

Food marketing to children – Guidelines to protect children from the harmful effects of marketing

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1. Introduction

Childhood obesity is a major public health issue in Finland. Although the increase in obesity has levelled off over the recent decade,¹ it remains significantly more common than ever before.² Underlying this phenomenon are several factors, with the food environment playing a key role.³ Our current food environment favours unhealthy choices by encouraging the purchase and consumption of foods and beverages rich in saturated fat, sugar and salt. Such products are in plentiful supply and accessible at all times.

Marketing enhances the appeal of unhealthy food products, and most marketing targeted at children centres around these.⁴ Children are more susceptible to the effects of marketing and thus require special protection.⁵ According to UNICEF, the marketing of unhealthy foods violates a number of children's rights, such as the right to life, health, food, appropriate information and privacy.⁶ These rights are set out in the international Convention on the Rights of the Child (UN 1989), which took effect in Finland on 20 July 1991.

¹ Vuorenmaa M, Mäki P, Tuovinen E, Kauppala T. Lasten ja nuorten ylipaino ja lihavuus 2022 ('Child and adolescent overweight and obesity'). Finnish Institute for Health and Welfare. Tilastoraportti 55/2023. <https://urn.fi/URN:NBN:fi-fe20231002138128>

² Kautiainen S, Koivisto AM, Koivusilta L, et al. Sociodemographic factors and a secular trend of adolescent overweight in Finland. *Int J Ped Ob* 2009;4(4):360–70.

³ Erkkola M, Fogelholm M, Konttinen H, et al. Ruokaympäristön osatekijät ja ohjaukeinoet ('The components of and the steering instruments for the Finnish food environment'). Publications of the Government's analysis, assessment and research activities 2019:51. <http://urn.fi/URN:ISBN:978-952-287-777-2>

⁴ Food marketing exposure and power and their associations with food-related attitudes, beliefs and behaviours: a narrative review. Geneva: World Health Organization 2022. <https://iris.who.int/handle/10665/351521>

⁵ Boyland E, Nolan S, Kelly B, et al. Advertising as a cue to consume: a systematic review and meta-analysis of the effects of acute exposure to unhealthy food and nonalcoholic beverage advertising on intake in children and adults. *Am J Clin Nutr* 2016;103(2):519–533.

⁶ A child rights-based approach to food marketing: a guide for policy makers. Geneva: United Nations Children's Fund 2018. https://www.unicef.org/media/139591/file/A_Child_Rights-Based_Approach_to_Food_Marketing.pdf

The World Health Organization (WHO) recommends regulating the marketing of unhealthy foods to protect all children under the age of 18.⁷

Finnish legislation does not currently prohibit the marketing of unhealthy foods. The Consumer Protection Act⁸ contains provisions on marketing that is misleading and contrary to good practice. The Act recognises the special status of minors, or children under the age of 18, and marketing aimed at them is assessed more rigorously than other marketing.⁹ Under the Act, marketing targeting or commonly reaching minors is regarded as being contrary to good practice, particularly if it exploits the inexperience or credulity of a minor, is likely to have an adverse effect on their balanced development or aims to bypass parents' ability to fully exercise parental guidance of their child. In addition, marketing is regarded as being contrary to good practice if it is clearly in conflict with generally accepted societal values. The determination of marketing as such is made in each case by considering the circumstances comprehensively.

These guidelines define the unhealthy foods that should not be marketed to children. The guidelines are further justified in a separate background report.

2. Guidelines

The marketing of unhealthy foods (see definition in Section 3 below) should not specifically target children.

In these guidelines, 'children' mean persons under the age of 18, who come under the scope of the Convention on the Rights of the Child. It has been found that adolescents (aged between 13 and 17) are exposed particularly to digital marketing and are susceptible to its effects. They usually have their own money and more influence over their choices than children of preschool or primary school age. Adolescents may be an attractive target group for marketing, as their parents have diminishing opportunities to influence their purchase decisions and consumption.

The marketing to children of foods not considered unhealthy under the criteria set out in Section 3 should not be restricted. However, all general regulations on marketing must be taken into account (see Section 5, item 4).

3. Unhealthy foods

The health effects of a diet must always be considered in its entirety. A health-promoting diet can include foods classified as unhealthy by nutritional standards as long as they are consumed in limited quantities. Marketing restrictions seek to protect children from advertising that persuades them to consume unhealthy foods, thus minimising the harmful effects of the food environment on eating habits. To restrict the marketing of unhealthy foods, these must be unambiguously defined.

⁷ Policies to protect children from the harmful impact of food marketing: WHO guideline. Geneva: World Health Organization 2023. <https://www.who.int/publications/i/item/9789240075412>

⁸ Consumer Protection Act, 20 January 1978/38, accessed 8 October 2024. <https://www.finlex.fi/fi/laki/ajantasa/1978/19780038>

⁹ Website of the Finnish Competition and Consumer Authority. Marketing aimed at children. Accessed 5 November 2024. Available at <https://www.kkv.fi/en/consumer-affairs/children-as-consumers/marketing-aimed-at-children/>.

Whereas unhealthy foods contain high levels of saturated fatty acids, sugar and salt,^{10,11} healthier foods are rich in fibre and unsaturated fatty acids. Alongside nutritional content, dietary habits play a role. For dental health, it is advised to eat three to six times per day, including snacks.^{12,13} However, the type of foods designed for snacking between meals can be regarded as harmful to the teeth.

WHO has developed nutrient criteria for classifying foods to determine the healthiness of foods by product category.¹⁴ Although the definition of unhealthy foods in the present guidelines is based primarily on the WHO model, the product categories have been modified to better correspond to Finnish food options and culinary culture. In addition, to better respond to the specific nutritional challenges of Finns, the nutrient criteria were adapted using the Finnish Heart Symbol criteria.¹⁵ The nutritional factors (including their definitions) taken into account in these guidelines are presented in Table 1.

Table 1 Nutritional factors and their definitions considered in the guidelines*

Nutritional factor	Definition
Quality of fat	Ratio of saturated fat to all fat: amount of saturated fat / total amount of fat * 100%
Sugar	All mono- and disaccharides
Free sugar	Sugar added to foods during manufacture (sucrose), fruit sugar (fructose) and other sugar products (e.g., glucose syrup) as well as the sugar contained in honey, syrup, and fruit and berry juices, and the sugar present in their concentrates
Non-sugar sweeteners	Sweeteners not containing sugar (e.g., aspartame, acesulfame potassium, steviol glycosides [stevia], sucralose, saccharins and cyclamates)
Salt	Salt content of a food product calculated by multiplying its total sodium content by 2.5
Fibre	Non-absorbable carbohydrates, including cellulose, hemicellulose, lignin, vegetable gums and pectin (AOAC method)

* A more extensive nutritional science glossary is openly available in the [Helsinki Term Bank for the Arts and Sciences](#) (partly in English).

Both WHO and these guidelines classify each food product in a specific category. The basic principle is that products used for similar purposes belong to the same category. If the selection of category is complex, the most appropriate category is selected. The guidelines do not apply to foods specifically designed to

¹⁰ Blomhoff R, Andersen R, Arnesen EK, et al. Nordic Nutrition Recommendations 2023: Principles and guidelines for a healthier diet. Copenhagen: Nordic Council of Ministers; 2023. <https://www.norden.org/en/publication/nordic-nutrition-recommendations-2023>

¹¹ National Nutrition Council and Finnish Institute for Health and Welfare. Kestävää terveyttä ruoasta – kansalliset ravitsemussuositukset 2024 ('Sustainable health through food – Finnish nutrition guidelines 2024'). Helsinki: PunaMusta Oy, 2024. <https://www.julkari.fi/handle/10024/150005>

¹² Website of the Finnish Dental Association. Terveelliset ruokatottumukset ('Healthy food habits'). Accessed 5 November 2024. Available at <https://www.hammaslaakariliitto.fi/fi/yleistietoa-suunterveydesta/ravinto-ja-suunterveys/terveelliset-ruokatottumukset>.

¹³ Karies (hallinta) ('Caries management'). Current Care Guideline. Workgroup appointed by the Finnish Medical Society Duodecim and the Finnish Dental Society Apollonia. Helsinki: Finnish Medical Society Duodecim, 2020. Accessed 5 November 2024. Available at <https://www.kaypahoito.fi/hoi50127>.

¹⁴ WHO Regional Office for Europe nutrient profile model: second edition. World Health Organization 2023. <https://www.who.int/europe/publications/i/item/WHO-EURO-2023-6894-46660-68492>

¹⁵ Homepage of the Heart Symbol. Heart Symbol product criteria. Accessed 15 October 2024. Available at https://ammattilaiset.sydanmerkki.fi/elintarviketeollisuus/tuotteiden_myontamisperusteet.

supplement the diet and nutritional requirements of children under the age of three. This means the nutritionally regulated infant and follow-up formula, processed cereal-based food and baby food referred to in EU legislation.¹⁶ In contrast, the guidelines apply to other food products commonly consumed by children and potentially considered children's food (e.g., custards and breakfast cereals).

Table 2 presents the nutrient criteria for each product category, which have been justified in detail in a separate background report. If at least one of these criteria is met, the food in question is classified as unhealthy and should not be marketed to children. Regardless of nutritional content, products in the following four categories should not be marketed to children:

- 1) Confectionary products, chocolate and sugar products
- 2) Ice creams, sorbets and water-based ices
- 3) Energy drinks
- 4) Alcoholic beverages and their non-alcoholic equivalents

All foods in the above categories are so nutritionally unhealthy that it is hard to identify a clearly healthier option within each category. In addition, children may be unable to distinguish between products with a similar purpose. As marketing for children focuses precisely on the above product categories (excluding alcoholic beverages), restrictions are justified.

¹⁶ Regulation (EU) No 609/2013 of the European Parliament and of the Council. Accessed 11 December 2024. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32013R0609>

Table 2 Product category–specific nutrient criteria for restricting marketing. If at least one of the criteria is met, marketing should not target children.

Product category	Detailed content description (example products)	Criteria for restricting marketing (per 100 g)
1. Confectionary products, chocolate and sugar products	- Confectionary products (e.g., sweets, toffees, liquorice, marzipan, chewing gum) - Chocolate (e.g., dark chocolate, milk chocolate, white chocolate, chocolate bars) - Nuts with a sweet coating and dried fruit (e.g., yoghurt-coated nuts, chocolate raisins) - Energy bars (e.g., protein bars) - Sweet toppings and spreads (e.g., caramel sauce, nutty chocolate spread) - Sugar, syrup, honey and other sugar products The product category does not include: Cereal- and nut-based nutrition bars (belong to the category 'Biscuits and pastry products')	All products (excluding xylitol products meeting the criteria for Finnish Dental Association recommendations)
2. Savoury snacks	- Potato crisps and similar snacks regardless of the main ingredient (e.g., rye crisps, sweetcorn snacks, lentil crisps, vegetable crisps) - Salted nuts and similar products (e.g., chilli nuts) - Savoury biscuits and similar products (e.g., savoury crackers or pretzels, fish-shaped savoury snacks and salted sticks) - Popcorn	Free sugar > 0 g Sweeteners > 0 g Salt > 0.25 g Fibre < 10 g
3. Ice creams, sorbets and water-based ices	- Dairy (milk- and cream-based) ice cream - Frozen yoghurt - Equivalent plant-based products - Sorbet - Ice lollies	All products
4. Energy drinks	Beverages containing caffeine which often also contain guarana, taurine, glucuronolactone or other stimulants and are supplemented with B-complex vitamins, minerals, inositol or choline	All products
5. Alcoholic beverages and their non-alcoholic equivalents	- Drinks containing alcohol, i.e., ethanol (e.g., cider, the Finnish low-alcohol beverages lonkero ('long drink') and kotikalja (home-brewed low-alcohol beer), wine, spirits, cognac, rum, whiskey) - Equivalent products from which alcohol has been removed (e.g. non-alcoholic beer)	All products

Product category	Detailed content description (example products)	Criteria for restricting marketing (per 100 g)
6. Juice, soft drinks, bottled water and other beverages	- Juice, squash, nectar and juice-based beverages (e.g., fruit and berry smoothies containing juice as an ingredient) - Undiluted juice (100% fruit or vegetable juice) - Soft drinks and sports drinks - Flavoured and unflavoured bottled water, mineral water - Coffee, tea and herbal infusions - Mead, kombucha and equivalent fermented beverages whose alcohol content is usually below 1.2%	Sugar > 0.5 g Sweeteners > 0 g
7. Dairy milk, buttermilk and milk-based beverages as well as equivalent plant-based drinks	- All dairy milk, buttermilk and milk-based beverages (e.g., milkshakes, hot chocolate, coffee drinks, smoothies, yoghurt drinks) - Equivalent plant-based drinks (e.g., oat, soya and rice drinks)	Fat > 0.5 g, of which saturated fat > 30% (No marketing restrictions apply to products if their total fat content is 0.5 g or less, regardless of the type of fat.) Sugar > 5 g Sweeteners > 0 g Salt > 0.13 g
8. Yoghurts, custards and equivalent dairy or plant-based products	- Yoghurts and yoghurt-based spoonable products - Quark, high-protein quark, the fermented milk products viili and skyr, and equivalent spoonable milk-based products - Custards, mousse, foam and dairy-based sauces (e.g., vanilla sauce) - Sour cream, crème fraîche - Equivalent plant-based products	Fat > 1 g, of which saturated fat > 30% (No marketing restrictions apply to products if their total fat content is 1 g or less, regardless of the type of fat.) Sugar > 10 g Sweeteners > 0 g Salt > 0.25 g
9. Cheese and equivalent plant-based products	- Ripened cheese (Emmental, Edam, Gouda and Parmesan) - Melting cheese - Cream cheese and other unripened cheese (e.g., feta, mozzarella, goat cheese) - Cottage cheese - Equivalent plant-based products	Fat > 17 g, of which saturated fat > 30% (No marketing restrictions apply to products if their total fat content is 17 g or less, regardless of the type of fat.) Salt > 1.2 g
10. Sweet biscuits and baked goods	- Sweet biscuits and other hard baked goods (including snack bars and rusks) - Sweet and savoury soft baked goods (e.g., cakes, buns, muffins, pies, croissants, Danish pastries, donuts, waffles, pancakes) - Flour mixes for making the above products - Cereal-based snack bars	Saturated fat > 30% of fat Sugar > 20 g Sweeteners > 0 g Salt > 0.7 g Fibre < 6 g

Product category	Detailed content description (example products)	Criteria for restricting marketing (per 100 g)
11. Bread	All bread excluding crispbread and rye crisp	Fat > 5 g, of which saturated fat > 20% (No marketing restrictions apply to products if their total fat content is 5 g or less, regardless of the type of fat.) Sugar > 7 g Salt > 0.9 g Fibre < 6 g
12. Crispbread and rye crisp	Crispbread, rye crisp	Fat > 5 g, of which saturated fat > 20% (No marketing restrictions apply to products if their total fat content is 5 g or less, regardless of the type of fat.) Sugar > 5 g Salt > 1.2 g Fibre < 10 g
13. Cereal-based breakfast foods	- Flakes, bran, flour and other unflavoured cereal products - Cereals, muesli and other flavoured cereal-based products (e.g., granola, rice pops, corn flakes) - Porridge mix The product category does not include: Hot instant cereals (belong to the product category 'Ready meals')	Saturated fat > 30% of fat Sugar > 15 g Sweeteners > 0 g Salt > 1 g Fibre < 6 g
14. Pasta, rice and equivalent grain-based side dishes	- Fresh and dried pasta and noodles - Rice - Grain-based side dishes (e.g., barley and oat groats, whole grains, grain mixes), couscous, bulgur and quinoa The product category does not include: Flavoured instant noodles (belong to the product category 'Ready meals')	Fibre < 6 g
15. Unflavoured meat, fish and eggs	- Unflavoured meat and fish (e.g., mince, fillets and strips) - Eggs	Saturated fat > 30% of fat Added salt or ingredients containing sodium, or both > 0 g

Product category	Detailed content description (example products)	Criteria for restricting marketing (per 100 g)
16. Meat and meat products, fish and seafood products as well as plant-based analogues	• Marinated meat or fish • Preserved meat or fish • Meat and meat products (e.g., steaks, patties, balls and nuggets) • Fish and seafood products (e.g., fish fingers) • Sausages, hot dogs, cold-smoked and cured sausages, liver sausage and spread • Cold cuts and whole-meat products • Equivalent plant-based products (e.g., balls, steaks, sausages, hot dogs and cold cuts) • Plant-based protein products intended for use similarly to plain or marinated meat (e.g., pulled oats, ground fava bean, tofu, seitan)	Saturated fat > 30% of fat Salt > 1.0 g
17. Ready meals and convenience foods	• Composite foods and convenience foods prepared according to instructions • Ready meal components (e.g., seasoned instant noodles, chips) • Convenience foods (including in a restaurant)	Saturated fat > 30% of fat Sugar > 7 g Salt > 0.75 g
18. Fats and oils	• Spreadable fats (e.g., butter, butter blends, margarine, and vegetable oil spreads) • Oils (e.g., rapeseed and olive oil) • Liquid vegetable oil spreads	Saturated fat > 30% of fat Salt > 1 g
19. Sauces and pastes	• Ketchup and mustard • Sauces and condiments (e.g., BBQ sauce, soy sauce, fish sauce and similar Asian-style condiments, curry paste, salsa) • Dips and dipping sauces • Pastes and spreads (e.g., hummus) • Salad dressings, mayonnaise, hamburger, and sandwich sauces • Cooking sauces (e.g., pasta sauce) • Broths (including those made from stock cubes according to instructions)	Saturated fat > 20% of fat Sugar > 15 g Sweeteners > 0 g Salt > 1 g
20. Fruit and vegetables	• Fruit and berries • Root and other vegetables (including potato, sweet potato, and other starchy root vegetables) • Pulses (e.g., lentils, beans, chickpeas, peas) • Nuts and seeds • Mushrooms The product category includes: Chopped, grated, pureed, frozen, boiled and dried products	Added fat > 0 g Free sugar > 0 g Added salt > 0 g

Product category	Detailed content description (example products)	Criteria for restricting marketing (per 100 g)
21. Fruit and vegetable products	• Canned and pickled vegetables and pulses • Olives, sun-dried tomatoes, and similar products • Vegetables and pulses in sauces • Battered or breaded vegetable products (e.g., onion rings) • Tinned fruit • Jams and marmalades • Dried fruit bars and chews	Saturated fat > 20% of fat Free sugar > 0 g Salt > 0.5 g

4. Marketing aimed at children

In this context, marketing means all measures designed to boost the sales of food products. WHO defines marketing as follows: *“Any form of commercial communication, message or action that acts to advertise or otherwise promote a product or service, or its related brand, and is designed to increase, or has the effect of increasing, the recognition, appeal and/or consumption of products or services.”*⁷ This definition encompasses all forms of direct and indirect marketing that advertise a product or service or otherwise promote its recognition or sales.

The present guidelines cover all marketing channels, including television, radio, magazines, schools and extracurricular environments, shops, outdoor spaces, websites, mobile apps, social media channels, digital games and streaming services. Marketing also includes food packaging, promotional toys, sponsorship and product placement.

Particular attention must be paid to digital marketing and social media influencer marketing. On social media, the line between marketing and other content may be blurred and difficult to distinguish. Children do not necessarily understand when they are being targeted by marketing. Many social media influencers have followers aged both under and over 18 years, and the influencers themselves may be minors.

These guidelines seek to restrict the marketing of certain foods to children. Determining if marketing is aimed at children relies on the overall impression created. It requires comprehensive assessment, taking into account factors including the following:

1. Marketing content

- Do children typically use or like the marketed product (goods or services)?
- Does the design or visual appearance of the product include features appealing to children, such as bright colours, unusual or exaggerated fonts, images, signs or symbols, emojis, memes, GIFs, filters and lenses (Image 1)?
- Does the marketing include features appealing to children, such as animation, fantasy elements, avatars, other children, celebrities, influencers, sportspeople, animals, music or (a young person's or a childlike) voice?
- Does the language used or other audio target particularly children? Are children, for example, encouraged to ask their parents or other adults to buy the product (goods or services) for them?

- Does the marketing include entertaining elements appealing to children, such as games, competitions or exclamations?

2. Marketing tools

- When and where is the marketing seen or heard? This may happen, for example, at the cinema before a children's film, on a platform aimed at children or frequently used by them (e.g., TikTok, Snapchat or YouTube) or in events or facilities designed for children.
- Does the marketing use effects that are popular among children on social media, such as trendy songs, hashtags and filters?
- Does the marketing appeal to children with additional or free products, such as gifts, promotional toys, collectibles and games?
- Is the product placed in shops in an area designated for children's products (such as toys)?
- Does the marketing entice parents or other adults to buy the product for children?



Image 1 Example of a chocolate bar and a packet of sausages designed to attract the attention of children in particular. The packaging features bright colours and images appealing to children. Created with Microsoft Copilot, 2024.

Below are examples of marketing considered to target children:

- 1) Marketing at schools or events aimed primarily at children (e.g., sports competitions for children under the age of 18)
- 2) Distributing samples to children
- 3) Framing marketing as a competition, comic book or activity page
- 4) Encouraging children through marketing to persuade their parents to buy a product

The guidelines do not apply to the following circumstances:

- 1) Providing a product description, ingredients list and nutritional information on the company website or in a shop without using marketing elements
- 2) Sponsoring if using only the company's name or logo (or both), not an individual product or product category; no other advertising capturing children's attention should be connected to sponsored content or events

5. Checklist

When designing food marketing for children, please consider the following points:

1. **To what product category does the item belong?** The foods included in each product category are listed in Table 1. If the selection of category is complex, the most appropriate category is selected.
 - Regardless of nutritional content, foods belonging to the category 'Confectionary products, chocolate and sugar products', 'Ice creams, sorbets and water-based ices', 'Energy drinks' or 'Alcoholic beverages' should not be marketed to children.
 - For food belonging to any other product categories, continue to item 2.
2. **Is the food classified as unhealthy based on nutrient criteria for food categories, as outlined in Table 1?**
 - For example, a custard-based dessert containing 15 g of sugar per 100 g is classified as an unhealthy food. (The limit for the total amount of sugar in custards is 10 g per 100 gr, and any custards exceeding that limit are classified as unhealthy.)
 - If a food is classified as unhealthy, its marketing should not target children. Continue to item 3 and confirm which forms of marketing are considered to target children.
 - If a food is not classified as unhealthy, its marketing to children need not be restricted. Continue to item 4.
3. **Determining if marketing is aimed at children relies on the overall impression created, with assessment focusing on factors including the following:**
 - The product has been designed specifically for children, or its packaging has been designed to capture their attention (e.g., cartoon characters, unusually shaped product or packaging).
 - The message has been crafted to appeal to children.
 - The marketing channel or location reaches especially children, for example, through children's programmes or events, or social media accounts or channels followed especially by children (e.g., TikTok, Snapchat, YouTube).
 - The product has been placed for sale together with other products of interest to children (e.g., toys).
 - The marketing entices parents or other adults to buy the product for children.
 - The marketing has been framed as a competition, comic book or activity page, or placed, for example, in an online game, television programme or other form of entertainment.
 - The message includes a direct invitation for children to buy the product, such as 'buy', 'try', 'you will get' or 'you will experience'.
4. **Foods not classified as unhealthy can be marketed to children.** However, the general regulations for food marketing must be taken into account:

- The Food Act¹⁷ regulates the marketing of food products to ensure consumers are not misled, for example, about the products' origin or nutritional content or how healthy they are.
- The Consumer Protection Act⁸ contains provisions on marketing that is misleading and contrary to good practice. Marketing under the said Act is overseen by the consumer ombudsman, who has published guidelines on marketing and commercial activity in schools, other educational institutions and early childhood education¹⁸ as well as influencer marketing on social media.¹⁹ The ombudsman's guidelines clarify the interpretation of the Consumer Protection Act in such environments if marketing targets children.
- In addition to Finnish law, food marketing is regulated by EU regulations, such as the Food Information to Consumers Regulation²⁰ and the Nutrition and Health Claims Regulation.²¹ Similarly to the Finnish Food Act, the former Regulation ensures that the information on food products provided in their marketing is correct and sufficient. The latter Regulation governs the nutrition and health claims (e.g., that calcium is necessary for the normal growth and development of children's bones) that can be made in marketing food products. Such claims must be scientifically justified and approved by the European Commission. The Commission maintains a register of approved health claims.²²
- The EU's Digital Services Act²³ prohibits both collecting personal data from children on digital platforms and targeting marketing accordingly.
- The marketing code of the International Chamber of Commerce includes a section on food marketing.²⁴ Although not legally binding, the code provides a globally known and recognised guidance framework for ethical marketing. In Finland, the Council of Ethics in Advertising oversees compliance with the code.

6. On preparing these guidelines

The guidelines were drawn up by researchers from the Department of Food and Nutrition at the University of Helsinki, as commissioned by the Ministry of Social Affairs and Health. The project is part of the implementation plan for the National Child Strategy. The project steering group included representatives of the Ministry of Social Affairs and Health, the Ministry of Agriculture and Forestry, the Finnish Institute for Health and Welfare, the National Nutrition Council and the Finnish Competition and Consumer Authority.

¹⁷ Food Act 9 April 2021/297, accessed 8 October 2024. https://www.finlex.fi/fi/laki/kaannokset/2021/en20210297_20210718.pdf

¹⁸ Markkinointi ja kaupallisuus kouluissa, oppilaitoksissa ja varhaiskasvatuksessa ('Marketing and commercial activity in schools, educational institutions and early childhood education'). Consumer Ombudsman's Guidelines 2021. Accessed 18 October 2024. <https://www.kkv.fi/kuluttaja-asiat/tietoa-ja-ohjeita-yrityksille/kuluttaja-asiamiehen-linjaukset/markkinointi-ja-kaupallisuus-kouluissa-oppilaitoksissa-ja-varhaiskasvatuksessa/>

¹⁹ Influencer marketing in social media. Consumer Ombudsman's Guidelines 2019. Accessed 18 October 2024. <https://www.kkv.fi/en/consumer-affairs/facts-and-advice-for-businesses/the-consumer-ombudsmans-guidelines/influencer-marketing-in-social-media/>

²⁰ Regulation (EU) No 1169/2011 of the European Parliament and of the Council. Accessed 18 October 2024. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32011R1169>

²¹ Regulation (EU) No 1924/2006 of the European Parliament and of the Council. Accessed 18 October 2024. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32006R1924>

²² European Commission. Nutrition and health claims. Accessed 18 October 2024. https://food.ec.europa.eu/food-safety/labelling-and-nutrition/nutrition-and-health-claims_en

²³ The website of the European Commission's digital strategy. Digital Services Act Package. Accessed 9 October 2024. <https://digital-strategy.ec.europa.eu/en/policies/digital-services-act-package>

²⁴ ICC framework for responsible food and beverage marketing communications. International Chamber of Commerce 2019. <https://kauppakamari.fi/wp-content/uploads/2023/08/icc-framework-for-responsible-food-and-beverage-mar.pdf>

Key stakeholders and collaboration partners (e.g., marketing specialists as well as representatives of research institutes, NGOs, food companies and the retail sector) were invited to comment on the project in the otakantaa.fi service, where the draft guidelines were openly available for comment.

The guidelines are based on a recommendation on marketing unhealthy food products to children updated by the WHO in 2023⁷ and a report on the EPELI project carried out in 2020 and 2021 with funding from the Prime Minister's Office.²⁵ The latter investigated the state of regulating the marketing of unhealthy foods to children in Finland and their exposure to such marketing, and suggested regulatory improvements. In addition, the guidelines were developed by taking into account a Norwegian legislative proposal prohibiting the marketing of unhealthy foods to children.²⁶

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²⁵ Fogelholm M, Närvänen E, Erkkola M, et al. Epäterveellisten elintarvikkeiden markkinointi lapsille ja nuorille: Tilanne Suomessa ja pelisääntöjä markkinoinnin säätelyyn ('Marketing unhealthy foods to children and adolescents: Situation in Finland and rules for regulation'). Publications of the Government's analysis, assessment and research activities 2021:57.

<https://julkaisut.valtioneuvosto.fi/handle/10024/163546>

²⁶ Government of Norway. Høring om forslag til ny forskrift om forbud mot markedsføring av visse næringsmidler rettet mot barn og forslag til ny hjemmel i matloven § 26 a for å kunne ilegge overtredelsesgebyr ved brudd på forskriften ('Consultation on a proposal for a new regulation banning the marketing of certain foods aimed at children and a proposal for a new provision in section 26a of the Food Act to impose penalties for violations of the regulation'). Accessed 18 October 2024.

<https://www.regjeringen.no/no/dokumenter/horing-forslag-til-ny-forskrift-om-forbud-mot-markedsforing-av-visse-naringsmidler-rettet-mot-barn-og-forslag-til-ny-hjemmel-i-matloven-26-a-for-a-kunne-ilegge-overtredelsesgebyr-ved-brudd-pa-forskriften/id3050866/>