Submission to

Australian Preventative Health Agency
Draft Framework for monitoring television marketing and advertising to children of unhealthy food and drinks

on behalf of

Australian Association of National Advertisers

21 June 2013
Section 1: Executive Summary

- AANA represents Australia’s national advertisers. The advertising, marketing and media industry play a fundamental economic role in society and contribute in excess of $30 billion to the Australian economy annually.

- AANA established the self regulatory system for advertising and marketing communications in 1997. Since that time, new codes have been introduced and existing codes have been amended to keep pace with the ever evolving advertising, marketing and media industry.

- The Code of Ethics is the cornerstone of the advertising self regulatory system and is supplemented by a Code of Advertising and Marketing to Children, Food & Beverages Code and Environmental Claims Code.

- In 2008, AANA developed in conjunction with its members and the Australian Food and Grocery Council, two additional signatory initiatives, the Responsible Children’s Marketing Initiative and the Quick Service Restaurant Initiatives (the AFGC Initiatives).

- The self regulatory system is underpinned by an independent, transparent and robust complaints handling system which was established by AANA over a decade ago.

- The complaints handling system is administered by the Advertising Standards Bureau (ASB) and complaints are adjudicated by the Advertising Standards Board (Board), made up of individuals who are representative of the community and not connected to the advertising industry. Complaints under the initiatives are also handled by the ASB.

- The level of complaint and breach findings by the Board under the AFGC initiatives is low when compared with the level of advertising nationally. This low level of complaint indicates that the initiatives are providing the appropriate level of community safeguard in relation to the advertising and marketing communications which are subject to the initiatives.

- AANA is not opposed to the development of a uniform monitoring framework for the AFGC Initiatives, however, such frameworks should reflect the definitions and constructs in the AFGC Initiatives and not extend beyond those (ie into viewing times which are covered by the AFGC Initiatives).

- If the Australian National Preventative Health Agency (ANHPA) is minded to monitor advertising at other times, AANA recommends that uniform definitions and data sources be used.
Section 2: Introduction

Australian Association of National Advertisers (AANA) provides this submission to the Australian National Preventative Health Agency’s (ANPHA) Draft Framework for Monitoring Television Marketing and Advertising to children of Unhealthy Food and Drinks (the Draft Framework).

AANA is the peak body and has represented national advertising for over 85 years. It represents the common interests and obligations of companies across all business sectors involved in the advertising, marketing and media industry.

AANA serves to protect the rights of consumers in ensuring advertising and marketing communications is conducted responsibly, including through its development and administration of industry codes and the self-regulatory system.

The advertising, marketing and media industry plays a fundamental economic role in society and contributes in excess of $30 billion to the Australian economy annually.

It is the driver of consumer choice and, by promoting competition, helps consumers get better value for money. It enables innovation to be brought to market and stimulates economic growth and jobs. It provides substantial funding to support media and a variety of media content.

AANA has a strong ongoing commitment to self regulation. AANA designed and delivered the self-regulatory component of regulation controlling advertising and marketing communications in Australia.

AANA’s self regulatory system applies to all media and all forms of advertising and marketing communications. As such, all outdoor media in Australia is subject to AANA’s self regulatory system and the complaints handling system which underpins it.

This submission comments on the following issues in response to the Discussion Paper:

Section 3: General Comments

Section 4: Specific Comments about each Framework

Section 5: Suggested Alternate Draft Framework for monitoring compliance

Section 6: Suggested Alternate Draft Framework for framework for other monitoring
Section 3: General Comments

3.1 Draft Framework 2

AANA is not opposed to the development of a uniform monitoring framework for the AFGC Initiatives. AANA notes the draft Framework 2 which is intended to provide a uniform framework for monitoring compliance with the AFGC Initiatives (Draft Framework 2). While AANA supports the concept of a draft monitoring framework, AANA provides in this submission an outline of our concerns with Draft Framework 2 and a suggested alternative framework.

AANA supports the development of a monitoring framework to track compliance with the AFGC Initiatives. However, such a framework should remain true to the construct and definitions in the AFGC Initiatives. AANA is concerned that the Draft Framework 2 has not incorporated the definitions and scope of the AFGC Initiatives and will not provide meaningful and relevant data sets to monitor compliance with the AFGC Initiatives.

Please refer to Section 5 below for AANA’s Draft Proposed Monitoring Framework.

3.2 Draft Framework 1

AANA is however concerned at the intent behind and the scope of the Draft Framework for other monitoring which extends beyond the scope of the AFGC Initiatives (Draft Framework 1). AANA is of the view that the AFGC Initiatives provide appropriate community safeguards in relation to food and beverage advertising and marketing to children. As such, the AANA questions the need for monitoring which goes over and above the scope of the AFGC Initiatives.

If ANHPA is minded to monitor advertising outside the scope of the AFGC Initiatives, AANA recommends that uniform definitions and data sources be used.

Please refer to Section 6 for AANA’s Draft Proposed Framework.

3.3 Industry Self Monitoring

The statement in paragraph 5 of the Section “Global Policy Context”, “Both of these initiatives are self-monitored by the food industry” misstates the situation in relation both to complaints handling under the AFGC Initiatives and the monitoring activities of the AFGC.

The self regulatory system which includes the AFGC Initiatives is underpinned by a robust and transparent complaints handling system. The complaints handling system is administered by the Advertising Standards Bureau and complaints are adjudicated by the Advertising Standards Board which is independent of industry.

AANA refers to and supports the submission of the Advertising Standards Bureau in this regard.
In addition, the AFGC monitors the compliance of signatories with the AFGC Initiatives and is transparent in relation to reporting on that compliance monitoring. Further, the AFGC has supported the development of uniform monitoring frameworks.

3.4 Focus on “Exposure”

The issues paper and the draft frameworks utilize terminology such as “exposure”. This term fails to consider the engagement or resonance of marketing messages with children. The AANA Code of Advertising and Marketing Children, along with the AFGC Initiatives capture marketing and advertising which is “primarily directed to children”.

This definition picks up and incorporates the various factors which have been determined by the Australian and Communications Authority (ACMA) in the context of the broadcasting co-regulatory system as determining those advertisements for which additional regulation is required. It is these factors which the ACMA has determined create sufficient engagement with children as to warrant additional protection and regulation.

Emphasis on “exposure” assumes that a child “seeing” an advertisement or marketing measure is an appropriate and sufficient measure. This approach is inconsistent with the approach taken in the AANA Self-regulatory system, the AFGC initiatives and the co-regulatory system developed by the broadcasters and approved by the ACMA as providing appropriate community safeguards.

3.5 Children’s media consumption patterns

There are a number of incorrect assumptions in the Issues Paper and the Draft Frameworks about the viewing or media consumption patterns of children. In addition, different definitions and assumptions are made about different media.

Terminology is used inconsistently throughout the Issues Paper and draft Frameworks.

For example, the treatment and identification of children’s viewing patterns for commercial free to air television exaggerates the viewing patterns of children vis a vis the definition and treatment for subscription television.

The focus in the framework for commercial free to air television is on prime time, and G, PG and M programs up to 10pm and overnight for G programs.

The focus for subscription television is on channels which are dedicated to children’s viewing and channel/programs that are determined to be directed primarily to children by the nature of the themes, visuals and language and those that attract a high number of children.

There is no explanation provided for the vastly different treatment of these two television broadcasters.

AANA is also most concerned at the note that: ABC 2 and 3 should not have any advertisements, however these channels should be checked. The charter of the public broadcast prohibit the advertising or marketing of any products or services. These
networks and the audiences they attract should be excluded from any analysis of children’s media consumption patterns.

The definition of relevant viewing times for commercial free to air television includes PG and M rated programs broadcast up to 10pm. However the audiences for these programs are predominantly adults and of the small percentages of children who are watching, over half are watching with an adult.

OzTam data for prime time on commercial free to air television shows that children aged 5 – 12 years comprise just 6.2% of the total prime time audience on Free TV.¹ Of those the vast majority (70.4%) are watching with an adult.

Advertisers and marketers place their advertising and marketing messages to maximize return on investment (ROI). ROI is calculated in the first instance as a ratio of the cost of the advertisement divided by the numbers of target audience available. It is not commercially viable for advertisers to advertise to children during prime time as the cost is prohibitive vis a vis the child audience available.

Further the inclusion of all G rated programs broadcast overnight will catch the many G rated programs which are clearly directed to adults. G rated programs are not by the virtue of being mild in nature, necessarily intended or designed for the child audience. They are G rated on the basis of the mild impact of the themes, language and storylines. Only G rated programs which are directed to children, or of principal appeal to children and which satisfy a designated audience percentage (such as 35%) should be included.

3.6 35% maximum child audience rating for the day

AANA is concerned at the suggestion in paragraph 31 that time period where the number of children watching television “across all channels is greater than 35% of the maximum child audience for the day”.

AANA notes and supports the submission of Free TV Australia in this regard.

In addition, AANA provides the following:

- The metric will capture a range of programs which are neither being viewed by children or which are not of principle appeal to children.

- It will also capture programs which are watched by a very low number of children, as the percentages will be inflated by children watching across a range of channels, including those which are dedicated for children (such as on pay tv or the ABC where ads are not permitted).

- This approach is also contrary to the currency upon which advertisers and marketers base their media buy decisions, which is the audience of the particular program the advertisement is to be placed in, not an aggregate

¹ Source: OzTAM, 5 city metro, weeks 1 – 52 2008 – 2010 and weeks 1 – 53 2011, 6pm – 9pm
The recommendation is also fundamentally flawed as it disregards the practical fact that no matter the number of screen time opportunities available to children, or the number of channels available, any one child can only watch one channel at a time. To aggregate figures across channels will seriously exaggerate and misstate the media consumption patterns of children.

3.7 Data Periods

AANA supports the AFGC submission in relation to data periods. Additionally AANA submits as follows:

- A data period should be of sufficient length to take account of seasonal and audience fluctuations.
- In the case of broadcast media, a sample of data periods both within and without a ratings period may be necessary.
- In addition care should be taken when selecting data periods during school holidays, public holidays, and holiday periods (such as Easter, Christmas and end of financial year sales).
- Data periods should be representative of the audience composition of relevant programs.

3.8 Data Sources

AANA notes in paragraphs 28 and 29 of the Section entitled “Key Issues and Review” that the Issues paper recommends a number of commercial sources for data. AANA makes the following recommendations:

- That data sources in the first instance be those which advertisers and marketers base their media buy decisions. These data sources are the “currency” upon which advertisers and marketers determine the placement schedule for their marketing communications;
- Data which provides advertising spend data is also recommended as this informs the intended reach of the marketing communication placement;

AANA opposes the recommendation in paragraph 29 that researches collect their data by viewing television programs and advertisements themselves during defined period in time.

This methodology will provide researchers with only the number of advertisements broadcast. Such a methodology is seriously flawed and does not provide credible data to indicate reach and frequency of advertisements.

This methodology neither provides data about audience figures (and child percentages) nor whether the relevant marketing communications are directed primarily to children and so have the necessary engagement and resonance with the child audience.
Advertisers buy audience volume (numbers of people watching). Spend on advertising is a more accurate indicator of advertisers’ priorities than counting the number of spots screened, as is suggested in the Issues Paper. This is AANA’s recommended approach for monitoring other than compliance.

3.9 Definition of Food

The Issues Paper sets out some options for defining the foods which should be subject to monitoring (under either Framework). The Issues Paper notes that this issue has been subject to debate for some time and that there is currently no agreed definition.

AANA notes the inherent difficulties in drawing a line between “healthy” and “unhealthy” options for food and beverages. AANA also notes that the Issues Paper and Draft Frameworks use numerous terms and that these terms are used inconsistently. Refer to page 7 of the Submission by the Australian Food and Grocery Council (AFGC).

The inherent difficulty in dividing food in to “healthy” and “unhealthy” is at the precise core of the issue in relation to the obesity debate. It is not food (unhealthy or healthy) in and of itself which cause obesity. Nutritionists agree that obesity levels rise when there is an imbalance between energy in and energy out. Focusing on food alone (energy in) is only half of the equation. Further not any one food if consumed would lead to obesity.

AANA supports the AFGC submission in this regard and in particular supports Recommendation 1 in the AFGC Submission.
Australian Association of National Advertisers

Draft Framework for monitoring television marketing and advertising to children of unhealthy food and drinks

Section 4: Specific Comments about each Framework

4.1 Framework 2: Compliance

AANA suggests a re-ordering of the Framework as suggested in Section 5 below.

a) Sample period

Refer to comments in Section 3.7 above.

AANA’s recommendation:

*ANPHA consult with industry to further analyze, discuss and determine appropriate sample periods. As a guide, sample periods must be a representative period of the year and include average seasonal fluctuations as a result of holiday periods (Easter and Christmas), school holidays and peak and non-peak viewing times.*

b) Markets

Refer to comments in Section 3.5 above. The relevant markets for the purposes of monitoring compliance with the AFGC Initiatives should be derived from the definition of Media.

*Media* means television, radio, print, cinema and third party internet sites ....

AANA understands that the Draft Frameworks are based in the first instance on television (both free to air and pay).

Definitions and descriptions of markets must be read in conjunction with the definitions of channels and programs as described below. The definition of Media in the AFGC Initiatives is a threshold definition to determine broadly the marketing communications which are subject to the restrictions in the AFGC Initiatives.

As such, AANA does support separate monitoring of each of the broadcast media identified, ie commercial free to air and pay tv as the viewing patterns of children’s varies between these two broadcast services.

AANA supports the definition of Markets as described in the framework.

c) Channels

Refer to comments in Section 3.5 above.

AANA is concerned at the listing of commercial free to air television networks under channels. The list appears selective and incomplete in comparison to the list of commercial television broadcasting licensees published by the Australian
Communications and Media Authority (ACMA).\textsuperscript{2}

For the purposes of monitoring compliance, AANA supports the option for monitoring reports to cover metro and/or regional as is appropriate.

For efficacy, all broadcast media should be treated consistently. AANA recommends that the framework reference the entire suite of subscription channels in the first instance.\textsuperscript{3}

AANA strongly objects to the inclusion of or reference to the National Broadcaster in any form. The ABC is prohibited from accepting commercial messages in any form through its charter and governing legislation. As such it is inappropriate and inaccurate to include the national broadcasters in any way in the Issues Paper or Draft Framework.

AANA notes that the program section is determinative of the precise programs to be monitored and reported against. AANA refers to 4.2 (f) below and AANA’s recommended compliance framework in Section 5 which reorders the framework to ensure that the sections on markets, channels and programs are read together to more accurately reflect the definitions in the AFGC Initiatives.

\textit{AANA’s recommendation:}

\textit{Include reference to relevant channels in the section on markets and fully detail and describe the markets and channels subject to the AFGC Initiatives. Refer to the ACMA listing in relation to Commercial Free to Air Television and Subscription Television.}

d) Data Source

Refer to comments in Section 3.8 above.

\textit{AANA’s recommendation:}

- \textit{That data sources in the first instance be those on which advertisers and marketers base their media buy decisions. These data sources are the “currency” upon which advertisers and marketers determine the placement schedule for their marketing communications;}

- \textit{Data which provides advertising spend data is also recommended as this informs the intended reach of the marketing communication placement.}


\textsuperscript{3}http://www.acma.gov.au/theACMA/subscription-television-broadcasting-licences-listings
e) Objectives

Refer to comments in Section 3.2 above. Further the third objective “To Identify the amount of non-core food and drink advertisements on television as determined by the types of food products advertised, the number of unique non-core food products” is beyond scope of the AFGC Initiatives and should be removed. Further as discussed above in Section 3.8 counting the number of advertisements does not provide an accurate or adequate data source.

The Objective for the framework should be stated at the start.

**AANA’s recommendation:**

*To monitor compliance with the RCMI and QSRI by signatories.*

f) Programs

Refer to comments in Section 3.5 above.

AANA objects to the inclusion of all P, C and G rates programs and all time periods where the number of children watching television across all channels is greater than 35% of the maximum child audience rating for the day. This approach departs from the definitions and construct of the AFGC Initiatives. A Compliance Monitoring Framework must remain true to the intent and construct of the obligation which signatories have agreed to be bound by.

The AFGC Initiatives cover Media and includes media where the audience is predominantly children and/or having regard to the theme, visuals, and language used are directed primarily to children. In regards to television this includes:

- all C and P programs
- all programs where more than 35% of the audience is children under 12 years
- G rated programs which having regard to the theme, visuals, and language used are directed primarily to children.

These are the programs which should be captured and these criteria (apart from the C and P programs) can be easily applied in the subscription television scenario.

Advertising or marketing communications from signatories only should be included in this analysis.

**AANA’s recommendation:**

*Programs where the audience is predominantly children and/or having regard to the theme, visuals, and language used are directed primarily to children. In regards to television this includes*
g) Food Classification

Refer to comments in Section 3.9 above. AANA supports the submission of the AFGC in regard to Framework 2 – Food Classification. AANA strongly recommends that the nutrient profiling used by signatories be applied when determining the compliance of signatories with the AFGC Initiatives.

The terminology used in the Draft Framework for food classification should be consistent with and adopt the terminology of healthy dietary choices in the AFGC Initiatives. Reference should also be made to established scientific or Australian government standards.

The reference to the Note should be amended consistent with the AFGC’s submission.

**AANA’s recommendation:**

*Food and beverage products should be classified according to healthy dietary choices, consistent with established scientific or Australian government standards and as identify by individual signatories company action plan.*

h) Data Points

AANA supports the data points listed however submits that the reference to Licensed Characters and Popular personalities be removed. AANA supports the responsible and careful use of licensed characters and popular personalities in advertising and marketing directed primarily to children.

It is not appropriate to call out this messaging restriction in the data points section. Any analysis of particular messaging could be included under the “Possible Analysis/Indicator List”

**AANA’s recommendation:**

*Remove the reference to Licensed Characters and Popular Personalities from the Data Points section.*

i) Possible Analysis Indicator List

AANA supports the recommendation of the AFGC in relation to a refine possible Analysis/Indicator List.
AANA recommends that further work be conducted in relation to the Possible Analysis Indicator List.

AANA’s recommendation:

To adopt as a discussion starter the Possible Analysis/Indicator List presented by the AFGC in their submission.

To remove the reference to “significantly high”.

4.2 Framework 1: Exposure

AANA is concerned at the intent behind and the scope of the Draft Framework for other monitoring which extends beyond the scope of the AFGC Initiatives (Draft Framework 1). AANA is of the view that the AFGC Initiatives provide appropriate community safeguards in relation to food and beverage advertising and marketing to children. As such, the AANA questions the need for monitoring which goes over and above the scope of the AFGC Initiatives.

If ANHPA is minded to monitor advertising outside the scope of the AFGC Initiatives, AANA recommends that uniform definitions and data sources be used.

AANA suggests a re-ordering of the Framework as suggested in Section 5 below.

a) Sample period

Refer to comments in Section 3.7 above.

AANA’s recommendation:

ANPHA consult with industry to further analyze, discuss and determine appropriate sample periods. As a guide, sample periods must be a representative period of the year and include average seasonal fluctuations as a result of holiday periods (Easter and Christmas), school holidays and peak and non-peak viewing times.

b) Markets

Refer to comments in Section 3.5 above.

AANA understands that the Draft Frameworks are based in the first instance on television (both free to air and pay).

Definitions and descriptions of markets must be read in conjunction with the definitions of channels and programs as described below.

AANA supports separate monitoring of each of the broadcast media identified, ie commercial free to air and pay tv as the viewing patterns of children’s varies between these two broadcast services.
AANA supports the definition of Markets as described in the framework.

c) **Channels**

Refer to comments in Section 3.5 above.

AANA is concerned at the listing of commercial free to air television networks under channels. The list appears selective and incomplete in comparison to the list of commercial television broadcasting licensees published by the Australian Communications and Media Authority (ACMA).

For the purposes of monitoring compliance, AANA supports the option for monitoring reports to cover metro and/or regional as is appropriate.

For efficacy, all broadcast media should be treated consistently. AANA recommends that the framework reference the entire suite of subscription channels in the first instance.

AANA strongly objects to the inclusion of or reference to the National Broadcaster in any form. The ABC is prohibited from accepting commercial messages in any form through its charter and governing legislation. As such it is inappropriate and inaccurate to include the national broadcasters in any way in the Issues Paper or Draft Framework.

AANA notes that the program section is determinative of the precise programs to be monitored and reported against. AANA refers to 4.2 (f) below and AANA’s recommended framework in Section 6 which reorders the framework to ensure that the sections on markets, channels and programs are read together to more accurately reflect the definitions in the framework.

**AANA’s recommendation:**

*Include reference to relevant channels in the section on markets and fully detail and describe the markets and channels. Refer to the ACMA listing in relation to Commercial Free to Air Television and Subscription Television.*

d) **Data Source**

Refer to comments in Section 3.8 above.

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AANA’s recommendation:

- That data sources in the first instance be those which advertisers and marketers base their media buy decisions. These data sources are the “currency” upon which advertisers and marketers determine the placement schedule for their marketing communications;

- Data which provides advertising spend data is also recommended as this informs the intended reach of the marketing communication placement.

e) Objectives

Refer to comments in Section 3.1 above.

AANA is concerned at the intent behind and the scope of the Draft Framework for other monitoring which extends beyond the scope of the AFGC Initiatives (Draft Framework 1). AANA is of the view that the AFGC Initiatives provide appropriate community safeguards in relation to food and beverage advertising and marketing to children. As such, the AANA questions the need for monitoring which goes over and above the scope of the AFGC Initiatives.

If ANHPA is minded to monitor advertising outside the scope of the AFGC Initiatives, AANA recommends that uniform definitions and data sources be used. Please refer also to

AANA’s recommendation:

To monitor the reach and frequency of advertising and marketing communications of food and beverages (as defined) directed primarily to children during programs or principle appeal to children or for which children comprise 35% of the audience.

f) Programs

Refer to comments in Section 3.5 above.

AANA objects to the inclusion of all P, C and G rates programs and all time periods where the number of children watching television across all channels is greater than 35% of the maximum child audience rating for the day. This approach will catch a range of programs which are for predominantly adult audiences and for which additional regulation and protection in terms of advertising and marketing directly primarily at children is not required.

Only programs which are intended or specifically designed for children or by virtue of their themes etc are primarily directed to children should be included. Additionally programs where more than 35% of the audience is children could be included.

AANA’s recommendation:
Programs where the audience is predominantly children and/or having regard to the theme, visuals, and language used are directed primarily to children. In regards to television this includes

- In the case of commercial free to air television, all C and P programs
- All programs where more than 35% of the audience is children under 14 years
- G rated programs which having regard to the theme, visuals, and language used are directed primarily to children.

**g) Food Classification**

Refer to comments in Section 3.9 above. AANA supports the submission of the AFGC in regard to Framework 1 – Food Classification. AANA strongly recommends that further clarity be provided for the “other/miscellaneous reference”.

**AANA’s recommendation:**

Provide further clarity around “other/miscellaneous”.

**h) Data Points**

AANA supports the data points listed however submits that the reference to Licensed Characters and Popular personalities be removed. AANA supports the responsible and careful use of licensed characters and popular personalities in advertising and marketing directed primarily to children.

It is not appropriate to call out this messaging restriction in the data points section. Any analysis of particular messaging could be included under the “Possible Analysis/Indicator List”

**AANA’s recommendation:**

Remove the reference to Licensed Characters and Popular Personalities from the Data Points section.

**i) Possible Analysis Indicator List**

AANA supports the recommendation of the AFGC in relation to a refine possible Analysis/Indicator List.

AANA recommends that further work be conducted in relation to the Possible Analysis Indicator List.

**AANA’s recommendation:**

To adopt as a discussion starter the Possible Analysis/Indicator List presented by the AFGC in their submission.
To remove the reference to “significantly high”.

Section 5: Suggested Alternate Draft Framework for monitoring compliance

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- in the case of commercial free to air television, all C and P programs  
- all programs where more than 35% of the audience is children under 12 years (14 years for a compliance monitoring framework for the Quick Service Restaurant Initiative);  
- G rated programs which having regard to the theme, visuals, and language used are directed primarily to children. |
Only advertising or marketing communications from signatories should be included in the analysis.

| Food Classification | Food and beverage products should be classified according to healthy dietary choices, consistent with established scientific or Australian government standards and as identified by individual signatories company action plan.  
NB: Where indefinite criteria, such as the Australian Guide to Healthy Eating, are applied there may be difficulty in applying them to some foods. Where subjective decisions are made around the coding of some products, the basis for such decisions should be clearly explained in all reports and documentation. |
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NB: Where indefinite criteria, such as the Australian Guide to Healthy Eating, are applied there may be difficulty in applying them to some foods. Where subjective decisions are made around the coding of some products, the basis for such decisions should be clearly explained in all reports and documentation.

### Data Points

Remove the reference to Licensed Characters and Popular Personalities from the Data Points section.

### Possible Analysis Indicator List

To adopt as a discussion starter the Possible Analysis/Indicator List presented by the AFGC in their submission.

To remove the reference to “significantly high”.

- G rated programs which having regard to the theme, visuals, and language used are directed primarily to children.