



**Ad Standards** Community Panel  
PO Box 5110, Braddon ACT 2612  
P (02) 6173 1500 | F (02) 6262 9833

**AdStandards.com.au**

Ad Standards Limited  
ACN 084 452 666

## Case Report

<b>1. Case Number :</b>	<b>0025-22</b>
<b>2. Advertiser :</b>	<b>Yum Restaurants International</b>
<b>3. Product :</b>	<b>Food/Bev Venue</b>
<b>4. Type of Advertisement/Media :</b>	<b>Billboard</b>
<b>5. Date of Determination</b>	<b>2-Feb-2022</b>
<b>6. DETERMINATION :</b>	<b>Dismissed</b>

### ISSUES RAISED

AANA Food and Beverages Code\2.2 Healthy Lifestyle/Excess Consumption

### DESCRIPTION OF ADVERTISEMENT

This billboard advertisement features an image of a meal available at KFC and the text "Live life to the fullest...belly. Look on the fired side of life".

### THE COMPLAINT

Comments which the complainant/s made regarding this advertisement included the following:

*This type of advertising is irresponsible and promotes unhealthy eating and consumer behaviors. The equivalent for a liquor producer would be "drink until you're drunk" or "gamble until you're broke" for an entertainment facility. Advertising for those providers is restricted, and food providers should be held responsible for their advertising also.*

### THE ADVERTISER'S RESPONSE

Comments which the advertiser made in response to the complainant/s regarding this advertisement include the following:



*I refer to your letter of 24 January 2022 setting out a complaint made by a complainant. As the marketing manager responsible for the relevant advertisement in this instance, I respond to the complaint as follows below.*

#### *Description of advertisement*

*The advertisement to which the Complainant refers to is an out of home billboard and website a-panel for the KFC brand and the Zinger Crunch Bowl (Advertisement). The Advertisement is targeted at adults and was advertised until 25 January 2022.*

*The Advertisement is a photograph of the Zinger Crunch Bowl set against a dark background. The headline reads "Live life to the Fullest...Belly, look on the Fried Side of Life".*

#### *The complaints and relevant codes*

*The Complainant has expressed concern that the Advertisement encourages excessive consumption and unhealthy eating behaviours.*

*The following concerns are cited in the complaints:*

- AANA Food and Beverages Code\2.2 Healthy Lifestyle/Excess Consumption\  
encourage excess consumption*

#### *Alleged promotion of excessive consumption*

*This Advertisement promotes KFC's ethos about living life to the fullest and making the most of every situation. The reference to having a full belly in the headline is in line with the sentiment of making the most of life, and is in line with other "Fried Side of Life" KFC advertisements which encourage people to live life fully and freely.*

*In no way does the Advertisement promote excessive consumption. There is a single Zinger Crunch Bowl shown on the Advertisement and this product includes a crunchy slaw and corn chips which are healthier menu options.*

*A full belly is a term often associated with happiness rather than overindulgence and the image provided clearly encourages the consumption of just one product per person which is in line with food health standards.*

#### *Australian Association of National Advertisers Code of Ethics (Code of Ethics)*

*With respect to section 2 of the Code of Ethics, I note that the Advertisement:*

- does not discriminate or vilify any person or section of the community on account of race, ethnicity, nationality, gender, age, sexual preference, disability, mental illness or political belief (section 2.1);*



- *does not employ sexual appeal in a way that is exploitative or degrading of any individual or group of people (section 2.2);*
- *does not present or portray violence in any way (section 2.3);*
- *does not depict or treat sex, sexuality and nudity in any way nor without sensitivity to the relevant audience (section 2.4);*
- *does not use language which is inappropriate in the circumstances (section 2.5);*  
*and*
- *the Advertisement is clearly distinguishable as an advert and uses KFC branding to that effect (section 2.7).*

*Therefore, for the reasons outlined above, KFC believes that the Advertisement complies with the Code of Ethics.*

*We trust this addresses the Complainants' concerns.*

## **THE DETERMINATION**

The Ad Standards Community Panel (the Panel) considered whether this advertisement breaches the AANA Food and Beverages Advertising Code (the Food Code).

The Panel noted the complainant's concern that the advertisement promotes unhealthy eating behaviours.

The Panel viewed the advertisement and noted the advertiser's response.

**Food Code Section 2.2 - Advertising for Food or Beverage Products must not undermine the importance of healthy or active lifestyles nor the promotion of healthy balanced diets or encourage what would reasonably be considered to be excess consumption through the representation of product/s or portion sizes disproportionate to the setting/s portrayed or by means otherwise regarded as contrary to the Australian Dietary Guidelines.**

The Panel noted the complainant's comments that the advertisement is the equivalent of an alcohol brand promoting "drink until your drunk" or a gaming brand promoting "gamble until you're broke".

The Panel noted the advertiser's response that a full belly is often associated with happiness and satisfaction rather than overindulgence. The Panel considered that the suggestion that a person be 'full' is not a promotion of excessive consumption but rather of being satisfied.

The Panel noted that the meal depicted in the advertisement includes slaw and corn chips which are healthier menu options, and noted that a single serve is depicted.



The Panel considered that the suggestion a person should be 'full' in life or eat until they are 'full' is not encouraging excess consumption.

#### **Food Code Section 2.2 Conclusion**

The Panel determined that the advertisement did not undermine the importance of healthy or active lifestyles nor the promotion of healthy balanced diets or encourage what would reasonably be considered as excess consumption through the representation of portion sizes disproportionate to the setting portrayed. The Panel determined the advertisement did not breach Section 2.2 of the Food Code.

#### **Conclusion**

Finding that the advertisement did not breach the AANA Food Code the Panel dismissed the complaint.