Recommendation Extract

Protecting Children from Unhealthy Food Marketing: A British Heart Foundation and Children’s Food Campaign proposal for a statutory system to regulate non-broadcast food marketing to children

We examine the role that advertising plays in forming children’s attitudes to food and their food choices in contributing to poor diet.

2.2 The role of food promotion in making food choices

For present purposes this report focuses on the influence of food promotion through a variety of media, as this is an area which, despite growing evidence and understanding of its impact on children, has not been effectively tackled.

The effect of marketing on product choice has long been established. However, the impact of television food adverts on food preferences has also been demonstrated, as has an association between the proportion of overweight children and the number of food advertisements shown each hour during children’s television.

As the food categories most heavily promoted to children in the UK tend to be unhealthy, the effect on their food choices contributes to an unhealthy diet.

There is also evidence that advertising may affect children differently than it does adults.

In recent years, traditional broadcast (television and radio) and non-broadcast (point of sale, packaging, display and sponsorship) methods of advertising and marketing have been joined by new and emerging media such as internet advertising.

2.4 Lack of regulation of unhealthy food marketing in non-broadcast media

Focusing only on television food advertising and not the wider non-broadcast marketing picture ignores a swathe of promotional practices shown to drive consumer behaviour, with children making up one of the most easily influenced consumer groups. Children’s food marketing concentrates on unhealthy food to encourage children to eat more of it.

3. Non-broadcast unhealthy food marketing – what the existing regulation does and does not say

Food is marketed using many diverse and sophisticated ways of persuading children – and their parents – to purchase a particular product. Together with the more traditional advertising forms, the following promotional techniques are used to market food products to children:

- New media, e.g. internet and SMS messaging
- Sponsorship
- Product packaging
- In-store and ‘point of sale’ promotion
- Product design

3.2 What the current regulations do not cover

Concerns have been raised for some time that many of the ways in which foods are promoted to children are not covered by the CAP Code. Specifically, the code does not cover a number of marketing techniques which can be broadly grouped as follows:

- **Product-based** – food packaging; colour and shape of food.
- **Promotional** – Many aspects of the internet and new media; sponsorship
- **Placement** – in-store point of sale promotion; frequency of advertising.

3.3 Criticisms of the current codes

The self-regulatory codes have been criticised by the Children’s Food Campaign and other public interest groups for three reasons. The first is that, as noted above, the Scope of the Code does not cover all promotional activity. However there are two other criticisms commonly made of the CAP Code and other self-regulatory codes:

- the language used
- definitions of both the age of children and the types of food covered
- enforcement

5.1 What the rules should be

This report recommends that the proportionate response to the massive scale of the dietary health problems the UK faces is to end the marketing of unhealthy food to children. We therefore propose that the following principle is written into law:

*It is prohibited to act in a way where the purpose or effect is to promote an unhealthy food product to individuals under the age of 16.*

The proposed law would have the effect of stopping all marketing of unhealthy food to children.

6 Conclusion

Advertising plays a significant role in influencing children’s dietary choices. Food advertisers use a huge range of methods and media, all with the purpose of encouraging children to eat their products. To make matters worse, the advertising of food to children is weighted heavily towards unhealthy foods, with very few advertisements promoting healthy foods.
There are four key aspects of our proposals: First, the law must cover all marketing techniques used to promote unhealthy food to children – including non-traditional channels such as packaging; the internet; sponsorship and store placement.

Second, distinguishing between healthy and unhealthy food is essential – it does not make sense to ban companies from promoting healthier food to children when this would clearly contribute positively to children’s food choices.

Third, there must be a clear means of establishing whether a given product or promotion is targeted at children.

Finally, monitoring and enforcement must be carried out by a body independent of the advertising industry.