

LEGAL CONTROL OF FOOD ADVERTISING ON CHILDREN PROGRAM*

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ABSTRACT

The incidence of child overweight and obesity has been increasing dramatically all over the world. Children with overweight and obesity are subsequently at risk of developing a number of diseases. Overweight and obesity during the childhood will result in the same conditions during adulthood, and suffering from other chronic diseases and death at early age. One among factors that causes overweight and obesity is food marketing aimed at children especially foods producing high energy but less nutritional values. One of the best marketing approaches is to advertise foods on children programs and programs with children as the target group. Today advertising is a key marketing strategy in business. In the opinion of marketing professionals, children is a major group as potential consumers despite without their own purchasing power but have influence over those with actual purchasing power like parents and guardian. According to the investigation on advertisement and children behavior, it was found that television advertisements affect children's consumption behavior.

Relevant laws on food advertising in Thailand concern with prescribed rules for advertising in general while none of them is specific to food advertising targeted at children. Given this condition, advertisers employ various strategies in food advertisement aiming to simulate and raise the purchasing demand. However, children are less mature to distinguish between food that is and is not beneficial to their health and hence believe in the advertisement messages without considering about nutritional values.

This thesis mainly focuses on legal measures and self-regulation measures for the control of food advertising on children program particularly in the United Kingdom, Australia, and Singapore. These 3 countries made available the code of food advertising on children program that encompasses both the contents and formats of advertisement, including the restriction on advertising regarding types of program, types of food, and advertising time. Moreover, they prohibited the use of particular advertising strategies in children programs. In comparison, food advertising laws and measures in Thailand failed to protect children from food marketing on television through children program. Revision of Thai laws should thus be taken into consideration

Keywords: Advertising, food, children

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บทคัดย่อ

อัตราการมีน้ำหนักเกินและโรคอ้วนในวัยเด็กในปัจจุบันกำลังเพิ่มอย่างรวดเร็วทั่วโลก เด็กที่มีน้ำหนักเกินและเป็นโรคอ้วนยังเสี่ยงต่อการเป็นโรคต่างๆ ตามมา ถ้ามีภาวะน้ำหนักเกินและโรคอ้วนตั้งแต่เด็กจะส่งผลถึงการเป็นผู้ใหญ่ที่เป็นโรคอ้วน เป็นโรคเรื้อรังและเสียชีวิตตั้งแต่อายุยังน้อย อย่างไรก็ตาม มีปัจจัยหลายอย่างที่อาจทำให้เกิดภาวะน้ำหนักเกินและโรคอ้วน ซึ่งหนึ่งในนั้นคือการทำการตลาดในอาหารที่มุ่งเป้ากับเด็ก โดยเฉพาะอาหารที่ให้พลังงานสูงแต่มีคุณค่าทางอาหาร และการทำการตลาดที่ดีที่สุดวิธีหนึ่งก็คือการโฆษณาอาหารในรายการเด็กและรายการที่มีกลุ่มเป้าหมายเป็นเด็ก ซึ่งในปัจจุบันการโฆษณา ถือเป็นกลยุทธ์ทางการตลาดที่สำคัญในทางธุรกิจ ซึ่งเด็กถือเป็นกลุ่มผู้บริโภคที่สำคัญ แม้ไม่มีกำลังซื้อเป็นของตนเอง แต่ก็มีอิทธิพลเหนือผู้มีกำลังซื้อจริง ๆ อย่างพ่อแม่และผู้ปกครอง ทั้งนี้ จากการศึกษาเรื่องการโฆษณากับพฤติกรรมของเด็ก พบว่าการทำการโฆษณาทางโทรทัศน์ต่อเด็กมีผลต่อการบริโภคของเด็ก

กฎหมายที่เกี่ยวข้องด้านการโฆษณาอาหารในประเทศไทย ประกอบด้วยพระราชบัญญัติอาหาร พ.ศ. 2522 พระราชบัญญัติคุ้มครองผู้บริโภค พ.ศ.2522 พระราชบัญญัติการประกอบกิจการกระจายเสียงและกิจการโทรทัศน์ พ.ศ. 2551 และประกาศสำนักงานคณะกรรมการอาหารและยา เรื่อง หลักเกณฑ์การโฆษณาอาหาร พ.ศ. 2551 พบว่า เป็นกฎหมายที่เกี่ยวข้องกับการกำหนดหลักเกณฑ์ในการโฆษณาสินค้าโดยทั่วไปซึ่งไม่ได้เจาะจงการโฆษณาอาหารที่มีกลุ่มเป้าหมายเป็นเด็ก ด้วยเหตุนี้ นักโฆษณาจึงใช้กลยุทธ์ต่าง ๆ ในการโฆษณาอาหารเพื่อกระตุ้นความต้องการซื้อสินค้า และด้วยความเป็นเด็กไม่มีวุฒิภาวะพอที่แยกแยะว่าสิ่งไหนเป็นประโยชน์หรือไม่เป็นประโยชน์หลงเชื่อตามโฆษณา โดยไม่คำนึงถึงคุณค่าทางโภชนาการแต่อย่างใด

วิทยานิพนธ์ฉบับนี้ศึกษากฎหมายและมาตรการในการควบคุมการโฆษณาอาหารในรายการเด็ก ในประเทศอังกฤษ ประเทศออสเตรเลีย และประเทศสิงคโปร์ ซึ่งมีการกำหนดหลักเกณฑ์ในการโฆษณาอาหารในรายการเด็กครอบคลุมทั้งรูปแบบและเนื้อหา โดยมีการกำหนดประเภทรายการที่ห้ามโฆษณา มีการกำหนดประเภทอาหารที่ห้ามโฆษณา มีการกำหนดระยะเวลาในการโฆษณา รวมถึงห้ามมีการใช้กลยุทธ์ต่างๆ ในการโฆษณาอาหารในรายการเด็ก เมื่อเปรียบเทียบกับกฎหมายและมาตรการในการควบคุมการโฆษณาอาหารของประเทศไทย นั้น พบว่าไม่เพียงพอต่อการคุ้มครองผู้บริโภคที่เป็นเด็กจากการทำการตลาดอาหารผ่านทางโฆษณาในรายการเด็ก

คำสำคัญ: โฆษณา, อาหาร, เด็ก

Introduction

In Thailand, a number of studies indicated increasing trends in overnutrition among Thai children. There are 50,000 children more reported with overnutrition each year. During 2008 – 2009, about 11 – 12 % of children aged 1 – 5 and 6 – 9 years display their body weight in a range of overweight and obesity, and the figures rise to 14.9 % between ages 10–14 years.¹ Including in early childhood children aged 1-5 years, overweight and obesity was 5.8 % in 1995 and increased to 8.5 % in 2009. Similarly, this trend was also found in school age children between 6-14 years; that is, 5.8 % in 1995 and 9.7 % in 2009.² According to the facts, it can conclude that the ages of Thai obesity child are between 1-14 years old.

¹ Office of the National Economic and Social Development Board, Ministry of Public Health, Mahidol University, Thailand Healthy Lifestyle strategic Plan B.E.2554-2563 8 (2554)

² สถาบันวิจัยประชากรและสังคม มหาวิทยาลัยมหิดล, สำนักงานกองทุนสนับสนุนการสร้างเสริมสุขภาพ, สำนักงานคณะกรรมการสุขภาพแห่งชาติ, สุขภาพคนไทย 2557 11 (พิมพ์ครั้งที่ 1.นครปฐม: บริษัทอมรินทร์พริ้นติ้งแอนด์พับลิชชิ่ง จำกัด (มหาชน) 2557) (Institute for Population and Social Research, Mahidol University, Thai Health Promotion Foundation, National Health Commission Office, Thailand 11 (1st ed.2014).

Moreover, Assoc.Prof. Dr. Ladda Mosuwan, a pediatrician, pointed out that obesity now become a severe threat of Thai children as the prevalence of overweight and obesity has constantly increased.³ Overweight during childhood is associated not only with an increased risk of adult obesity, but also with a number of immediate health-related problems.⁴

One among factors that causes overweight and obesity in children is food advertising on children program. According many researchers found that more increased television viewing time to the food advertisements, more increasing the children's attempts to influence their parents' purchases, particularly towards those food items for which they had seen an advertisement, and showed that the more advertisements a child could remember, the more they subsequently ate.⁵ As children are less cognitive mature to distinguish between what is and is not beneficial but only think about what they like or want, they believe in what is presented in the advertisement without any concern with nutritional value.

However, relevant laws on food advertising in Thailand include the Food Act B.E.2522, the Consumer Protection Act B.E.2522, the Broadcasting Business Act B.E.2551, and the Notification of the Food and Drug Administration on Rules for food Advertising B.E.2551. The review of these laws suggested that they concern with prescribed rules for advertising in general but not specifically include those foods advertising targeted at children. Thailand has only Guideline for Practice on Foods and Snacks Advertising targeting at Children by the Advertising Association of Thailand (AAT).

This article aims to study legal measures and self-regulation measures on food advertising on children program in foreign countries, especially in The United Kingdom, Australia and Singapore where different measures to handle the problem are available. It seeks regulations for improving the current legal measures in Thailand to be comparable to other countries. The goal is to protect children consumers and enhance their quality of life.

1.The associated outcome of childhood obesity

Obesity during the childhood may lead to developing noncommunicable diseases (NCDs) such as hypertension (high blood pressure), breathing difficulties, dyslipidaemia (imbalance of fatty substances in the blood), hyperinsulinaemia (abnormally high levels of insulin in the blood), metabolic syndrome refers to a cluster of risk factors related to a state of insulin resistance, in which the body gradually becomes less able to respond to the metabolic hormone insulin. People with the metabolic syndrome have an increased risk of developing coronary heart disease, stroke and type 2 diabetes, exacerbation of asthma, type 2 diabetes,

³ *Id.*

⁴ World Health Organization, Set of recommendations on the marketing of foods and non – alcoholic beverages to children 4 (2010).

⁵ REBECCA SIXSMITH and ADRIAN FURNHAM, A content analysis of British food advertisements aimed at children and adults 25 (2009).

chronic liver disease. Including childhood obesity is associated with a higher chance of obesity, premature death and disability in adulthood.⁶

Moreover, psychological problems such as poor self-esteem, being perceived as unattractive, depression, disordered eating and bulimia, in addition, almost all obese children have experiences of teasing, social exclusion, discrimination and prejudice.⁷

2. International organization's guidelines regarding marketing of food to children

In 2006, the WHO's Technical Meeting on Marketing of Food and Non-Alcoholic Beverages to Children concluded that advertising has an adverse effect on children's understanding of food knowledge, attitude, purchase behaviour and consumption.⁸

In March 2008, Consumer International (CI) and the International Obesity Taskforce (IOTF) launched Recommendations for an International Code on Marketing of Foods and Non-Alcoholic Beverages to Children, which target the marketing of energy dense, nutrient poor foods that are high in fat, sugar and salt to children up to 16 years old. Its demands include:⁹

(1) A ban on radio or television adverts promoting unhealthy food between 06.00 and 21.00.

(2) No marketing of unhealthy food to children using new media (such as websites, social networking sites and text messaging).

(3) No promotion of unhealthy food in schools.

(4) No inclusion of free gifts, toys or collectible items, which appeal to children to promote unhealthy foods.

(5) No use of celebrities, cartoon characters, competitions or free gifts to market unhealthy food.

In May 2010, the World Health Assembly (WHA), through resolution WHA63.14, endorsed a set of recommendations on the marketing of foods and non-alcoholic beverages to children. The main purpose of the recommendations was to guide efforts by Member States in designing new policies, or strengthening existing policies, on food marketing communications to children in order to reduce the impact of marketing foods high in

⁶ WHO Obesity and overweight, <http://www.who.int/mediacentre/factsheets/fs311/en/> (last visited May 12, 2015).

⁷ Overweight and obesity: the public health problem, http://www.fph.org.uk/uploads/HealthyWeight_SectA.pdf (last visited June 4, 2015)

⁸ Consumer International, **The junk food trap marketing unhealthy food to children in Asia Pacific** 11 (2008).

⁹ *Id.*, at 29.

saturated fats, trans-fatty acids, free sugars, or salt.¹⁰ The World Health Organization has four recommended policy as follows.¹¹

- (1) Prohibiting advertising of energy-dense, micronutrient-poor food products at particular settings using specific methods or targeting a particular age group;
- (2) Prohibiting advertising of energy-dense, micronutrient-poor foods and beverages to children;
- (3) Prohibiting advertising of all food or drinks to children;
- (4) Prohibiting all commercial promotion of any products to children

3.The controlling of food advertising on children program in foreign countries

3.1 The United Kingdom

3.1.1 The controlling of food advertising on children program under legal measures

The United Kingdom specified a type of food and a kind of program prohibited for advertisements; that is, banning high in fat, sodium or sugar food in children program and program with children as the target group.¹² Including, banning on sponsorship high in fat or sodium or sugar food in such program.¹³ Moreover, product placement in children program is also prohibited.¹⁴ It control either the contents and format of advertisement targeting at children, for example, any advertisement must not encourage excessive consumption¹⁵, must not encourage children to make a request from their parents¹⁶ and it must not imply that children will be inferior to others if they do not purchase particular product.¹⁷

3.1.2 The controlling of food advertising on children program under self-regulation measures

Television Advertising Standard Code provided that the advertised messages must not mislead the children¹⁸, advertising must avoid anything likely to encourage poor nutritional habits or an unhealthy lifestyle in children¹⁹, The advertised messages should not guide or

¹⁰ World Health Organization, A FRAMEWORK FOR IMPLEMENTING THE SET OF RECOMMENDATIONS on the marketing of foods and non-alcoholic beverages to children 6 (2012).

¹¹ Oommen, V.G., Anderson, P.J., **Policies on Restriction of Food Advertising during Children's Television Viewing Times: An International Perspective** 3 (2008).

¹² Ofcom, HFSS advertising restrictions Final review

¹³ *Id.*

¹⁴ Ofcom, *Product Placement Summary of responses to consultation on issues relating to product placement*, <http://stakeholders.ofcom.org.uk/> (last visited Apr. 21, 2015).

¹⁵ Advertising Standards Code, cl. 8.3.2.

¹⁶ *Id.* cl. 7.2.1.

¹⁷ *Id.* cl. 7.2.2.

¹⁸ Television Advertising Standard Code, sec.5(5.1.2).

¹⁹ *Id.* sec.7(7.2.1).

persuade children to buy or to request their parents or other adults to buy the product²⁰, The advertised messages must support adverse effect in children's dental health²¹, promotional offers in HFSS product targeted directly at pre-school or primary school children are prohibited²², promotional offers should be used with a due sense of responsibility²³, and characters and celebrities well-known to children may not be used in HFSS product advertising directed at pre-school and primary school children.²⁴

3.2 Australia

3.2.1 The controlling of food advertising on children program under legal measures

Children Television Standard 2009 determined the contents and formats of food advertisement on children program. It is banned to broadcast advertisements targeting at preschool children.²⁵ Any advertisement must not be misleading or deceptive in relation to nutritional claims of food²⁶, and must not put pressure to purchase the food being advertised.²⁷ The use of words "only" or "just" are restricted²⁸, and it is banned to have celebrities or persons known to children in food advertisement before, during, and after children program.²⁹ The length of time and repetition of advertisement in children programs are also specified.³⁰

3.2.2 The controlling of food advertising on children program under self-regulation measures

The Australian Association of National Advertisers Code provided that advertising directed to children for food and beverages should not encourage or promote an inactive lifestyle, should not encourage or promote unhealthy eating or drinking habits, must not contain any misleading or incorrect information about the nutritional value of the product, must not mislead or deceive, shall not include any appeal to children to urge parents or other adults responsible for a child's welfare to buy particular children's food or beverage products for them, must not state or imply that a product makes children who own or enjoy it superior to other children, must not be minimised by words such as "only" or "just", must not encourage children's excessive consumption of any food or beverage products, must not be placed in media where editorial comment or program content and must not use popular personalities or celebrities (live or animated) to endorse, recommend, promote or advertise.

²⁰ *Id.* sec.7(7.7.2).

²¹ *Id.* sec.8(8.3.1).

²² *Id.* sec.7(7.2.3).

²³ *Id.* sec.7(7.2.3).

²⁴ *Id.* sec.7(7.2.4).

²⁵ Children Television Standard 2009, CTS 24.

²⁶ *Id.*, CTS 32(7).

²⁷ *Id.*, CTS 31.

²⁸ *Id.*, CTS 32(6).

²⁹ *Id.*, CTS 35.

³⁰ *Id.*, CTS 27, 29.

3.3 Singapore

3.3.1 The controlling of food advertising on children program under legal measures

Singapore made available the law to control food advertising to general consumer, but not to those advertising targeting at children in specific.

3.3.2 The controlling of food advertising on children program under self-regulation measures

The Guidelines for Food Advertising to Children³¹ provided that all food and beverage products promoted in marketing communications that are primarily addressed to children 12 years old or younger in any media must meet the common nutrition criteria endorsed by the Health Promotion Board, should not encourage or promote unhealthy eating or drinking habits, should feature quantities of food or portion sizes that are responsible and relevant to the scene depicted, should not imply that children are likely to be inferior to others, should not show prices with words such as “only” or “just”, should not urge children to eat or drink a product only to take advantage of a promotional offer and the premium and must not use popular personalities or celebrities (live or animated) primarily well known to children in advertising and marketing communications to promote or endorse the product, or premium unless they may present factual and relevant statements about nutrition and health.

4. Legal measure of food advertising on children program in Thailand

Relevant laws on food advertising in Thailand include the Food Act B.E.2522, the Consumer Protection Act B.E.2522, the Broadcasting Business Act B.E.2551, and the Notification of the Food and Drug Administration on Rules for food Advertising B.E.2551. The review of these laws suggested that they concern with prescribed rules for goods advertising in general but not specifically include those foods advertising targeting at children. Only the Food and Drug Administration’s Notification on Rules for food Advertising B.E.2551 that identified the age of models featuring in advertisement must be over 3 years for finished gelatin and jelly, and over 12 years for finished gelatin and jelly containing glucomannan or starch of konjac plant. Including, there are only few of such provisions to regulate advertising food for children and they apply to specific foods only food for infants and young children, supplementary food for infants and young children, milk and milk products, a finished gelatin and jelly and a finished gelatin and jelly containing glucomannan or starch of konjac plant, which are considered very few comparing to a wide range of food sold today.

However, the Broadcasting Business Act B.E.2551 does not have any stipulation to monitor a substance of an advertisement. It provided only period of advertising.

Given the absence of regulatory laws to control the contents and formats of food advertisements on children program, food marketing on television aimed at children is thus possible at all times. Advertisings can even apply different strategies which can stimulate

³¹ The new guidelines will be incorporated into the Singapore Code of Advertising Practice 2008

children's appetite and lead to excessive consumption. Children are less mature to distinguish between what is and is not beneficial but only think about what is delicious and it is easy for them to believe what is presented in the advertisements without any knowledge on nutritional values. As a consequence, children are more likely to develop a health condition and a disease especially overweight or obesity. It is important to note that overweight during childhood is associated not only with an increased risk of adult obesity, but also with a number of immediate health-related problems.

As stated above, Thailand should have related laws to control food advertising on children program.

5.The development for Thai Laws

5.1 Prohibited product to advertising on children program

Although the snacks often cause the problems of obesity or overweight and Thai children consume them a lot; however, there is no clear definition what kind or type of food is considered as snacks. It thus suggests that food high in fat, sodium or sugar should be prohibited to advertise in children program, following the United Kingdom's restriction. Because high fat, sodium or sugar food is nutrition that consists of fat or sodium or sugar. Over consuming of these nutritions will lead to be obese. And some kinds of HFSS food provide high energy but low nutrition value.

In this way, the Food and Drug Administration should examine and determine what kind of food contains high fat, sodium or sugar as the United Kingdom where the Food Standards Agency's nutrient profiling model is used. Therefore, FDA may use the UK model or formulate a new methodology which suits for Thai childhood. All Foods, therefore, are advertised in children programs required the certification of Food and Drug Administration as a non-HFSS food.

5.2 Children Program

Besides the fact shown the ages of Thai obesity child are between 1-14 years old and childhood is the person whose age not 14 years in medical regime. Therefore, the definition of "Children program" is a program with children aged 1-14 as the target group in order to serve the fact and medical regime.

5.3 Show time of children program

The Notification of National Broadcasting and telecommunications Commission on Criteria for Scheduling of Broadcasting or Television Service B.E. 2556 provides that between 06.00 pm – 10.00 pm is prime time during which children may also view television. In addition to the restriction of advertising of HFSS food during children programs, such practice should also apply to the prime time as well.

5.4 Other prohibitions on advertising in children program

The use of actor, singer, cartoon character, celebrity or persons known by children in advertisements on children programs, including sale promotion by giving rewards, free toys, and using the words “only” or “just”, are strategies which affect children’s purchasing and consumption behavior. Therefore, these strategies should be prohibited.

5.5 Advertising time during children program

Regarding the advertising time, the Broadcasting Business Act B.E.2551 allowed for 12.5 minutes per hour or an average of 10 minute per day. Therefore, it is unnecessary to specifically define the advertising time on children program. The government sector by the National Broadcasting and Telecommunications Commission; however, need to strictly regulate, supervise, and inspect for the advertising not to exceed the length of time prescribed by the Act.

5.6 The regulator to control food advertising on children program

5.6.1 Food and Drug Administration

Food and Drug Administration, Other than inspecting the benefits, quality, and properties of foods to comply with section 41 in the Food Act B.E.2522, the Food and Drug Administration should also perform testing of food composition whether it is high in fat, sodium or sugar, and issue the advertiser a non-HFSS food certificate. In the testing, it may apply the FSA’s nutrient profiling model of the United Kingdom or formulate a new methodology which suits for Thai childhood.

In brief, advertising of food in children program required both FDA’s approval to advertise benefits, quality, and properties of foods, and FDA’s certificate of non-HFSS food.

5.6.2 The Broadcasting Commission

The Broadcasting Commission shall be comprised of chairman from vice chairman of the National Broadcasting and Telecommunications Commission (NBTC) while other shall be from the NBTC which is not chairman or vice chairman of the NBTC,³² which have the power to act on behalf of the NBTC to license and regulate the operations of television broadcasting and prescribe licensing criteria and procedures or conditions.³³ Therefore, the Broadcasting Commission should also act to control food advertisements on children program with the following details.

(1) The author views that it should launch new notification under the authority of Act on Organization to Assign Radio and to Regulate the Broadcasting and Telecommunications Services B.E.2553 concerning on Advertising control for children program and prime time period which shall be mentioned the rules as follows:

(1.1) Advertisements shall not encourage excessive consumption.

³² Act on Organization to Assign Radio Frequency and to Regulate the Broadcasting and Telecommunications Services B.E.2553, sec. 35.

³³ *Id.* sec. 37.

(1.2) Advertisements shall not encourage eating desserts to substitute regular meals.

(1.3) Advertisements shall not encourage inactive lifestyle.

(1.4) Advertisements must not directly recommend or ask children to purchase or to ask their parents or others to make a request and must not imply that children will be inferior to others if they or their family do not take a particular food

(1.5) Advertisements shall not have actor, singer, cartoon character, celebrity or persons known by children to present the product.

(1.6) Advertisements shall not contain sale promotion such as giveaway or free toy, etc.

(1.7) Advertisements shall not offer discount using the words “just” or “only”.

(2) Screening the contents in food advertisement on children program in conformity to (1) as prescribed above.

(3) Define a definition of “children program” as a program with children aged 1-14 as the target group.

(4) Prohibit the advertising of high in fat, sodium or sugar food on children program and during the prime time between 06.00 pm. – 10.00 pm.

In summary, food advertising in children program is subject to an approval by 2 regulators. Initially, it requires FDA’s approval to advertise benefits, quality, and properties of foods, and FDA’s certificate of non-HFSS food. Later, it requires a content inspected by the Broadcasting Commission whether it is contrary to the rules of food advertising in children program, if not, it can be advertised.

Conclusion and Recommendations

Having examined Thai laws, the controlling of food advertising is under the Consumer Protection Act B.E.2522, the Food Act B.E.2522, the Notification of Food and Drug Administration on Rules for Food Advertising B.E. 2551 and the Broadcasting Business Act B.E.2551 which the enforcement of these laws aims to protect consumers in general. None of any specific details is provided to protect children from food advertising. Given the absence of regulatory laws to control the contents and formats of food advertisements on children program, food marketing on television aimed at children is thus possible at all times by applying different strategies which can encourage children’s appetite and lead to excessive consumption and finally become obesity children.

Food Act B.E.2522 should be amended by adding the second paragraph of Section 41 as “Any persons who want to advertise within children program or prime time period shall be passed the approval of FDA concerning on nutrition of food composition whether it is high in fat, sodium, or sugar.” Including, launch new notification under the authority of Act on Organization to Assign Radio and to Regulate the Broadcasting and Telecommunications

Services B.E.2553 concerning on Advertising control for children program and prime time period.

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