

December 2006

TELEVISION ADVERTISING OF FOOD & DRINK PRODUCTS TO CHILDREN

Response by Voice of the Listener & Viewer (VLV) to Ofcom's Statement and Further Consultation of 17 November 2006 And the Amended Annex 9 published on 6 December 2006

Introduction and Context

- 1.1 In its response in June 2006, VLV welcomed Ofcom's original Consultation and Options for New Restrictions on Television Advertising of Food and Drink Products to Children in its Consultation Paper of 26 March 2006, and the opportunity to state its view on this important issue. VLV has been concerned about the quality of children's television and the impact it has on the quality of children's lives for more than 20 years. Hitherto, these concerns have focused on the impact that television has on the intellectual, cultural and social development of children. VLV was pleased then to consider its impact on the physical health of children.
- 1.2 VLV said then, and reiterates now, that it is both aware of and shares concerns about the health risks associated with increasing obesity in children and the adverse effect upon children of the consumption of unhealthy food and drink. VLV also recognises that television advertising has an impact upon those watching, including children. VLV is as concerned as anyone about the health and well-being of children, and believes that this involves mental and intellectual as well as physical aspects.
- 1.3 VLV considers that restrictions on the advertising of HFSS foods and drink products should be imposed and carefully framed so as to give maximum protection to children from the advertising of harmful food and drink. At the same time the restrictions should be proportionate and introduced in a structured manner over a period of time that will allow broadcasters, particularly those producing and broadcasting high quality indigenous children's programmes, to find alternative advertising.
- 1.4 Whilst not repeating all of its original submission of June 2006, VLV stands by what it said then and asks that this submission be read in that context.
- 1.5 VLV welcomes this opportunity to comment upon Ofcom's decision and proposed new restrictions on the television advertising of food and drink products to children published in its Statement and Further Consultation of 17 November 2006.

Consultation Question: *In light of the impact of Modified Package 1 in particular on the revenues of music channels, Ofcom is seeking views on Modified Package 1 in so far as it extends the restrictions contained in Package 1 to children up to 16.*

- 2.1. VLV accepts Ofcom's decision set out in its Statement and Further Consultation of 17 November 2006 to reduce significantly the exposure of children under 16 to the advertising of food and drink products that are high in fat, salt and sugar (HFSS). VLV supports this targeted and proportionate ban on HFSS food and drink advertisements in and around all programmes of particular appeal to children under the age of 16, broadcast at any time of day or night on any channel (at a time when the 9pm watershed is becoming increasingly impossible to police).
- 2.2. VLV expects parents and guardians to exercise their responsibility for monitoring and supervising the viewing by children under 16 of programmes not intended or aimed to be of particular appeal to them and of the advertising in and around such programmes. That supervision should include explanation and commentary, as it does with other media. This highlights the importance of media literacy for parents/guardians and children.
- 2.3. VLV has grave concerns that no attempt appears to have been made to find alternative sources of funding for the continued production of original, indigenous programmes for children in the UK. It also seems disproportionate both to enforce this ban at times when very small numbers of children will be viewing television, and to allow the dedicated children's satellite channels, which commission virtually no original programming and broadcast mainly imported foreign programmes, extra time to adjust to the situation.
- 2.4. Television, and content produced by television companies, is a major source of entertainment and information for most people in the UK, including children. VLV is as concerned as anyone about the current epidemic of obesity among young people and the impact it will have on their future health. It is equally important, however, to recognise that an unrelieved diet of 'junk' television will stunt the mental and intellectual growth of children. If they are to develop into active, informed young members of their own communities, children need access to a wide range of high quality television programmes which put their needs above all else, and which reflect their own culture, environment, language, literature and values. Unless new forms of funding to make these programmes are found, the commercially funded broadcasting companies will simply import foreign programmes, often made cheaply with profit in mind and without some of the safeguards against commercial exploitation demanded of producers in the UK. If exposed to such an unrelieved diet, our children will grow up with a 'Disneyfied' view of their own history and culture. The effect on the UK's future cultural identity and the healthy intellectual development of our young people will be profound. A balanced mental diet is as important to children's health, well-being and development as their physical diet.
- 2.5. Thus, VLV urges that the commercial analogue PSB channels which broadcast high quality indigenous children's programmes produced within the last five years (in line with the EU regulation) – ITV and Five - should not be penalized more than dedicated digital children's channels. The restrictions for them should also be phased in over 24 months to the end of 2008 in the same way that they will be for dedicated children's channels, so long as they continue to broadcast high quality indigenous children's programmes produced within the last five years.
- 2.6. VLV continues to call upon Government, Ofcom and the broadcasters to enter actively, seriously and now into the necessary public policy debate about how to save and maintain UK children's television, which has served young viewers so well in the past and been a long-

standing jewel in the crown of the UK media industry, a world leader and an export earner. It is no good waiting until 2012 to find ways to finance PSB content, including children's, on commercial broadcasters as by then in-house production capacity will have been disbanded, many independent producers will have moved out of children's television and it will be too late.

27 December 2006

Voice of the Listener & Viewer (VLV) is an independent, non-profit-making association, free from political, commercial and sectarian affiliations, working for quality and diversity in British broadcasting. VLV represents the interests of listeners and viewers as citizens and consumers across the full range of broadcasting issues. VLV is concerned with the structures, regulation, funding and institutions that underpin the British broadcasting system. VLV does not handle complaints.