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Response of the British Heart Foundation to Television advertising of food and drink products to children: option for new restrictions

The aim of the British Heart Foundation (BHF) is to play a leading role in the fight against disease of the heart and circulation so that it is no longer a major cause of disability and premature death.

We provide funding for a number of organisations at the forefront of work to improve public health, including the BHF Centre for Physical Activity and Health at the University of Loughborough, the BHF Health Promotion Research Group at the University of Oxford and the National Heart Forum (NHF).

Diets which are high in fat, salt and sugar can contribute directly and indirectly to a number of major risk factors in the onset of coronary heart disease (CHD), including high blood pressure, diabetes and obesity. With childhood obesity now at epidemic proportions, the BHF is committed to leading the fight to tackle this problem now, in order to minimise future cases of heart disease.

The BHF welcomes the opportunity to comment on the key proposals contained in this additional consultation document. We are pleased both by the proposal to use the nutrient profiling scheme published by the Food Standards Agency, and that Ofcom has accepted that advertising restrictions for food and drink which is high in fat, sugar and salt should be applied to all programmes aimed at children up to the age of 16.

However, despite endorsing the key principles of this consultation, the BHF remains convinced that Ofcom has missed a golden opportunity to leave a lasting legacy for the health of the UK's children by failing to bring forward recommendations to ban the advertising of foods high in fat, sugar and salt before the 9pm watershed. The BHF's own polling has found that the vast majority of parents are in favour of such a ban.

The scale of the problem presented by overweight and obesity in the UK is such that public health should be put first on this issue, and short term considerations over media profits should be weighed against the longer term gain to the health and social economy of a society with lower incidence of key risk factors for cardiovascular disease.

The consultation: Modified Package 1

The BHF welcomes the proposal to implement a Modified Package 1 which would implement the Food Standards Agency's nutrient profiling model to distinguish between healthy and unhealthy foods, and which would establish the principle that restrictions should be applied to all programming which is of particular appeal to children under the age of 16.

However, using the BARB index to measure the popularity of programmes based on their relative appeal to both children and adults means that a number of programmes which children watch in extremely high numbers will not be caught by the new rules, for example evening soaps which attract very large numbers children.

The BHF believes this to be an illogical approach which falls well short of providing the restrictions required to really dent children's viewing of adverts for foods high in fat, sugar or salt (HFSS). Instead, children's viewing of such adverts will be cut by only 41%, compared to the 82% reduction which would have been achieved by a pre-9pm watershed ban.

Content Rules

We are also concerned that by limiting the proposed content rules to pre-school and primary-aged children, and not to all children up to 16, these rules are wholly inconsistent with Ofcom's own proposed scheduling rules. We believe that the natural consequence of Ofcom's acceptance that advertising restrictions should apply to programmes of particular appeal to the under-16's is to apply the same principle to the content rules. If Ofcom is to take a coherent, evidence based approach, we would expect Ofcom to be consistent in its approach to these related issues, and ensure that children under 16 are appropriately protected from advertising of foods high in fat, sugar and salt.

Conclusion

The BHF endorses the proposals in this document for a Modified Package 1, extending protections to children under the age of 16 and applying the FSA's nutrient profiling model. We are also pleased to note Ofcom's commitment to review the effectiveness of the new restrictions, and that it will look to advertisers and broadcasters to follow both the 'spirit and the letter' of the rules.

However, we remain disappointed that Ofcom failed to use this opportunity to recommend the best possible protection for children against HFSS advertising, and the flawed approach to determining which programmes restrictions must be applied to.

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