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**SNACMA's Response to the Ofcom Consultation
"Television Advertising of Food and Drink Products to Children"**

Dear Julia,

The Snack Nut & Crisp Manufacturers Association (SNACMA) welcomes the opportunity to comment on the latest proposal from Ofcom on advertising food and drink products to children. The Association recognises, and shares, the concerns of society in relation to the issue of obesity especially in children.

However, we would like to register our surprise and disappointment at the Ofcom decision issued on 17 November 2006. The response to the results from the consultation was disproportionate, and outside of the scope of the original consultation framework.

The "goalposts" have effectively been moved by extending restrictions on advertising to young people up to 16 years old whereas the consultation was aimed at protecting children up to the age of 12yrs. Indeed the Government's key target in this respect is children of primary school age.

Children above 12 years of age have been shown to be capable of thinking critically about commercial messages and, therefore, can be discriminating in their purchase behaviour. We also believe, as shown by many if not all reviews on this subject, that the effects of advertising are not significant and are peripheral to the main factors that contribute to obesity. Advertising restrictions, by themselves, will have little or no effect on children's food choices as demonstrated by the evidence from similar initiatives elsewhere in the world, for example in Canada and Sweden, where restrictions on industry's communication with children have yielded no perceived positive benefits¹.

In response to Ofcom's further questions for consultation, we would like to make the following comments :

Nutrient Profiling.

SNACMA is disappointed by the decision to use the nutrient profiling model developed by the Food Standards Agency. The model is basically flawed because.

¹ Sonia Livingstone and Helen Helsper, *Advertising Foods to Children : Understanding Promotion in the Context of Children's Daily lives*, London school of economics, 2006

- It is not based on sound scientific evidence.
- It does not recognise that a balanced diet is based on the combination of foods eaten, the frequency of consumption and the portion size.
- It ignores the positive nutritional aspects of a food especially the micro nutrients
- It has been developed in a circular approach aimed at supporting the justification for labelling pre-selected foods as “good” and “bad”.
- It does not allow industry to advertise healthier alternatives to traditional products; and provides no incentive for the further development of lower fat, salt or sugar products

On this last point we find ourselves with a considerable dilemma.

On the one hand Government is strongly encouraging manufacturers to reformulate existing products and to develop new products offering improved nutritional profiles with respect to fat, saturated fat and salt. Whilst, on the other hand, the Ofcom proposals, as they currently stand, would deny us the opportunity to make consumers aware of these ‘better-for-you’ variants and hence present a real barrier to change in this respect.

Our members have made significant reductions in the levels of saturated fats in their products with reductions being more than 50%. Also total fat and salt levels have been significantly reduced across a wide range of savoury snacks.

The FSA nutrient profiling model, apart from its lack of scientific credibility, will prove a serious obstacle for even the most innovative manufacturers who will find, as we have, that despite very significant investment in new ingredients and technology it is impossible to meet its arbitrarily set nutrient targets. It will not, as suggested by Ofcom, encourage manufacturers to develop healthier products and is more likely to discourage further investment in this respect.

Extending Restrictions to Children up to 16yrs

We are very concerned by the decision to extend the volume and scheduling restrictions of food and drink advertising to children under 16. The original objective of the Ofcom consultation and the intention of the Government, was to protect children of primary school age. The decision by Ofcom to extend the age range to 16 is outside of the Government’s objective.

A review of the Livingstone reports² and other academic literature shows that there is an insufficient evidence base relating to the impact of food and drink advertising on older children. Children above the age of 12 are capable of critical thinking and are able to differentiate between advertising and entertainment.

Evidence from other countries does not support the decision to extend the advertising restrictions to 16 year olds. Following advertising bans in Quebec, Canada to children under 13 yr old and in Sweden to children under 12 years old, neither initiative resulted in even a modest reduction in obese or overweight children.

Consumers are well aware of the limited role that advertising plays in childhood obesity – something clearly shown from Ofcom’s own consumer research³.

Given the lack of evidence to support the extension of restrictions to older children up to the age of 16, SNACMA members are deeply concerned about Ofcom’s decision and believe the threshold should remain at 12 years of age.

² Sonia Livingstone and Helen Helsper, *Advertising Foods to Children : Understanding Promotion in the Context of Children’s Daily lives*, London school of economics, 2006

³ Opinion Leader Research: *Regulating TV Advertising of Food and Drink to Children*, 2006

In conclusion, SNACMA shares the concerns over rising obesity levels particularly in children. Our Members will continue to work to find effective solutions but unfortunately the Ofcom proposed package offers no incentive to the further development of new products. The measures proposed are disproportionate given the evidence that exists on the likely effect of advertising to older children.

The savoury snacks industry has already taken significant steps to control advertising aimed at young children. The package put forward by the food industry in the initial consultation added to these controls.

The findings of research from a number of sources clearly demonstrates that advertising has little significant effect on obesity levels and therefore the restrictions proposed will make little contribution to the Government objective of reducing the year-on-year rise in childhood obesity by 2010.