



Ms Michele Herriot
Director, Health Promotion Branch
SA Health
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15 October, 2008

Dear Ms Herriot

On behalf of the Public Health Association of Australia (PHAA) and its members, I write to congratulate you on the recently released "Eat Well Be Active" discussion paper regarding the influence of junk food and drink advertising during peak children's television viewing times in South Australia, and the possibility of potential action on this issue. This is an issue the PHAA has been concerned about for some years.

As outlined in the enclosed position statement, since 1999 the PHAA has been advocating a ban on all TV food advertising at times when children comprise the majority of the viewing audience. This ban needs to be more encompassing than the current regulations for C and P programs, as these are not the only times significant numbers of South Australian children are watching TV (potentially unsupervised).

The PHAA has been a member of the Coalition on Food Advertising to Children (CFAC) since its commencement in 2002 and therefore advocates a ban on all food advertising, not just junk food and drinks. We have adopted this strong position, because just banning junk food would create years of debate about what is, and what is not, junk food; thereby creating more years inaction.

While we appreciate the Australian Guide to Healthy Eating gives guidance on what foods should be consumed for good health, there are potential grey areas (e.g. Nutri-Grain, Coco Pops and LCM's are foods that could fit into the breads and cereals food group, but the

PHAA believes these foods are too refined and too high in sugar to be "healthy" foods which is the way they are advertised). Also, it is important to note that while the food industry regularly argue "there are no junk foods, just junk diets", trying to categorise all the foods on supermarket shelves as well as those in take-away stores, would be very difficult and very time consuming to develop, implement, evaluate and keep up to date (as is evident by Food Standards Australia New Zealand's current attempt to categorise foods and drinks for health claims legislation).

The PHAA also congratulates you on considering the role of non-TV forms of advertising in influencing children's eating habits, and encourages further research into these less scrutinised advertising mediums. We appreciate and agree that TV advertising is a good place to start with respect to regulation, but encourage you not to forget the power and importance of other forms of advertising.

Once again we congratulate you for your attention to this issue and we look forward to a strong health promoting outcome from this consultation. Therefore, we urge you to put our children's health before corporate wealth by banning all food and drink advertising during children's peak television viewing times in South Australia.

Yours sincerely

Michael Moore
CEO
Public Health Association of Australia