



Case Report

1	Case Number	0180/12
2	Advertiser	Green's Foods Ltd
3	Product	Food and Beverages
4	Type of Advertisement / media	TV
5	Date of Determination	23/05/2012
6	DETERMINATION	Dismissed

ISSUES RAISED

Food and Beverage Code (Children) Encourage excess consumption

DESCRIPTION OF THE ADVERTISEMENT

The commercial features a family unit of four – two adults and two children – in a colourful home setting. During the commercial a 100 gram serving of Poppin Microwave Popcorn is prepared to be shared by the family of four people and whilst the mum keeps an eye on the popcorn in the microwave we see the dad and children 'popping' on the sofa in the lounge room. At the end of the advertisement the family members have 'popped' back to their original seats and the mum brings in a bowl of the popcorn for them all to share.

THE COMPLAINT

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

Green's General Foods Poppin Microwave Popcorn

This advertisement is in breach of the AANA Code for Advertising & Marketing Communications to Children and the Responsible Children's Marketing Initiative of the Australian Food and Beverage Industry.

We believe the ad breaches clause 2.15 (a) of the AANA Code for Advertising & Marketing Communications to Children as it encourages the consumption of unhealthy food.

The advertisement was directed to children as it was shown during multiple children's television programs. Lab Rats Davincibles and Zeke's Pad are of particular appeal to children and are given a C rating. The advertisement itself is of appeal to children because it contains ideas of adventure and fun with children bouncing on a lounge with their father similar to the popcorn popping in the microwave.

Nutrition Information

The Poppin Butter Flavour Popcorn contains a large amount of fat and saturated fat. This includes 25.2g total fat and 9.6g saturated fat per 100g. It is also high in sodium at 500mg per 100g.

The Dietary Guidelines for Children and Adolescents in Australia advise to “limit saturated fat and moderate total fat intake” and “choose foods low in salt”. This popcorn is not a healthy dietary choice as it is high in total fat and saturated fat and sodium (salt).

Broadcast

- *During Lab Rats rated C on Channel 7;*
 - o *On March 9th 2012 at 4.18pm*
 - o *On March 8th 2012 at 4.18pm*
 - o *On March 7th 2012 at 4.10pm*
 - o *On March 6th 2012 at 4.25pm*
- *During Jake and The Never Land Pirates rated G on Channel 7 on 4th March 2012 at 6.44am*
- *During DaVincibles rated C on Channel 7;*
 - o *On March 3rd 2012 at 11.22am*
 - o *On February 25th 2012 at 11.20am*
- *During Stitch! rated G on Channel 7;*
 - o *On March 3rd 2012 at 6.17am*
 - o *On 25th February 2012 at 6.23am*
- *During Zeke’s Pad rated C on Channel 7 on 25th February 2012 at 11.55am.*

THE ADVERTISER’S RESPONSE

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

Creative Treatment in the Commercial

The commercial is 30 seconds in length. A 15 second version is also available. The commercial starts in the kitchen in a home with a mother opening a pack of Poppin, placing it in the microwave and switch-ing it on. The audio features the distinctive hum of a microwave. As we hear the sound of the micro-wave the commercial cuts to the rest of the family, a father, his daughter (aged 11) and son (aged 9) sitting on the couch. The family can hear the microwave and look excited.

The commercial cuts to the microwave as the bag begins to expand. As the popcorn in the microwave begins to pop the family begin popping up and down randomly in time with the action in the micro-wave.

We then hear the ‘DING’ of the microwave signalling that the popcorn is ready and everyone drops back into place. The commercial cuts to the mother pouring the popcorn into a bowl. She brings the bowl into the sitting room to share with the family. The commercial ends with a voice over stating “It’s Poppin Time”.

The commercial features the soundtrack “Popcorn” from the 1960s band Hot Butter. There is no dialogue other than the voice over at the end of the commercial stating “It’s Poppin Time”.

Advertising Standards and the Commercial

Green's General Foods Ltd wishes to address each relevant aspect of Section 2 of the Advertiser Code of Ethics, including the AANA Code for Advertising & Marketing Communications to Children and the AANA Food & Beverages Advertising & Marketing Communications Code.

In relation to the AANA Code for Advertising & Marketing Communications to Children:

- a) The commercial is fully compliant with the provisions of the Advertising Standards Board (ASB) and does not contravene prevailing community standards. The commercial was approved by Commercial Advice Pty Ltd (CAD) in September 2010 with a "C" rating [CAD reference no. 861786] for the 15 second and 30 second TVCs. A "C" definition enables a commercial to be broadcast at any time, except during pre-school programs and is considered "general unrestricted" (please refer to Appendix C – Poppin CAD Issuance).*
- b) The commercial is designed to appeal to grocery buyers – principally adult women and men aged 24 – 55 years with a skew towards grocery buyers of families with children. The included media brief outlines the target audience Green's General Foods planned to reach with the commercial (please refer to Appendix D – Poppin Media Brief).*
- c) The commercial does not undermine an active lifestyle nor promote unhealthy eating habits. Consumption in the home is realistic for the product, which requires a microwave for preparation. The popcorn is prepared in an environment synonymous with its consumption and is a reasonable snack choice within this context.*

In relation to AANA Food & Beverages Advertising & Marketing Communications Code:

- a) The commercial does not encourage excess consumption. The commercial clearly shows the preparation of one 100 gram pack of Poppin to be shared between four people and in moderation. While the complainant's letter discusses the nutritional value based on the 100 gram pack, the commercial clearly shows an intention to share the serving among four people. The recommended serving size is 25 grams.*
- b) There are no product claims made in this commercial.*
- c) There is no exploitation of the imagination of children. The commercial is not targeted towards children and does not have a primary appeal to children. The commercial was developed for adult grocery buyers – principally adult women and men aged 24 – 55 years with a skew towards grocery buyers of families with children. The media placement schedule was developed to reach this demographic and did not include purchasing time slots during children's programs. The media schedule included slots during programs such as Downton Abbey, Brothers and Sisters and Jamie Oliver (please refer to Appendix E – Poppin Media Schedule).*
- d) Channel 7 screened the commercial in bonus airtime that was not requested by the company. Attached are two documents, the first refers to the booking schedule showing the requested media placements (please refer to Appendix E – Poppin Media Schedule). The second shows what actually went to air (please refer to Appendix F – Poppin Post Analysis Detail Report). All of the placements raised in the complaint letter 0180/12 from the complainant were not booked by the company but were placed as 'run-of-station' spots and were not requested by Greens General Foods.*

Based on the above, we believe the commercial to be fully compliant with all the provisions of the relevant AANA Codes and fully approved by the industry body as evidenced by the CAD. We further believe the company has acted ethically and responsibly in the development and placement of this commercial.

Please don't hesitate to contact us should you require any further information to assist you with your review.

THE DETERMINATION

The Advertising Standards Board ('The Board') considered whether this advertisement breaches the AANA Code for Advertising and Marketing Communications to Children, the AANA Food and Beverages Advertising and Marketing Communications Code and Section 2 of the AANA Advertiser Code of Ethics (the "Code").

The Board noted the complainant's concern that the advertisement promotes unhealthy food to children and encourages excess consumption.

The Board reviewed the advertisement and noted the advertiser's response.

The Board noted that the program in which the advertisement is shown is not relevant to the determination of whether or not an advertisement is directed primarily to children.

The Board considered the advertisement under the AANA Code for Advertising and Marketing Communications to Children which provides, "Advertising or Marketing Communications to Children means Advertising or Marketing Communications which, having regard to the theme, visuals and language used, are directed primarily to Children and are for Product."

The Board noted that the advertisement features a mother preparing microwave popcorn for her family and whilst the popcorn is cooking her family can be seen 'popping' on the sofa.

The Board considered that whilst the advertisement would be attractive to children, in their view the advertisement is aimed at the whole family with specific appeal to the main grocery buyer.

The Board noted that the advertisement features bright colours and family members 'popping' in time to the popcorn popping in the microwave and considered that whilst this would be attractive to children in the Board's view it is not primarily directed to children.

The Board considered that the overall theme (a family preparing to share popcorn), visuals (a woman preparing the popcorn for her waiting family, bright colours and family members 'popping') and the language used are not directed primarily to children. The Board considered that this advertisement is not directed primarily to children and therefore that the provisions of the Children's Code do not apply.

The Board then considered the AANA Food and Beverages Code (Food Code). The Board considered section 2.2 of the Food Code which provides:

'Advertising or marketing communications for food or beverage products shall not ... 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 Board noted the complainant's concerns regarding the nutritional content of the advertised product and considered that as the Food Code does not preclude the advertising of

food based on its nutritional content the Board would only consider whether excess consumption of the product is being encouraged. The Board noted that one bag of microwave popcorn is shown to be shared between four family members and considered that this depiction was not suggestive of, or encouraging, excessive consumption.

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

Finding that the advertisement did not breach any of the Codes on any grounds, the Board dismissed this complaint.