

# Regulating advertising of unhealthy and unsustainable food

## Overview

Growing evidence suggests that consumers' food choices are shaped by marketing, advertising and promotional offers from food retailers. Most individuals, however, may not realise the extent to which their eating habits are steered by the advertisements they see on billboards, television and social media, or the range of food products that is available at the supermarket, or through the promotional offers and discounts offered by retailers. These and other practices communicate to consumers about which food options are readily available, their nutritional values, their origins and their potential sustainability impacts.

Today, food marketing and advertising tends to push consumers towards diets out of step with healthy eating recommendations – often including large amounts of highly-processed and environmentally unsustainable options. However, under the right regulatory conditions, food advertising can help drive consumer demand for sustainable and healthy food options while reducing demand for unhealthy and unsustainable foods.

## Concrete measures to implement

Measures to regulate food advertising to help drive consumer demand for sustainable and healthy food options while also reducing demand for unhealthy and unsustainable foods, among others, include:

- Increase research, measurement and attention on the effects of food marketing at the environmental and societal level, rather than only

focusing on the effects of marketing on individual choices and health outcomes. This can help to build the case for more comprehensive food marketing regulations.

- Restrict marketing, advertising and other promotional strategies (e.g., in-store promotions or giveaways) of ultra and highly processed foods on television, radio, internet, social media and other platforms – in particular, such marketing that is geared towards children and located in the areas around schools. Research shows that marketing regulations are effective at reducing the consumption of unhealthy foods (e.g., junk food or food items high in fats, sugar and salt). Similar regulations could be implemented to limit the advertising of food products linked to negative environmental impacts.
- Regulate labelling and marketing to enforce or promote accurate product information in a standardised, comparable format across food product categories. Such criteria can include those related to food safety, origin, nutritional value, labour conditions, resource use and associated emissions. Conditions for effective labeling include regulations, strategies, guidelines and instruments that make it mandatory, science- and evidence-based, front-of-package, incremental, multi-dimensional, clear and reliable according to national contexts. Labeling also needs to be credible and actionable. Different options for designing environmental impact labels include star labels, stoplight labels, nutrition label add-ons and detailed comparison labels.
- Labelling guidelines and strategies should also consider diverse science and evidence-based FOPL schemes, potentially including interpretive and informative labelling that accounts for the Codex Alimentarius Commission guidelines, standards, and recommendations, as well as other relevant standards.
- Encourage food manufacturers to adopt food labelling that highlights impacts of products to both the environment and the individual consumer (i.e., connecting the purchase decision to a direct, tangible impact).
- Implement regulations that ensure that foods' health and sustainability claims are accurate, and require food packages and menus are clearly labelled with nutritional information (e.g., calories, fats, including saturated and trans-fats, sugars, salt, and nutrients) and environmental impacts (e.g., carbon, land-use or water 'footprints').
- Establish equitable access to fresh, locally produced food in urban and peri-urban areas (e.g., strengthening or establishing farmers' markets and

cooperatives from the surrounding region) and promote it with public advertising.

- Allocate additional finance for the marketing and promotion of organic food (i.e., under rural development programmes), as well as for regionally-produced food, within national or subnational budgets.
- Restrict not only the marketing of certain unhealthy food products, but also restrict marketing that encourages certain behaviours like excessive or mindless eating, with special emphasis on considering its impacts on children.
- Develop and launch advertising campaigns on “ugly produce” (fruits and vegetables) to raise awareness that these products offer the same nutritional value, taste and aroma as their more conventional looking counterparts.
- Educate consumers about how healthy foods are not always environmentally sustainable, such as by providing information on the expected range of sustainability levels within “healthy food” categories, or emphasising that healthy food can exhibit a broad range of sustainability levels. Ideally, complement this awareness campaign with policies that incentivise manufacturers of healthy foods (or perceived healthy foods) to adopt production practices that minimise negative environmental impacts.
- Improve nutritional care in health care system programming to bolster public education about the health benefits of healthy and sustainable diets.

## Enabling governance measures

- Policies, guidelines and public investment decisions should be coherent and align across different levels of governance.
- Offer technical assistance and guidelines to help suppliers and retailers measure key sustainability and health information about their products. This support aims to enable the design of more accurate advertising and labelling, ensuring consumers ultimately receive reliable information.
- Increase food literacy among consumers (i.e., consumers’ nutritional knowledge and understanding of food labels). In developing countries, this may also entail increasing general literacy.
- Make healthy and sustainable food more affordable for consumers, such as through subsidies and social protection measures.

# Tools and MRV systems to monitor progress

## 2011 Quebec study

Assess the impacts of food advertising regulations by measuring consumer choices before and after the implementation of policy measures

Link: <https://journals.sagepub.com/doi/abs/10.1509/jmkr.48.5.799>

---

## Mitigation benefits

- Regulatory measures aimed at limiting the promotion, and ultimately decreasing the consumption, of unhealthy, highly- and ultra-processed food items can help reduce diet-related greenhouse gas emissions from food production and processing.

## Other environmental benefits

- Limiting the promotion of specific food items that cause outsized levels of pollution (e.g., from industrial processes of manufacturing), leading to their reduced production, can concurrently decrease associated pollution levels and enhance air quality.

## Adaptation benefits

- Just as healthy natural ecosystems are more resilient to climate change, so too are human and societal ecosystems. Regulating the advertising of unhealthy foods improves the diets and health of people. Transitioning to healthy diets considerably reduces the prevalence of diet-related non-communicable diseases, as well as morbidity and mortality, and it increases physical and mental resilience.

## Other sustainable development benefits

- SDG 3 (Good health and well-being): improved health outcomes due to decreased rates of obesity and diet-related non-communicable diseases.
- SDG 12 (Responsible consumption and production): more sustainable consumption and production patterns due to increased awareness and understanding of the sustainability impacts associated with food products; reduced food loss from production of processed foods.
- SDG 15 (Life on land): increased conservation and sustainable use of terrestrial ecosystems and biodiversity due to reduced demand for and production of unsustainable foods.

## Main implementation challenges and potential negative externalities and trade-offs

- Barriers to implementing strong restrictions on advertising of food items include poor monitoring of the advertising industry; weak regulatory enforcement; opposition from food industry lobby groups; poor intersectoral collaboration; and weak scientific criteria underlying the definition of 'unhealthy' or 'unsustainable' food.
- Without careful design, new sustainability labelling policies could contribute to higher food prices for consumers. This is because additional production requirements that minimise negative environmental impacts could be slow, difficult to implement and impose significant costs to companies. There is the potential for these costs to be passed on to consumers.
- New labelling policies could lead to misinformation such as greenwashing, where companies attempt to "deceive" the system by embellishing their sustainability/health labels in order to attract consumer attention.

## Measures to minimize challenges and address potential negative externalities and trade-offs

- All regulatory measures to incentivise a transition to more sustainable and healthier diets – including restrictions on advertising and marketing or

mandatory labelling –must consider the local cultural context and food security requirements.

- To address costs associated with shifts in production processes, policy programmes could provide funds and assistance to producers to facilitate implementation of new labelling/marketing requirements.
- To address greenwashing, labels could be required to provide sustainability and nutritional information which is detailed and comprehensive yet succinct and easily understood.

## Implementation costs

The economic mitigation potential of shifting to sustainable and healthy diets ranges from 1.8–3.4 billion metric tons of carbon dioxide equivalent per year, at prices of USD 20–100 per metric ton of carbon dioxide. The feasibility of creating economically viable transitions to more sustainable and healthy diets that also respect food security requirements depend largely on local contexts.

## Intervention in practice

- The Chile Food Labelling and Advertising Regulation of 2016 restricts the advertising directed at children under the age of 14 for foods high in fat, sugar and salt, including on television programmes, internet, radio and in magazines. The law also banned promotional strategies for these foods such as cartoons or advertising in schools. Consequently, child-directed marketing decreased significantly. In addition, purchases of products high in calories, sugar, saturated fat and sodium declined.

## References

1. Alfraidi, A., Alafif, N., & Alsukait, R. (2023). The Impact of Mandatory Food-Marketing Regulations on Purchase and Exposure: A Narrative Review. *Children*, 10(8). Retrieved February 19, 2024, from <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10453145/>
2. Barrett, B. (2022). Health and sustainability co-benefits of eating behaviors: Towards a science of dietary eco-wellness. *Preventive Medicine Reports*, 28. Retrieved February 19, 2024, from <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9272027/>

3. Cairns, G. (2019). A critical review of evidence on the sociocultural impacts of food marketing and policy implications. *Appetite*, 136, 193–207.
4. Cho, Y.-N. (2015). Different Shades of Green Consciousness: The Interplay of Sustainability Labeling and Environmental Impact on Product Evaluations. *Journal of Business Ethics*, 128(1), 73–82
5. Committee on World Food Security (CFS) (2024). CFS Policy Recommendations on Reducing Inequalities for Food Security and Nutrition (First draft). Available from <https://www.fao.org/cfs/workingspace/workstreams/inequalities-workstream/en/>.
6. Dhar, T., & Baylis, K. (2011). Fast-Food Consumption and the Ban on Advertising Targeting Children: The Quebec Experience. *Journal of Marketing Research*. Retrieved February 19, 2024, from <https://journals.sagepub.com/doi/abs/10.1509/jmkr.48.5.799>
7. Food and Climate Change: Healthy diets for a healthier planet. (n.d.). *United Nations*. Retrieved February 19, 2024, from <https://www.un.org/en/climatechange/science/climate-issues/food>
8. Galli, F., Prosperi, P., Favilli, E., D'Amico, S., Bartolini, F., & Brunori, G. (2020). How can policy processes remove barriers to sustainable food systems in Europe? Contributing to a policy framework for agri-food transitions. *Sustainable Food Systems for Healthy Diets in Europe and Central Asia*, 96, 101871
9. HLPE. 2023. *Reducing inequalities for food security and nutrition*. Rome, CFS HLPE-FSN. Available from <https://www.fao.org/cfs/cfs-hlpe/insights/news-insights/news-detail/reducing-inequalities-for-food-security-and-nutrition/en>.
10. Holdsworth, M., Kimenju, S., Hallen, G., Laar, A., & Oti, S. O. (2023). Review of policy action for healthy environmentally sustainable food systems in sub-Saharan Africa. *Current Opinion in Environmental Sustainability*, 65, 101376
11. Leach, A. M., Emery, K. A., Gephart, J., Davis, K. F., Erisman, J. W., Leip, A., et al. (2016). Environmental impact food labels combining carbon, nitrogen, and water footprints. *Food Policy*, 61, 213–223
12. Manders, A. (2023, March 8). Harmonised and mandatory nutrition labelling in the EU. Retrieved February 19, 2024, from [https://www.europarl.europa.eu/doceo/document/P-9-2023-000783\\_EN.html](https://www.europarl.europa.eu/doceo/document/P-9-2023-000783_EN.html)
13. Modern food emissions. (2023). *Nature Climate Change*, 13(3), 205–205
14. *REGULATION (EU) No 1151/2012 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 21 November 2012 on quality schemes for agricultural products and foodstuffs*. (2012). Retrieved from 2. <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:343:0001:0029:en:PDF>

15. Russell, S. J., Croker, H., & Viner, R. M. (2019). The effect of screen advertising on children's dietary intake: A systematic review and meta-analysis. *Obesity Reviews*, 20(4), 554–568
16. Stein, A. J., & de Lima, M. (2022). Sustainable food labelling: considerations for policymakers. *Review of Agricultural, Food and Environmental Studies*, 103(2), 143–160
17. The EU Ecolabel: The environmental label you can trust. (2023, December 21). Retrieved February 19, 2024, from <https://eu-ecolabel.de/en/>
18. The Food and Land Use Coalition. (2019). *Growing Better: Ten Critical Transitions to Transform Food and Land Use*. Retrieved from 1. <https://www.foodandlandusecoalition.org/wp-content/uploads/2019/09/FOLU-GrowingBetter-GlobalReport.pdf>
19. Van Loo, E. J., Hoefkens, C., & Verbeke, W. (2017). Healthy, sustainable and plant-based eating: Perceived (mis)match and involvement-based consumer segments as targets for future policy. *Food Policy*, 69, 46–57
20. Xu, Y., Jeong, E., Jang, S. (Shawn), & Shao, X. (2021). Would you bring home ugly produce? Motivators and demotivators for ugly food consumption. *Journal of Retailing and Consumer Services*, 59, 102376

