

Advertising to Children

Date:	August 12, 2010
To:	Board of Health
From:	Medical Officer of Health
Wards:	All
Reference Number:	

SUMMARY

In February 2010, the Board approved a recommendation calling for “a total ban on all commercial advertising targeted to children under 13 years of age”, in order to support parents and protect children as part of an overall health strategy. This report responds to a request from the Board of Health to assess local children’s advertising practices at the Toronto Transit Commission (TTC) and Transportation Services - Public Realm Section, which manages the Street Furniture program.

Children today continue to be exposed to a greater intensity and frequency of advertising messages through a variety of media than any previous generation. However, the vast majority of child-targeted advertising appears via television, the Internet and through a myriad of sophisticated techniques such as product placement, viral marketing, product tie-ins, sponsorships, and more.

Based on the regulations used in Quebec, children’s advertising is defined as an ad whose content specifically appeals to children so as to arouse their interest and is broadcast, shown or displayed in a child-targeted context (such as a children’s TV program). At the local level, Toronto Children’s Services and the Toronto Public Library Board have implemented rules to restrict commercial ads to children in their facilities.

An examination of advertising practices at the TTC and the City’s Street Furniture program found no evidence that either regularly engage in commercial advertising targeted to children. However, both organizations rely on private sector contractors to administer advertising contracts and neither the TTC nor Public Realm Section has explicit policies or guidelines prohibiting advertising targeted to children.

RECOMMENDATIONS

The Medical Officer of Health recommends that:

1. the Board of Health request the Toronto Transit Commission to reaffirm their existing practices by incorporating requirements in their advertising contracts to prohibit commercial advertising targeted to children under thirteen years of age.
2. the Board of Health request the City of Toronto Public Realm Section, Transportation Services to reaffirm their existing practices of not targeting children under thirteen years of age with commercial advertising.

Financial Impact

There are no direct financial implications arising from this report.

DECISION HISTORY

The Board of Health received a report from the Medical Officer of Health entitled “Food Advertising to Children: Update” on February 16, 2010. The Board approved a recommendation to call for, “a total ban on all commercial advertising targeted to children under 13”, in order to support parents and protect children as part of an overall health strategy. The Board also:

- requested the Medical Officer to report to the August 20, 2010 Board of Health meeting on the feasibility and cost of undertaking a comprehensive review of advertising in the TTC and of the City’s street furniture program; and
- referred the following motion by Councillor Davis to the Medical Officer of Health for consideration in his report to the August 20, 2010, meeting of the Board of Health: “That the TTC and the City of Toronto Public Realm Section, Transportation Services, be requested to eliminate advertising of food and beverages targeted to children in their advertising contracts.”

ISSUE BACKGROUND

Children today are exposed to a greater intensity and frequency of marketing messages than any previous generation. Marketing has expanded into new media (Internet, mobile phones) and employs more sophisticated techniques than ever before. Children are a more valued demographic to marketers. This is a result of children’s influence over household purchases, estimated at \$20 billion annually in Canada, the importance of brand recognition at an early age in securing lifelong customers, and other factors.

Corporations, supported by big marketing budgets, have become dominant educational and cultural forces in shaping how young people define their interests, values and

relations to others. This influence extends far beyond food choices to clothing, toys, entertainment and virtually every sphere of children's lives. Parents continue to have the responsibility to protect children from media and marketing they believe to be harmful but this task is becoming increasingly difficult. Many child health advocates believe that the idea that parents alone can protect their children from commercializing forces is outdated in today's highly developed commercial culture.

COMMENTS

Defining "Children's Advertising"

Children's advertising refers to promotional messages that specifically target young people. This is different from advertising messages intended for a general audience that children may happen to be exposed to during the day (such as billboards, TV ads during family or adult programming, etc.). Advertising itself refers to a broad range of promotional messages which can manifest as television commercials, promotional content on the Internet, in print, outdoor media and elsewhere. In this report, children's advertising only refers to commercial advertising, not public service announcements or educational advertising sponsored by non-profit organizations or governments.

For the purposes of reviewing the advertising practices of City of Toronto agencies, this report will rely on the definition of children's advertising used by the Quebec Consumer Protection Office (CPO). Commercial advertising targeted to children under 13 years of age has been prohibited in that province for over 30 years. The Province of Quebec determines whether an ad specifically targets children based on the content of the ad, as well as the context in which it is shown (Quebec Consumer Protection Office, 1980).

In terms of the content of advertising, a children's ad is one which is judged to "appeal particularly to the instinctual needs of children so as to arouse their interest". Signs of "appealing to children" can be:

- the use of themes relating to fantasy, magic, mystery, suspense or adventure;
- the use of persons with whom a child can identify;
- the undue use of children, the use of children's voices, of heroes, of imaginary or fanciful creatures, and of animals;
- the use of animated cartoons; and,
- at the technical level, the use of such methods as spectacular sound and colour, fast cutting, animation and repetition.

The context of a children's ad refers to one which is broadcast, shown or displayed to an audience which is primarily children. In Quebec, an ad targeted to young people may not be broadcast on TV during a program which has a high percentage of child viewers (more than 15% of viewers aged 2 to 11 years).

For an ad to qualify as children's advertising, its content must be targeted to children and it must be shown in a child-specific context. At the local level, for example, an ad for a children's cereal at a childcare centre would qualify and not be permitted under the

Quebec Consumer Protection Act. In 2009, Toronto Children's Services adopted formal guidelines stating that "child care centres will not participate in any direct or indirect food advertising or marketing by food companies that may be directed to children or parents".

City of Toronto Policies and Practices on Commercial Advertising Targeted to Children

The City of Toronto does not have a corporate policy on the types of commercial advertising that are displayed in its facilities or at events. There is a City of Toronto Advertising Policy but it deals with advertising that the City itself generates to promote programs, services, policies and employment opportunities. The Board of Health received a report on February 8, 2008, "Food and Beverage Marketing to Children", which included a survey of advertising practices and policies among selected City divisions, agencies, boards and commissions. The scan revealed that most of the organizations did not have policies on advertising but that there were very few, if any, examples of ads in City services or at events/venues that would qualify as commercial advertising targeted to children.

Since that time, along with the guidelines developed by Children's Services, the Toronto Public Library Board revised its Sponsorship Policy. It now states that the Board will not "seek or accept sponsorships for programs, events, services or activities involving or targeted to children... that involve commercial advertising of food and beverages to children."

In response to the February 16, 2010 recommendations from the Board of Health, the following section describes advertising practices at the Toronto Transit Commission (TTC) and Transportation Services, Public Realm Section, and their relevance to the children's advertising issue.

Toronto Transit Commission

Sales for advertising on and in TTC vehicles and facilities are administered by CBS Outdoor Media (excluding transit shelter ads which are the domain of the Street Furniture program). The TTC received \$20.4 million in advertising in 2008 (2.3% of total revenue). Questionable or controversial ads are forwarded to the TTC Advertising Review Committee (ARC) comprised of TTC Commissioners. The Committee is the final arbiter in all matters relating to advertising acceptance and can refuse or order the removal of any advertising material at any time. TTC staff receive a monthly report from CBS Outdoor Media which shows the types of products advertised and photos of each ad.

In preparing this report, Public Health staff were unable to identify any examples of commercial advertising targeted to children on or in TTC vehicles or facilities. Unlike Toronto Children's Services or the public library system, the TTC does not have child-specific venues. TTC marketing staff were also unable to recall examples of advertising which specifically targeted children (such as breakfast cereals, snacks, toys, videogames, etc.).

The TTC has an advertising policy which states that the Commission adheres to Advertising Standards Canada's industry self-regulatory code (Canadian Code of Advertising Standards), as well as the Toronto municipal code and the Ontario Human Rights Code. The TTC does not have guidelines specific to children's advertising, other than the principles outlined in Canadian Code of Advertising Standards. The Code has general provisions related to children which focus on the avoidance of direct harm and which require marketers not to exploit children's credulity (naiveté or willingness to believe too readily), lack of experience or sense of loyalty.

Transportation Services, Public Realm Section

The Public Realm Section manages the City of Toronto's Street Furniture program which will provide up to 26,000 street furniture elements, such as transit shelters, litter/recycling receptacles, benches, multi-publication box structures, postering boards and information pillars. Revenue is generated through advertising that appears on transit shelters and information pillars. There are no ads on benches or litter bins and the total amount of advertising must not exceed levels that existed before the contract took effect. The City has a 20-year contract with Astral Media which allows the company to sell ad space on these selected items, in exchange for the provision of the elements, their maintenance, and a continuing revenue stream to the city. The total value of the contract over its 20-year life is approximately \$1 billion.

The Public Realm Section does not have child-specific advertising policies for the Street Furniture program, but similar to the TTC, this advertising is guided by ASC's Canadian Code of Advertising Standards.

CONCLUSIONS

Children continue to be exposed to a greater intensity and frequency of advertising messages than any previous generation. However, the vast majority of child-targeted advertising appears via television, the Internet and through a myriad of sophisticated techniques such as product placement, viral marketing, product tie-ins and sponsorships. Relying on the Quebec ad ban model, both the content and the context of ads must be child-targeted to qualify as children's advertising. Based on this definition, there is no evidence that the TTC or the City's Street Furniture program regularly engage in commercial advertising targeted to children. Both organizations rely on private sector contractors to administer advertising contracts and neither the TTC nor Public Realm Section has explicit policies or guidelines prohibiting advertising targeted to children.

CONTACT

Carol Timmings
Interim Director, Planning & Policy
Toronto Public Health
Tel: 416-392-7463
Email: ctimming@toronto.ca

Brian Cook
Research Consultant
Toronto Public Health
Tel: 416-338-7864
Email: bcook@toronto.ca

SIGNATURE

Dr. David McKeown
Medical Officer of Health

REFERENCE

Quebec Consumer Protection Office (1980). *The Consumer Protection Act: Application Guide for Sections 248 and 249*.