Children and adolescents’ exposure to food and beverage digital marketing in Argentina
Pursuant to Article 24 of the Convention on the Rights of the Child (CRC), the State Parties recognize the right of the child to the enjoyment of the highest attainable standard of health. In this sense, a rights-based approach should underscore the role of food and beverage marketing as one of the factors causing increased child obesity rates worldwide, analyze and discuss the extent to which children and adolescents (C&A) are exposed to unhealthy food through marketing practices, and contribute to the categorization of foods as “healthy” or “unhealthy” based on their nutritional profile, in order to enable and guarantee people’s access to information on the actual content of energy and nutrients in the products consumed and warn them about excess critical nutrients and their negative impact on their nutritional and health condition.

Based on this framework, the general aim of this research is to identify and characterize the digital marketing practices used by major companies producing unhealthy foods and beverages to reach C&A in order to evaluate their level of exposure, and generate public policy recommendations on the regulation of those practices.

The methodological approach developed (based on the CLICK\textsuperscript{1} methodology) focuses on a study analyzing the content of selected and popular food and beverage brand publications targeting C&A in Argentina and in their Facebook, Instagram and YouTube official sites, with the aim of estimating the impact of such communications. In addition to this analysis, interviews were held with experts in digital marketing, nutrition and communication, among other areas, to obtain a multidimensional view of the issue. In parallel, a quantitative and qualitative study was carried out among C&A to capture their views and opinions on the problem and their actual online browsing and eating habits.

Along the various research stages, the report underlines the lack of regulations on the subject and the limited effects of the self-regulation practices applied by brands and platforms. In the first place, it is observed that the brands generating the highest level of communication addressed to C&A through digital media in the food and beverage categories tend to promote unhealthy products. Secondly, the communication of these brands through digital media has a significant outreach, as reflected in C&A’s memory of and testimony about the frequency of their ads. On the other hand, and based on the analysis of the contents that these brands publish on their own sites, it may be said that the contents presenting unhealthy foods and beverages use emotional resources, such as promising fun or using popular figures or celebrities, thus generating a very attractive communicational proposal for the target public.

In this sense, the findings highlight the need to advance towards the design of systems and policies regulating communications on unhealthy foods and beverages on digital media. Given the dynamics characterizing these platforms, this aim requires working in close cooperation.

**Overweight in C&A in Argentina**

Malnutrition by excess, and particularly child overweight and obesity, are growing at alarming rates. In Latin America and the Caribbean, studies by the Food and Agriculture Organization of the United Nations (FAO), the Pan American Health Organization (PAHO), the World Food Programme (WFP) and United Nations Children’s Fund (UNICEF) (2018)\textsuperscript{2} show a prevalence of overweight of 7.3% in children under 5; in addition, estimates show that, should the current trend persist, the proportion of adult population suffering from obesity will increase to 30% by 2030. At

\textsuperscript{1} WHO. Regional Office for Europe. Monitoring and restricting digital marketing of unhealthy products to children and adolescents. Moscow; 2018: WHO.

the national level, the findings of the 2nd National Nutrition and Health Survey (ENNyS2)\(^3\), carried out in 2018 (sic), reflect that the prevalence of excess weight, an indicator combining overweight and obesity, is 13.6% for children under 5 and 41.1% for C&A aged 5 to 17.

On the other hand, the third edition of the Global School-based Student Health Survey (3rd EMSE)\(^4\) applied to high school students in Argentina shows that, in the 13-15 age group, there was a sustained growth of overweight, reaching almost 10 percentage points since the first edition (24.5% in EMSE 2007; 28.6% in EMSE 2012; and 33.1% in EMSE 2018), while obesity values rose to almost double as compared to the first edition (4.4% in EMSE 2007, 5.9% in EMSE 2012; and 7.8% in EMSE 2018).

As highlighted in several studies (Driessen et al., 2014; Lima et al., 2017; Machin et al., 2016), the increase in overweight levels observed in the population is not exclusively caused by personal behavior problems; rather, it is a response to stimuli from unhealthy environments which promote the consumption of ultra-processed products containing excess sugars, fats and sodium and with low or nil nutritional value.

There is sufficient evidence as to the key role played by the marketing of ultra-processed foods in the construction of unhealthy environments. It is argued that the exposure to the publicity of such foods and beverages increases their consumption among children (Boyland et al., 2016), influences their and their families’ buying decisions, and conditions their eating habits (Mallarino et al., 2013). On the basis of the above, the prohibition of the publicity, promotion and sponsoring of foods and beverages containing excess sugars, fats and sodium has been identified as a key policy for obesity prevention in C&A (PAHO, 2011).

Research goals

The goal of this study is to document C&A’s level of exposure to digital media marketing of ultra-processed products (foods and beverages) with excess critical nutrients (sugars, fats and sodium) and to contribute data which can be used as input for public policy recommendations based on the local context.

Methodology

It is important to emphasize that, given the complexity of the digital ecosystem and taking into account the constant evolution and improvement of the technologies used for digital marketing (including the segmentation of publicity ads), a single and defined method to evaluate exposure to digital marketing does not exist at present, as mentioned by the WHO Regional Office for Europe in their *Internet Tracking Guide* (WHO, 2020)\(^5\). This document explains that, both in Argentina and other countries, there is no digital, analytical or big data tool allowing the automatic collection and analysis of brand and audience data.

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In order to identify the main practices employed by food and beverage companies to reach C&A in digital environments (and obtain information about how C&A relate to and are influenced by these practices), the researchers used the conceptual framework proposed by the WHO Regional Office for Europe to monitor the digital marketing of unhealthy products targeting C&A, as well as some of the goals of the CLICK methodological scheme described in the mentioned framework. The research team participated in a training course on the CLICK methodology provided by international experts Mimi Tatlow Golden and Emma Boyland. Taking into account the need to adapt the system to the local scenario, the requirement for a fluid exchange with UNICEF teams was established in order to agree on the decisions required to define the scope and methodological approach of the study.

THE CLICK METHODOLOGY

The CLICK methodology comprises five steps (its name is the acronym for these steps) to monitor the degree to which C&A are exposed to the online marketing of unhealthy products. Similar to other experimental designs, this system can only provide a proxy of the surveyed children and adolescents' online behavior, since it cannot fully mimic their reactions to advertisements, peers' comments, likes in social networks, etc.

The five CLICK steps are the following:

C - COMPREHEND THE DIGITAL ECOSYSTEM
Map the global, regional and national digital marketing ecosystem and C&A's website/app usage.

L - LANDSCAPE OF CAMPAIGNS
Assess campaigns run by leading national brands by collecting information from advertising agencies and by sampling whole-country social media.

I - INVESTIGATE EXPOSURE
Map exposure to some paid-for digital marketing experienced by a panel of children in each age bracket using a smartphone (with consent).

C - CAPTURE ON-SCREEN
Use real-time screen capture software on a panel subgroup to assess what a representative sample of children actually sees online on their devices.

K - KNOWLEDGE SHARING
Create user-friendly materials from the research data and develop partnerships with young people, parents, policy-makers and civil society, who together can advocate change, raise awareness and influence policy.
Of the five CLICK steps, the research focused on the first three, i.e., understanding the digital ecosystem, assessing brand campaigns and investigating exposure.

To achieve those goals, a research was proposed which combined several information survey techniques: literature review, marketing analysis in social networks and online sites, and interviews with key informants. Also, it was agreed to organize workshops in order to obtain additional knowledge regarding C&A's online uses and habits, with the aim of measuring their degree of exposure to publicity promoting foods with excess critical nutrients. Due to the pandemic and the limitations on in-person activities, the workshops were replaced by virtual meetings (debate forums on Whatsapp), where this information was collected. In addition, a nutrition specialist was consulted for advice on the classification of the surveyed products and brands according to two nutrient profile models developed by WHO. The analysis consisted in triangulating the information from these different quantitative and qualitative sources in order to characterize the exposure level of C&A to the marketing of these foods and identify certain features of such communication.

The work was structured around three stages:

**Stage 1. Mapping local digital practices and brands.**
To identify the main food and beverage brands targeting C&A through digital media and the platforms and social networks used by C&A, the following activities were undertaken:

- **Desk research** (information from publicly available secondary sources and previous syndicated studies by Voices! Consultancy Group)

- **12 qualitative semi-structured interviews with key informants from different areas and with different profiles** (reporters specializing in technology/digital media or publicity; representatives from digital media agencies and publicity agencies specialized in digital media; representatives from authorities in charge of regulating publicity in general and digital marketing; representatives from NGOs working on issues related to C&A nutrition or health; influencers and opinion leaders on health, nutrition, technology and childhood issues)

- **Online survey among adolescents through the U-Report Argentina platform**, to investigate social network usage and what brands and influencers are followed by Argentine adolescents in the Web. 509 answers were received. The universe was composed of adolescents aged 13-19 (77%) and young people aged 20-24 (18%) (5% of the answers were discarded because the age criterion was not fulfilled). Although adolescents from every province in the country participated in this survey (carried out from 29 May to 5 June 2020), it is important to note that the U-Report platform is not representative of the country (as regards sample size) but of those adolescents and young persons who had access to this platform and decided to participate.

In this stage, a nutrition specialist was consulted, who provided information on the classification of the products and brands surveyed, according to the nutrient profile model developed by the WHO Regional Office for Latin America and the Caribbean (OPS/OMS, 2016)⁶ and for Europe (WHO Regional Office for Europe, 2015). The WHO (Europe) system, created with the aim of reducing the marketing targeting children, categorizes products with excess critical nutrients as “not allowed” for advertising among children.

This **first stage** yielded a mapping of some of the most active brands and the most popular products (foods and beverages) for children and adolescents, as well of the digital platforms most used by these audiences at local level. The main platforms were selected for inclusion in the online

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communication analysis performed in the following stage.

Stage 2. C&A exposure to communication on unhealthy foods and beverages. In order to understand and estimate the impact of unhealthy foods and beverages on C&A, the following activities were undertaken:

- 8 qualitative semi-structured interviews (held from 14 to 27 May 2020) with experts from different areas and with different profiles (representatives from influencer agencies, videogame and digital entertainment experts, and representatives from social media platforms, among others), to explore common features in contents relevant to C&A that are used by food and beverage brands.

- Analysis of online communication by brands and influencers. For this analysis, 18 brands and 3 platforms were selected from the mapping performed in the first stage. Information was gathered on the brands and their available online communications and marketing activations. The marketing material of these brands found on their social networks (Facebook, Instagram and YouTube) and websites was analyzed. The analysis also included the profiles of 3 influencers popular among children and adolescent audiences, in order to detect mentions of foods and beverages in their publications.

In this stage, the research team was trained in the CLICK methodology used by the WHO Regional Office for Europe (2019). Based on the protocols established in the guides developed by WHO to monitor Internet brand communications, a methodology was obtained that allows both to gather information systematically, and to code and subsequently analyze multiple variables useful for estimating the scope of social network communications on unhealthy foods and beverages and the extent of C&A exposure to them. The following factors were analyzed for each brand: number of followers, digital reputation, publication frequency, publication types, communication target audience, language and storytelling used, type of products communicated (including their categorization according to the PAHO nutritional profile model).

- An online quantitative survey (performed from 27 June to 19 July 2020) with 1043 participants: 913 mothers/fathers of children aged 5-15 (255 mothers/fathers of children aged 5-8, 297 mothers/fathers of children aged 9-12, and 361 mothers/fathers of children aged 13-15), y 130 adolescents aged 16-18 at national level. The data obtained do not correspond to a probabilistic sample, but to a quota sample by age ranges.

- An online qualitative model consisting of:

  - 12 online ethnographic interviews with mothers/fathers and children aged 5-12 (socioeconomic levels C1/C2 and C3/D1), in the cities of Córdoba and Buenos Aires, and in Greater Buenos Aires) through a video call platform (with prior written consent both from participants and guardians).

  - 6 discussion forums on WhatsApp aimed at obtaining adolescent’s opinions, among affinity groups comprising male and female adolescents aged 13-18 (between 7 and 8 participants per group, with a total of 45 adolescents), from the same localities and socioeconomic level as the children.

These forums investigated the following main topics: the devices used and the ways of using them; online contents of interest; entertainment consumption; time spent online simultaneously with other activities; content awareness: personalities, objects, messages; brand awareness; activity; observation of device usage during the session.

Stage 3. Data analysis
In the third stage, the information obtained through the different methodologies and surveys was triangulated to generate a report that integrates the findings and lessons.
Explanatory note: the findings presented below are not strictly divided into stages coinciding with those of the research; rather, the information obtained from the various stages along the entire study has been articulated and integrated.

The results obtained cannot be extrapolated to the total C&A population, as this is an exploratory study aimed at obtaining relevant information on the exposure of C&A to unhealthy products (foods and beverages) marketing in order to establish priorities for subsequent research and suggest verifiable premises, as well as to sensitize, advocate for change and influence public policies.

Chapter 1. Mapping practices and platforms

This chapter presents the findings of the first research stage, where information from secondary sources was gathered and interviews with key informers and online quantitative surveys were carried out to obtain, on one hand, a clear picture of C&A’s digital media usage and practices in Argentina and, on the other, to identify some of the food and beverage brands communicating to this target public more actively through digital means. This mapping revealed the following online media usage data:

- Children are having their first access to Internet at increasingly early ages: 11, in Argentina (UNICEF, 2016). A study performed by UNICEF and Google in 2020 revealed that in Argentina, children acquire their first web-enabled device at an average age of 9.1, earlier than in other countries in the region.\(^7\)

- Mobile phones are the devices most used by adolescents (9 out of 10) to connect to Internet.

- The COVID-19 pandemic brought about an increased use of Internet. As reference data, Internet traffic in Argentina showed an average increase of 22%-25% during the first two days after the suspension of school classes and the promotion of teleworking in March 2020, according to data from the Argentine Internet Business Chamber (CABASE).\(^8\)

- The online quantitative survey shows that, in addition to the search for homework materials, C&A aged 5-18 stated that their main online recreation activities are playing online games, listening to music, chatting with friends, and listening to podcasts or seeing influencer contents. Almost one third of the C&A surveyed engaged in these activities.\(^9\)

- As stated by the C&A surveyed, the three platforms most used (in decreasing order) are YouTube, Whatsapp and Netflix, followed by Instagram and TikTok.

- Some platforms, such as Netflix, Instagram, TikTok and Pinterest, are more popular among female users, while male users prefer gaming-related platforms\(^11\) (Minecraft, Fortnite, Roblox).

- A significant proportion of the C&A surveyed (64%) mentioned at least one

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\(^9\) See Stage 2 of the methodology.

\(^10\) Netflix (67% female users vs. 63% male users), Instagram (51% vs. 44%), TikTok (59% vs. 36%) and Pinterest (24% vs. 6%)

\(^11\) Minecraft (33% male users vs. 15% female users), Fortnite (31% vs. 8%) and Roblox (20% vs. 13%)
influencer whom they follow in social networks. The content generated by influencers is one of the communication types they find most attractive.

With respect to the consumption of brand products and communication, the findings are the following:

- According to the 2nd National Nutrition and Health Survey (2019), C&A’s eating patterns are significantly less healthy than those of adults: they consume 40% more sugary beverages, twice as much pastry products or salted snacks, and three times as much confectionery products than adults.

- One of the factors that influence these eating patterns is that these kinds of food are readily available.

- PAHO analyses show that the foods and drinks with increased presence in the Argentine diet were those most intensively advertised.

- Almost 8 out of every 10 C&A surveyed (75%) stated to be very exposed to ads while using social networks.

- El 28% remembered having seen specific food and beverage ads.

- 1 out of every 2 boys and girls buy unhealthy foods because they are attracted by the ads.

Chapter 2. Key actors’ views

The different views of the key actors interviewed in stages 1 and 2 of this study because of their engagement with the issue under consideration lead some conclusions on the current context in Argentina as regards the use of devices and networks, the online communication practices used by food and beverage companies and the regulatory situation of this sector:

- There is a need for parents to accompany C&A in the use of social networks and platforms, to familiarize themselves with the technologies and to impose firm limits and rules on the amount of time spent on this activity and on the way to carry it out.

- There is significant investment in publicity by food and beverage companies. The repetition of their messages makes it difficult to limit the exposure of C&A to their communications.

- The mechanisms and criteria applied by the various platforms and content producers on their own initiative in order to moderate, edit and create contents are quite varied and dissimilar, which highlights the absence of common parameters and the need for external regulation.

- The companies and their agencies use different strategies to make the messages more


powerful and persuasive: integration as branded content (which does not look like publicity), the use of well-known personalities or the creation and design of characters that arouse the targets’ empathy, and audio-visual techniques to boost the message, among others.

- Also, the linkage with influencers is increasingly used and appreciated by the brands, which recognize their powerful access to a segmented audience.

- A draft act on influencers is being developed and one of its aims is to enhance the transparency of influencers’ recommendations and promotions.

- There is recognition in Argentina of the lack of regulations and control on communication in general, and of mechanisms contemplating the nutritional quality of the foods and beverages being promoted.

- In Argentina, there are several initiatives to establish a warning label system restricting the publicity, promotion and sponsoring of unhealthy foods.

- The greatest local progress took place recently through a draft act establishing the mandatory implementation of a front-of-pack warning label system (which includes a graphic scheme consisting in black octagons warning about the excessive content of critical nutrients and including the PAHO nutrient profile system), and also regulating the publicity, promotion and sponsoring of unhealthy foods and beverages and improving school environments in this respect. The Senate gave preliminary approval to the bill, which was then forwarded to the Chamber of Deputies for treatment.

Chapter 3. C&A Uses, Practices, and Vision

Ethnographic online interviews and focus group discussions with C&A allowed access to their views on common marketing practices, the use and role of social media in their lives, their concerns, and their level of nutrition-related knowledge. Among the main outcomes, the following can be mentioned:

- There was a technological gap detected in lower socioeconomic levels (SEL), with lower device availability and variety (computer, video game console).

- According to some parents, the increase in the number of hours spent online as a result of the COVID-19 pandemic had negative effects that were difficult to mitigate: sedentary lifestyle, sleep disorders, mood alterations, changes in language, attention deficit problems, apathy, anxiety and irritability, device dependence, among others.

- The prolonged exposure time is higher than desired and conflicts arise as a result of trying to reduce it.

- The somatic and virtual conditions in which children and adolescents find themselves for long hours when they are connected are highly conducive to the permanent recreation of unhealthy environments since it promotes unhealthy habits.

- The repetition of unhealthy food images is and appears on different platforms and with different advertising tools.

- There are several types of influencers that play a key role in content consumption and browsing by C&A.

- There is a high level of understanding among adolescents of the logic and workings of influencers and
their commercial links with brands and products, without it leading to disenchantment. The role of influencer is one to which many of these adolescents aspire.

- Among the most frequently used techniques employed by food and beverage brands are ads with content such as stories or videos, segmented campaigns with sponsorships and dares such as challenges, sweepstakes, tagging and collectibles, and others run by brand ambassadors.

- Survey participants report little food education and several difficulties in accessing reliable sources of nutritional information.

Chapter 4. Analysis of C&A exposure level to brands in social media

This chapter describes the methodology used to analyze brand communication exposure in social media and its results. The 18 food and beverage brands especially targeted at C&A that showed the highest commercial and social media activity were selected for the analysis, as well as the 3 platforms with advertising content most used by this audience. The visible posts on each of the 18 brands’ official pages were analyzed in each platform (up to a maximum of 20 posts per brand). In addition, the publications made by 3 influencers with different profiles (targeting C&A) were analyzed to detect the presence of unhealthy food and beverages. Of the 16 specific branded products identified in influencers’ videos and rated according to their nutritional profile, none of them could be considered healthy or allowed to be communicated to C&A, according to WHO criteria.

The main findings show the following:

- 40.1% of the publications were on Instagram, 33% on Facebook, and 26.9% on YouTube. This and other indicators confirm that Instagram is the most active platform.

- 13% of the 845 publications analyzed displayed a more targeted tone and arguments to attract mothers, fathers, and families.

- The product to be sold is shown in 7 out of 10 advertisements.

- In all the analyzed content in which the product is present and nutritional information is available, the products would be considered "not allowed" to be advertised to C&A according to the WHO nutrient profile model and recommendations, and half of them have excess sugars. 4 out of 10 products shown have excess saturated fats and/or total fats.

- Spanish-speaking sports athletes and singers are prominently featured.

- The trend for categories in social media except for beverages and dairy is to display products outside their packaging (fast-food and snacks) and their nutritional composition. In the case of cookies and chocolate, there is a trend towards content that promotes their use in recipes and combinations with other similar products.

- On Instagram and Facebook, around 7 out of 10 posts have some hashtag (#) incentive or request for interaction ("comment", "like", "share").

- In the 3 platforms, a greater proportion of the total number of posts used "fun" as an element of attraction.

- There are also multiple posts that used corporate messages, general brand news (especially in those posts related to the brand and not to the product), and also the invitation to connect or watch sporting or music events, seeking to reach a more adolescent audience. And, although less used, the mention or
reference to family ties and relationships stands out.

- There is no evidence in any of the brands regarding nutrition content, education for mothers, fathers, or C&A about nutrients, or packaging or nutritional table information, either explicitly or directly, such as in games or contests.

- In cases where the image or video has a warning or alert about nutrients, highlighted components, a sponsorship, or contest legal notice, the wording is difficult to see and read.

- Concerning influencers analysis, low post frequency was detected in very popular accounts as well as a low food and beverage occurrences incidence. The presence of these products in influencer videos did not seem to be motivated by commercial ties.

- Brands choose influencer channels relevant to boys and girls to promote sweets and candy (40%), and cookies and cakes (16%).

- However, none of the specific branded products identified in influencers’ videos and rated according to their nutritional profile could be considered healthy or allowed to be communicated to C&A, according to WHO criteria.

- In addition, 56.16% of products are presented in the unequivocal home context of the influencers, achieving proximity and identification with their followers.

- It is clear from the brands’ communication behaviour analysis that advertising self-regulation in Argentina is not enough and that external regulation is needed to mitigate the impact of such communication on C&A.

General conclusions and discussion

The Panorama of Food and Nutrition Security in Latin America and the Caribbean report (2018) by FAO, PAHO, WFP, and UNICEF states that it is perfectly possible to transform food systems to ensure better food for all people, more sustainably and adapted to climate change. It proposes working to improve environments so that they facilitate access to healthy food and encourage practices that help people make more informed and responsible consumption choices.

New technologies open up new paths, make it possible to discover new worlds and connect with those who are far away and provide access to information that is often overlooked by the media. But they are also a source of new ways of misinformation and misunderstandings. When children and adolescents are given an electronic device (cell phone, tablet, computer, etc.), they are being granted access to a world of content generated by different broadcasters for specific purposes which, whether commercial or not, have great influence and power, and can have a negative impact on their habits, including eating habits.

Some authors and experts argue that the problem is not technology but rather the absence of adult supervision and monitoring; however, today technological mediation is an inevitable reality that is here to stay, which is why governments must take regulatory measures to protect the rights of C&A. The agenda of problems to be prevented and solved is extensive. Issues related to privacy and the use of personal data for specific purposes, protection against inappropriate content, the fight against fake news, hate campaigns or any form of political extremism, gender bias in programming, restricted access to valuable and reliable information, the technological gap and cybercrime prevention such as phishing, hacking, stalking, slander and libel or the dissemination of private images without consent are urgent.

Several studies have identified that the marketing of unhealthy food affects the fundamental rights
of C&A established by the CRC to health, food, survival and development, education, information, rest, leisure, recreation and culture, occupations, privacy, and non-discrimination. Marketing can have a powerful influence on the self-esteem, choices, and behaviors of C&A, and it is therefore important for governments to ensure that advertising for commercial purposes does not have adverse effects. Digital platforms are now becoming the primary means through which C&A communicate, receive, create and disseminate information. The inability to distinguish factual content from content that promotes unhealthy foods and beverages represents a risk to C&A's rights to health and access to information. Added to this are several challenges associated with the media literacy of guardians and adults in recognizing and resisting marketing, and regulatory frameworks regarding intrusion into the private domain of the individual, including family, home, and correspondence. All of this requires greater attention to and regulation of what takes place in the digital settings where C&A spend time and the complementing of these regulatory strategies with informational ones.

This report shows that digital settings are completely unregulated in terms of the persistent and constant exposure of C&A to unhealthy foods and beverages and non-recommended amounts. On the one hand, it is clear in the different instances of the analysis that brands that manufacture food and beverages achieve great communication impact through digital media. On the other hand, and based on these brands' content analysis of their own social media posts, it is possible to conclude that the direct display of unhealthy food and beverages images represents an important part of their overall online communication volume.

It is important to note that during the food and beverage brands selection process that was part of the analysis, no healthy product brands with a big presence on these platforms were detected to be taken into consideration; that is, the advertising of brands with a broad social media reach is mostly generated for unhealthy products.

On a second note, it has also been revealed that excessive exposure to unhealthy food and beverage images does not only respond to official marketing campaigns coming from mass consumption food and beverage brands. On one hand, other players contribute to saturate the media with images of these foods for commercial purposes: local food companies, delivery apps, creators of "satisfying" visual content pages, to name a few. On the other hand, platform users themselves replicate content on their personal accounts. This shows that part of its promotion exists intrinsically to digital culture because it is embedded in eating habits. In other words, there are favorable environments for unhealthy food consumption that feed back into a vicious circle that expands and becomes increasingly permissive, if not regulated.

Marketing regulation can do something about this if it is based on a comprehensive diagnosis that enables the problem to be understood in all its dimensions. Social media are partly responsible, as they offer audience segmentation tools for advertising and content. It is evident that today there are almost no reach-limiting filters imposed by social media platforms on advertisements for ultra-processed products. This could be an initiative to work on, in addition to the observation and monitoring of official campaigns' advertising content, and the marketing strategies review integrated to digital environments that display unhealthy food and beverage brands as well as their sales channels.

Beyond the demand for greater regulation in social media outreach filters, there are plenty of future possibilities and opportunities for digital education on healthy eating to balance the scale. There are many initiatives to promote healthy living and eating, but these seem to reach only a portion of the C&A segment, so strengthening these initiatives also involves using a strategy to integrate them with digital content, in addition to other media.

**FINAL RECOMMENDATIONS**

As mentioned, the analysis shows the need to regulate content generated by unhealthy food and beverage brands targeting C&A in digital media, and the need to work together with different stakeholders and sectors of society to address and counteract the effects generated by unhealthy
environments.

In this sense, we suggest some focal points and players with whom UNICEF can work jointly to provide, on one hand, improved access to reliable nutritional information for the population and its understanding; and on the other hand, reduce the impact and scope of ultra-processed products promotion.

UNICEF and regulatory decision-makers working together

Although it is necessary to establish consensus with the stakeholders involved, it has been shown that the definition of criteria to be implemented cannot be left to them alone.

The first step is to implement a clearer, simpler, and more practical food classification system so that society as a whole can adopt it. At present, the PAHO nutrient profiling model is the one that enjoys the greatest consensus among experts and organizations whose objective is to research and collaborate in the design of public health policies. However, some food industry representatives reject it as strict or lacking in scientific basis. Nevertheless, its advocates point out that this particular model is intended to be applied to processed foods and ultra-processed products. The National Coalition to Prevent Obesity in Children and Adolescents (2020) points out, among others, some reasons why it is the best model: 1) it was developed by the highest health authority in the region; 2) it is based on WHO nutrient intake guidelines, developed by a panel of experts based on a rigorous scientific evidence review; 3) this nutrient profiling system has the highest agreement with the Dietary Guidelines for the Argentine Population (Guias Alimentarias para la Población Argentina - GAPA).

In this sense, the front-of-package labeling system proposed in the Bill for the Promotion of Healthy Eating (which has been partially passed by the Argentine Senate) considers the best standards: front-of-package warnings labels, with graphic black octagons system and PAHO nutrient profiling system; in line with UNICEF and other United Nations agencies (FAO, PAHO) recommendations. In addition, this project is accompanied by a set of restrictions on advertising, promotion, and sponsorship of foods and beverages considered to be unhealthy because they contain an excessive amount of critical nutrients, and also proposes some school environment improvements (by determining which foods can be marketed, offered, advertised, etc. in educational establishments; as well as including nutritional food education in the national school system).

This system’s advantage is that, in addition to limitations for the industry, it contributes to raising awareness of these foods and products’ real composition and their excessive consumption effects, which leads to greater awareness when making purchasing decisions, as was the case with cigarettes, as well as greater ethical questions about how these products are presented.

It is therefore essential to move forward in regulations generation to define parameters such as ages, food and beverages’ categories or nutritional profiles that are or are not allowed, and the requirements to post content or advertise them on digital platforms.

Recommended Action Plan:

- Raise awareness and highlight the need for regulation that allows consumers to access clear information on the nutritional value of the products they consume.
- Contribute to disseminate and support, based on the vast evidence and studies available, the front-of-package labeling system, which currently has a good chance of becoming law. In this regard, the partnership with other NGOs, associations, and universities (such as those that make up the National Coalition to Prevent Obesity in Children and Adolescents), and also with influencers linked to health and nutrition issues, is key.
- Continue to respond with clear and evidence-based information to the criticisms and questions that challenge the front-of-package labeling system’s suitability. Contribute to disseminate documents such as the one prepared by the National Coalition to Prevent Obesity in C&A.
- Share recommendations to transfer the advertising, promotion, and sponsorship of unhealthy food and beverages aimed at C&A regulation application to the digital environment. Front-of-package food labeling should be applied to the digital universe and be included in the advertisement, guideline, and/or mention within each advertisement/platform, regardless of whether the product is shown inside or outside its packaging.
- Consider regulation possibilities on influencers’ activity related to unhealthy food and beverages...
promotion. Essentially, work should be done on the need to make the commercial link with the promoted brand explicit, to communicate responsible consumption or warn about excesses, to indicate whether the product is healthy or not. For content especially directed at C&A, the front-of-package labeling bill establishes the prohibition of promoting products with excessive amounts of critical nutrients, so that (if passed) mechanisms should be sought to control compliance with this rule.

- At a later stage, and once the regulation has been implemented, contribute to monitoring compliance with the adopted regulations through methodologies design or performance metrics in collaboration with other NGOs and relevant organizations.
- Also organize campaigns to inform the population about the current regulation and set up complaint channels and mechanisms so that citizens can also participate in such monitoring.

UNICEF and industry and communicators working together

The food and beverage industry, advertising agencies, media, influencers, and communicators linked to them should be encouraged to establish good practices that go beyond what is required by law, promoting an ethical debate that generates dynamic and continuous collaborative accountability on the part of those responsible for digital content.

**Recommended Action Plan:**

- Promote partnerships among Advertiser Chambers to systematize and generate good practice guidelines and incorporate them into the usual management tools. For example CONARP, the entity that groups the Argentine Chamber of Advertisers (CAA), the Argentine Advertising Association (AAP), the Argentine Chamber of Media Agencies (CAAM), the Argentine Advertising Council, and the Union of Interactive Agencies (Interact). To advance in the implementation of these guidelines.
- Encourage these players to create an alliance and meeting spaces where industry chambers, agencies, and other players connect to ensure compliance with the standards and guidelines.
- Promote the creation of "certified advertisers or agencies" programs that are in positive compliance with the new guidelines and guidelines.
- Generate proactive and positive campaigns on healthy products for influencers. Advise and inform influencers about the impact of recommendations made on unhealthy categories to encourage an ethical and responsible attitude.
- Seek to disseminate this information in partnership with the influencers themselves, influencer agencies and agents, sites, and profiles that are taken as a reference by this segment.

UNICEF and social media working together

At the next level, it is possible to think of a series of measures that operate on digital platforms or are implemented in coordination with them. These measures can be taken as a starting point to broaden a regional and global conversation with social media and relevant agencies.

**Recommended Action Plan:**

- Work together with the platforms, agencies, and chambers that regulate online communication to limit ultra-processed products advertising frequency (not only those specifically targeted at C&A).
- Restrict co-branding, alliances, and characters in brands whose main target is the children's world in these platforms.
- Establish requirements that contemplate nutritional profiles in the opening of company web pages.
- Establish legends, legal or labels parameters (according to regulations) that should be used for posts that promote unhealthy products on these platforms.
- Promote the establishment of new aesthetic guidelines for ultra-processed product advertisements identification on all digital platforms by creating a recognition code.
- Encourage platforms to report monthly and openly on the use of ads and posts in the mentioned categories and how policies are being improved.
- In agreement with the platforms, request feedback from users with ongoing automatic surveys from the platforms on the ads seen by adolescents and make the statistical results open to the public to benchmark yearly improvements. This tool could provide information on the frequency and persuasive power of ads viewed, as well as the audience's understanding of the products' nutritional quality and the information displayed about them in the ads.
Consider the possibility of establishing rewards or positive reinforcement of healthy products through free spaces or establish a positive algorithm for them by rewarding them with greater communication reach.

- Request gaming platforms to restrict, in addition to banned content, the presence of unhealthy eating habits within games.
- Create, post, and promote user education on the platforms’ accounts. For example, launch on the same platform an @instagramAdsR (responsible ads) or a BluePrint but for advertisers and the public, with training to promote good practices and anonymous reports to those who circumvent the system.
- Analyze the possibility of establishing content validation (interactive games or videos) for those who post organically and not only for advertised content.
- Promote the generation and implementation through certified partners or developer programs that build listening platforms to detect brand advertisement irregularities.

**UNICEF and parents, caregivers, teachers, and C&A working together**

Furthermore, regulations must be accompanied by the training of parents, caregivers, teachers, and all adults involved with C&A so that they become aware of this online universe, giving it due relevance and not underestimating it. It is necessary to work on digital education generating awareness and reducing the generation gap.

One of the main issues to be addressed is awareness and education on healthy eating as a counter-message.

**Recommended Action Plan:**

- Reinforce education and awareness on healthy eating as a counter-message in collaboration with educational institutions, organizations, NGOs, influencers.
- Use for the dissemination of these messages the same digital platforms on which advertising messages circulate.
- Collaborate in strengthening the many initiatives to promote healthy living and eating, by integrating it into digital content to better reach the C&A audience.
- Contribute to the transformation of content already existing in other projects, such as the Healthy School Environments Guide, digital tools for teaching, and analysis on the subject to ensure access to reliable information when C&A are searching for information.
- Work on digital education, generating awareness, and reducing the generation gap in the adult population. Here it is possible to build collaboration among various agencies, NGOs, and government initiatives that carry out digital education projects, in addition to private sector partners (educational institutes specializing in digital education, software companies, and even digital platforms themselves).
- It is essential that parents also know how these platforms and devices work to better advise C&A. Educational campaigns can take advantage of the content available on the different platforms.
- Organize awareness-raising courses or basic training on the impact of advertising on C&A.
- Participate with the platforms in content moderation or reporting.

UNICEF has an opportunity as a respected, publicly known, and convening player to generate agreements and joint actions with different stakeholders (private, civil society, governmental, public) to continue promoting the generation of public policies and good practices that help safeguard the rights of C&A and promote digital education by raising awareness.