



Ad Standards Community Panel
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AdStandards.com.au

Ad Standards Limited
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Case Report

1. Case Number :	0233-19
2. Advertiser :	Primo Foods
3. Product :	Food/Bev Groceries
4. Type of Advertisement/Media :	TV - Free to Air
5. Date of Determination	24-Jul-2019
6. DETERMINATION :	Dismissed

ISSUES RAISED

AANA Food and Beverages Code\2.1 Truthful Honest Not Misleading or deceptive
AANA Food and Beverages Code\2.2 Healthy lifestyle/ excess consumption

DESCRIPTION OF ADVERTISEMENT

This television advertisement features a jingle about what meat to eat each day of the week. There are seven versions of the advertisement which start on each day of the week. The advertisement then lists the days of the week and what the family has eaten on each day.

- Monday is sandwiches - a young girl opens her lunch box to reveal a ham sandwich with the bread cut into a happy face
- Tuesday is pizza - a young girl and boy are making home made pizzas with pepperoni, the boy puts the pepperoni over his eyes and his family laughs.
- Wednesday is roast beef - a teenage male on a worksite shows his roast beef sub off to a colleague.
- Thursday is Twiggy Sticks - a young girl holds a Twiggy Stick under her nose like a moustache and her older brother laughs.
- Friday is hotdogs - a young boy, his older brother and his dad have hotdogs while watching a football game.
- Saturday is prosciutto - a young boy brings a cheese and meat platter to his mum and a friend.
- Sunday is bacon and eggs - a father puts bacon on his daughter's plate so the bacon and two eggs look like a smiley face.



THE COMPLAINT

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

*We ban class 1 carcinogen ads (cigarettes) but not bacon and processed meat?
The ad is aimed at children and implies that it's great to eat processed meat each day of the week. Surely we have enough disease and I obesity in children already?
Where are the ads for fresh fruit and vegetables?*

The Australian Dietary Guidelines recommend adults intake of processed meat to be limited, however the Primo ad suggests you should be having processed meat everyday of the week. The main actress (little girl) is having ham on Monday, Bacon on Tuesday, Hot dogs on Wed, Sausage sticks on Thursday and Pepperoni on Fridays. This is misleading people in thinking they can have more processed meat than what is recommended for their health and wellbeing.

THE ADVERTISER'S RESPONSE

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

Introduction

Primo is pleased to have the opportunity to assist the Ad Standards Community Panel, and will appreciate all feedback from the Panel. Primo is a large food company in Australia supplying the Australian community and at all times seeks to comply with applicable requirements and meet community standards and expectations.

A description of the Advertisement

Primo is Australia's largest supplier of smallgoods with more than half of the nation's families enjoying Primo products every week. The Primo Purpose is to 'Enrich everyday family moments' and this advertising campaign is aimed at Australian families. Primo positions itself as an everyday brand – not a special occasion brand. Unlike many other brands, we believe that there's special in everyday. As such, the point of this advertisement is to show that there are small moments worth celebrating in the everyday, every day.

The advertisement follows a family through different days of the week and demonstrates how Primo fits into the everyday situations that occur in their lives, that are the real magic.

It's a positive, family-friendly campaign that demonstrates the caring and love experienced by a happy Aussie family.

Response to the complaint



By the campaign, Primo aims to help Aussie families because Primo believes that, with our busy lives, food ideas and options are always appreciated. The campaign therefore highlights a range of Primo food products that are convenient food options for consideration by parents and family members.

By using the “day a week” approach, the campaign makes it easy to understand the range of options on offer. The charming, and very entertaining, singing by family members makes the ad fun and memorable.

We live our daily lives, working hard and with lots of responsibility, and need to feed our families and ourselves. When we share food together, every day of the week, we create the bedrock for loving and sustainable families. Primo believes that, in a small way, by its products and the advertising campaign, it is making a contribution. The advertisement does not try to take over parental responsibilities or do any lecturing (and certainly no hectoring) about roles and behaviours in families. Remember, this is an everyday family. There are no promotional claims in the advertisement. There are no comparisons with other products. The fact is, there is no talking (but there is singing), just food options that we can easily see and understand, that can help our daily lives. All presented in an attractive and easy to understand way.

Against the above background, Primo respectfully does not agree with the complaints and does not believe there is any non-compliance with any applicable Code or Standard:

- The advertisement is not aimed at children but at everyday Australian adult family members.*
- The advertisement does not imply any messages other than that food choices are available in the Primo product range, for families.*

With respect to the person making the first complaint, it is not realistic to think that ham, roast beef, bacon etc are not food options worthy of consideration. Primo’s products comply with all food health and safety requirements.

There is no implied messaging that “processed meat is recommended for health and wellbeing”, as suggested by the complainant. The campaign is not about pushing any barrow, just making it easy to understand the food options from Primo that families are able to consider for including in their diet.

As to the second complaint and the Australian dietary guidelines, Primo always bears these closely in mind. Yes, intake of foods high in saturated fat including food such as processed meats should be limited. However, no one individual in the ad family consumes a Primo product every day of the week. Older brother has a hotdog and a roast beef and salad roll. Younger brother has pizza and hotdog (and serves the prosciutto). Younger sister has ham sandwich, bacon and eggs, one Twiggy stick snack and pizza. Dad is involved in the hotdogs and pizza occasions. Mum is entertaining with the prosciutto platter. Primo does not believe that the combination of vignettes is inconsistent with the Guidelines.



There is no excess consumption shown of any food product. There are many depictions of real life everyday activities and worthwhile work. The food options presented are just a subset of the range available and the large number of food occasions that we all enjoy each week.

This is a real family with real family members taking on realistic roles. As the Panel works through the attached storyboard, they might notice the following:

- Monday's smiley face, ham sandwich and apple lunchbox, shows love and care in this family;*
- It's great that Dad cooks the bacon and eggs on Sunday, served with orange juice, and its fun too (smiley bacon and eggs, so maybe Dad made the smiley face sandwich?);*
- All of us can relax on Saturday night, and young son helps out with the prosciutto platter (with olives and strawberries);*
- Boys night in on Friday with homemade hotdogs and Dad, older brother and young son bonding over team and hotdogs, nothing wrong with that;*
- Older brother teased by younger sister, and a Twiggly stick to help a hungry tummy after school on Thursday;*
- Roast beef and lettuce bread roll for older brother, during work lunch break on Wednesday (maybe Mum and Dad taught him how to make it for himself);*
- Good to teach the children how to be self-sufficient and make homemade pizza on Tuesday (with pepperoni, cheese and other ingredients, supervised by Dad). Everybody loves pizza; and*
- Primo brand end frame puts the brand forward for consideration with a "make everyday Primo" slogan to echo the ad, with just a little puffery.*

Primo believes that this covers all issues that could properly be seen to arise on the ad campaign and the Codes that are applicable. As to other issues covered by the Codes, there is no suggestion in the advertising campaign of offensive language, gender stereotypes, sexual appeal, violence, discrimination or vilification and the advertisement is clearly an advertisement. There are no health and safety issues except as specifically suggested by the complaints, and dealt with above. As explained above, the complainants' concerns are not justified and the Panel can fairly and reasonably confirm that the campaign complies with all Codes and standards and the complaints may be dismissed.

*Details of the programs in which the advertisement appears;
We have appeared within News/A Current Affairs, Sport, General Entertainment, Drama, Reality and Movies. We have not appeared within any children's programming.*

Detailed spot list which shows the exact shows that we appear within is attached to the email

Whether the audience of the programs is predominantly children



Our TVC was given a 'W' placement code based on the AANA Food and Beverages Advertising Code (Code). The Code includes compliance with the Quick Service Restaurant Initiative (QSRI) and the Responsible Children's Marketing Initiative (RCMI). A 'W' placement code is the equivalent of a G classification, but requires special care in placement in G programs principally directed to children. To avoid all risk, none of our TVC's are able to air within children's programs or programs aimed at children. We have also confirmed this with all of our partners.

Substantiation of any health, nutrition or ingredient claims or statements made in the advertisement

No claims made in the ads, however the ads feature packshots in some instances, and we provided substantiation for the gluten free claim on this pack shots.

Conclusion

Primo again confirms its commitment to meet and reflect community standards and all Codes and standards. We believe our advertising campaign does that, and trust that the Panel is reassured and able to dismiss the complaints.

THE DETERMINATION

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

The Panel noted the complainants' concern that:

- The ad is aimed at children and implies that it's great to eat processed meat each day of the week
- That the Australian Dietary Guidelines recommend intake of processed meat be limited but this ad suggests it should be eaten every day.

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

The Panel noted that this television advertisement features a jingle about what meat to eat each day of the week. There are seven versions of the advertisement which start on each day of the week. The advertisement then lists the days of the week and what the family of five has eaten on each day.

- Monday is sandwiches - a young girl opens her lunch box to reveal a ham sandwich with the bread cut into a happy face.
- Tuesday is pizza - a young girl and boy are making home made pizzas with pepperoni, the boy puts the pepperoni over his eyes and his family laughs.
- Wednesday is roast beef - a teenage male on a worksite shows his roast beef sub off to a colleague.
- Thursday is Twiggy Sticks - a young girl holds a Twiggy Stick under her nose like a moustache and her older brother laughs.



- Friday is hotdogs - a young boy, his older brother and his dad have hotdogs while watching a football game.
- Saturday is prosciutto - a young boy brings a cheese and meat platter to his mum and a friend.
- Sunday is bacon and eggs - a father puts bacon on his daughter's plate so the bacon and two eggs look like a smiley face.

The Panel considered whether the advertisement complied with relevant provisions of the Food Code.

The Panel considered section 2.2 of the Food Code which states: “the advertising or marketing communication 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 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 Panel noted that Australian Dietary Guideline 3 suggests that intake of processed meat should be limited and are in the ‘discretionary foods’ category as: “Processed and cured meats can be high in added salt and saturated fat and are not recommended as substitutes for unprocessed meat.” (<https://www.nhmrc.gov.au/file/10001/download?token=0f-SfTH2>).

The Panel first considered whether the advertisement undermined the promotion of healthy balanced diets.

The Panel noted the complainants’ concerns that the advertisement suggests that the advertisement suggests that processed meat should be eaten every day which is contrary to the Australian Dietary Guidelines.

The Panel noted the advertiser’s response that the advertisement does not show any one individual family member consuming a Primo product every day of the week.

The Panel noted there are five members of the family featured in the advertisement, who are shown consuming meat on different days:

- The Mother is seen at the table for bacon and eggs and eating prosciutto on Saturday and Sunday
- The Father is seen eating hotdogs, serving the bacon and eggs and helping with pizza on Tuesday, Friday and Sunday
- The Older Brother is seen at the table for bacon and eggs, eating hotdogs, and roast beef on Wednesday, Friday and Sunday
- The Younger Brother is seen at the table for bacon and eggs, making pizza, serving prosciutto and eating hotdogs on Tuesday, Thursday, Saturday and Sunday



- The Sister is seen at the table for bacon and eggs, making pizza, eating a Twiggy Stick and having a ham sandwich on Monday, Tuesday, Thursday and Sunday.

A minority of the Panel considered that the advertisement appears to condone eating processed meats every day, and that this is not in line with advice from the Australian Dietary Guidelines. A minority of the Panel considered that the advertisement did undermine the promotion of healthy balanced diets.

The majority of the Panel considered that not every family member is shown eating processed meats every day, and that the consumption of processed meats 2-4 times a week is not contrary to the Australian Dietary Guidelines. The majority of the Panel considered that the meat was often featured as part of a meal with other ingredients, such as a ham and salad roll and pepperoni on a homemade pizza. The majority of the Panel considered that the consumption of processed meats a few times a week as part of a meal with other ingredients would not be seen to undermine the promotion of healthy balanced diets.

The Panel noted that advertiser's should exercise caution when advertising food in the discretionary category, and ensure that there is no suggestion it should be eaten in amounts which are contrary to the Australian Dietary Guidelines.

The Panel considered whether the advertisement encouraged excess consumption.

The Panel noted the AANA Food and Beverages Advertising and Marketing Communications Code – Practice Note which provides that: *"In testing whether an advertising or marketing communication encourages excess consumption through representation of products or portion sizes disproportionate to the setting portrayed, or by any other means contrary to prevailing community standards, the Panel will consider whether members of the community in the target audience would most likely take a message condoning excess consumption."*

A minority of the Panel considered that the advertisement depicts a family eating processed meats every day, and that this is an excessive consumption of a discretionary food.

The majority of the Panel considered that not every family member is shown eating meat every day, and that the portion sizes of the meals shown are not excessive. The majority of the Panel considered that a young boy shown eating a hotdog one day, bacon on another day and pepperoni on homemade pizza another day was not an excessive amount of processed meat for an entire week. The majority of the Panel considered that the young girl eating a single Twiggy stick one day, two pieces of bacon on another day, pepperoni on homemade pizza on another day and a ham sandwich another day was not an excessive amount of processed meat for the entire week. The majority of the Panel considered that the older family members were also



not depicted as eating an excessive amount of processed meat in the course of a week.

The majority of the Panel considered that the amount of processed meat consumed by the family did not portray excessive consumption through the representation of portion sizes disproportionate to the settings portrayed or by means otherwise regarded as contrary to prevailing community standards.

The Panel considered 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 excess consumption.

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

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