza**

Erika Rocha Jan 4, 2022 10:00 AM  
Empresas, Fast Food, Marketing Digital, Noticias Diarias, Promociones, Social Media





## B. Self-regulation: Voluntary initiatives and agreements to protect children... or companies?

The UPP industry has worked to weaken junk-food marketing regulations by providing their own definition of “children” – a prime example of the industry promoting its own ineffective self-regulatory measures in place of mandatory policies. Businesses claim that they responsibly market their unhealthy products, even joining behind trade associations to offer empty pledges so that they have the opportunity to delay, hinder and obstruct marketing regulations. Additionally, companies are welcomed into privileged spaces and given a place at decision-making tables where public policy affecting children is designed. They exert their influence and expose vulnerable populations to advertising, promotion, and sponsorship of harmful products, while defending reformulation initiatives, and disregarding the information asymmetry between corporations and consumers.



### United Kingdom:

[Kellogg's legally challenged government regulations on the marketing of junk food products](#), specifically those high in fat, sugar, and sodium. The company argued that the restrictions failed to consider that consumers eat their products with milk or yoghurt, which elevates the profile of their products so that they would no longer be considered junk.



### Global:

Unilever, PepsiCo, Nestlé, and Kellogg's are leading the UPP industry in voluntary initiatives on responsible marketing to children.

As part of these efforts, [Unilever launched its document Principles on Responsible Food & Beverage Marketing to Children](#). The document argues it's enough for companies to [comply with the agreements of the IFBA](#) – a global trade association whose members are the most powerful multinational UPP companies – because this alliance had increased its age threshold for marketing to children

### Kellogg's to challenge new UK rules for high-sugar cereals in court

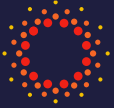
Restrictions on promotion of junk food products part of government's plan to tackle childhood obesity



Kellogg's is fighting plans to restrict some cereals being displayed in high-profile locations in supermarkets, such as checkouts and store entrances. Photograph: incamerastock/Alamy







from 12 to 13 years old, presumably raising the standards of responsible marketing across the industry.

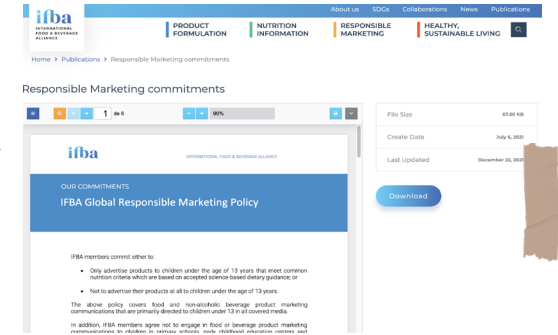
[Nestlé also raised industry standards in marketing to children](#) as a contributor to the updated IFBA Global Responsible Marketing Policy, which restricts marketing indulgent products to children under 13 years old and extends primary schools' current marketing limitations to include secondary schools.

The UPP industry modifies the narratives of its global operational reports to incorporate its self-assessment regarding the respect of human rights. For example, in 2022, [Ferrero published its first report on compliance with human rights](#) in relation to: child protection and no-child-forced labor, diversity and inclusion, health and safety, privacy, environmental-related human rights issues, rights relating to consumer health, and responsible marketing as outlined by the IFBA, among others.

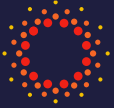
## IV. Conclusion

Normalizing UPP advertising, promotion, and sponsorship of unhealthy and harmful products – especially targeted at children and adolescents – opens the door for exploitation, inadequate nutrition, poor health, and a lifetime of NCDs for these populations, beginning early in the lifespan. These practices also use children's images while falsely claiming to protect youth, and let the UPP and other unhealthy commodities industries to go practically unregulated globally by establishing ineffectual marketing restrictions or positioning self-regulation as the solution to their own abusive, pervasive actions designed to guarantee and maintain profit margins.

Advertising, promotion, and sponsorship of harmful and unhealthy products, such as UPP, specifically targeted at children and adolescents, have been historically normalized and legitimized as a commercial practice for companies to sell products. However, a closer analysis of these practices is necessary to understand how children are being indiscriminately







exposed to diverse forms of exploitation, inappropriate nutrition, poor health, and a host of NCDs and other health disorders.

Additionally, the advertising, promotion, and sponsorship activities practiced by the UPP and other industries promote insidious narratives that convince policymakers and the general public of the businesses' (false) good intentions, which clearly “compete” with private vested interests. Companies use childhood imagery and locations to illustrate their “good intentions” for the (false) sake of youngsters’ protection – permitting governments to make lax marketing restrictions, or position self-regulation as the solution to corporate actions that, while abusive and pervasive, guarantee and maintain profit margins.

---

1 World Health Organization. Report of the Commission to end childhood obesity. Geneva: WHO; 2016. Available at: [https://apps.who.int/iris/bitstream/handle/10665/206450/9789243510064\\_spa.pdf?sequence=1](https://apps.who.int/iris/bitstream/handle/10665/206450/9789243510064_spa.pdf?sequence=1)

2 United Nations Children’s Fund. Exploratory study on the promotion and publicity the promotion and publicity of unhealthy food and beverages targeting children in Latin America and the Caribbean. Panama: UNICEF; 2015. Available at: <https://www.unicef.org/lac/media/1851/file/PDF%20Estudio%20promoci%C3%B3n%20y%20publicidad%20de%20bebidas%20y%20alimentos%20no%20salusables-Reporte.pdf>

3 CLARK, Helen, et al. A future for the world’s children? A WHO–UNICEF–Lancet Commission. The Lancet, 2020, vol. 395, no 10224, p. 605-658. Available at: <https://cap-2030.org/wp-content/uploads/2021/04/who-unicef-lancet-commission-report-a-future-for-the-worlds-children.pdf>

4 *A conceptual framework for understanding the environmental impacts of ultra-processed foods and implications for sustainable food systems.* K. Anastasiou, P. Baker, M. Hadjikakou, G.A. Hendrie, M. Lawrence; Journal of Cleaner Production, 2022. 133155. ISSN 0959-6526. <https://doi.org/10.1016/j.jclepro.2022.133155>