

IMO



IRISH MEDICAL
ORGANISATION

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Dear Mr Goodman

Thank-you for your letter of the 8th of September 2014 and the opportunity to comment on the ***Draft Code of Standards for Advertising – Section 6 Food and Non- Alcoholic Beverages.***

EU regulations relating to the labelling, presentation and advertising of food stuffs and the requirement for nutrition and health claims to be backed up with evidence and registered are to be welcomed. However the IMO believes that the ASAI should uphold and enforce the highest standards in advertising particularly when it comes to the advertising of foods that are high in fat, salt and sugar (HFSS) to vulnerable children.

As you are aware the World Health Organisation has described obesity as “*one of the greatest public health challenges of the 21st century*”. Obesity in adults is linked to a range of serious physical and mental health problems. At least three quarters of type 2 diabetes, a third of ischaemic heart disease, a half of hypertensive disease, a third of ischaemic strokes and about a quarter of osteoarthritis can be attributed to excess weight gain. A fifth of colon cancers, a half of endometrial cancers and one in eight breast cancers in post-menopausal women are also attributable to excess weight. Obesity is also a feature of many adults with mental health conditions particularly depressive and anxiety disorders.

Childhood obesity is associated with a higher chance of obesity, premature death and disability in adulthood. Obese children also experience breathing difficulties, increased risk of fractures, hypertension, early markers of cardiovascular disease, insulin resistance and psychological effects.

In Ireland 24% of adults are obese and 37% are overweight (IUNA) and 7% of children are obese and 19% are overweight (Growing Up In Ireland Survey), with higher rates among more socio-economically disadvantaged groups.

While to a certain extent genetic factors contribute to obesity, for the majority of overweight and obese people, poor nutrition and lack of exercise are the principal causes. Evidence shows that the promotion and consumption of energy dense foods - foods that are high in fat, salt and sugar (HFSS) – promote weight gain and obesity and that children are particularly susceptible. Placing restrictions on advertising of HFSS foods is among the measures recommended by the European Commission and the WHO to address inequities in obesity and overweight.



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DOCHTÚIRÍ na hÉIREANN

A wide range of measures, involving many stakeholders, are necessary to tackle obesity, the IMO would urge the ASAI to uphold the highest standards in advertising HFSS foods particularly to young people.

While the IMO welcomes ASAI Standard 6.19 which states that *Marketing Communications for foods high in fat, salt and sugar (HFSS) should not be targeted at pre-school or primary school children*, the IMO is concerned how this standard is to be enforced. While the Nutrient Profiling Model developed by the UK Foods Standards Agency is adopted by the ASAI to assess HFSS foods, there is no mechanism to assess how a Marketing Communication affects children as many marketing communications of HFSS foods can affect consumption of HFSS foods by children without being explicitly targeted at them.

The IMO were disappointed at the Broadcasting Authority of Ireland's failure to introduce a ban on all advertising of HFSS foods between 6am and 9pm, the IMO would request that the ASAI uphold this requirement in its new Code of Standards.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Trevor Duffy', with a long horizontal line extending to the right.

Trevor Duffy
President

