



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

1. Case Number :	0280-20
2. Advertiser :	George Western Foods
3. Product :	Food/Bev Groceries
4. Type of Advertisement/Media :	TV - Free to Air
5. Date of Determination	23-Sep-2020
6. DETERMINATION :	Dismissed

ISSUES RAISED

AANA Code of Ethics\2.6 Health and Safety

DESCRIPTION OF ADVERTISEMENT

This television advertisement features a family in a kitchen making lunch using the advertised product. When the voiceover references the calorie count of the product the scene shows a teenage girl biting into her lunch.

THE COMPLAINT

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

I think that the commercial pointedly focuses on a thin teenage girl highlighting her eating a low calorie product. The voiceover promotes the product as a healthy alternative to bread. I am disappointed that a food product needs to have its calorie count stated. Any bread product is a healthy choice

I am dismayed that any advertising would highlight calories while focusing on a young slim teenage girl.

I believe that the incidence and risk for eating disorders especially in young women is well known and that this advertisement breaches ethical guidelines in relation to eating disorders

THE ADVERTISER'S RESPONSE

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



We confirm receipt of the Notification of Complaint from Ad Standards dated 9 September 2020 (Complaint). We also confirm that George Weston Foods Limited is the supplier of Tip Top products in Australia and authorised the creation and broadcast of the Tip Top Sandwich Thins (the Product) advertisement that is the subject of the Complaint (the Ad). We have set out our response to the Complaint below.

Complaint and compliance with Codes

1. We understand the concern raised by the complainant in the Complaint to be that the depiction in the Ad of a young woman consuming the Product in connection with a voiceover statement of the per serve caloric value of the Product may influence or inspire unhealthy body image or eating habits in young women, in breach of the AANA Code of Ethics (Code of Ethics) and/or the AANA Code for Advertising & Marketing Communications to Children (Marketing to Children Code) and the AANA Food & Beverage Advertising & Marketing Code (Food & Beverage Code).

2. On that basis, the relevant provisions of those Codes are as follows:

(a) Section 2.6 of the Code of Ethics, which provides that advertising and marketing material shall not depict material that is contrary to Prevailing Community Standards on health and safety. The AANA provides guidance on Prevailing Community Standards Code in the form of Practice Notes. The AANA's Ethics Practice Note recommends particular care to be exercised when portraying young people in advertisements and marketing material, but does not otherwise currently provide for any specific guidance on Prevailing Community Standards relevant to healthy eating or body image.

(b) Section 2.14 of the Marketing to Children Code, which provides that advertising and marketing material directed at children must not encourage or promote an inactive lifestyle or unhealthy eating or drinking habits. The AANA's Practice Note to the Marketing to Children Code provides that marketing communications which features family settings and parents or adults more prominently than the children are unlikely to be 'directed primarily to children', or advertisements of a kind to which the Marketing to Children Code is intended to apply.

(c) Section 2.2 of Food & Beverage Code, which provides that marketing material must not undermine the importance of a healthy or active lifestyle nor the promotion of healthy balanced diets, or encourage what would reasonably be considered as excess consumption in a manner contrary to Prevailing Community Standards. The AANA's Practice Note to the Food & Beverage Code provides that, in testing whether an advertising or marketing communication undermines the importance of a healthy lifestyle, the Community Panel will consider whether the communication is disparaging of healthy foods or food choices or disparaging of physical exercise.

3. Without undermining or dismissing the seriousness of any concern about not promoting unhealthy body image or eating habits in young women, which is a concern that George Weston Foods shares, we do not believe that the Ad has breached any relevant provision of an AANA Code. The complainant has not alleged that the



depiction of the young woman in the Ad is exploitative or degrading, depicts her as engaging in unsafe activity, promotes excess consumption. The complainant confirmed that their view is that bread products may be consumed as part of a healthy and balanced diet, and that is a position supported by George Weston Foods and promoted by the Ad. The Ad is not primarily directed to children, rather (in keeping with the AANA Practice Note referenced above), the Ad depicts a family enjoying a meal together and is primarily directed at adults.

4. *However, George Weston Foods fully understands and appreciates the importance of responsible marketing to children, and of promoting healthy and balanced eating and lifestyle habits for all members of our community. As such, particular care is always given in creating any Tip Top advertisement or marketing material, especially when the material includes images or video of young adults and children, to ensure that we are conveying a clear and appropriate message. George Weston Foods welcomes all feedback from our consumers and we want to assure the complainant that we take these matters seriously.*

5. *To that end, we confirm that the Ad was not in any way created with the intention of promoting unhealthy body image or eating habits in the mind of any consumer. The Product, a thinner, softer bread, is one of the first of its kind in the Australian market, launched in May 2017. The Ad was created to educate consumers about the features of the product as a new choice for the whole family offering a softer, lighter way to enjoy bread as part of a balanced diet. The Ad shows the whole family coming together at the table to enjoy the Product for lunch. Our research shows that consumers often seek lighter alternatives at lunch and the 99 calorie claim seeks to communicate the Product's lightness. The sandwich is filled with delicious, nutritious ingredients to demonstrate that the Tip Top Thins should be enjoyed as part of a balanced diet.*

6. *When creating an advertisement, casting typically involves agency recommendations of appropriate actors. In this case, the recommendation was to represent a Mum, Dad, and two children as a representation of a traditional family unit, sharing a meal. The brand team chose the actors based on their acting and ability to demonstrate product benefits, not their appearance. The young woman was chosen as the actor for the close-up of eating the sandwich, as she displayed the most natural enjoyment. The reference to '99 calories' was intended to communicate the lightness and flexibility of the product itself. However, we acknowledge that the particular timing of that voiceover statement may not have been an ideal way of clearly and effectively communicating our message in this instance, and we will keep the concerns raised by the complainant in mind in developing future advertisements for the Product.*

Tip Top commitments

7. *Tip Top is a household name and has long held a place in the hearts and pantries of Australian Families. While we are focused on continuing to develop a wide range of nutritious products to be enjoyed by all Australians as part of a healthy, balanced diet, George Weston Foods is also committed to educating and supporting*



young people and our community in leading healthy lifestyles. Tip Top has invested significantly in educating Australian consumers about the positive health and nutritional value of bread in Australia. For example, educational campaigns such as “A Grain of Truth” (see: <http://agrainoftruth.com.au/>). George Weston Foods, in connection with the Tip Top brands, is a proud supporter of a number of community outreach and education projects, including Foodbank charities (providing bread that is used in school breakfasts programs) and the Bread and Butter Project, a social enterprise bakery supporting refugees.

8. Our dedication to ensuring that the appropriate message is always conveyed to our viewers (especially children) is evidenced by our adoption of the Australian Food and Grocery Council’s (AFGC) Responsible Children Marketing Initiative (RCMI), which as you know was developed in collaboration with AANA. In compliance with the objectives with the RCMI, we developed our own company action plan (Company Plan), which governs the way in which we create, implement, and promote our products. In particular, the following principles outlined in our Company Plan are relevant to the Complaint:

- (a) we do not target children younger than six;*
- (b) we take account of the relative sophistication of the audiences, especially audiences between the ages of six and 11; and*
- (c) we showcase good eating habits and an active lifestyle.*

Next steps and further information requested

9. We confirm that the Ad will finish airing in Australia by approximately 31 October 2020. We thank the complainant for bringing their concerns to our attention. We always welcome feedback from our consumers in relation to our products and marketing materials, and want to ensure that our commitment to promoting good nutrition and great products in a responsible and considerate manner is clearly communicated in everything that we do. We will take this feedback on board in planning future advertising of the Product.

We trust that the above addresses the Compliant and Ad Standards’s request for further information. If you have any questions, please feel free to contact us.

THE DETERMINATION

The Ad Standards Community Panel (Panel) considered whether this advertisement breaches Section 2 of the AANA Code of Ethics (the Code).

The Panel noted the complainant’s concern that the advertisement focusses on a thin teenage girl showing her eating a low calorie product which breaches ethical guidelines in relation to eating disorders.

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

The Panel considered whether the advertisement complied with 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 advertiser’s response that the reference to 99 calories was intended to communicate the lightness of the product itself and was not in relation to the teenage girl shown.

The Panel considered that the teenage girl was depicted as thin but that her body shape did not appear to be unhealthy or unattainable through healthy practices.

The Panel considered that the advertisement was in a family setting with the entire family enjoying the product and the advertisement did not single the girl out. The Panel considered that the body of the girl was not the focus of the advertisement and that the advertisement did not focus on her body shape.

The Panel considered that the overall impression of the advertisement is that the product can be consumed as part of a healthy, balanced diet. The Panel considered that the advertisement did not condone or portray unhealthy eating habits or a body image which would be against prevailing community standards.

On this basis, the Panel considered that the advertisement did not contain material which would be contrary to Prevailing Community Standards on health and safety and determined that it did not breach Section 2.6 of the Code.

Finding that the advertisement did not breach any other section of the Code the Panel dismissed the complaint.