

Our Ref: 3/5.49



The Consumer Council  
Elizabeth House  
116 Hollywood Road  
BELFAST  
BT4 1NY  
T: 028 9067 2488  
W: [consumercouncil.org.uk](http://consumercouncil.org.uk)

To: Ms Julia Richards  
Ofcom

From: Eddie Lynch  
Head of Consumer Affairs

Date: 20 December 2006

Re: Television Advertising of Food and Drink Products to Children:  
Further Consultation

Thank you for the opportunity to respond to the above consultation.

The Consumer Council welcomes Ofcom's proposal to extend its recommendations to children under 16 rather than children under 10, however, we are disappointed that Ofcom has not sought to establish a 9pm watershed.

The Consumer Council would prefer a ban on the advertising of food products that are high in fat, sugar or salt before a 9pm watershed. We believe that children's health, and in turn public health, must be paramount over television and food industries' profits. The food industry must be encouraged to develop a responsible advertising culture that recognises its public health responsibilities along with profit.

That said we believe that Ofcom's extension of the recommendations to include children aged 10 to 15 will reduce significantly the exposure of these children and young people to advertising of food products that are high in fat, salt or sugar.

The Consumer Council believes that children and young people are responsive to food advertisements since their food choices vary according to the advertising they are exposed to. More than 47 per cent of a Northern

Ireland sample<sup>1</sup> of 9 –17 year olds revealed that their favourite advertisements were for food and soft drinks. Similarly, researchers<sup>2</sup> found that food advertisements significantly influence the food preferences of children between the ages of 7 and 11. This was true to the extent that most heavily advertised products also promoted the largest number of requests from 7 – 11 year olds.

It is our view that the age threshold of under 16 is much more appropriate for the following reasons:

1. Defining children as ‘nine and under’ for the purposes of volume controls on advertising of less healthy food products has no justifiable basis - other than this is one of the age distinctions that is used by the Broadcasters’ Audience Research Board (BARB) in collecting its viewing data (four to nine olds and 10 – 15 year olds). The choice of nine as a distinction for advertising controls bears no relationship to what is understood by experts about child development. Ofcom acknowledges in the consultation that media literacy grows with age, confirming that only by 11 to 12 years have children developed a critical understanding of advertising.
2. Controls on advertising define children as ‘under 16’.
3. Under the former proposals advertisers may have sought to place greater emphasis on targeting the over 10s with less healthy food advertisements, whether on television or via other media. Given the greater autonomy and purchasing power of over 10s, the overall impact would be detrimental rather than beneficial to children’s diets.

Please do not hesitate to contact me if you require any further information from the Consumer Council.

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<sup>1</sup> Warwick, J. (1998) Food Choices of Young People in Northern Ireland – The Influences and Health Implications; University of Ulster, Belfast.

<sup>2</sup> Donkin, A.J.M., Neale, R.J. and Tilston, C. (1993) Children’s Food Purchase Requests. Appetite (21).