



Ad Standards Community Panel
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AdStandards.com.au

Advertising Standards Bureau Limited
ACN 084 452 666

Case Report

1	Case Number	0243/18
2	Advertiser	Kraft Heinz
3	Product	Food and Beverages
4	Type of Advertisement / media	TV - Free to air
5	Date of Determination	23/05/2018
6	DETERMINATION	Dismissed

ISSUES RAISED

Food and Beverage Code 2.1 (b) - Contravenes community standards
Food and Beverage Code (Children) 3.3 peer advantage
Food and Beverage Code (Children) 3.4 undermine parent
2.6 - Health and Safety Bullying (non violent)

DESCRIPTION OF THE ADVERTISEMENT

This television advertisement features a number of children opening their lunchboxes. Each of the children takes it in turns to complain about their parents giving them unusual lunches which follow modern food trends. The first child has rice crackers with vegetarian toppings on lettuce leaves, which the child describes as “flexitarian”. The second child “Krish” has a small pile of grains, nuts and berries; he sighs and says “another deconstructed muesli bar”. The third child holds up a vegetable which has been cut into a spiral shape, and says “Mum bought a spiralizer”. The children all laugh. One child pulls out a slice of Kraft Singles and says “At least there’s Kraft Singles, hey?”. The advertisement ends with a shot of another child doing a pull up on monkey bars with one hand, and holding a steak in the other hand. The first child calls this “paleo”.

THE COMPLAINT

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





included the following:

I (and many other parents) object to this advertising campaign on the basis that we believe it sends inappropriate messages to kids about having healthy food in their lunchboxes and it undermines parents for providing healthy lunch options for their children.

After spending 2 years travelling Australia talking to parents on matters which are impacting their ability to feed their kids healthy foods, I am extremely disturbed and angry at Kraft for using images of children with healthy lunchboxes being unhappy with their lunchboxes. Children with lunchboxes packed full of delicious real food are already made to feel 'not normal' at school because majority of Australian Children are eating at least 2 packaged foods in their lunchbox a day. These children are already dealing with kids saying their lunchboxes are yuk. Even though these kids understand their Lunchbox is good for them, it still hurts them.

This issue of children feeling not normal because their parents lovingly pack real food that nourishes their bodies and brains is actually a very big issue for parents around Australia too.

Australia has an issue with children's health at the moment. We should be encouraging children to eat real food and congratulating parents on their efforts, not ridiculing their efforts. And yes, whilst the ads use extreme examples of healthy lunchboxes (we've visited 93 schools and spoke to over 20,000 children parents & teachers and not once saw anything like a deconstructed muesli bar), it is totally inappropriate.

Kraft Singles maybe simple but as a large corporation, I would expect Kraft to have a little more social responsibility towards the issue of children's health and not be poking fun at families who choose to pack their children real food.

On behalf of all the parents around this country who lovingly pack their children real food everyday, and the parents who are struggling to get their kids to eat more healthy food, we consider this campaign to be offensive.

I look forward to hearing from you. Thank you.

(if you wish to hear from parents concerned about this advertisement, you can refer to this post on Facebook and read the comments from parents - <https://www.facebook.com/theRootCauseAU/posts/1026984394134898>)

As a parent of a school aged child with food intolerances I am upset that this ad promotes acceptance of teasing other children about their lunch. Inciting bullying is



not appropriate for our screens. My child has a difficult time having a different lunchbox (full of whole foods not packaged processed foods). This ad makes it appear acceptable that children like mine should be made fun of. It also encourages that kraft singles are a healthy addition to the lunchbox when a review of the ingredients would tell you otherwise (full of preservatives etc, a better choice would be unprocessed cheese).

I would like to see the ad removed from our screens.

With obesity so high and parents trying to pack healthy food. This add slams the healthy food and could sway people to change to unhealthy options. We need to do all we can to promote individual choose and stereo typing lunch foods.

THE ADVERTISER'S RESPONSE

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

RE: KRAFT SINGLES TELEVISION ADVERTISEMENT (COMPLAINT 0243/18)

We respond to the letter from the Advertising Standards Bureau (Ad Standards) dated 8 May 2018, in which three complaints were made about the Kraft Singles "Keep it Simple, Keep it Singles" television advertisement (the Advertisement). We note that the Advertisement was also the subject of complaint 0239/18, to which we have already provided a response.

H.J. Heinz Company Australia Limited (Kraft Heinz) is the author of the Advertisement and the exclusive licensee of the Kraft brand in Australia.

For the reasons outlined in this letter, Kraft Heinz denies that the Advertisement contravenes any prevailing community standards, promotes bullying, implies any peer advantage or undermines the role of parents.

Details of the Advertisement

The Advertisement is set in a primary school playground, where a number of children are seen sitting on benches, opening their lunchboxes to see what they have to eat for lunch. Each of the children takes it in turns to complain about their parents giving them unusual lunches which follow modern food trends. The first child has rice crackers with vegetarian toppings on lettuce leaves, which the child describes as "flexitarian". The second child "Krish" has a small pile of grains, nuts and berries; he sighs and says "another deconstructed muesli bar". The third child holds up a vegetable which has been cut into a spiral shape, and says "Mum bought a spiralizer". The children all laugh. One child pulls out a slice of Kraft Singles and says "At least there's Kraft Singles, hey?". The Advertisement ends with a shot of another child doing a pull up on monkey bars with one hand, and holding a steak in the other hand. The



first child calls this “paleo”.

In addition to this description, we attach to our response:

- a. a copy of the script for the Advertisement; and*
- b. a digital copy of the Advertisement.*

The CAD reference number is W5JYLFDA. The CAD rating is W.

We note for the sake of completeness that the Advertisement was broadcast on television in a full 30-second version, as well as three shortened 15-second versions. We have provided details only of the complete 30-second version, which contains all of the advertised material in full, including the material the subject of this complaint.

AANA Code for Advertising & Marketing Communications for Children

The target audience of the Advertisement is grocery buyers with children, and was not broadcast during programmes directed at children. Although it is set in a primary school playground, we consider that the Advertisement is not “directed primarily to children”. Nevertheless, we will address the concerns raised in the three complaints on the assumption that the AANA Code of Advertising and Marketing to Children applies.

Response to complaints

The basis of the complaints are that the Advertisement:

- a. “promotes acceptance of teasing other children about their lunch”;*
- b. “sends inappropriate messages to kids about having healthy food in their lunchboxes”;*
- c. “slams healthy food and could sway people to change to unhealthy options”;*
- d. “encourages that kraft singles are a healthy addition to the lunchbox”;* and
- e. “undermines parents for providing healthy lunch options for their children”.*

Kraft Heinz firmly denies these allegations. As explained in our response to complaint 0239/18, the Advertisement simply makes light-hearted fun of certain modern food trends such as “flexitarian” diets, “spiralizers”, “deconstructed” meals, and “paleo” diets. It does not make fun of healthy eating or promote Kraft Singles as being healthy, and it certainly does not portray or encourage any teasing or bullying.

e take our responsibility to advertising extremely seriously and the last thing we would want to do is provoke or upset parents regarding such important topics.

Response to healthy eating complaints

The Advertisement does not make fun of healthy food or food intolerances. As previously mentioned, the intention is simply to make fun of certain modern food trends, which are neither medical requirements nor necessarily healthy. For example, cutting a piece of vegetable into a spiral shape is completely unnecessary from a medical or health perspective. In the same way, giving a child a “deconstructed muesli



bar” for lunch is unnecessarily complicated compared to a regular muesli bar.

In this regard, we would draw attention to and emphasize the words of the third complainant (“Smith”), namely that:

... the ads use extreme examples of healthy lunchboxes (we’ve visited 93 schools and spoke to over 20,000 children parents & teachers and not once saw anything like a deconstructed muesli bar) ...

The fact that this complainant has never seen a deconstructed muesli bar in a child’s lunchbox (nor, presumably, has anyone else) highlights the comedic factor of the Advertisement. Extreme examples such as these are not representative of healthy food generally.

The intention of the Advertisement is simply to promote Kraft Singles as a simple and easy component of children’s lunches. The message is that children’s lunches do not need to be overly complicated and follow modern food trends, and that there are simpler, easier ways to make a lunch that children will enjoy. We recognize that not all parents have the time to create elaborate meals for their children’s lunches, and so the Advertisement highlights the simplicity of cheese slices as part of a child’s lunch.

The Advertisement does not comment on the issue of parents packing healthy lunches. We fully support parents providing their children with healthy lunches, and do not wish to undermine the role of parents or carers in guiding diet and lifestyle choices. In this regard, we note that the product is shown towards the end of the Advertisement in a sandwich, accompanied by an apple and some grapes. Similar imagery also appears on the packaging of the product. This is one of the usual ways in which Kraft Singles would ordinarily be served, as simply one component of a balanced diet.

Response to bullying complaints

The Advertisement does not at any point portray a child or their lunch being singled out, or any child bullying or teasing another. Kraft Heinz certainly does not encourage such behaviour, and we reject any notion that the Advertisement “promotes” it. The Advertisement is presented in an inclusive manner, where all of the children agree that they would have preferred something simpler for lunch.

As explained above, although the Advertisement makes fun of extreme modern food trends, it does not make fun of or promote bullying with respect to healthy eating generally.

Other matters

For the reasons outlined in our response to complaint 0239/18, we do not consider that the Advertisement portrays any racial discrimination or vilification.



We note that as part of developing the Advertisement, consumer research was conducted in order to ascertain consumers' possible reactions, and no objections were raised in the nature of the complaints made here.

We are not aware of any other matters which warrant comment from us in relation to the AANA Code of Ethics and related codes.

THE DETERMINATION

The Ad Standards Community Panel (the "Panel") considered whether this advertisement breaches the AANA Code for Advertising and Marketing Communications to Children (the "Children's Code"), the AANA Food and Beverages Advertising and Marketing Communications Code (the "Food Code"), and the AANA Code of Ethics (the "Code").

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

The Panel noted the advertisement featured a group of children comparing lunches on the school playground. One boy comments that his mother is 'flexitarian', another comments that his lunchbox contains 'another deconstructed muesli bar' and a third comments that her mum had bought a spiralizer and holds up a vegetable in a corkscrew shape. One girl comments 'at least there's Kraft Singles, hey?' and she unwraps the cheese slice. At the end of the advertisement a boy is depicted doing a one-handed pull-up on the monkey bars while holding a piece of steak and another child comments 'Paleo'.

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

The Panel considered 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 Panel noted the complainants' concern that the advertisement makes fun of healthy lunches in favour of unhealthy cheese slices and that this is a depiction that undermines healthy diets.

The Panel noted the advertiser's response that makes light-hearted fun of certain modern food trends and does not make fun of healthy eating in general and does not promote their product as being healthy – just convenient and more likely to be eaten by children.



The Panel considered that the lunches featured in the advertisement included modern food trends such as flexitarian, deconstructed meals, spiralizers and paleo, and that these examples were humorous exaggerations of what some parents pack in their children's lunches.

The Panel noted that these lunches did appear to be examples of healthy lunches, however considered that the overall impression of the advertisement was that the lunches were humorous representations of modern food trends which children found fussy and funny, and were not examples of children rejecting healthy food.

The Panel noted that the end frame of the advertisement depicted the product in a sandwich, accompanied by an apple and grapes and considered that most members of the community would consider this to be a simple, healthy lunch.

The Panel considered that the depiction of children preferring cheese slices over food prepared in accordance with exaggerated and complicated food trends was a depiction which most members of the community would not consider undermines the promotion of healthy balanced diets.

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

The Panel then considered whether the advertisement complied with the requirements of the Children's Code.

To fall within this Code, or Part 3 of the Food Code, "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 Panel considered that the advertisement featured children talking about their lunches and that this was a theme which would be familiar and attractive to children. However, the Panel considered that the modern food trends identified in the advertisement were not something most children would be aware of and considered that this theme would appeal more to an adult audience. The Panel considered that the voice over at the end of the advertisement was directed to parents and the call to action was for parents to buy Kraft Singles to pack in their children's lunches. The Panel considered that cheese slices are a product that would be of equal appeal to adults and children.

The Panel considered that the theme, visuals and language used would appeal to a broad audience and were not directed primarily to children, and that the advertisement was not for a product of principal appeal to children.



The Panel determined that as the advertisement is not directed primarily to Children, the Children's Code and Part 3 of the Food Code do not apply.

The Panel then considered whether the advertisement complied with the requirements of the Code.

The Panel considered whether the advertisement complied with Section 2.1 of the Code which requires that 'advertisements shall not portray or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, gender, age, sexual preference, religion, disability, mental illness or political belief.'

The Panel noted the complainants' concern that the advertisement is racist and depicts children making fun of an Indian boy for his 'funny lunch'.

The Panel considered that the advertisement did not depict the Indian boy being picked on or made fun of by his peers, and considered that the relationship between the children was shown as friendly and sympathetic.

The Panel noted that there was a 15 second cut down version of this advertisement which only showed the Indian boy's lunch and the other children laughing, however considered that the overall impression in this advertisement was that the children were laughing at the concept of a deconstructed muesli bar prepared by his parent, and not at the boy.

The Panel considered that the concept of laughing at a 'deconstructed muesli bar' was not linked to any ethnicity but was directed at the parent and the children's reaction to this lunch could not be seen as vilifying of a particular race or ethnicity.

The Panel considered the advertisement did not portray material in a way which discriminates against or vilifies a person on the basis of race and did not breach Section 2.1 of the Code.

The Panel considered Section 2.6 of the Code. Section 2.6 of the Code states: "Advertising or Marketing Communications shall not depict material contrary to Prevailing Community Standards on health and safety".

The Panel noted the complainants' concern that the advertisement portrayed children being picked on because of the food in their lunchboxes.

The Panel noted that the Practice Note for Section 2.6 of the Code provides: "the age of the people depicted in an advertisement, their relationship to each other and the nature of the communication are relevant in determining whether an advertisement



constitutes bullying and is contrary to Prevailing Community Standards.”

The Panel considered the children in the advertisement are shown comparing lunchboxes and showing amusement and frustration at the unusual food choices their parents have packed.

The Panel considered that the laughter in the advertisement is directed towards the parents, and was not directed at the children.

The Panel considered that no child was shown to be upset or distressed by the reaction of their peers and there was no suggestion in the advertisement that any child in particular was being singled out.

The Panel noted that there were a number of 15 second versions of this advertisement which featured either the boy with the deconstructed muesli bar or the boy who has a flexitarian lunch. The Panel considered that the impression in these cut-down versions is still that the children’s laughter is directed at the parents’ food choices and not at the children themselves.

The Panel considered that the advertisement did not depict material contrary to Prevailing Community Standards on health and safety regarding bullying and in the Panel’s view did not breach Section 2.6 of the Code.

Finding that the advertisement did not breach the Code on any other grounds and did not breach the AANA Food Code or the AANA Children’s Code, the Panel dismissed the complaints.

