



Case Report

1	Case Number	0147/16
2	Advertiser	Kellogg (Aust) Pty Ltd
3	Product	Food and Beverages
4	Type of Advertisement / media	TV - Free to air
5	Date of Determination	13/04/2016
6	DETERMINATION	Dismissed

ISSUES RAISED

Food and Beverage Code 2.2 - healthy lifestyle / excess consumption

DESCRIPTION OF THE ADVERTISEMENT

This television advertisement opens with a woman drinking the left over milk from a bowl of cereal. The scene then switches to a series of consumption scenes; a woman eating a cereal bar, a pregnant woman eating a bowl of cereal with a spoon, a woman snacking on a handful of cereal and a young woman sitting on a skateboard eating cereal from a bowl with a spoon.

The VO then goes on to say “Dig in to real food with real ingredients”, as the scenes depict a traditional breakfast scene of two women eating breakfast at a dining table, and a woman snacking on a cereal bar as she plays with a football. The scenes then show women eating a cereal bar as they get ready for work. The intent was to show and recognise the fact that in increasingly full and busy lives, women often consume breakfast and snacks on the go, in addition to or instead of the traditional breakfast scenario.

The TVC then shows two women seated on a sofa eating cereal, as a VO says “Ditch the spoonful and grab a handful”. The next frame is a woman in a changing room after a sporting match eating a cereal bar, looking to camera with a strong, confident stare, the VO says “Ditch the doubt...”. The next frame the VO continues with “...better yet devour the doubt”, whilst a girl eats the last of the cereal from the cereal box.

The next series of frames are ingredients shots with a VO describing each of the scenes; “Devour berries, almonds, coconut, pepitas and multi-grains in the Special K range”. The frames then transition into a pack and food shot of Special K Nourish Cereal bars and a bowl of Special K Nourish cereal, showing a serve size. The VO states, “It looks good because it is good”.

We then transition to a frame of pack shots and then a series of images showing diverse women of different ages, nationalities and sizes. The VO says “Special K cereal and bars, don’t just eat it, own it”. The TVC ends on the Special K logo fading into an end frame with the Special K end line, “Because you’re strong”.

THE COMPLAINT

A sample of comments which the complainant/s made regarding this advertisement included the following:

The ad is actively encouraging inappropriate and excessive consumption. It is irresponsible marketing.

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 regarding the above complaint received by the ASB in relation to a Special K television advertisement.

Details of the programs in which the advertisement appears/details of audience - see the enclosed media buy. We confirm that at all times, the advertisement was broadcast in “W” appropriate broadcasting times, in compliance with the CAD rating. We confirm that the advertisement was not placed in any “C” or “P” timeslots, and that the media buy was targeted to the 25-54 age range.

Prior to addressing the substantive issues, Kellogg would like to confirm its long-standing support for the ASB and its commitment to uphold the relevant Codes together with its own internal guidelines.

AANA Food Code

Section 2.2 of the AANA Food Code provides:

Advertising or Marketing Communications for Food or Beverage Products shall 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 product/s or portion sizes disproportionate to the setting/s portrayed or by means otherwise regarded as contrary to Prevailing Community Standards.

The complaint relates to a relatively brief scene towards the middle of the advertisement. Kellogg disputes that this scene, or the advertisement as a whole, encourages overconsumption of Special K.

Firstly, while the scene depicts a non-conventional manner of eating cereal, the amount of food that she is depicted as eating is not excessive and is consistent with a normal serving of Special K. The angle of the box (which is nearly vertical) suggests that the woman is trying

to obtain the last morsels from the box of Special K, rather than her eating a large or excessive amount of food.

Secondly, Kellogg submits that the scene needs to be assessed in the overall context of the advertisement, which is intended to encourage women to have a healthy relationship with their bodies and food. The dominant cultural narrative around women and food is one of restriction, and the intent of the advertisement is to challenge this message and to emphasise that a strong and healthy body requires the consumption of nutritious food. The tone of the advertisement is one of celebration and enthusiasm, with women depicted as enjoying providing their body with the nourishment it needs to thrive. The tagline at the end of the advertisement is “because you are strong”, and the development and maintenance of physical strength requires a good diet, not restriction. The women in the advertisement are depicted as being strong. Further, a number of the scenes depict women either engaging in physical activity or as having recently been engaged in physical activity. While the women are depicted eating enthusiastically, the portions shown throughout the advertisement are normal portion sizes and are not excessive.

Special K’s heritage is rooted in helping to empower women in making healthy food and lifestyle choices. Women want to enjoy good food, full of ingredients that keep their bodies healthy and strong, so Special K is dedicated to making foods with ingredients and nutrients that support women in this quest for health and wellbeing. Along with this, Special K encourages participation in activities that help women stay active and fit to maintain a well-balanced sustainable level of fitness.

Kellogg highlights that the intended audience for the advertisement is adult women. This is reflected in the themes, language and visuals in the advertisement, as well as the media buy which is targeted to the 25-54 age range. This is not a vulnerable demographic, and Kellogg submits that the advertisement should be assessed by reference to the overall impression, rather than by reference to an isolated scene divorced from its context.

Conclusion

For the reasons stated above the complaint should be dismissed in its entirety.

Kellogg is pleased to have had the opportunity to respond to this complaint and to confirm its support for the ASB and the codes to which Kellogg is subject.

THE DETERMINATION

The Advertising Standards Board (“the Board?”) considered whether this advertisement breaches the AANA Food and Beverages Advertising and Marketing Communications Code (the “Food Code?”).

The Board noted the complainant’s concerns that this advertisement encourages inappropriate and excess consumption.

The Board viewed the advertisement and noted the advertiser’s response.

The Board considered whether the advertisement complied with all relevant provisions of the Food and Beverages Code.

The Board noted in particular Section 2.2 which states: ‘the advertising or marketing communication...shall not undermine the importance of healthy or active lifestyles nor the promotion of healthy balanced diets, or encourage what would reasonably be considered 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 prevailing community standards.’

The Board noted this television advertisement shows images of different women consuming Special K products in a variety of ways:

The Board noted the complainant’s concern over the depiction of a woman tipping cereal from the packet directly in to her mouth.

The Board noted that various women are shown consuming Special K products in a variety of manners and considered that the intention of the advertisement is to highlight the versatility of the products. The Board noted the scene where the woman tips cereal straight from the packet in to her mouth and considered that we do not see how much of the product she consumes and given the woman’s healthy body weight there is no suggestion that she is overeating. The Board noted that this method of eating cereal is not unknown and is a reflection of a situation such as when the household may have run out of milk.

The Board noted that the advertisement does not suggest how much of the product should be consumed or how often and considered that there is no suggestion in the advertisement that any of the women are eating the products in excess of the recommended amounts. The Board noted the complainant’s concern that the advertisement encourages inappropriate consumption and considered that it is not uncommon for food to be consumed on-the-go and the scenarios depicted in the advertisement are reflective of how some people may consume these products. The Board noted that the advertisement does not suggest that the products should only be consumed in the manners depicted in the advertisement.

The Board noted that advertisers are allowed to promote their products being consumed in any manner they wish as long as such depictions are not outside the provisions of the Code. The Board considered in this instance the advertising or promotion of Special K cereal products does not promote inappropriate or excess consumption.

The Board determined that the advertisement did not breach Section 2.2 of the AANA Food Code.

Finding that the advertisement did not breach the Food Code on other grounds, the Board dismissed the complaint.

