Author's response to reviews

Title: An analysis of the potential barriers and enablers to regulating the television marketing of unhealthy foods to children at the state government level in Australia

Authors:

Alexandra Chung (alexandra.chung@monash.edu)
Jane Shill (jshill@diabetesvic.org.au)
Boyd Swinburn (boyd.swinburn@deakin.edu.au)
Helen Mavoa (helen.mavoa@deakin.edu.au)
Mark Lawrence (mark.lawrence@deakin.edu.au)
Bebe Loff (bebe.loff@med.monash.edu.au)
Bradley Crammond (bradley.crammond@monash.edu)
Gary Sacks (gary.sacks@deakin.edu.au)
Steven Allender (steven.allender@deakin.edu.au)
Anna Peeters (anna.peeters@monash.edu)

Version: 2 Date: 10 October 2012

Author's response to reviews: see over
Dear Editor,

Thank-you for the opportunity to submit a revised version of our article: MS:1852150517682534 – An analysis of the potential barriers and enablers to regulating the television marketing of unhealthy foods to children at the state government level in Australia. Thank-you also to the reviewers whose thoughtful comments have improved the article. We have made the required formatting changes and have responded to the reviewer’s comments.

We look forward to your response.

Kind regards

Anna Peeters
Reviewer 1, Comment 1

This manuscript would provide a much greater contribution to the field if the authors applied their findings to regulation of unhealthy food advertising to children in other countries. For example, the authors could discuss the demise of the proposed Interagency Working Guidelines on Foods Marketed to Children in the U.S in the discussion. The power of the food industry, the need for evidence of a causal link between advertising and eating behaviors and effectiveness of regulation, and the need for community support and framing as an environmental issue all came up during the discussion of this proposal. Public health researchers in the U.S. have also proposed that state and local governments can provide a testing ground for new policies that, if successful, could increase political will to take on the issue at a national level. A sentence about applicability outside Australia should also be included in the conclusion of the abstract.

This is a well made point and the discussion of the proposed Interagency Working Group for Foods Marketed to Children has been included in the Discussion section (p.10). “Calls for a national approach to the issue are not limited to Australia. In the United States there is pressure for a national commitment and government action to address food marketing to children through implementation of the Interagency Working Group for Foods Marketed to Children Guidelines.”

A sentence about applicability outside Australia has been added to the abstract (p.3). “The relevance of our findings is likely to extend beyond Australia as unhealthy food marketing to children is a global issue.” And the discussion (p.10) “These findings are likely to have relevance to other countries which have a federal government system and a market driven economy similar to Australia as unhealthy food marketing to children is a global issue.”

Reviewer 1, Comment 2

The title should reference Australia to be clear that the research did not involve other countries with states (e.g., United States).

We agree and the title of the paper now includes a reference to Australia. The title now reads “An analysis of the potential barriers and enablers to regulating the television marketing of unhealthy foods to children at the state government level in Australia”.

Reviewer 1, Comment 3

Similarly, I assume that the first sentence of the abstract and the third sentence of the introduction refer to government action in Australia, since government actions have been implemented elsewhere. These sentences also should be worded to clarify that they refer to Australia.

We agree and the word Australia has been added to the aforementioned sentences in the abstract (p.2) and background (p.4). “In Australia there have been many calls for government action to halt the effects of unhealthy food marketing on children’s health, yet implementation has not occurred.” (p.2) “Currently in Australia there is limited government regulation of the marketing of unhealthy food to children.” (p.4)
Reviewer 1, Comment 4

In the United States, there are several structural barriers to state-level regulations regarding television food advertising, such as laws against limiting interstate commerce and media delivery at the national level (most of children’s exposure to food ads on TV occurs during national, not local, programming). In the introduction, the authors need to explain the provisions for regulation of television advertising by individual state and territory governments in Australia for those who are not familiar with Australia’s regulatory and media structure. Is most television programming in Australia delivered at the state/territory level, do state and territory governments have regulatory authority over television that originates elsewhere, or is there some other mechanism to make this option feasible?

This is a well made point and details have been provided to explain the provisions for regulation of television advertising in Australia (p.4). “Provisions exist for regulation of television food marketing to be introduced by the Commonwealth through their legislative power to make laws regarding postal, telegraphic, telephonic, and other like services, and by individual state and territory governments in Australia through their general power to pass legislation on locally relevant topics.”

Reviewer 1, Comment 5

I assume that this journal has asked for the methods to appear at the end of the document. To provide some context for the numbers that follow, it would be helpful to include an introductory sentence at the beginning of the results that describes the participants and how many there were.

As acknowledged by the reviewer and requested by the journal the Methods section has been moved to follow the Background section. We believe this change deems it unnecessary to amend the Results section of the paper (as suggested by the reviewer) as relevant contextual information is provided in the Methods section which now precedes the Results section.

Reviewer 1, Comment 5

It is not clear which contributing categories go with each theme in Table 1. The theme should line up with the first relevant category or the table should include horizontal lines to separate the themes.

We agree and have re-aligned the table so that each theme aligns with the first relevant category (p.20).

Reviewer 2, Comment 1

The title suggests that the paper covers more ground than it does. I would recommend that the title refer to the stakeholder perceptions studied by the authors.

Thank-you for the suggestion. In combination with Reviewer 1 Comment 2 we have amended the title of the paper to now include a reference to Australia. The title now reads “An analysis of the potential barriers and enablers to regulating the television marketing of unhealthy foods to children at the state government level in Australia”.
Reviewer 2, Comment 2
(Methods) I am curious about why the authors chose to focus only on participants deemed to be content experts on unhealthy food marketing. Because this study assesses attitudes rather than technical knowledge, it seems it would be worth capturing the ideas of people who may not be content experts but who nonetheless might have an impact on the policymaking process.

The rationale for this inclusion criterion is that those involved in policy processes for issues far removed from unhealthy food marketing (such as Department of Transport) are unlikely to have contributed information relevant to our research questions.

Reviewer 2, Comment 3
(Power of Industry) It isn’t immediately clear why industries’ sizable marketing budgets comprise a barrier to the regulation of food marketing on TV. I imagine the link is that the food industry has a huge financial stake in continuing to advertise on TV and will therefore exert political pressure on government not to interfere. In any case, this should be spelled out. Can “the idea of collaborating with industry” be elaborated upon? Did participants suggest what that collaboration would look like?

With regards to the Reviewer’s first comment, the barrier around industries’ sizable marketing budgets aligns with the point about their clever marketing strategies and refers to industry’s capacity to find alternate means to advertise their products in the case of regulations on unhealthy food advertising. Detail has been added to make this clear in the article (p.8). “Explanations included industries’ sizable marketing budgets and clever marketing strategies (indicative of their ability to get around any proposed regulation), as well as pressure against the government with regard to regulation.”

As for the second comment, unfortunately this point was not clarified or expanded upon by participants. A revision has been made to explain this (p. 8). “The idea of collaborating with industry rather than working against them was postulated but ways in which this could be done were not described.”

Reviewer 2, Comment 4
(Evidence of Community Support) I’m not a social scientist, so I imagine “rich point” is a term of art. But to the extent this is aimed at a wider audience, it might be worth explaining what a “rich point” is.

Thank you for this comment. An explanation of how dominant themes and the rich point were determined is provided in the Data analysis section of the Methods section (p.6). “Three dominant themes and one rich point were identified. Dominant themes included those to which more than a third of the sample contributed. The rich point comprised comments made by a small number of participants that added to the overall understanding of the feasibility of regulating unhealthy food marketing to children.”

Reviewer 2, Comment 5
I’m not clear whether the discussion section is meant to provide an objective analysis of the potential significance of the findings about stakeholder attitudes, whether it is meant to cover a broader swath of reflections about the prospects for future regulation, and/or whether it is meant to identify advocacy strategies for pursuing food marketing regulations.

Our discussion aims to provide an objective analysis of the potential significance of the findings and reflects on the prospects for future regulation. We have added a sentence to indicate this (p.10). “The discussion below reflects on each of the key themes that emerged from our research and considers their implications for the regulation of unhealthy food marketing in Australia.”

Reviewer 2, Comment 6

(A national approach) This section starts by describing the participants’ preference for a national approach and noting that this preference makes a national approach more politically feasible. Then, out of the blue, there are two sentences about how evidence suggests national regulation is likely to be efficient and that one group has floated a national legislative proposal. These observations seem out of place because they are commenting on the general prospects for national regulation, not on what the study participants think. Then the last paragraph comes back (I think) to the study findings, noting that the barriers to state and territorial regulation as identified by the study participants are not insurmountable.

Thank you for this comment. We have rearranged this section of the Discussion to first summarise the research findings that relate to this theme and then provide context and speculation about the implications of these findings (p.10). “Here we found that policy makers favour a national approach to the regulation of unhealthy food marketing, with very few enablers or solutions to implementation of such regulation by states and territories identified by the study participants. In the context that both the state and territory governments and the Commonwealth government in Australia have the potential to act to regulate unhealthy food marketing to children this may imply a lack of political will due to the way policy-makers have framed the issue and suggests that a national approach to the regulation of unhealthy food marketing is more politically feasible.

The literature suggests Commonwealth-led regulation is likely to be the most efficient and in Australia, the Obesity Policy Coalition recently outlined a legislative proposal that argues for comprehensive, national regulation of unhealthy food advertising to children. Calls for a national approach to the issue are not limited to Australia. In the United States there is pressure for a national commitment and government action to address food marketing to children through implementation of the Interagency Working Group for Foods Marketed to Children Guidelines. Beyond the preference for a national approach, the barriers to regulating television marketing of unhealthy food by states and territories, as identified by those involved in state and territory policy-making processes, do not appear to be intractable. Therefore, despite the evidence in favour of a national approach, should action not result at the Commonwealth level, willing states and territories could act independently. This could occur in collaboration or possibly through the actions of one particular state or territory, implementing regulation as a test case.”
Reviewer 2, Comment 7
(Food industry power) The first paragraph says that “approaches” to mitigating the barrier of industry power and influence would need to include comprehensive regulation that restricts unhealthy food marketing through media and other avenues. It seems to me that these aren’t approaches to mitigating the barrier but instead are the policy goals that the authors would like to see implemented if the barrier of industry power and influence can be overcome. I’m not sure how the second paragraph is meant to flow from the first. The observations in this paragraph do not appear to be connected to anything the authors found in the participant interviews, nor are they directly connected to the issue of industry’s economic and political power. Instead, they seem to be suggestions the authors are proposing about how to counter industry’s individual responsibility frame.

Thank you for these comments. In response to the Reviewer’s first comment here, we have revised this section of the Discussion to explain our point about comprehensive regulation as part of an overall approach to counteract food industry power (p.11). “Approaches to overcome barriers posed by food industry would need to include comprehensive regulation that expands on current self-regulatory codes which are limited in scope and effectiveness, and which restricts unhealthy food marketing through media and other avenues including, but not limited to, television."

With regards to the second and third points, we have deleted the paragraph discussing industry’s individual responsibility frame (p.11). “Further food industry related barriers to the regulation of unhealthy food advertising may arise as a result of the food industry’s likely perception that childhood obesity is an individual issue, where obesity is considered a problem of the individual for which advertising of unhealthy food plays a minor role. This is in contrast to the public health frame, which considers obesity issues from a population or environmental perspective. The issue of framing obesity as a complex population problem rather than an individual problem will require ongoing effort by public health researchers and advocates to demonstrate that prevention of obesity will not be achieved through individual-level approaches alone.”

Reviewer 2, Comment 8
(Evidence) The first and second paragraphs each describe a type of evidence considered in the policymaking process, note that there is abundant data to support each type of evidence, and question why the evidence doesn’t seem to be reaching the relevant stakeholders. Then the third paragraph talks about how governments internationally are showing support for action on unhealthy food marketing. I think the point of the third paragraph is that, if other countries pass policies, there may be opportunities to study the impact of regulation. But this paragraph seems a bit out of place following upon the above two paragraphs which say the research is there but public awareness is not.

Thank you for these comments. We have made a revision to clarify our purpose for including a discussion on international action on unhealthy food marketing (p.13). “As governments around the world continue to respond to the issue of unhealthy food marketing to children, opportunities to study the impact of regulation arise,
increasing the available evidence to demonstrate the effects of regulation as a strategy for obesity prevention.”

We have also rearranged this section of the Discussion according to recommendations in Reviewer 2 Comment 9 (p.12). “Our research found that policy makers require scientific research evidence to demonstrate the effectiveness of regulating unhealthy food marketing. Given that there is a body of existing research evidence demonstrating that unhealthy food marketing influences children’s food preferences, purchase requests, and consumption behaviour\textsuperscript{2,3} and that omitting television food advertising would contribute towards a reduction in obesity\textsuperscript{16} and obesity prevalence,\textsuperscript{17} and that regulation of unhealthy food marketing is a cost-effective obesity prevention strategy,\textsuperscript{5} perhaps the barrier here is around to the nature of evidence sought by policy makers. Stakeholders frame problems and solutions differently and evidence can be sought to support a particular view, rather than inform a rounded view of an issue.\textsuperscript{18} Given the wealth and breadth of evidence that exists, further work in this area should explore the extent to which this evidence is not reaching the relevant policy makers and the extent to which it is not deemed relevant for informing policy.

Our research also identified that evidence of community support is an important factor in the policy process, making the point that scientific research is just one type of evidence considered in the policy making process\textsuperscript{19} and it is a broader view of evidence that comprises stakeholder views\textsuperscript{12}. Organisational and community support for the regulation of unhealthy food marketing through advertising is evident. Numerous key public health agencies in Australia have expressed concern over marketing of unhealthy foods to children\textsuperscript{4,5,20-22} and argue that current controls are both ineffective and inadequate.\textsuperscript{4,20,21} Parents have expressed concern around unhealthy food marketing targeting children’s vulnerabilities.\textsuperscript{23} A recent national survey identified that 83% of consumers are in favour of government-led restrictions on television marketing of unhealthy food to children.\textsuperscript{24} Once again, it will be important to explore whether this information is not reaching the relevant people, or whether the information itself is deemed not relevant.”

Reviewer 2, Comment 9
(Final comment) My basic point about the discussion section is that it could be be clearer about what it is trying to convey. Given the material currently covered by the discussion section, my suggestion is for each subsection to be organized as follows: (1) explain what the participants had to say about the topic; (2) speculate about what implications the perceptions of these participants might have for future policymaking prospects; and (3) describe any relevant evidence that supports or contradicts the participants’ perceptions and speculate about how that evidence might be brought to bear to confirm/correct/shape stakeholders’ perceptions.

Thank you for this recommendation. We have rearranged each section of the Discussion to first summarise the relevant research findings and then move on to provide context and speculation. These changes have been described above in the responses to Reviewer 1 Comments 6, 7 and 8. For further clarity we have also reworded the subheadings in the Discussion section to exactly match the themes identified in the research.