Misinformation and Exploitation:
An Assessment of Advertising and Marketing of HFSS FNAB to Children

March 2017
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Executive Summary

Verité Research (VR) conducted an assessment on the frequency and power of advertising and marketing of foods and non-alcoholic beverages that are high in fat, sugar, and salt (HFSS FNAB) to children.

The first component of VR’s study monitored the frequency of HFSS FNAB advertising to children across (a) print media; (b) television; (c) social media; and (d) outdoor signage.

In the second component of the study, VR analysed the power or impact of HFSS FNAB marketing and advertising on children. This study uses the term ‘impact’ to refer to the power of advertising and marketing, including persuasive power. In this regard, VR conducted Key Informant Interviews with specialists from the field of nutrition, psychology, advertising, marketing, and media. Furthermore, VR held 6 Focus Group Discussions across three districts, interviewing child and parent groups separately.

Using data from the media monitoring content analysis, and corroborating findings with the Key Informant Interviews and Focus Group Discussion participants, VR identified four drivers of impact that bolstered HFSS FNAB consumption through advertising and marketing. They were:

(a) The power of inducements
(b) HFSS FNAB products being perceived as ‘good for you’
(c) Advertising appealing directly to children
(d) Taste preferences and convenience

HFSS FNAB advertising and marketing was found to use a combination of exploitation and misinformation strategies to target children. Exploitation and misinformation strategies included the use of inducements, directly appealing to children through using child actors, role models and cartoons, and convincing parents and children of health benefits associated with the product.

The findings related to the four drivers of impact are as follows:

(a) The power of inducements

‘Inducements’, or items given with the sale of a product that offered extraneous benefits (for example toys, school supplies, and entry into raffle draws) were identified as a strategy to advertise and market certain categories of HFSS FNAB. These inducements were seen to be common and popular with both children and adults, based on the extensive use of this type of promotion in the content analysis, and the observations of the FGD participants.

(b) HFSS FNAB products are ‘good for you’

Certain HFSS FNAB categories such as Malted Beverages, Dairy Products, and Other Beverages (such as fruit cordials) were perceived as healthy by children and parents in the FGDs. These were however, identified as long-standing perceptions that were then reinforced by advertising and marketing. This was evident in the number of advertisements that contained Health Benefits messaging (87 advertisements across all four media). Techniques such as using an actor in a white lab coat, to give credibility to nutritional claims, were used in the advertisements.

(c) Direct appeal to children

HFSS FNAB products directly appealed to children by (a) using other children in advertisements; (b) advertising and marketing at schools or extracurricular activities, where children regularly made independent consumption choices; and (c) the use of celebrities, cartoon and fictional characters, or other recognizable figures to endorse products and give it Social Appeal. For example, children in the FGDs engaged with advertisements that used child actors of a similar age to them.

(d) The appeal of taste and convenience

A consumer’s perception of ‘good taste’ is built up over time, and is reinforced by advertising of HFSS FNAB products. Moreover, the convenience of HFSS FNAB, in terms of cutting down cooking time for both mothers and children, drove consumption of HFSS FNAB. Taste Appeal was the most frequently used type of persuasive appeal across the media content analysis (343 advertisements), and children in the FGDs purported that they bought most HFSS FNAB products for their good taste.

Of the four drivers of impact identified, the ability to utilise strategies linked to (a), (b) and (c) (identified above) are carefully regulated internationally. However, there is no legislation regulating the advertising and marketing of HFSS FNAB products to children in Sri Lanka. Moreover, regulation of persuasive appeal used in HFSS FNAB advertisements in general is also minimal. Yet, such regulations can be introduced to
counter marketing strategies that directly appeal to children, promote Health Benefits and Other Benefits, and provide inducements. Furthermore, Sri Lanka can borrow from international best practices to target unethical advertising and marketing to children. This will restrict the possibility of consumers, particularly children, being misled by advertising and marketing strategies that use techniques involving misinformation or exploitation.
1. Background

1.1. Problem analysis

The consumption of foods and non-alcoholic beverages (FNAB) that are high in fat, sugar and salt (HFSS) has increased in Sri Lanka. A recent study showed that Sri Lanka is undergoing a ‘nutritional transition’, with an ‘upward trend’ in the prevalence of ‘overweight, obesity and central obesity among Sri Lankan adults’. These HFSS FNAB are accessible and marketed to most socio-economic segments in Sri Lanka, thereby increasing the widespread consumption of these products. Children between the ages of 6 months and 18 years are highly exposed and susceptible to HFSS FNAB advertising and marketing.

‘Unhealthy foods’, is defined by WHO as ‘any commercially produced food products perceived to be HFSS’. Such foods include – but are not limited to – candy, chocolates, biscuits, crisps, carbonated beverages and processed meats. Many are high in sugar, and are known to contribute to overweight and obesity, which are risk factors for non-communicable diseases such as diabetes. Obesity has become a significant health problem in Sri Lanka. In a study on diabetes and cardiovascular disease conducted between 2005 and 2006, an obesity prevalence of 14.3% for males and 19.4% for females was reported in Sri Lanka. In the post-war period, this figure increased to 21% for men and 32.5% for women. This increase in the level of obesity in Sri Lanka was in part due to the increased availability of calorie-dense foods, combined with a higher per capita income figure in the post-war period.

International Diabetes Federation (IDF) data indicates that the prevalence of diabetes among Sri Lankan adults between the ages of 20 and 79 years was approximately 8.5% of the population in 2015. Moreover, between the ages of 20 and 34 years, the prevalence of diabetes in Sri Lankans is higher than both the World average and the South East Asian average. Exhibit 1 below demonstrates the high prevalence of diabetes among Sri Lankan youth compared to the World and South East Asian averages.

Exhibit 1:

Prevalence of diabetes in adults by age, Sri Lanka 2015
Despite its status as a low-middle income country, mainstream media reach within Sri Lanka is substantial. A recent study on the media in Sri Lanka notes that ‘ownership of media access devices gives an indication of the mainstream media’s outreach in Lankan society’. Supported by data from the Census of Population and Housing in 2012, the study found that mobile telephones are the most common communication device in Sri Lanka; found in 78.9% of households. Television sets and radio receivers are the second and third most used media access devices, as they are found in 78.3% and 68.9% of houses respectively. The market leader in satellite TV – Dialog TV – claimed in 2015 to have 504,000 subscribers. In this context, producers and distributors of HFSS FNAB often utilise media – television, print and social media – to influence consumer choice. Therefore, the media has the potential to function as an important vehicle that influences consumption patterns associated with HFSS FNAB. The media plays an influential role in encouraging poor nutritional habits, and an unhealthy lifestyle among children.

### 1.2. International standards

Article 3 of the United Nation’s Convention on the Rights of the Child (CRC) states that “the best interests of the child shall be a primary consideration”. Article 13 of the CRC recognises the child’s right to freedom of expression, which includes the freedom to ‘seek, receive and impart information and ideas’. Children, therefore, have the right to receive a wide range of information, including advertisements. However, article 17(e) calls for appropriate guidelines for the protection of the child from information and material that could be injurious to his or her well-being.

In 2011, the International Chamber of Commerce (ICC) observed that when using marketing communications to address children:

1. Communications should not undermine positive social behaviour, lifestyles and attitudes;
2. Products unsuitable for children or young people should not be advertised in media targeting them; and
3. Advertisements directed to children or young people should not be inserted in media where the editorial matter is unsuitable for them.

In recent years, countries adopting food-advertising regulations have utilised a mixture of legislation and advertising self-regulation to restrict the kinds of food products that are marketed toward children. Legislation is thus designed to regulate food advertisements targeted at children. Such regulations include restrictions on:

1. The presentation of the product;
2. The scheduling of promotion (e.g. frequency and time of the advertisement); and
3. Communication design (e.g. utilising celebrities as a method to exercise social pressure on the child to purchase the item).

Advertising self-regulation is a system whereby advertising industries decide upon a set of regulations and standards that surpasses their legal commitments. The enforcement of such regulations and standards are often ensured by Self-Regulatory Organisations (SROs). These SROs are responsible for enforcing promotion standards, monitoring advertisements, responding to complaints, and conducting investigations.

Internationally, Quebec (Canada), Norway and Sweden have the most stringent regulations, which completely ban advertisements towards children under the age of twelve years. The United Kingdom and several other European Union countries have a regulatory system of legislation and self-regulation, while the United States is largely self-regulated with minimal legislation in place.

The United Kingdom’s self-regulation policies cover broadcast and non-broadcast advertising. Non-broadcast advertising is self-regulated, and broadcast advertising is co-regulated by the Advertising Standards Authority (ASA) and Ofcom (the UK telecommunications regulator). With respect to non-broadcast advertising, the rules in the UK cover harm, credulity and unfair pressure, direct exhortation and parental authority and promotional provisions. Meanwhile, twelve rules for broadcast advertisements are outlined in section 5 of the UK Code of Non-Broadcast Advertising, Sales Promotion and Direct Marketing. Accordingly, the UK abides by the EU’s Unfair Commercial Practices Directive, which is designed to regulate unfair business practices.

In January 2015, Singapore adopted a new set of self-regulatory guidelines into the Singapore Code of Advertising Practice (SCAP). Singapore is one of the first countries in Asia to incorporate advertising regulations. Singapore’s rules are enforced by the Consumers Association of Singapore (CASE). The criteria require all food companies to meet the Common Nutrition Criteria as well as a series of guidelines on healthy lifestyles, purchasing pressure, promotional offers and the use of popular personalities to exert undue influence on children.
The Advertising Standards Council of India (ASCI) also adopted a Code for Self-Regulation in Advertising. This Code aims to ensure that advertisements: (a) make honest representations, (b) are non-offensive to the public, (c) are against harmful products/situations, and (d) offer fair competition. It specifies that advertisements should not be ‘used indiscriminately for the promotion of products, hazardous or harmful to society or to individuals particularly minors, to a degree unacceptable to society at large.7

1.3. Local regulatory framework

At present, Sri Lanka does not have any laws that are designed to regulate the advertising of HFSS products to children. However, the Food Act, No. 26 of 1980 (‘Food Act’) sets out certain general requirements applicable to the advertising and labelling of products. Section 3(1) of the Food Act states that no person shall ‘advertise food in a manner that is false, misleading and deceptive, or likely to create an erroneous impression regarding its character, value, quality, composition, merits and safety’. Further requirements relating to the advertisement of food products are set out under the Food (Labelling and Advertising) Regulations of 2005 issued in terms of the Food Act. These Regulations place advertising and labelling limitations on manufacturers in relation to certain identified products. For example, section 7(1) of the 2005 Regulations state that in the event that the product does not contain sufficient quantities of fruit, it is required to be labelled as ‘artificial’. Thus, under the Regulations, such ‘artificial’ products are prohibited from being advertised in a manner that either uses the word ‘fruit’ in the description of the product, or carries a picture of such fruit.

In addition to a gap in legislation pertaining directly to the advertising of food to children in Sri Lanka, the Secretariat for Media Reforms highlights that there is no overarching advertising code of conduct in Sri Lanka, nor is there an advertising standards authority.8
2. Methodology

In November 2016, the World Health Organisation in Sri Lanka (WHO) contracted Verité Research (VR), an independent, inter-disciplinary think tank to assess the advertising and marketing of HFSS FNAB to children, through various media. In this context, VR aimed to answer the overarching research questions below:

A. What is the frequency of advertising of HFSS FNAB to children through various media?

B. What is the power of advertising and marketing of HFSS FNAB to children through various media?

According to the American Marketing Association (AMA), advertising is defined as:

The placement of announcements and persuasive messages in time or space purchased in any of the mass media by business firms, non-profit organisations, government agencies, and individuals who seek to inform and/or persuade members of a particular target market or audience about their products, services, organisations, or ideas. 9

The AMA defines marketing as:

The activity, set of institutions, and processes for creating, communicating, delivering, and exchanging offerings that have value for customers, clients, partners, and society at large. 10

VR will adopt these definitions in assessing the frequency and impact of advertising and marketing of HFSS FNAB on children. The focus of this study will be on HFSS FNAB advertising, which is a form of marketing. However, the section on Power makes reference to other marketing strategies in addition to advertising.

The methodology VR employed for each component of the study is detailed below.

2.1. Frequency of advertising

The first research question involved a study of the frequency of advertising of HFSS FNAB to children. The term frequency refers to both the rate of advertising and its reach.

VR conducted a one-week pilot study (11 - 17 July 2016) of HFSS FNAB advertisements in daily and weekend newspapers across the three language mediums. Based on the sample findings, VR developed a methodology to (a) categorise HFSS FNAB products; and (b) analyse the persuasive appeal of HFSS FNAB advertising.

This standardised metric enabled cross comparison of data collected from the different languages and types of media.

Categorisation

The categories of HFSS FNAB are broadly divided into:

(1) Carbonated Beverages
(2) Malted Beverages
(3) Other Beverages
(4) Confectionaries and Fine Bakery Wares
(5) Composite Foods (Prepared Foods)
(6) Dairy Products
(7) Processed Meats and Other Products
(8) Flavouring, Sauces, Dips and Dressing
(9) Cereals and Baby Foods
(10) Edible Oils
(11) Other Foods
(12) Range of Products

In addition to monitoring the categories of HFSS FNAB, VR monitored modes of delivery of HFSS FNAB. For example, VR recorded advertisements for restaurants, hotels, catering services and bakeries.

Persuasive Appeal

Each advertisement was assessed on the type of persuasive appeal it used, and identified as containing one or more of the following messages:

1. Emotional appeal: associating the product with familial or personal relationships; messaging evokes emotions such as nostalgia, friendship and happiness

2. Social appeal: associating the product with fun, social activities, and/or celebrity endorsements

3. Taste appeal: associating the product with a pleasing taste or flavour

4. Health benefits: associating product the with health benefits including high nutritional value

5. Promotion: encouraging sale of the product through giveaways, prize draws and discounts, or through supplying recipes etc.; or

6. Other benefits: associating product with other positive benefits (e.g. enabling high energy, contributing to intelligence)
Four selected media

The following checklist of media sources was developed in consultation with WHO and includes (1) print media; (2) television; (3) social media; and (4) outdoor signage. A limitation of the study is that VR did not assess advertising and marketing of HFSS FNAB at points of sale such as supermarkets, with the exception of school canteens.

Print Media

The following Sinhala, Tamil and English weekday and weekend newspapers were monitored for a period of three weeks.

*All daily and weekend editions of the listed Tamil newspapers were monitored

<table>
<thead>
<tr>
<th>Tamil</th>
<th>Sinhala</th>
<th>English</th>
</tr>
</thead>
<tbody>
<tr>
<td>Virakesari</td>
<td>Dinamina</td>
<td>The Island</td>
</tr>
<tr>
<td>Thinakkural</td>
<td>Lakkima</td>
<td>Daily News</td>
</tr>
<tr>
<td>Thinakaran</td>
<td>Mawbima</td>
<td>Daily Mirror</td>
</tr>
<tr>
<td>Sudar Oli</td>
<td>Lankadeepa</td>
<td>Ceylon Today</td>
</tr>
<tr>
<td></td>
<td>Divaina</td>
<td>Sunday Observer</td>
</tr>
<tr>
<td></td>
<td>Sunday</td>
<td>Sunday Times</td>
</tr>
<tr>
<td></td>
<td>Lankadeepa</td>
<td>Sunday Ceylon Today</td>
</tr>
<tr>
<td></td>
<td>Sunday</td>
<td>Sunday Divaina</td>
</tr>
<tr>
<td></td>
<td>Mawbima</td>
<td>Sunday Island</td>
</tr>
<tr>
<td></td>
<td>Divaina</td>
<td>Sunday</td>
</tr>
<tr>
<td></td>
<td>Silumina</td>
<td>Island</td>
</tr>
</tbody>
</table>

using readership data from market research surveys as identified by VR in its past media research. All sections of the newspaper were monitored to collate all relevant advertisements and code them into multiple categories. These categories included:

1. Newspaper name
2. Date
3. Section (e.g. main paper, women’s section, children’s section)
4. Colour scheme (i.e. black and one colour, black and two colours or black and three colours)
5. Language
6. Size of advertisements (i.e. column centimetres)

Television

The same broad categories of HFSS FNAB listed above were used in the monitoring of television advertising. Additionally, each category was classified into further sub-categories. VR in consultation with WHO and its market research partner Survey Research Lanka selected the following 40 food and beverage sub-categories to be monitored on television. Three sub-categories of ‘modes of delivery’ were also recorded. All advertisements broadcasted on selected channels during the one-month monitoring period were recorded and analysed. The twelve television (TV) channels monitored were chosen based on viewership and ratings, in consultation with Survey Research Lanka.

(1) Carbonated Beverages
- Soft drinks
(2) Malated Beverages
- Malated milk
(3) Other beverages
- Cordials
- Energy drinks
- Fruit juices
- Instant drinks
- Milk tea
- Ready to drink
(4) Confectionaries and fine bakery wares
- Biscuits
- Cakes
- Chewing gum
- Chocolates
- Confectionaries
- Crackers
- Dessert
- Glucose
- Ice-cream
- Jams
(5) Composite Foods (Prepared Foods)
- Fast foods
(6) Dairy Products
- Cheese
- Condensed milk
- Full cream milk powder
- Junior milk powder
- Liquid milk
- Yoghurt
- Yoghurt drink
(7) Processed Meats and Other Products
- Food products
- Instant foods
- Meat products
- Noodles
Modes of Delivery

(1) Bakers
(2) Coffee shop restaurants
(3) Restaurants

Modes of delivery refers to retailers, such as restaurants and caterers, that prepare and serve food and beverages. This category excludes composite food retailers, as this category is monitored independently.

Advertisements on television were monitored by:

- Duration;
- Frequency

The data collected was further stratified as being aired during:

- Children’s programming
- Adult primetime television; or
- Other times.

Social media

20 leading HFSS FNAB brands or products advertised or marketed on Facebook were selected based on audience and user engagement. Audience was measured by the total number of ‘likes.’ User engagement was measured by the frequency of content produced by the brand’s Facebook page, and by user responses to content. To meet the minimum threshold for selection in this study, the HFSS FNAB product or brand Facebook page had: (a) upwards of 30,000 ‘likes’; (b) a minimum of four posts in the month monitoring began (i.e. November 2016); and (c) was a Sri Lanka-focused page.

The sample brands and products selected for social media monitoring were:

Outdoor Signage

VR monitored outdoor signage advertising of HFSS

<table>
<thead>
<tr>
<th>Brand/Product Name</th>
<th>Number of ‘Likes’ as at 1 December 2016</th>
<th>Facebook Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>KFC Sri Lanka</td>
<td>197,047</td>
<td><a href="https://www.facebook.com/KFCSriLanka/?fref=ts">https://www.facebook.com/KFCSriLanka/?fref=ts</a></td>
</tr>
<tr>
<td>Milo Sri Lanka</td>
<td>92,460</td>
<td><a href="https://www.facebook.com/MiloSriLanka/">https://www.facebook.com/MiloSriLanka/</a></td>
</tr>
<tr>
<td>Ritzbury Revello</td>
<td>208,113</td>
<td><a href="https://www.facebook.com/RitzburyRevello/">https://www.facebook.com/RitzburyRevello/</a></td>
</tr>
<tr>
<td>Maliban Biscuits</td>
<td>38,436</td>
<td><a href="https://www.facebook.com/malibanbiscuits.lk/?fref=ts">https://www.facebook.com/malibanbiscuits.lk/?fref=ts</a></td>
</tr>
<tr>
<td>Maam Biscuits</td>
<td>56,350</td>
<td><a href="https://www.facebook.com/MaamBiscuits/?fref=ts">https://www.facebook.com/MaamBiscuits/?fref=ts</a></td>
</tr>
<tr>
<td>Prima Kottumee Lanka</td>
<td>99,104</td>
<td><a href="https://www.facebook.com/PrimaKottumeeLK/?ref=br_rs">https://www.facebook.com/PrimaKottumeeLK/?ref=br_rs</a></td>
</tr>
<tr>
<td>N-Joy Healthy Food</td>
<td>41,640</td>
<td><a href="https://www.facebook.com/NJoyHealthyFood/">https://www.facebook.com/NJoyHealthyFood/</a></td>
</tr>
<tr>
<td>Prima Chicken</td>
<td>58,242</td>
<td><a href="https://www.facebook.com/PrimaChicken/?ref=br_rs">https://www.facebook.com/PrimaChicken/?ref=br_rs</a></td>
</tr>
<tr>
<td>Nestlé Milkmaid Sweet Delights</td>
<td>254,021</td>
<td><a href="https://www.facebook.com/NestleMilkmaidSweetDelights/?fref=ts">https://www.facebook.com/NestleMilkmaidSweetDelights/?fref=ts</a></td>
</tr>
</tbody>
</table>
FNAB at (a) the premises of ten schools; and (b) five public parks in Colombo and its suburbs. The schools were selected in consultation with WHO, and were based on size, location, composition (all male, all female or mixed gender), and registration status (state, state-assisted, or private). The monitoring of advertisements at ‘school premises’ also included any outdoor signage located within ten feet of the school’s boundary walls. Data monitored was coded into:

1. Location (i.e. school or park); and
2. Type of advertisement (i.e. sticker, billboard, hoardings, product placement).

In analysing the data gathered across the four selected media, the same categories and persuasive appeal indicators were used to enable cross-comparison.

Content analysis

Based on the findings from the monitoring of the four selected media (i.e. print/television/social media/outdoor signage), VR conducted a content analysis of the collated HFSS FNAB advertising. The content analysis assessed the different types of persuasive appeal across the twelve categories to devise a quantitative measure of the frequency of advertising. The content analysis also identified the extent to which advertising of HFSS FNAB products reached different audiences (i.e. parents and children) across the four selected media. Finally, the findings of the content analysis informed the next stage of the study, which used key informant interviews (KIIs) and focus group discussions (FGDs) to assess the impact of HFSS FNAB advertising and marketing.

2.2. Power of advertising and marketing

In addition to measuring the frequency of advertising and mapping the different types of persuasive appeal, VR measured the power of advertising and marketing on consumer decision-making. The term ‘impact’ is used to refer to the power of advertising and marketing, including persuasive power. This component considered the potential that advertising and marketing had to exploit human vulnerabilities and emotions, such as impulsive behaviour, and parental responsibility.

Therefore, VR assessed the extent to which advertising and marketing of HFSS FNAB could undermine good decision-making through:

1. Misinformation; and
2. Exploitation.

Misinformation

To ascertain whether advertisements were responsible for misinformation regarding a certain product, VR attempted to measure the ‘nutritional gap’ between the messaging of health and other physical benefits and the actual benefits of the product. The nutritional gap represents the distance between a product’s actual nutritional value and the perception of its nutritional value among consumers after being exposed to HFSS FNAB advertising.

Exploitation

VR assessed the impact of advertising and marketing of HFSS FNAB in terms of both the intentionality in advertising design, and the impact on consumers in exploiting known weaknesses and vulnerabilities in consumer decision-making.

To assess the use of misinformation or the exploitation
of consumers through advertising and marketing, VR carried out primary research on stakeholder perceptions. In this regard, VR conducted eight KIIs with specialists in:

1. Nutrition and health benefits;
2. Child and consumer psychology;
3. Media house advertising and marketing; and
4. Creative direction and brand management at advertising and marketing agencies.

Furthermore, VR conducted six FGDs with the target audience of HFSS FNAB advertising and marketing (i.e. parents and children). The FGDs were conducted across the districts of Colombo, Kandy, and Galle. VR used a mixed sample from different social and economic strata. In consultation with VR’s logistics partner, Vanguard Survey (Pvt) Ltd, mothers were selected to represent the parent groups, based on their significant share of responsibility for children’s consumption patterns. Mothers accompanied children interviewed under the age of 18. However, during the time of discussion, mothers did not hear or participate in the conversation.

**FGD Sample**

Two FGDs were conducted in each district. The first FGD in each district consisted of ten or eleven children. The second FGD in each district involved the mothers of those same children interviewed. The participants for each of the FGDs were recruited using the attached survey (See Annex 1 – FGD Recruitment Survey).

Participants of the Colombo and Galle FGDs were not acquainted with each other. In contrast, the majority of child participants in the Kandy FGD were acquainted with each other, as they were recruited based on their association with a sports ground in Kandy Town. However, in all FGDs, including in Kandy, the children were of different ages, went to different schools, were of differing economic strata and were of mixed ethnicities and faiths.

The FGDs specifically aimed to ascertain the different types of messages targeting children and parents, and were used to assess consumer reactions and decision-making. Based on the findings from the FGDs, together with the information derived from KIIs and the content analysis, VR developed an analytical framework that identified four drivers of impact in HFSS FNAB advertising and marketing to children.

In the analysis of these drivers of impact, VR used prominent HFSS FNAB products as case studies. The chosen case studies were selected through the content analysis and tested with the KIIs and FGD samples.

The resulting analytical framework aims to inform the prioritisation of WHO interventions. The framework includes a perceptual graph on how the different HFSS FNAB categories use exploitation, misinformation or a combination of both to appeal to consumers. The map is also based on the findings of the primary research on stakeholder perceptions through KIIs and FGDs.

### Exhibit 4:

<table>
<thead>
<tr>
<th>Location</th>
<th>Date</th>
<th>Age Group</th>
<th>Children’s Details</th>
<th>Mothers’ Socio-Economic Classification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kandy</td>
<td>20-Jan-17</td>
<td>11-14 years</td>
<td>Girls: 2, Boys: 9</td>
<td>A: 5, B: 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Colombo</td>
<td>25-Jan-17</td>
<td>15-16 years</td>
<td>Girls: 6, Boys: 5</td>
<td>A: 5, B: 5, C: 1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Galle</td>
<td>27-Jan-17</td>
<td>6-10 years</td>
<td>Girls: 5, Boys: 5</td>
<td>A: 4, B: 4, C: 2</td>
</tr>
</tbody>
</table>

*As per the Socio-Economic Classification of Households, accessible at: http://www.srl.lk/factfile/socio-economic-classification-sec-of-households/.*
3. Frequency of HFSS FNAB Advertising

Under the first research question of the study, VR assessed the frequency of advertising of HFSS FNAB to children. It is reiterated that the term ‘frequency’ refers to both the rate of advertising and its reach. The monitoring of (1) print media; (2) television; (3) social media; and (4) outdoor signage took place between September 2016 and December 2016.

The target audience was identified based on whether (a) child actors were used in the advertisements; and/or (b) the advertisements directly appealed to children. Key informants in advertising and a child psychologist stated that advertisements appealed to children through the use of: cartoons; fantasy or make-believe situations; colour and visual tone; and the tone of voice used in audio-visual advertising. Advertisements also targeted children through the use of role models such as celebrities.

In the categorisation of dynamic media advertisements (i.e. TV and social media), up to three unique messages were recorded per advertisement. In the categorisation of static media advertisements (i.e. print media and outdoor signage), only the primary message was recorded.

An unequal number of newspapers and TV channels were monitored in terms of language medium. For instance, more Sinhala newspapers were monitored than English or Tamil newspapers. This scope was set in consultation with WHO, and was due to the wider readership or higher ratings for Sinhala language media.

3.1. Print media

VR monitored newspaper advertising of HFSS FNAB over a non-contiguous period of three weeks. The dates captured in the sample are: (a) 18 September 2016 to 24 September 2016; (b) 24 October 2016 to 30 October 2016; and (c) 28 November 2016 to 4 December 2016.

A total of 344 advertisements were recorded. 306 of these advertisements fell under one of the following categories of HFSS FNAB:

(1) Carbonated Beverages
(2) Malted Beverages

(3) Other Beverages
(4) Confectionaries and Fine Bakery Wares
(5) Composite Foods (Prepared Foods)
(6) Dairy Products
(7) Processed Meats and Other Products
(8) Flavouring, Sauces, Dips and Dressing
(9) Cereals and Baby Foods
(10) Edible Oils
(11) Other Foods
(12) Range of Products

38 advertisements were for modes of delivery offering HFSS FNAB products. These modes of delivery will be analysed separately.

By language medium

Eight English language newspapers, nine Sinhala language newspapers and four Tamil language newspapers (weekday and weekend inclusive) were monitored across the three non-contiguous weeks. These newspapers were:

<table>
<thead>
<tr>
<th>Tamil</th>
<th>Sinhala</th>
<th>English</th>
</tr>
</thead>
<tbody>
<tr>
<td>Virakesari</td>
<td>Dinamina</td>
<td>The Island</td>
</tr>
<tr>
<td>Thinakkural</td>
<td>Lakhbima</td>
<td>Daily News</td>
</tr>
<tr>
<td>Thinakaran</td>
<td>Mawbima</td>
<td>Daily Mirror</td>
</tr>
<tr>
<td>Sudar Oli</td>
<td>Lankadeepa</td>
<td>Ceylon Today</td>
</tr>
<tr>
<td></td>
<td>Divaina</td>
<td>Sunday Observer</td>
</tr>
<tr>
<td></td>
<td>Sunday Lankadeepa</td>
<td>Sunday Times</td>
</tr>
<tr>
<td></td>
<td>Mawbima</td>
<td>Sunday Ceylon Today</td>
</tr>
<tr>
<td></td>
<td>Divaina</td>
<td>Sunday Island</td>
</tr>
<tr>
<td></td>
<td>Silumina</td>
<td></td>
</tr>
</tbody>
</table>

*All daily and weekend editions of the listed Tamil newspapers were monitored

During this period, 130 advertisements from the twelve HFSS FNAB categories listed above were identified in English language newspapers.
Exhibit 6:
English Newspapers

151 advertisements were identified in Sinhala language newspapers.

Exhibit 7:
Sinhala Newspapers

25 advertisements were identified in Tamil language newspapers.

Exhibit 8:
Tamil Newspapers
Categories

The most advertised HFSS FNAB category was Confectionaries and Fine Bakery Wares with 216 advertisements (70.59% of 306 advertisements). 99 of these advertisements (45.83% of Confectionaries and Fine Bakery Wares advertisements) were in English papers, 113 (52.31%) were in Sinhala papers, and four (1.85%) advertisements were in Tamil papers.

A disproportionate number of advertisements in the category of Confectionaries and Fine Bakery Wares are carried in The Island (English) and Divaina (Sinhala) newspapers. These two newspapers are owned by the Upali Group, which also advertises Upali Group-owned products (falling under the Confectionaries and Fine Bakery Wares category) in its newspapers.

The next most commonly advertised category of HFSS FNAB was Composite Foods (Prepared Foods), with a total of 21 advertisements (6.86% of 306 advertisements). 11 of these advertisements (52.38% of Composite Foods advertisements) were in English papers, eight (38.10%) were in Sinhala papers, and two (9.52%) were in Tamil papers.

The third most frequently advertised category was Range of Products – which included supermarket advertising of various goods – with 14 advertisements (4.58% of 306 advertisements).

Exhibit 9:

<table>
<thead>
<tr>
<th>Category</th>
<th>English Newspapers</th>
<th>Sinhala Newspapers</th>
<th>Tamil Newspapers</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbonated Beverages</td>
<td>2</td>
<td>1</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>Malted Beverages</td>
<td>1</td>
<td>6</td>
<td>1</td>
<td>14</td>
</tr>
<tr>
<td>Other Beverages</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Flavouring, Sauces, Dips and Dressing</td>
<td>3</td>
<td>6</td>
<td>1</td>
<td>9</td>
</tr>
<tr>
<td>Confectionary and Fine Bakery Wares</td>
<td>99</td>
<td>113</td>
<td>4</td>
<td>216</td>
</tr>
<tr>
<td>Dairy Products</td>
<td>3</td>
<td>2</td>
<td>1</td>
<td>8</td>
</tr>
<tr>
<td>Processed Meats and Other Products</td>
<td>3</td>
<td>0</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>Edible Oils</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Other Foods</td>
<td>4</td>
<td>2</td>
<td>1</td>
<td>7</td>
</tr>
<tr>
<td>Cereals and Baby Food</td>
<td>2</td>
<td>1</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>Range of Products</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td>Composite Foods (Prepared Foods)</td>
<td>11</td>
<td>8</td>
<td>2</td>
<td>21</td>
</tr>
</tbody>
</table>

Exhibit 10:

- Composite Foods (Prepared Foods): 21
- Range of Products: 15
- Cereals and Baby Food: 5
- Other Foods: 5
- Edible Oils: 1
- Processed Meats and Other Products: 6
- Dairy Products: 8
- Confectionaries and Fine Bakery Wares: 216
- Carbonated Beverages: 5
- Malted Beverages: 14
- Other Beverages: 1
- Flavouring, Sauces, Dips and Dressing: 9
**Persuasive Appeal**

The messaging of HFSS FNAB was overwhelmingly on Taste Appeal. Of the 306 advertisements collected, 198 advertisements (64.71%) were on Taste Appeal. 90 of these advertisements (45.45% of Taste Appeal advertisements) were in English papers, 103 (52.02%) in Sinhala papers, and five (2.53%) in Tamil papers.

The second most frequent type of persuasive appeal was that of Promotions (57 or 18.63% of all advertisements). 15 advertisements containing Promotions (26.32% of Promotions advertisements) were in English papers, 28 (49.12%) were in Sinhala papers, and 14 (24.56%) were in Tamil papers. In fact, Promotions was the most frequently used messaging across all Tamil advertisements of HFSS FNAB.

16 advertisements (5.23% of all advertisements) contained messaging with an Emotional Appeal.

Finally, of the 306 advertisements, 19 (6.21%) advertisements did not contain an identifiable message. For example, some advertisements displayed only a brand name and product image.

Only six (1.96%) advertisements promoted Health Benefits, while four (1.31%) advertisements promoted Other Benefits.

### Persuasive appeal by category

The most frequently advertised category of HFSS FNAB was Confectionaries and Fine Bakery Wares (216 or 70.59% of all advertisements). Within this category, the most recurrent message was Taste Appeal (178 advertisements or 82.41% within Confectionaries and Fine Bakery Wares). 17 advertisements within this category (7.87%) had no identifiable message, and 12 advertisements (5.56%) had Emotional Appeal.

The second most heavily advertised category of HFSS FNAB was Composite Foods (21 or 6.86% of all advertisements). Within this category, Promotions was the most frequently used tool of persuasive appeal (18 advertisements or 85.71% within Composite Foods), followed by Taste Appeal (3 advertisements, 14.29%).

### Exhibit 11:

<table>
<thead>
<tr>
<th>Taste Appeal</th>
<th>Emotional Appeal</th>
<th>Social Appeal</th>
<th>Promotions</th>
<th>Health Benefits</th>
<th>Other Benefits</th>
<th>No Message</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>English Newspapers</td>
<td>90</td>
<td>6</td>
<td>2</td>
<td>15</td>
<td>0</td>
<td>0</td>
<td>17</td>
</tr>
<tr>
<td>Sinhala Newspapers</td>
<td>103</td>
<td>8</td>
<td>4</td>
<td>28</td>
<td>6</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Tamil Newspapers</td>
<td>5</td>
<td>2</td>
<td>0</td>
<td>14</td>
<td>0</td>
<td>2</td>
<td>17</td>
</tr>
<tr>
<td>Total</td>
<td>198</td>
<td>16</td>
<td>6</td>
<td>57</td>
<td>6</td>
<td>4</td>
<td>19</td>
</tr>
</tbody>
</table>

### Exhibit 12:

<table>
<thead>
<tr>
<th>Carbonated Beverages</th>
<th>Malted Beverages</th>
<th>Other Beverages</th>
<th>Flavouring, Sauces, Dips and Dressing</th>
<th>Confectionary and Fine Bakery Wares</th>
<th>Dairy Products</th>
<th>Processed Meats and Other Products</th>
<th>Edible Oils</th>
<th>Other Foods</th>
<th>Cereals and Baby Food</th>
<th>Range of Products</th>
<th>Composite Foods (Prepared Foods)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Taste Appeal</td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>7</td>
<td>178</td>
<td>0</td>
<td>2</td>
<td>1</td>
<td>4</td>
<td>0</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Emotional Appeal</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Social Appeal</td>
<td>1</td>
<td>3</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Promotions</td>
<td>2</td>
<td>8</td>
<td>0</td>
<td>1</td>
<td>8</td>
<td>2</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>4</td>
<td>13</td>
<td>18</td>
</tr>
<tr>
<td>Health Benefits</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other Benefits</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>No Message</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>17</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>5</td>
<td>14</td>
<td>1</td>
<td>9</td>
<td>216</td>
<td>8</td>
<td>6</td>
<td>1</td>
<td>5</td>
<td>5</td>
<td>15</td>
<td>21</td>
</tr>
</tbody>
</table>
**Modes of delivery**

The modes of delivery monitored included advertising by restaurants, hotels, bakers and caterers. In the three-week sample collected, 38 advertisements were recorded. This included advertising by restaurants for family dinners, themed or international buffets, weekend promotions and individual food products. The primary persuasive appeal used was Promotions (19 advertisements, 50% of 38 advertisements), followed by Taste Appeal (16 advertisements, 42.11%). Three (7.89%) advertisements had no identifiable message and only displayed a brand name.

**Exhibit 14:**

<table>
<thead>
<tr>
<th>Channel</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Derana TV</td>
<td>69</td>
</tr>
<tr>
<td>Hiru TV</td>
<td>89</td>
</tr>
<tr>
<td>ITN</td>
<td>38</td>
</tr>
<tr>
<td>Nethra TV</td>
<td>16</td>
</tr>
<tr>
<td>Rupavahini</td>
<td>27</td>
</tr>
<tr>
<td>Shakthi TV</td>
<td>17</td>
</tr>
<tr>
<td>Sirasa TV</td>
<td>13</td>
</tr>
<tr>
<td>Swarnavahini</td>
<td>23</td>
</tr>
<tr>
<td>TNL TV</td>
<td>6</td>
</tr>
<tr>
<td>TV1</td>
<td>1</td>
</tr>
<tr>
<td>Varnam TV</td>
<td>21</td>
</tr>
<tr>
<td>Vasantham TV</td>
<td>28</td>
</tr>
<tr>
<td>Total</td>
<td>348</td>
</tr>
</tbody>
</table>

The recorded advertising of HFSS FNAB was stratified into the following three target programming times:

1. Children’s programming (i.e. cartoons and children’s TV shows);
2. Adult’s Prime Time (i.e. teledramas, evening news and late night TV); and
3. Other (i.e. TV programmes during off peak hours, such as shows after 2pm on weekdays and political shows after 10pm).

All advertisements of HFSS FNAB in English, Sinhala and Tamil broadcast during this period were monitored and recorded. Advertisements were identified as targeting either children; adults; or both children and adults.

A total of 348 advertisements of HFSS FNAB products were recorded across the sample.

**Exhibit 15:**

<table>
<thead>
<tr>
<th>Messaging for modes of delivery</th>
<th>Channel</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Message: 3</td>
<td>3</td>
</tr>
<tr>
<td>Taste Appeal: 16</td>
<td>16</td>
</tr>
<tr>
<td>Promotion: 19</td>
<td>19</td>
</tr>
</tbody>
</table>

3.2. Television

VR monitored TV data over a randomly selected period of one month, between 10 October 2016 and 10 November 2016. TV was widely cited by KIIs as the primary mode of consumer goods advertising, including HFSS FNAB advertising. Additionally, data gathered from the six FGDs (discussed below) identified TV as the most popular medium through which children and their parents were exposed to HFSS FNAB advertising.

The 12 TV channels monitored were:

(1) Hiru TV
(2) Derana TV
(3) ITN
(4) Vasantham TV
(5) Rupavahini
(6) Swarnavahini
(7) Varnam TV
(8) Shakthi TV
(9) Nethra TV
(10) Sirasa
(11) TNL TV
(12) TV1

The channels that advertised HFSS FNAB most frequently during the sample period were Hiru TV (89
advertisements or 25.57% of total TV advertisements), Derana TV (69 advertisements, 19.83%), and ITN (38 advertisements, 10.92%).

**By language medium**

<table>
<thead>
<tr>
<th>Language</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>1</td>
</tr>
<tr>
<td>Sinhala</td>
<td>279</td>
</tr>
<tr>
<td>Tamil</td>
<td>68</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>348</strong></td>
</tr>
</tbody>
</table>

Advertising by language medium came out heavily dominated by the Sinhala language (279, 80.17% advertisements), which also made up the majority in terms of TV channel language medium. Tamil was the next language most frequently advertised in, with 68 (19.54%) advertisements. Only one advertisement was recorded in English.

**By programming time**

Of the 279 advertisements monitored on Sinhala TV, 94 (33.69%) aired during Adult Primetime TV, 45 (16.13%) aired during Children’s Programming, and 140 (50.18%) aired during Other Times.

Of the 68 advertisements recorded on Tamil TV, 32 (47.06%) were shown during Adult Primetime TV, three (4.41%) during Children’s Programming, and 33 (48.53%) during Other Times.

The one advertisement on English TV was aired during Adult Primetime TV.

<table>
<thead>
<tr>
<th>Language</th>
<th>Adults Primetime</th>
<th>Children’s Programming</th>
<th>Other Times</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Sinhala</td>
<td>94</td>
<td>45</td>
<td>140</td>
<td>279</td>
</tr>
<tr>
<td>Tamil</td>
<td>32</td>
<td>3</td>
<td>33</td>
<td>68</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>127</strong></td>
<td><strong>48</strong></td>
<td><strong>173</strong></td>
<td><strong>348</strong></td>
</tr>
</tbody>
</table>

**Categories**

The category of HFSS FNAB that was advertised the most on TV was Confectionaries and Fine Bakery Wares, with 123 (35.34%) advertisements. 105 (85.37% of the Confectionaries and Fine Bakery Wares advertisements) of these advertisements were on Sinhala TV, and 18 (14.63%) advertisements were on Tamil TV. No advertisements were recorded in English.

The second most frequently advertised category of HFSS FNAB on TV was Dairy Products, with 80 advertisements (22.99% of total TV advertisements). 60 of these advertisements (75% of the Dairy Products advertisements) were in Sinhala, 20 (25%) were in Tamil and none were recorded in English.

Processed Meats and Other Products (63 or 18.10% of total TV advertisements) and Malted Beverages (43 advertisements, 12.36%) were the next most prominently advertised categories of HFSS FNAB.

Edible Oils, Other Foods, and Range of Products were not advertised during the monitored period.
In the analysis of persuasive appeal on TV, VR identified up to three messages per advertisement. Similar to the persuasive appeal of HFSS FNAB in print media, persuasive appeal on TV advertising was predominantly through Taste Appeal. 112 (25.75% of total TV messages) advertisements contained messaging on Taste Appeal, whereas the next most frequently identified message, Social Appeal, was found in 81 (18.62%) advertisements. Health Benefits were identified in 73 (16.78%) advertisements while Emotional Appeal and Promotions were communicated in 69 (15.86%) and 58 (13.33%) advertisements respectively.

Children were targeted directly by Taste Appeal messaging in 29 advertisements (25.89%), and together with adults in 47 advertisements (41.96%). Adults were targeted by Taste Appeal messaging in 36 (32.14%) advertisements.

Children were directly targeted by Social Appeal messaging in 23 (28.40%) advertisements, whereas adults were targeted directly by 27 (33.33%) advertisements. Children and Adults were both targeted by Social Appeal messaging in 31 advertisements (38.27%).
**Persuasive appeal by category**

Confectionaries and Fine Bakery Wares was the most frequently advertised category of HFSS FNAB. Of the 164 messages (37.70% of total messages) identified in the advertising of this category, 54 messages (32.93% of Confectionaries and Fine Bakery Wares advertisements) were for Taste Appeal. This finding mirrors the pattern of advertising of Confectionaries and Fine Bakery Wares in print media. In addition, 38 messages of Emotional Appeal (23.17%) were identified and 43 messages of Social Appeal (26.22%) were identified.

**Modes of delivery**

Only two advertisements were recorded for the advertising of modes of delivery. Two restaurants were advertised, both featuring Promotions. Adults were targeted directly in one advertisement whereas children and adults were both targeted in the second advertisement.

### Social media

Social media has become an increasingly important component of HFSS FNAB advertising. In this respect, 20 leading HFSS FNAB brands or products on Facebook were selected based on audience and user engagement. The Facebook pages were (a) monitored for types of messages; and (b) separated into each of the twelve broad food and non-alcoholic beverage categories discussed above. Additionally, the target audiences of the advertisements were recorded.

Advertising on social media in Sri Lanka has significant reach. According to recent statistics, there are over 4.2 million Facebook users in Sri Lanka, comprising a penetration rate of 18.9%. Although Facebook prohibits anyone under the age of 13 to register an account, it is possible to create a profile using falsified information. Thus there are no accurate figures regarding the number of children in Sri Lanka using Facebook under the age of 13 years.

### Categories

The number of brands by category monitored on social media, as per the selection criteria discussed in the Methodology, is as follows:

**Exhibit 21:**

<table>
<thead>
<tr>
<th>Categories</th>
<th>Number of Brands</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbonated Beverages</td>
<td>2</td>
</tr>
<tr>
<td>Malted Drinks</td>
<td>2</td>
</tr>
<tr>
<td>Other Beverages</td>
<td>1</td>
</tr>
<tr>
<td>Flavou ring, Sauces, Dips and Dressing</td>
<td>2</td>
</tr>
<tr>
<td>Confectionaries and Fine Bakery Wares</td>
<td>3</td>
</tr>
<tr>
<td>Dairy Products</td>
<td>4</td>
</tr>
<tr>
<td>Processed Meats and Other Products</td>
<td>3</td>
</tr>
<tr>
<td>Cereals and Baby Food</td>
<td>0</td>
</tr>
<tr>
<td>Edible Oil</td>
<td>2</td>
</tr>
<tr>
<td>Other Foods</td>
<td>0</td>
</tr>
<tr>
<td>Cereals &amp; Baby Food</td>
<td>0</td>
</tr>
<tr>
<td>Range of Products</td>
<td>0</td>
</tr>
<tr>
<td>Composite Foods (Prepared Foods)</td>
<td>1</td>
</tr>
<tr>
<td>Total</td>
<td>20</td>
</tr>
</tbody>
</table>
**Target audience**

The assessment of HFSS FNAB advertising and marketing on social media analysed the audience targeted by the 20 selected brands and products.

Out of a total of 60 advertisements analysed, 50 (83%) targeted children and young adults. For instance, the KFC advertisement below primarily targets youth, including children under the age of 18, based on the visual use of young people taking a group ‘selfie’.

Exhibit 23: Target Audience

While 31 (51.67%) advertisements directly targeted children, 19 (31.67%) other advertisements targeted both children and adults. Ten advertisements targeted adults.

Exhibit 24: Target Audience

The advertisement in Exhibit 24 below is an example of advertising of Astra margarine that targets both adults and children. The use of a child reaching for greater heights in the outdoors would appeal to children, whereas the giveaway promotion to ‘send your Astra fried rice recipe & win ovens’ would appeal to mothers.

**Persuasive appeal**

In analysing the persuasive appeal used in social media to advertise and market HFSS FNAB, up to three main messages were identified where possible. These messages were then categorised as having emotional, social or taste appeal, health or other benefits, or being promotional in value.

The following table highlights the types of persuasive appeal used across advertising of HFSS FNAB on social media. The data is further divided into the various target audiences.

The most commonly used persuasive appeal was Promotions. Out of 95 identified messages in the 60 advertisements studied, 31 used Promotions (32.63% of total messages). The second most utilised messaging tool was that of Social Appeal (25 advertisements, 26.32%), followed by Emotional Appeal (21 advertisements, 22.11%). Health and Other Benefits were used to a far lesser degree, in three and five advertisements respectively.

In the three advertisements in which health benefits were communicated, two directly targeted children, and the third targeted both children and adults.
3.4. Outdoor signage

In relative terms, outdoor signage represented the least popular mode of advertising of HFSS FNAB in the sample period monitored. VR visited the premises of 14 schools and five parks. VR and WHO requested access to two other Colombo-based schools, but were not granted permission to monitor the premises.

**Schools**

(1) The schools monitored were:
(2) The British School in Colombo
(3) Ladies’ College, Colombo
(4) St. Peters College, Colombo
(5) Thurstan College, Colombo
(6) Royal College, Colombo
(7) Methodist College, Colombo
(8) G. B. Senanayake Vidyalaya, Ekala
(9) Dharmaraja College, Kandy
(10) Kingswood College, Kandy
(11) Seetha Devi Girls’ College, Kandy
(12) Girls’ High School, Kandy
(13) Swarnamali Girls’ College, Kandy
(14) Mahanama College, Kandy
(15) Trinity College, Kandy

Advertising of HFSS FNAB was found in only eight of the 14 schools visited. A total of 13 advertisements were recorded. The types of advertisements included billboards (3), hoardings (3), stickers (5) and kiosks (2).

Multiple categories of HFSS FNAB were advertised and marketed within or immediately outside schools’ premises. The categories were Confectionaries and Fine Bakery Wares; Dairy Products; Processed Meats and Other Products; Other Beverages; Carbonated Beverages; Malted Beverages; and Cereals and Baby Foods. In addition, one mode of delivery (restaurants) was also advertised outside the premises of a school.

Two of the advertisements did not carry any discernible message. However, the remaining advertisements were identified as carrying one or more messages. Five of the advertisements contained messaging of Taste Appeal; three advertisements claimed Social Appeal; one advertisement had Emotional Appeal; and four advertisements claimed Health Benefits.

Although adults were ostensibly targeted by the advertising of HFSS FNAB in eight of the 13 advertisements, children were the primary target audience in all 13 advertisements. These advertisements are classified as targeting children as they were within school premises or within ten feet of the school’s boundary walls, and therefore expected to be viewed primarily by children.

**Parks**

(1) The parks visited were:
(2) Children’s Park, Havelock Road, Colombo
(3) Viharamahadevi Park, Colombo
(4) Dehiwala Zoo
(5) Jayasinghe Ground Children’s Park, Dehiwala
(6) Getambe Children Park, Kandy

In the parks visited, only four of the five parks had advertising of HFSS FNAB. 17 advertisements were recorded in total. Of these 17 advertisements, 12 were copies of the same advertisement displayed on 12 ice cream bicycles. Other types of advertisements included a billboard, two hoardings, a kiosk, and an ice cream van that bore HFSS FNAB advertising.

Only three categories of HFSS FNAB were advertised, namely, Dairy Products, Carbonated Beverages and Other Beverages. Children were targeted in all the advertisements, whereas adults were targeted (alongside children) in the advertising on the ice cream van and one of the hoardings.

Two of the advertisements contained Social Appeal messages, and one advertisement contained a Taste Appeal message.

**Exhibit 26:**

<table>
<thead>
<tr>
<th>Persuasive appeal across outdoor signage</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Taste Appeal</strong></td>
</tr>
<tr>
<td>5</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Schools</strong></th>
<th><strong>Parks</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>2</td>
</tr>
</tbody>
</table>

18
### 3.5. Type of persuasive appeal by media

The most frequently used type of persuasive appeal differed by media channel. For instance, print media overwhelmingly used Taste Appeal messaging. By contrast, TV used Taste Appeal and Social Appeal at a similar rate. The most popular type of persuasive appeal in social media was Promotions, while outdoor signage highlighted both Taste Appeal and Social Appeal.

Key findings from this study on Frequency are discussed in the next section. The findings from the content analysis have been appraised against additional findings from KIIs and FGDs.

#### Exhibit 27:

<table>
<thead>
<tr>
<th>Type of Media</th>
<th>Most Frequently Used Persuasive Appeal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Print Media</td>
<td>Taste Appeal (65%)</td>
</tr>
<tr>
<td></td>
<td>Promotion (19%)</td>
</tr>
<tr>
<td>TV</td>
<td>Taste Appeal (26%)</td>
</tr>
<tr>
<td></td>
<td>Social Appeal (19%)</td>
</tr>
<tr>
<td>Social Media</td>
<td>Promotion (33%)</td>
</tr>
<tr>
<td></td>
<td>Social Appeal (26%)</td>
</tr>
<tr>
<td>Outdoor Signage</td>
<td>Taste Appeal (38%)</td>
</tr>
<tr>
<td></td>
<td>Social Appeal (31%)</td>
</tr>
</tbody>
</table>
4. Power of HFSS FNAB Advertising and Marketing

In assessing the power of HFSS FNAB advertising and marketing to children, including persuasive power, VR triangulated findings from the media content analysis, KIIs and FGDs. In this regard, four drivers of impact were identified:

1. The power of inducements;
2. HFSS FNAB products as ‘good for you’;
3. Direct appeal to children; and
4. The appeal of taste and convenience.

Advertising and marketing of HFSS FNAB was seen to spread misinformation and exploited human vulnerabilities such as: the ability of children to pester their parents to purchase products (‘pester power’), the need for social acceptance, and familial love. In analysing the four drivers of impact above, VR used a range of HFSS FNAB products as case studies to highlight the role of advertising and marketing in affecting consumer choice. The case studies were chosen based on the following criteria: (a) the product’s advertisements were featured during the media monitoring period; (b) FGD participants recognised and engaged with the advertisements and the products; and (c) KIIs discussed the HFSS FNAB categories as frequently advertised.

4.1. The power of inducements

VR monitored the use of promotions across all four media. In total, 167 (19.15%) advertisements containing promotions were recorded. TV contained 60 (35.93%) promotions, print media carried 76 (45.51%) advertisements with promotions, and social media had 31 (18.56%) promotions (including any promotions for modes of delivery across the three media channels). No promotions were recorded in the study on outdoor signage.

An analysis of these figures revealed two broad types of promotions. First, HFSS FNAB advertisers gave promotions that had benefits directly related to the products. For example, consumers were offered price reductions, giving the product more value for money. Promotions with related benefits also included interactive content such as calls for recipes (for example, refer to Exhibit 24), which encouraged active participation in promotions to win prizes. Furthermore, advertisements often shared recipes, which conveyed to mothers that HFSS FNAB products were key ingredients in the recipes.

Second, certain promotions offered benefits that were extraneous to the HFSS FNAB product being advertised. These inducements could include a gift with the product, such as a McDonald’s Happy Meal toy or a mug with a packet of Milo. Inducements also came in the form of competitions or prize giveaways. For example, Prima Chicken ran a competition in which the participant could ‘Play Prima Find the Dish game and stand a chance to win exciting gift vouchers from Prima Chicken – The Chicken Guru’.

Inducements were seen to be common and popular not only with children but also with adults. In the FGDs, mothers opined that certain inducements offered with the product, such as lunch boxes or storage boxes, were useful. Parents in the FGDs noted that children demanded products sometimes exclusively for the gifts but would then consume the product too. This view was largely corroborated in the FGDs with children. KIIs from advertising agencies stated that inducements are effective in increasing consumption. This was validated by the frequency with which inducement promotions were recorded in the media content analysis. Furthermore, advertising KIIs asserted that promotions (particularly those offering inducements) are an effective means of advertising in terms of creating ‘pester power’. Due to the added benefits, aside from the product itself, children would be more likely to pester their parents to buy a particular HFSS FNAB product. These findings suggest that inducements often exploit the consumer, in convincing him or her to buy the product for the extraneous benefits as opposed to its utility alone.

Internationally, the use of promotions in advertising and marketing is heavily regulated. For example, the Food and Beverage Code of the Advertising Standards Authority of South Africa provides:

Food and beverage products that do not represent healthy dietary choices and a healthy lifestyle...
should not use promotional activity in television advertisements primarily targeted at children of twelve years old and under.\textsuperscript{17}

Another example is the Australian Media and Communications Authority (ACMA) which, in addition to a series of restrictions on advertisements directed towards children, prohibits promotions during children’s programming:

In relation to advertising, ACMA’s Children’s Television Standards (CTS) do not allow the broadcast of advertising during pre-school (P) time bands and permit only the broadcast of advertisements classified for general viewing in children’s (C) time bands…Other advertising and promotional requirements under the CTS are summarised below:

The CTS prohibit the offering of prizes during P programs. During C programs, prizes can be presented, but presenters are not to recommend or endorse the prize or promote its sale, if it is not a cash prize the value of the prize is not to be announced, and only broad descriptions of the prize can be provided.\textsuperscript{18}

While clear international precedents exist, there is insufficient regulation in Sri Lanka regarding the use of inducements in the sale of HFSS FNAB. Legislation targeting the use of inducements in promoting HFSS FNAB could potentially be introduced to limit extraneous benefits as a means of increasing the consumption of these products.

4.2. HFSS FNAB products are ‘good for you’

In the content analysis, numerous HFSS FNAB claimed they had health benefits. For example, the Maggi Noodles slogan is ‘rasai, gunai’ (tasty, healthy). However, most often consumers do not purchase these products based on these health claims, and instead purchase them for reasons such as taste and convenience (see below). They are thus purchased and consumed frequently despite awareness that they are unlikely to have health benefits (though FGDs demonstrated that there is also little awareness that many HFSS FNAB products are unhealthy). Therefore, simple mentioning of words such as ‘healthy’ or ‘good for you’ did not result in immediate consumer acceptance of all HFSS FNAB products as ‘healthy’.

Moreover, FGD participants confirmed purchasing and consuming these products for their perceived health benefits. HFSS FNAB categories that were perceived as healthy by children and parents in the FGDs conducted included Malted Beverages, Dairy Products, and Other Beverages such as fruit cordials. KIIs too confirmed that the manufacturers of these product categories were among those that called for highlighting the ‘goodness of the product’.

Two key factors contributed to FGD participants’ perception of these categories as ‘healthy’ and/or ‘good for you’. First, they were associated as using ‘natural’ ingredients such as fruit, vegetables and cow’s milk. Second, the items were promoted by brands that enjoyed trust and recognition, and association with health benefits developed over time by advertising and marketing. These long-standing perceptions continue to be reinforced by claims made in recent advertisements. For example, an MD Cordial advertisement claims it contains ‘double the fruit’. Horlicks uses an actor in a white lab coat, presumably resembling a doctor or scientist, to discuss the product’s various nutrients. Notably, mothers in the FGDs commented on the use of a ‘doctor’ in the Horlicks advertisement, claiming his appearance gave the product credibility. However, according to the Food (Labelling and Advertising) Regulations 2005, advertisements are not permitted to use:

- Any professional or any other words or device, pictorial or otherwise, which may imply or suggest that such food is recommended, prescribed or approved by any Medical Practitioner, Association or any professional unless approval is granted by the Chief Food Authority [to create a perception of legitimacy].\textsuperscript{19}

Yet, due to inadequate regulation of advertising and marketing of HFSS FNAB, advertisements featuring ‘doctors’ are aired. According to a nutritionist KII, this particular Horlicks advertisement is in contravention of the 2005 regulation, yet it was screened during the monitoring period. In contrast to these HFSS FNAB categories that can be considered ‘good for you’, other categories of HFSS FNAB such as Composite Foods (Prepared Foods) and Carbonated Beverages were unlikely to be considered healthy.

According to nutritionists interviewed, the Food Advisory Committee at the Ministry of Health, Nutrition and Indigenous Medicine vets advertisements for the health claims made. However, a loophole for advertising exists, in which HFSS FNAB advertisers can make nutritional claims. According to the Food (Labelling and Advertising) Regulations 2005,
a ‘nutrient content claim is a nutrition claim that describes the level of a nutrient contained in a food’. Thus advertisements are legally allowed to discuss the nutritional value of a product’s individual ingredients. As such, advertisers regularly imply health benefits through reference to the added nutrients of the product. For example, the advertising of Kist Tomato Sauce in Exhibit 29 below highlights the health benefits of tomatoes, claiming that tomatoes ‘reduced risk of heart disease and cancer’. However, according to nutritionists interviewed, tomato sauces are often high in preservatives, which offset the nutritional value of the pure tomato fruit.

Print advertisements by Bairaha Meatballs and Milo directly discuss the health benefits of their products. However, according to nutritionists interviewed, chicken meatballs get Sri Lanka Standards approv-
al for the process involved in making the meatball, which does not take into account the raw materials used to manufacture the product. According to Key Informants, the raw materials used to make meatballs are often the refuse parts of a chicken, and are not considered ‘healthy.’ The nutritionists interviewed also claimed that Milo milk packets contained an excessive level of sugar, and were not recommended as part of a balanced diet.

Findings from the FGDs suggested that brand recognition, perception, and value, weigh in on consumer decision-making processes. Many parents in the FGDs, from varied social and economic strata, considered HFSS FNAB products healthy based on entrenched impressions regarding the products’ nutritional values. These impressions were reinforced through misinformation in advertising. However, it was also evident that misinformation – in terms of a particular product’s health benefits – is more likely to succeed with a ‘reputed’ brand as opposed to a new entrant to the market.

This form of advertising is heavily regulated in many countries. In the United States, truth-in-advertising laws stipulate that advertising must be truthful, not misleading and when deemed appropriate. The laws also prohibit both false and unproven health claims being advertised, and the Federal Trade Commission takes legal action against firms engaging in such advertising. In Sri Lanka, gaps in regulation continue to allow misleading and/or unproven nutritional claims, and health and ‘wellness’ benefits to be key features in HFSS FNAB advertising.

4.3. Direct appeal to children

HFSS FNAB products directly appealed to children by (a) using child actors in advertisements; (b) advertising and marketing at schools or extracurricular activities, where children regularly make independent consumption choices; and (c) the use of celebrities, cartoon and fictional characters, or other recognisable figures to endorse products and give it Social Appeal.

Use of children in advertisements

A number of advertisements gathered during the monitoring period targeted children by either directly addressing them in the advertisement, or by using children to market the product. Advertisements that contained Social Appeal and Emotional Appeal messaging often directly targeted children by playing on human vulnerabilities such as the need for social acceptance. In total, 91 TV advertisements directly targeted children, employing techniques such as using child actors, songs and dancing, and cartoons.

According to Key Informants in the advertising industry, targeting children in advertisements was an effective means of creating ‘pester power’ and thereby selling the product. In the advertisements shown to children at the FGDs, child actors were used to endorse the product or to sing about the product. The sample of children in the FGDs responded positively to these advertisements. Some of the participants cited the music and the colours used in the advertisements as the reasons for their positive response.

The United Nations defines a child as a person below the age of 18 years. In order to protect children, countries such as the United Kingdom have banned HFSS FNAB advertising from ‘dedicated children’s TV channels and in or around programmes of particular appeal to children under 16.’

Article 18 of the International Chamber of Commerce’s code for advertising and marketing states that advertisements:

- Should not (a) exploit the inexperience or credulity of children; (b) suggest that possession or use of a product alone will give the child…physical, social or psychological advantages over other children; and (c) should not include any direct appeal to children…to persuade their parents or other adults to buy advertised products for them.

In Sri Lanka, however, the use of young children in advertising is used to directly appeal to children of a similar age, as seen in advertisements such as the Munchee Chocolate Cream Rounds and Maggi Noodles ‘Omelettes’ advertisements, which were aired during the monitoring period. The lack of regulation or legislation regarding advertising and marketing to children has enabled advertisers to ignore internationally accepted practices and standards.

Advertising and marketing at schools or extracurricular activities

Outdoor advertising and marketing that directly targeted children was monitored at schools and at parks. The findings showed that heavy advertising and signage in and around school premises and parks was not prevalent. However, according to Key Informants, there was a pervasive influence of HFSS FNAB advertising and marketing at points of sale. Points of sale include supermarkets and, more directly targeting children, at canteens.
VR tested the popularity of canteens as a point of sale of HFSS FNAB for children in the FGDs. Both parents and children affirmed that children bought HFSS FNAB products regularly at canteens. In 2006, the Ministry of Health and Ministry of Education jointly published a School Canteen Policy to regulate the consumption of HFSS FNAB by school children.28 This was followed by a Circular from the Ministry of Education. Circular 2007/02 of the Ministry of Education strongly advised the prohibition of the sale of carbonated drinks and other foods high in sugar, salt and fat in canteens, and encouraged the consumption of healthy foods.29 However, this Circular is not enforceable by law as it only offers a recommendation as opposed to a directive ordering the prohibition of the sale of carbonated drinks and other HFSS FNAB products.

Key Informants also noted that in the decade since the School Canteen Policy was adopted, canteens in many schools continue to ignore the Policy. Moreover, promotions by HFSS FNAB manufacturers at schools were pervasive. For example, manufacturers of HFSS malted beverages sponsored sports tournaments such as cricket matches and Sports Meets. Key Informants commented that children were exposed to new and existing HFSS FNAB products during these promotions, and were often given free samples to experiment. Thus, targeting children on school premises or during their extra-curricular activities is viewed as an effective means of advertising and marketing HFSS FNAB products. This view was corroborated by parents at the FGDs who noted that children are often exposed to these products in school through promotions.

Celebrity endorsements

In Sri Lanka, celebrities have been used to endorse HFSS FNAB products and services, creating Social Appeal. For example, cricketers such as Angelo Mathews and Lasith Malinga have been featured in advertisements for Elephant House Ice Cream and Pepsi respectively. Pop stars Bathiya and Santhush starred in the McDonald’s advertisement introducing the McDelivery service. In the advertisement with Angelo Mathews, the cricketer distributes Elephant House ice creams to children playing a cricket match. He also describes a promotion in which the children stand a chance to win scooters and mountain bikes if they pick a ‘lucky’ Elephant House ice cream stick, in the advertisement.

According to Key Informants in the advertising industry, the impact of celebrity endorsements in Sri Lanka is not as significant as in countries such as India. However, the Children’s Advertising Review Unit in the United States notes that ‘advertisers should recognise that the mere appearance of a celebrity or authority figure with a product can significantly alter a child’s perception of the product’.30 Thus the use of celebrities in the advertising and marketing of HFSS FNAB to children can help increase the consumption of these products.

A child psychologist interviewed for this study noted that children imitate role models, such as celebrities. The psychologist observed that children were also vulnerable to advertising and marketing that suggested owning a particular product would heighten their social status. Internationally, such advertisements are carefully regulated. For example, the Singapore Code of Advertising Practice provides that children ‘should not be made to feel inferior or unpopular for not buying the advertised product’.31 It further states that ‘advertisements should not contain or refer to any testimonial or endorsement unless it is genuine and related to the personal experience of the party who provided the testimonial or endorsement’.32

4.4. The appeal of taste and convenience

Selling taste

Taste Appeal was one of the most prominent messages across all four media, featuring in 343 advertisements in total (39.33% of total messages). TV contained 113 (32.94% of the Taste Appeal) advertisements with
Taste Appeal messaging (including modes of delivery), print media with 214 (62.39% of the Taste Appeal) advertisements, social media with 10 (2.92% of the Taste Appeal) advertisements, and outdoor signage with six (1.75% of the Taste Appeal) advertisements. Given that ‘taste’ is a subjective sensation, it is difficult to regulate the advertising and marketing of Taste Appeal. A consumer’s perception of ‘good taste’ is built up over time, and is reinforced by advertising and marketing of HFSS FNAB products. Taste Appeal is thus a significant driver of HFSS FNAB consumption.

Selling convenience

In addition to Taste Appeal, numerous HFSS FNAB products are advertised and marketed for their convenience. According to FGDs, stay at home mothers in addition to working mothers placed importance on the convenience factor of HFSS FNAB products. Advertising KIIs referred to ‘supplementary parenting,’ where parents feed children products such as fried sausages and instant noodles when they had limited time for cooking. Furthermore, mothers in the FGD revealed that their children would often take care of their own meals, by boiling instant noodles. Thus the convenience of HFSS FNAB, in terms of cutting down cooking time for both mothers and children, drove consumption of HFSS FNAB.

In FGDs, children’s food and drink preferences were overwhelmingly shown as fitting into one or more HFSS FNAB categories. Across all three children’s groups interviewed, sausages, noodles, biscuits, short eats, soft drinks, and fruit juices were highlighted as favourites. Taste Appeal primarily drove these preferences. The three mothers’ groups, who claimed that children always demanded HFSS FNAB products, confirmed the findings from the children’s groups. The impact of advertising and marketing of HFSS FNAB was highlighted in the FGDs: (a) HFSS FNAB products are sold to children as ‘tasty’; and (b) HFSS FNAB products are sold to mothers as convenient.

The need for education and awareness

The first three drivers of impact identified in the analysis above can be regulated to a certain extent. For example, offering inducements with particular HFSS FNAB categories could be prohibited. Advertising agencies could be barred from using children below a certain age, for example twelve years, in advertisements. However, beyond restrictions in advertising and marketing directly to children, it is difficult to regulate against the advertising and marketing of HFSS FNAB products as ‘tasty’ and ‘convenient.’ Instead, parents and children need to be convinced of the extent to which these products are unhealthy, and have negative long-term impacts on health and fitness. This vast nutritional gap – the gap between a product’s perceived level of nutrition and the actual level of nutrition – ought to be addressed through education and awareness measures.

A number of measures could be adopted to educate consumers and spread awareness. First, visible health warnings are a useful way of raising awareness on the negative side effects of consuming a particular product. There exists a precedent in Sri Lanka for ‘unhealthy products’ to contain health warnings on the packaging. For example, tobacco is a highly regulated product. According to the Tobacco Products (Labeling and Packaging) Regulations, No. 01 of 2012 (amended in May 2014):

‘No manufacturer, importer, retailer, storekeeper, agent or seller of any cigarette packet, package or carton containing cigarettes, shall produce, supply, distribute, sell or offer for sale any such packet, package or carton unless every packet, package, or carton containing cigarettes which is distributed, sold or offered for sale carries the specified health warning as depicted in the Schedule to these regulations’.

Every cigarette packet must also contain a pictorial health warning, which highlights the risks associated with the consumption of the product, e.g. tumors. Moreover, health warnings on tobacco products must be printed in all three languages, in font size not less than 10.

Second, more information about unhealthy ingredients could be presented clearly to the consumer. According to children and parents in the FGDs, and nutritionists interviewed, the introduction of ‘traffic lighting’ sugar levels for (a) carbonated beverages, (b) ready to serve beverages other than milk-based products, (c) fruit nectar, and (d) fruit juices, has increased their awareness of the high levels of sugar present in popular drink choices. This regulation could be broadened to include dairy products and malted beverages.

Finally, the Ministry of Health, the Ministry of Education, the Family Health Bureau, and the WHO could engage in counter-messaging activities. For instance, these institutions could produce TV advertisements containing information about the health risks inherent in consuming copious amounts of Processed Meats and Other Products. At schools, children could...
be engaged directly by nutritionists about the need to increase their intake of fruits and vegetables, and reduce their intake of HFSS FNAB products. It would be necessary to provide children with both tasty and convenient alternatives to HFSS FNAB products. However, according to a nutritionist interviewed, ‘healthy snacks’ are rarely available in bakeries or canteens.

### 4.5. Perceptual Graph

The final component of VR’s study on impact visualised the type of persuasive appeal most frequently used in the advertising and marketing of the most popular HFSS FNAB categories. Exhibit 33 below depicts the frequency and persuasive appeal across all HFSS FNAB categories.

Taste Appeal was the most widely used type of messaging (343, 39.33% advertisements). Promotion (167, 22.59% advertisements) was the second most frequently used type of persuasive appeal, followed by Social Appeal (117, 13.42% advertisements).

Confectionaries and Fine Bakery Wares had a total of 376 (43.12%) messages across the four media channels. Within this category, Taste Appeal was the most recurrent message.

Dairy Products was the next most frequently featured category, with 140 messages (16.06% of total messages) recorded. Health Benefits was the most popular message for advertising Dairy Products, followed by Taste Appeal.

In addition to the quantitative findings from the content analysis highlighted above, VR triangulated the qualitative results of the KIs and FGDs with the content analysis to create a perceptual graph. The graph depicts which HFSS FNAB categories use (a) misinformation; and/or (b) exploitation in its persuasive appeal.

<table>
<thead>
<tr>
<th>Confectionaries and Fine Bakery Wares</th>
<th>52</th>
<th>44</th>
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<table>
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<td>Carbonated Beverages</td>
<td>✓</td>
</tr>
<tr>
<td>Malted Beverages</td>
<td>✓</td>
</tr>
<tr>
<td>Processed Meat and Other Products</td>
<td>✓</td>
</tr>
<tr>
<td>Composite Foods (Prepared Foods)</td>
<td>✓</td>
</tr>
</tbody>
</table>
**Exploitation**

In the perceptual graph above, advertisements containing Inducements or Direct Appeal to children were classified under the Exploitation section. An advertisement directly appealed to children if its messaging contained Social Appeal, Emotional Appeal, or the actors in the advertisement directly addressed children as its target audience.

Confectionaries and fine bakery wares, Carbonated Beverages, and Processed Meats and Other Products used Direct Appeals to children. Advertisements used young children to sing about the product, describe their enthusiasm for the product and its taste, and ultimately endorse the product.

Malted Beverages and Composite Foods (Prepared Foods) used Inducements to advertise and market their products. For instance, children received timetables with milk packets at schools as part of a promotion.

**Misinformation**

Advertisements featuring Health Benefits or Other Benefits – such as stimulating energy or intelligence – were classified under the Misinformation section.

Dairy Products and Malted Beverages regularly leveraged Health Benefits in the advertising and marketing to children. For example, yoghurts were viewed as a source of nourishment, and were eaten as healthy snacks between meals.

Malted Beverages were also advertised and marketed for Other Benefits, such as contributing to energy and being alert.

Legislation targeting the advertising and marketing of the categories discussed in the perceptual graph (Exhibit 34) can be introduced in Sri Lanka. In addition to promoting taste and convenience, these HFSS FNAB categories used exploitation and misinformation strategies to target children. However, it is easier to regulate against marketing strategies that directly appeal to children, promote Health and Other Benefits, and give inducements, than it is to regulate the advertising and marketing of taste and convenience.
5. Conclusion

In the first component of this study, VR assessed the frequency of advertising of HFSS FNAB products to children. Accordingly, it monitored print media, TV, social media, and outdoor signage. In the second component of this study, VR analysed the power of advertising and marketing of HFSS FNAB products. This was conducted through FGDs with children and parents, and through KIIs with specialists in nutrition, child psychology, advertising, and marketing.

In a triangulation of its findings from the media monitoring section, FGDs, and KIIs, VR identified four drivers of impact, which influenced consumption patterns. These drivers were:

(a) The power of inducements;
(b) HFSS FNAB products as ‘good for you’;
(c) Direct appeal to children; and
(d) The appeal of taste and convenience.

An analysis of these drivers of impact revealed the fact that HFSS FNAB advertising and marketing uses a combination of exploitation and misinformation strategies to target children. For instance, children are exploited through the offer of gifts or other advantages extraneous to the HFSS FNAB product. Similarly, parents and children are misinformed about the extent of health benefits certain HFSS FNAB products contain. Drivers (a), (b) and (c) (identified above) have already been regulated internationally. Thus, Sri Lanka can leverage international best practices to better regulate the advertising and marketing strategies used in the three aforementioned drivers of impact. However, regulating the persuasive appeal of taste and convenience is significantly more challenging. Increasing public awareness regarding the extent of the nutritional gap in the advertising and marketing of certain HFSS FNAB categories should therefore be prioritised. Institutions such as the Ministry of Health, the Ministry of Education, the Family Health Bureau and WHO could also engage in counter-messaging strategies to educate consumers of HFSS FNAB.
Endnotes

5. Ibid, at 218.
10. Ibid., accessible at https://www.ama.org/resources/Pages/Dictionary.aspx?idLetter=M.
11. 'Range of products' was used to assess advertisements that displayed more than one category of HFSS FNAB. For instance, supermarkets would release one advertisement offering discounts across multiple HFSS FNAB categories such as Processed Meats and Other Products, Carbonated Beverages and Malted Beverages.
20. Food (Labelling and Advertising) Regulations (2005), at 9A.
32. Ibid., at 15.
33. Tobacco Products (Labeling and Packaging) Regulations, No. 01 of 2012, Clause 4.
34. Ibid., Clause 10.
35. Ibid., Clause 8.
36. Food (Colour Coding for Sugar levels) Regulations, 01 August 2016.