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13 June 2017

Re: Licensed Media Characters

Dear Mr Spiller,

BEUC, the European Consumer Organisation is deeply concerned by children's diets and the alarmingly high levels of obesity. We are writing to you regarding the issue licensed media characters used to promote foods to children which are high in fat, salt and sugar (HFSS).

We urge you to end the licensing of your licensed media characters for advertising and marketing of HFSS products. To determine whether a product is HFSS we encourage you to use the World Health Organisation (WHO) European Regional Office's nutrient profile.

With one in three children in Europe either overweight or obese, it is crucial that strong action is swiftly taken to tackle this serious public health problem. Research has shown that advertising to children of foods high in fat, salt and sugar is a significant risk factor for obesity. Numerous international bodies, health experts and consumer organisations have highlighted the need to improve food marketing practices to better protect children from such advertising.

Nevertheless, children remain exposed to many forms of persuasive and pervasive forms of marketing for foods high in fat, salt and sugar.

BEUC is calling for licensed media characters to only be used for both advertising and on packaging if the product meets the WHO's nutrient profile. This model is widely recognised as suitably strict to appropriately determine which foods should be permitted to be advertised to children.

Licensed media characters depicting fictional human and animal cartoons or animated objects from children's movies or TV programmes are regularly used on HFSS foods which are advertised and marketed to children.

The use of such characters is of especial concern for younger children who do not have the cognitive capacity to properly distinguish between cartoons they see in TV programmes, movies or digital games and those cartoons when they are used by food companies.

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Attractive licensed cartoon characters suggest a sense of fun and adventure to young children who can develop emotional bonds with the characters. **Scientific research has shown that such characters can have a powerful influence in shaping children's food preferences and purchase requests**, especially with regard to energy-dense and nutrient poor foods¹.

Supermarket and online surveys by our members have shown that some of Disney's characters are licensed for use with foods which are high in fat, salt and sugar. BEUC is calling for their use to be restricted to healthy produce and to encourage young children to increase their consumption of fruit and vegetables for example.

We welcome Disney's pro-active role in establishing nutritional criteria for marketing to children. **We would urge you however to consider updating these guidelines by adopting the World Health Organisation's nutrient profile model to determine which foods and beverages can be advertised to children**. This model is widely recognised as suitably strict for making an appropriate determination.

Packaging is a key form of marketing to children who are much more likely to assess products on a visual level. Licensed media characters that children have been exposed to through TV or movies can provoke powerful purchase requests to parents when seen on packaging in the supermarket. It is thus important that any restrictions on advertising are extended to packaging as well.

We believe it would send a very positive signal to families and food companies alike if an entertainment company with the gravitas and influence of Disney were to demonstrate leadership in this area and commit to restricting its character licensing to only healthy foods as defined by the WHO.

Kind Regards,

Monique Goyens
Director General

¹ V Kraak, M Story: Influence of food companies' brand mascots and entertainment companies' cartoon media characters on children's diet and health: a systematic review and research needs, Obesity Etiology/Pediatric Obesity, October 2014