



World Vision 

ENOUGH

Policy Brief: Ensuring Children's Right to Healthy Diets: The Role of Mandatory Food Regulation in Creating Healthy Food Environments

Introduction

In the global effort to combat child hunger and malnutrition, strengthening government oversight of the food industry is paramount to secure every child's right to a healthy diet. The private food and beverage sector wields substantial influence through multimillion-dollar marketing campaigns and political activity for its interests, and this profoundly shapes children's dietary habits and environments. Governments must enact mandatory food regulations to curb the marketing of unhealthy food and drinks to children and promote nutritious diets across settings such as homes, schools, and communities, protecting children's rights to healthy food environments and diets. Mandatory food regulations will create a safer and healthier food environment for children, and the

food industry has a significant role to support such environments.

Given the power of the food industry and its strategic investments in lobbying networks to influence public policy-making, governments must also safeguard public health interests and human rights, particularly those of children. This can be achieved by establishing transparent principles of engagement in policy-making processes to protect against commercial interests and lobbying. World Vision, as part of the [ENOUGH Campaign](#) to end child hunger and malnutrition, advocates for comprehensive mandatory food regulations and government standards for private sector engagement to create healthier food environments and diets for all children.

Scope of the Problem

In recent decades, there has been a global shift towards diets characterised by low dietary diversity and an increasing reliance on industrially processed food and drinks, especially products high in salt, sugar, oils, and additives (known as ultra-processed food and drinks, or UPFs).¹ UPFs are cheap and easily accessible in virtually every community worldwide.² Global diets are increasingly composed of UPFs, as evidenced from sales and consumption trends worldwide.³ This may be in part due to rising food costs, with 3.1 billion people worldwide unable to afford a healthy diet in 2021.⁴ In low- and middle-income countries such as Colombia and Mexico, calories from UPFs comprise 16 per cent and 30 per cent of total energy intake among adults, respectively.³ In high-income countries like the United States (US) and Canada, this figure rises to as much as 80 per cent.⁵ The significant portions of UPFs in children's diets are worrying. UPFs accounted for 18 per cent of total energy intake among preschool children in Colombia and 68 per cent among adolescents in the United Kingdom (UK).⁶ Ultra-processed food is directly linked to harmful health effects, including a higher risk of heart disease, cancer, type 2 diabetes, adverse mental health, and early death.³ Among children, ultra-processed food is linked with various markers of obesity and diet-related non-communicable diseases.⁷

Globally, 478 million young children (71%) consume four or fewer of the eight food groups in a day—the very definition of food poverty.⁸ At the same time, among young children 6 to 23 months, there is growing consumption of unhealthy food and drinks, which displace nutritious complementary foods and breastmilk that are essential for development.

The proliferation of markets and the consumption of commercial milk formula, as well as food and drink products for young children, are serious issues. They disrupt and commercialise infant and young child feeding systems (or 'first food systems'), moving them away from optimal diets that include breastmilk and local, indigenous whole foods.⁹ With the shift away from healthy diets, child obesity rates have risen, with adolescent obesity quadrupling since 1990.¹⁰ The most recent estimate of the global burden of overweight and obesity is 427 million children and adolescents.¹⁰

Robust evidence shows that aggressive and unethical marketing by the food industry has a detrimental impact on health, food environments, and dietary behaviours, particularly targeting children who are vulnerable due to their age and development.¹⁰ Taste, convenience, affordability, and emotional appeal are utilised by the food industry to promote fast food and processed products high in salt, sugar, and unhealthy fats, especially to children. This marketing saturation promotes unhealthy food preferences and consumption patterns that can persist into adulthood.¹¹ However, the industry's rhetoric around 'freedom of food choice' and 'individual responsibility for food choices' often serves to deflect accountability from their contribution to public health issues, unfairly placing the responsibility of such issues solely on individuals (for example, childhood obesity on parents).¹²

Moreover, industry influence in public policy-making is problematic for establishing effective food regulations.¹² Currently, no comprehensive mechanism exists for any private sector, except for the World Health Organization (WHO) Framework Convention on



Tobacco Control, to exclude private sector engagement from public policy-making.¹¹ Further, the food and beverage sector that produces UPFs strategically invests and builds vast networks of corporate interest groups and trade associations to sustain its power in global food governance decisions.¹² The food sector has capitalised on opportunities to generate profit with UPFs, and without government oversight and regulation, the food industry will not change its business and political activities for the promotion of healthy diets for all children.

Current food regulations require strengthening to ensure that all environments frequented by children—including schools, childcare centres, health centres, and public transport services—are covered by policies and standards promoting healthy food and food environments for children. Digital media and platforms are largely unregulated, and thus require stringent oversight to mitigate unethical marketing influences and other child protection issues. Mandatory food regulations will support the private sector to prioritise public health over profit-driven priorities.

Progress So Far

Public health efforts to promote healthy dietary habits and regulatory measures on the food industry have faced challenges.

This is due to commercial influences to promote unhealthy food environments and consumption, on top of intense lobbying efforts against public health policies and regulations. Voluntary measures such as self-regulation have proven ineffective in changing industry practices and reducing public consumption of unhealthy foods and drinks, necessitating mandatory regulations from governments.¹³ The issue of voluntary measures for industry is that they do not incentivise companies to adopt them. Additionally, they penalise industries that do take action by creating a perceived or real competitive disadvantage compared to those who take little to no action. One example from Fiji showcases how self-regulated taxes on sugar-sweetened beverages could not be sustained, as uneven implementation spurred lobbying from companies to abolish this initiative.¹³

A suite of mandatory food regulation policies is needed per context to support healthy diets for all, especially children and adolescents.

In early life, the first food systems need to be protected from unethical promotion of breast-milk substitutes (commercial milk formula) and inappropriate complementary food and drink products to caregivers of young children. The guidance is encompassed in the [WHO International Code of Marketing for Breast-Milk Substitutes](#) and [subsequent World Health Assembly resolutions](#) (referred to as the 'Code'), as well as [WHO's guidance on Ending Inappropriate Promotion of Foods to Young Children](#). In the latest report, 33 countries have substantial alignment with the Code, 40 countries have moderate alignment, 73 countries have some provisions, and 48 countries have no legislation on the Code.¹⁴ This demonstrates the ongoing struggle for worldwide Code implementation,

despite being in existence for over 40 years. The history of lobbying efforts to dilute or oppose Code legislation and enforcement is extensive.⁹ Strengthening and investing into formal enforcement and monitoring mechanisms are key actions to address barriers to Code enforcement where legislations exist.

WHO also has guidance on marketing of food and non-alcoholic beverages for children, which underscores that **any marketing, including food and drink marketing, is unethical when directed at children up to 18 years.**¹⁵ Regulations on marketing restrictions of unhealthy food and drink to children may include bans on advertisements on television (TV), radio, and social media targeted to children, in health centres and childcare centres and schools, parks, and recreation spaces for children. Restrictions on the timing of advertisements to reduce marketing exposure to children and adolescents have limited effectiveness due to gaps in covering multiple forms of media, especially digital media. Further, the timing of adverts may not extend to evening times when children are also exposed to unhealthy food and drink promotions on TV. Marketing restrictions may also include rules to reduce targeting of products to children, which may include the ban on use of cartoon characters, toys, games, or prizes to promote unhealthy products. Chile has the most comprehensive regulatory approaches for addressing childhood obesity in its Food Labelling and Advertising Law, which consists of regulations for school food sales, front-of-package warning labels and restrictions on food and drink high in energy, saturated fats, sugars, and sodium.¹⁶

Evaluations of the Chilean law found that it decreased overall purchased calories, sugar, saturated fat, and sodium, particularly from foods high in these components. The law improved the nutritional content of the food supply, reduced the availability of unhealthy foods in schools, and helped consumers identify



unhealthy products and discourage their consumption.¹⁷ Under this legislation, child exposure to unhealthy TV food marketing was reduced.¹⁶ Two different phases of restrictions were used to reduce ad exposure of unhealthy food and drink, including first a ban on ads for TV programmes created for children or with at least 20 per cent viewership from children and then a ban from 6:00 am to 10:00 pm for all such unhealthy food and drink ads; the latter being more effective.¹⁶ The law also bans the use of cartoon characters (e.g. Tony the Tiger on Frosted Flakes cereal boxes), children's music, and incentives such as toys and prizes to promote unhealthy products to children in TV media and on packaged products.¹⁶

Beyond marketing regulations, some governments have implemented fiscal policies to protect children, such as regulating unhealthy foods through sugar taxes on sugary beverages and snacks. These policies effectively discourage consumption by increasing prices for consumers and have been adopted in over 40 countries.¹⁰ For instance, a mandatory sugar tax ranging from 20 per cent to 50 per cent on products has proven effective and can continue to enhance its impact over time with inflation adjustments.¹⁰ Mexico's implementation of a sugar tax of a peso per litre decreased purchase of taxed sugary drinks by 7.6 per cent in 2014 and 2015; the revenue generated was over US\$2.6 billion, some of which was invested for water fountains at schools. The UK's sugar tax reduced sugar intake by nearly half for children and adults

within the first year of the legislation.¹⁸ A modest tax of only about 10 per cent was associated with a decline in purchases of taxed drinks and an increase in sales in healthier drinks that were untaxed, indicating that the tax was effective.¹⁹ Contrary to concerns about negative economic impacts, evidence from Mexico, the UK, and the US suggests these taxes did not adversely affect the economy, trade, or jobs.¹⁰ **Combining tax policies with income transfer programmes to support vulnerable households promotes equity by improving access to healthy foods where purchasing power is limited.**¹⁰ This successful approach can serve as a model for replication and scaling in other countries.

Front-of-pack labelling, as implemented in various countries including Chile, Israel, Mexico, Peru, and Uruguay, with plans for introduction in Argentina, Brazil, Colombia, and Venezuela, mandates that packaged foods and drinks meeting certain nutrition criteria or containing specific ingredients (such as non-caloric sweeteners) prominently display warning labels.² These labels clearly indicate whether a product is high in sugar, saturated or trans fats, sodium, or calories, empowering consumers to quickly identify unhealthy options, as most people spend less than 10 seconds selecting an item to purchase.² Front-of-pack labelling, particularly use of warning labels, has been effective among children and adolescents to identify unhealthy food and drinks.² These labels can also prompt industry to improve the nutrition profiles of the products they sell.²

Recommendations

World Vision is committed to promote mandatory regulatory interventions aimed at cultivating healthier food environments and safeguarding the well-being of children and vulnerable populations worldwide. We will actively seek and engage with stakeholders to align advocacy efforts with national and global priorities on food regulation. We will participate in coalitions and movements dedicated to food regulation advocacy, along with children and youth, to amplify impact and leverage collective action to advance regulatory agendas. These efforts must prioritise the protection of children's rights to healthy diets and food environments, aligning with global health and nutrition goals. We urge all stakeholders—including governments, civil society organisations, and the private sector—to join us in advancing these crucial measures to ensure every child has access to the nutritious food they need to thrive. Together, we can make a profound impact on the health and future of children worldwide.

In advocating for children's rights to healthy food environments and diets, World Vision calls for:

- Governments to implement comprehensive mandatory regulations and enforce these regulations through robust monitoring systems aimed at reducing the appeal and consumption of unhealthy food and beverages to children and adolescents. This includes restricting marketing directed at children in mass media (including digital media), implementing fiscal policies such as taxes, and requiring clear front-of-pack warning labels for unhealthy food and beverages. These measures are designed to reduce the commercial influence that drives the consumption of unhealthy products among children and adolescents and incentivise improved nutrition profiles of unhealthy products.
- Governments to establish policies that eliminate the promotion and availability of unhealthy food and drinks in settings where children are present, such as health facilities, childcare centres, and schools. This ensures that these environments support healthy eating habits and contribute positively to children's nutrition.
- Governments to establish transparent guidelines for banning the private sector in policymaking. These rules are essential to prevent conflicts of interest and prioritise public health goals over commercial interests. It is crucial that food and beverage industries, as well as related corporate interest groups, do not influence public policy decisions that impact children's rights to nutrition and health.
- Private sector to encourage and comply with ethical marketing practices for children and adolescents and cease interference and lobbying activities against public health interests in food regulations, including full ratification and enforcement of the International Code of Marketing of Breast-Milk Substitutes and subsequent World Health Assembly resolutions.
- Mobilisation of grassroots movements, including children and youth, that push for meaningful change in food policy. Civil society organisations to play a pivotal role in advocating for effective food regulations and healthier food environments. They should actively engage with governments, communities, and partners to raise awareness about the importance of mandatory food regulations to protect children's rights.

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