



**Ofcom consultation -  
Television Advertising of Food and Drink Products**

**Further consultation**

Response from Coca-Cola Great Britain and Coca-Cola Enterprises Ltd

**1. INTRODUCTION**

The Coca-Cola system in Great Britain consists of two separate companies: Coca-Cola Great Britain (CCGB) and Coca-Cola Enterprises Limited (CCE). CCGB is responsible for marketing Coca-Cola brands and protecting trademarks. CCE manufactures and distributes Coca-Cola products throughout Great Britain.

Coca-Cola has over 20 brands in Great Britain including Coca-Cola, Fanta, Sprite, Lilt and Dr Pepper and their equivalent diet versions diet Coke, Coke Zero, Fanta Zero, Sprite Zero, Lilt Zero and Dr Pepper Zero; juice such as Minute Maid 100% Pure Squeezed Juice and Appletiser juice-based drinks including Minute Maid Froot Refresh, Oasis and 5 Alive, Malvern Natural Mineral Water and Powerade and Sprite 3G sport and energy drinks.

**2. LONG STANDING GLOBAL POLICIES - OUR POSITION ON ADVERTISING TO CHILDREN**

2.1 At Coca-Cola, we have taken a strong self regulation position on the issue of advertising to children for many years and we will continue to lead the industry by continually reviewing and improving our policies. At the very heart of our long standing global policy on advertising to children is the belief that parents should be able to choose the drinks that they believe are right for their own families and their needs.

2.2 For the past 50 years we have not targeted carbonated soft drinks advertising at the under 12s, a policy which was updated in 2003 to include the advertising of all our brands including our fruit juices, juice drinks, sports drinks and waters.

This means:

- we do not advertise at all on any TV channels targeted primarily at children for example Cartoon Network, Nickelodeon, Fox etc;
- we do not advertise in any TV programme or media title whose audience composition is over 50% comprised of children under 12;
- we do not show children under 12 drinking carbonated soft drinks in any of our advertising;
- we do not show children under 12 drinking any of our other products (eg juice drinks or waters) unless in the presence of an adult;
- we do not use celebrities who have a specific children's focus (eg children's TV presenters).

2.3 Our media use is audited externally and independently to ensure compliance with these policies.

### **3. OUR VIEWS ON THE SPECIFIC QUESTIONS RAISED IN THE CONSULTATION**

3.1 Coca-Cola has reviewed the three options put forward as part of this consultation. Although we have a longstanding policy of not advertising to children under the age of 12, we would be prepared to work within the framework of a modified package 1 which would prevent HFSS advertising in pre-school children's programmes and in children's programmes as well as HFSS advertising around programmes of particular appeal to children aged 4 to 12.

3.2 We do not advertise at all on any TV channels targeted primarily at children and we do not advertise in any TV programme or media title whose audience composition is over 50% comprised of children under 12. We will continue with this policy, which is consistent with the Government's own focus, as stated by the Minister for Public Health, Caroline Flint MP, which is on primary school children. The Minister has also stated publicly that this does not mean that the Government is not concerned about teenagers, but that it is important to concentrate on younger children as food preferences are developed at an early age. The extension to under 16s in terms of volume restrictions by OFCOM is inconsistent with Government policy in this respect.

3.3 While carbonated soft drinks and all of our beverages are refreshing and appropriate for people of all ages, the Coca-Cola system respects and supports the primary role that parents, guardians and other caregivers play in the broad range of decisions affecting the lives of young children, including choices about diet and lifestyle. Consequently, we believe that decisions about the beverages that children drink should belong to those most responsible for their care. In keeping with a policy that has been in place for more than half a century, we do not aim or direct any marketing activity from any source to children under the age of 12.

Regarding teenagers, our own consumer insights show that 84% of 12-15 year olds get their drinks from home from 'mum'. For drinks purchased out of home, over half are purchased in the school environment which is heavily regulated. Although we would be prepared to work within the framework of a modified package 1, we believe that this approach would unfairly prohibit soft drink advertising on adult TV programmes and would not affect childhood obesity or influence childhood dietary preferences.

#### **Comments on:**

Option 5 – same option as Modified package 1, but would also include an additional prohibition on HFSS advertising and sponsorship from 4pm to 6pm

Option 6 – would be the same as Option 5, but extend the additional prohibition on HFSS advertising and sponsorship further from 4pm to 8pm

We feel that excluding advertising in all programmes before 8pm is disproportionate and unfairly prevents advertising in programmes that are viewed and targeted predominantly at adults. Therefore options 5 and 6 are not acceptable.

#### **4. ADVERTISING RESTRICTIONS ONLY PART OF THE SOLUTION**

4.1 At Coca-Cola we believe regulations and our own Code of Practice regarding advertising to children are only part of the solution to tackle obesity. We have a four strand strategy supporting health and wellness.

4.2 This strategy includes specific programmes to deliver a greater product choice. Our range of products and choice of drinks has more than doubled over the past 10 years and now includes over 20 brands and more than 100 products including juices, waters and sports drink solutions to meet consumers' different needs and their lifestyles. Our commitment to choice is particularly focused on low or no calorie products. For example, in 2006 we launched a third Coca-Cola called 'Coca-Cola' Zero which has all the taste of regular Coca-Cola but with zero sugar.

4.3 Our strategy also commits us to helping consumers to make informed choices and we are continuing to make our on pack labelling even clearer and helpful for consumers to see exactly what is in our products. We now label our products with calorie guideline daily amount information and are rolling out full GDA information across all our products on front of pack from January..

4.4 The fourth strand of our strategy is around sport and physical activity. In Great Britain we encourage tens of thousands of teenagers to get active via a range of grassroots sports and activity programmes each year. The Coca-Cola Company has been associated with sport for many years and physical activity has been featured in our advertising almost since our founding in 1886. We believe we have an opportunity to play a leadership role in helping to promote active lifestyles, particularly amongst young people. We therefore use our marketing activity and the motivating power of our brands to help promote active lifestyles and target those over the age of 12.

December 2006