

May 16, 2002

Dr. Derek Yach  
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**RE: Comments on draft report of the joint WHO/FAO  
expert consultation on "Diet, Nutrition and the  
Prevention of Chronic Diseases"**

Dear Dr. Yach:

Following are Commercial Alert's comments on the draft report of the joint World Health Organization (WHO)/ Food and Agriculture Organization (FAO) expert consultation on "Diet, Nutrition and the Prevention of Chronic Diseases."

In general, we strongly support the draft report, and its worthy objective of preventing chronic diseases such as obesity, diabetes mellitus, and cardiovascular disease. However, the policy recommendations that WHO proposes are inadequate to safeguard public health. We urge you to strengthen them. Specifically, Chapter 5 of the report should include the following recommendations:

**1. Reduce watching of television, and promote other activities instead.**  
In the United States, the average person watches television over four hours of television per day. Television watching and the corresponding lack of physical activity contribute significantly to the development of obesity, diabetes and cardiovascular disease. The public health costs of TV watching, because of decreased physical exercise, likely place an enormous public health and financial burden upon societies across the globe.

If television were an organism we would call it a pathogen, considering its effects upon physical and mental health. Some studies indicate a relationship between TV

watching and obesity in children<sup>1</sup> and adults,<sup>2</sup> and of increased cardiovascular risk.<sup>3</sup>

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<sup>1</sup> Ross E. Andersen, PhD; Carlos J. Crespo, DrPH, MS; Susan J. Bartlett, PhD; Lawrence J. Cheskin, MD; Michael Pratt, MD, MPH, "Relationship of Physical Activity and Television Watching With Body Weight and Level of Fatness Among Children." *Journal of the American Medical Association*, Vol. 279, No. 12, March 25, 1998. JAMA 1998;279:938-942. Gortmacher SL, et al. "Television Viewing as a Cause of Increasing Obesity Among Children in the United States, 1986-1990." *Archives of Pediatric Adolescent Medicine*, Vol.150, April 1996. 356-362. Mohammad N. Akhter, MD, MPH, "Give Up TV For A Healthy Lifestyle." *Albany Times-Union*, April 25, 1999.

<sup>2</sup> LA Tucker and M Bagwell, "Television Viewing and Obesity in Adult Females." *American Journal of Public Health*, 1991 Jul;81(7):908-11. LA Tucker and GM Friedman,

Evidence suggests that watching less television leads to decreases in childhood obesity.<sup>4</sup> Some research also suggests that television may be addictive.<sup>5</sup> Of course, there is also ample evidence showing that television and media violence promotes violent and aggressive behavior, including violent crime.<sup>6</sup>

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"Television Viewing and Obesity in Adult Males." *American Journal of Public Health*, 1989 Apr;79(4):516-8. Tucker L. "The Relationship of Television Viewing to Physical Fitness and Obesity." *Adolescence*, Winter 1986, Vol. 21(84), pp. 797-805.

<sup>3</sup> Sidney S; Sternfeld B; Haskell WL; Jacobs DR Jr; Chesney MA; Hulley SB, "Television Viewing and Cardiovascular Risk Factors in Young Adults: the CARDIA Study." *Annals of Epidemiology*, 1996 Mar, 6(2):154-9.

<sup>4</sup> Robinson, Thomas. "Reducing Children's Television Viewing to Prevent Obesity." *Journal of the American Medical Association*, Vol. 282 No. 16, October 27, 1999.

<sup>5</sup> Mihaly Csikszentmihaly and Robert Kubey, "Television Addiction." *Scientific American*, February 2002.

<sup>6</sup> See especially Jeffrey Johnson et al., "Television Viewing and Aggressive Behavior During Adulthood and Adolescence," *Science Magazine*, March 29, 2002. "More than 1000 scientific studies and reviews conclude that significant exposure to media violence increases the risk of aggressive behavior in certain children and adolescents, desensitizes them to violence, and makes them believe that the world is a "meaner and scarier" place than it is." American Academy of Pediatrics, Committee on Public Education, Statement on "Media Education." *Pediatrics*, August, 1999.

The WHO should include these policy recommendations in its final report:

- A) People should dramatically reduce the amount of time they spend watching television. Instead, people can do many other activities, for example, physical exercise, reading, talking with their families, community activities, volunteering, etc.
- B) National governments should strongly encourage their populations to reduce the amount of time they spend watching television, and to do other activities instead.
- C) National governments should place warning labels on television sets stating that watching too much television can contribute to obesity and cardiovascular disease.

2. **Fairness doctrine for advertising of unhealthy products.** Advertising depends upon a monopoly of cognitive space. Bust the monopoly and the spell is broken.

An excellent way to accomplish this is for national governments to require broadcast media to abide by a fairness doctrine for commercial advertising of unhealthy products, analogous to the old Federal Communications Commission's fairness doctrine, which required broadcast media to present contrasting views on important, controversial issues. Such a fairness doctrine for commercial products would compel broadcast media to provide equal time for counter-advertising *against* the sale of alcohol, junk food, fast food, video games or the promotion of TV programs.

In the United States, it was the fairness doctrine's requirement for equal time for anti-tobacco ads that ultimately removed tobacco ads from television. Similar results might be possible in other countries for other unhealthy products, following adoption of a fairness doctrine. The WHO should encourage national governments to adopt fairness doctrines for the marketing of unhealthy products.

3. **Adopt advertising bans to protect public health.** Advertising bans or restrictions on products such as alcohol and junk food are central to any serious strategy to reduce the incidence of advertising-related chronic diseases such as obesity, diabetes and cardiovascular disease. The WHO should strengthen its recommendations by encouraging national governments to ban all advertising of:

- A) High-added-sugar, high-added-fat food or foods of low nutritional value on television programs targeted to children and youth;

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<<http://www.aap.org/policy/re9911.html>>.

B) Liquor on television; and,

C) All beer and wine advertisements targeted to children and youth, especially such advertising that contains cartoon-like characters or child-enticing themes.

**4. Prohibit schools from advertising or marketing junk food, fast food and other products of low nutritional value.** Primedia's Channel One, Coca-Cola, PepsiCo and other corporations have entered into contracts with school boards in the United States to flood schools with advertisements for junk food, fast food, soda pop, violent entertainment and video games, among other products. State legislators in some states are proposing restrictions marketing and sale of junk food in schools.<sup>7</sup> The WHO should encourage both national and local governments to prohibit schools from advertising or marketing junk food, fast food and other products of low nutritional value in the schools.

**5. Prohibit municipalities and schools from acting as agents of corporate marketing.** In the United States, many schools and municipalities have entered into exclusive marketing agreements with Coca-Cola or PepsiCo to market soda pop. These cities include San Diego, CA; Huntington Beach, CA; Amherst, NY; Lynn, MA; East Lansing, MI.<sup>8</sup> At least 180 school districts have entered into exclusive marketing agreements for soda pop.<sup>9</sup> It is not the proper role of government to promote the sale of products that erode the health of their citizens. The WHO should promote policies to stop schools and municipalities from acting as agents of corporate marketing, and especially not for products such as soda pop that contribute to obesity and other chronic illnesses.

**6. Decrease exposure to advertising in general, particularly among children.** Some media -- especially television -- are saturated with powerful and effective advertisements and product placements for alcohol, tobacco and junk food, which can contribute to chronic disease.

The WHO should encourage people to limit their exposure to advertising and product placement generally. This is particularly important for television, which is an effective medium for of advertising, as well as movies and video games, which contain product placements. The WHO should also urge parents to reduce their children's exposure to

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<sup>7</sup> Greg Winter, "States Try to Limit Sales of Junk Food In School Buildings." *The New York Times*, September 9, 2001.

<sup>8</sup> Verne G. Kopytoff, "Now, Brought to You by Coke (or Pepsi): Your City Hall." *The New York Times*, November 29, 1999. Ray Huard, "City Council Will Be Asked to Set Sponsorship Policy; Pepsi Has Official Status; Can Others Be Far Behind?" *San Diego Union Tribune*, December 7, 1999.

<sup>9</sup> Marion Nestle, "Soft Drink Pouring Rights: Marketing Empty Calories to Children." *Public Health Reports*, July 1, 2000, No. 4, Vol. 115; Pg. 308.

commercial advertising.

Sincerely,

Gary Ruskin  
Executive Director