

Moira Newiss (individual)

Question	Your response
<p>Question 1:</p> <p>Do you consider Ofcom's proposed rule and the proposed definitions to be inserted into the BCAP Code reflect appropriately the requirements of Section 321A of the Communications Act? If not, please explain why.</p>	<p>I think that there are problems with the definitions being used. I would not be worried about natural foods containing high levels of saturated fats such as full fat dairy, coconut milk, as these are healthy foods. It is only when high levels of fats are combined with sugar and carbohydrates that fats are a problem. In relation to sugar, it should not just be sugar but all carbohydrates that should be looked at since they break down into simple sugars through the digestive process. Ultimately it should be highly processed foods that we should be targeting and not real whole natural foods. So foods like cakes, biscuits, chips, cereals should be on the list to be targeted whereas meat, fish and dairy should not be if this is about health.</p>
<p>Question 2:</p> <p>Do you consider Ofcom's proposed Rule 9.17A and the associated meaning, to be inserted into the Broadcasting Code, reflect appropriately the requirements of Section 321A of the Communications Act? If not, please explain why.</p>	
<p>Question 3:</p> <p>a) Do you agree with Ofcom's proposal to designate the ASA as a co-regulator for the prohibition on online advertising for less healthy food and drink products?</p> <p>b) If you do not agree with the proposal to designate the ASA as a co-regulator, please explain why. If appropriate, please include any alternative approaches to regulating online advertising for less healthy food and drink products under the Communications Act 2003, explaining why such an approach would better fulfil the statutory requirements.</p>	<p>ASA obviously has a track record in relation to policing advertising but would it not be more helpful to include an organisation such as the Public Health Collaboration who can help to identify the difference between a healthy food that fails the requirements such as coconut and an unhealthy food that might pass it such as products made with large amount of vegetable oil which is worse than saturated fat.</p>

<p>Any additional comments on: Ofcom's proposed approach to enforcing the new prohibition on advertising for less healthy food and drink products online; and Ofcom's assessment of the impact of our proposed approach to implementing the new restrictions on advertising and sponsorship for these products on TV, ODPS and online.</p>	<p>I think that there are problems with the definitions being used. I would not be worried about natural foods containing high levels of saturated fats such as full fat dairy, coconut milk, as these are healthy foods. In fact these foods can not only help you prevent chronic disease but even reverse it. It is only when high levels of fats are combined with high levels of carbohydrates that fats are a problem. In relation to sugar, it should not just be sugar but all carbohydrates that should be looked at since they break down into simple sugars through the digestive process. Ultimately it should be highly processed foods that we should be targeting and not real whole natural foods. So foods like cakes, biscuits, chips, cereals should be on the list to be targeted whereas meat, fish and dairy should not be - if this is about health.</p> <p>We ultimately need to make sure that the right message is being communicated to the public if this is about health.</p>