

# Healthy Advertising Policy

## Proposed outline & examples

Southwark Public Health Division, Place & Wellbeing

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# Proposal to adopt a new healthy advertising policy in Southwark

## POLICY PRINCIPLES

- Advertisements of food and/or non-alcoholic drink products rated high in fat, salt or sugar (HFSS) will not be permitted
  - This includes advertisements where there is a range of food/non-alcoholic drinks featured, and at least one is a non-HFSS product. For example, when promoting a meal within a restaurant or from a delivery service
  - All products within the advert need to be non-HFSS
- All food and non-alcoholic drink brands, service companies or ordering services can advertise providing it is their healthier options, consisting of non-HFSS products only
  - Brand only adverts must have healthy eating messages or promote non-HFSS products
- Advertisements cannot show or feature HFSS products 'incidentally', even if they are not the subject of the advertisement
  - This can include being referenced through text or graphic
  - Additionally, this includes any products that are not specifically identifiable but can still be assessed for a HFSS status
- All advertisements by manufacturers and distributors of alcohol will not be permitted

The **Nutrient Profiling Model (NPM)** is to be used to identify food and non-alcoholic drinks that are high in fast, salt or sugar (HFSS). The UK's NPM is:

- A scoring system which balances the beneficial nutrients and those which children should eat less of, so a good way of identify foods contributing to childhood obesity
- Widely used, including by Ofcom since April 2007
- Subject to rigorous scientific scrutiny, extensive consultation and review

# For consistency, this is based on the Transport for London's new advertising policy

## TRANSPORT FOR LONDON (TfL) POLICY

TfL's new policy on the advertisement of food and non-alcohol drinks will be implemented on 25<sup>th</sup> February 2019, across the entire TfL network.

### **Implementing a similar policy in Southwark will mean:**

- There is greater consistency across London, removing any ambiguity for brands and advertising companies
- TfL and the GLA are working with advertising companies to change campaigns to be inline with the new policy. Implementing a similar policy should therefore have little impact on the Council's advertising revenue
- All advertisements will be complimentary to the Commitments in the Council Plan:
  - Ensure residents live a healthier life
  - Give every child a great start in life that is healthy and active

#### References

1. <https://www.southwark.gov.uk/council-and-democracy/fairer-future/council-plan>

# Advertisements of food and/or non-alcoholic drink products rated high in fat, salt or sugar (HFSS) will not be permitted

## EXAMPLE [1/2]

### Lucozade zero pink lemonade

- Non-HFSS product so advertisement would be allowed, subject to compliance with the Council's wider guidance on advertising

Typical Values	Typical Values per 100ml
Energy, kJ/kcal	9/2.0
Fat, g	0
of which saturates, g	0
Carbohydrate, g	0.1
of which sugars, g	0.1
Protein, g	<0.1
Salt, g	0.04



## References

- The GLA's Healthy Food Advertisements Policy presentation

# Advertisements of food and/or non-alcoholic drink products rated high in fat, salt or sugar (HFSS) will not be permitted

## EXAMPLE [2/2]

### Skips crisps

- HFSS product so advertisement would be **not be allowed**



Typical Values	Typical Values Per 100g
Energy	2272kJ
-	544kcal
Fat	32g
of which Saturates	2.9g
Carbohydrate	58g
of which Sugars	7.8g
Fibre	0.7g
Protein	4.9g
Salt	2.3g

### References

1. The GLA's Healthy Food Advertisements Policy presentation

# Advertisements where there is a range of food/non-alcoholic drinks, including at least one non-HFSS product will not be permitted

## EXAMPLE

### Coca-Cola Original, Coco-Cola Zero and Diet Coke

- Coca-Cola Zero and Diet Coke are non-HFSS products, but Coca-Cola Original is an HFSS product so advertisement would be **not be allowed**

Typical Values	Typical Values Per 100ml
Energy	180kJ
-	42kcal
Fat	0g
of which saturates	0g
Carbohydrate	10.6g
of which sugars	10.6g
Protein	0g
Salt	0g
*Reference intake of an average adult (8400kJ/2000kcal)	-



## References

1. The GLA's Healthy Food Advertisements Policy presentation

# Brand only adverts must include healthy eating messages or promote healthier options

## EXAMPLE [1/2]

### McDonald's brand only directional signage

- As this advertisement is brand only it would **not be allowed.** McDonalds' would instead need to ensure the signage included healthy messaging or promoted their Non-HFSS products.



#### References

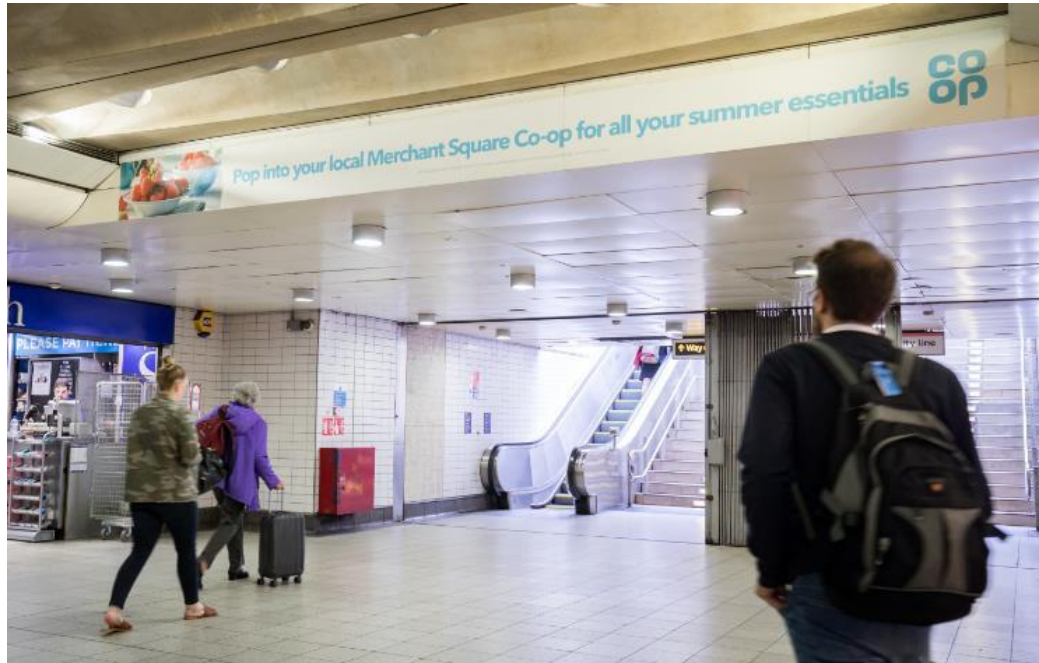
- The GLA's Healthy Food Advertisements Policy presentation

# Brand only adverts must include healthy eating messages or promote healthier options

## EXAMPLE [2/2]

### Co-op brand only advert

- The advertisement promotes a non-HFSS product, strawberries, and so the advertisement would be allowed



## References

1. The GLA's Healthy Food Advertisements Policy presentation



# Advertisements cannot show or feature HFSS products ‘incidentally’, even if they are not the subject of the advertisement

## EXAMPLE

### Go Compare

- The advert features pizza and spaghetti. The individual products cannot be assessed for HFSS status but pizza is likely to be HFSS. It is most likely that the advertisement would **not be allowed**



## References

1. The GLA's Healthy Food Advertisements Policy presentation

# The Council will review an advertisement ban if the advertiser or brand does not believe the product contributes to childhood obesity

## POTENTIAL EXCLUSIONS

Any potential exclusions will be reviewed by Southwark Council, on a case by case basis, with all decisions being made in accordance with TfL and the GLA's guidance.

In case of any doubt, it is for the advertiser to demonstrate that any product within the advertisement is not HFSS and that it does not directly contribute to childhood obesity.

The Council will consider banning an advertisement:

- If the product is on Public Health England's sugar or calorie reduction [list](#). The list categorises foods and drinks of concern for obesity prevention. For example:
  - sweet spreads and sauces
  - breakfast cereals
- If a product is borderline HFSS (e.g. cheestrings), the Council will consider if the product is generally consumed by children and if the presentation of the product or the advert appeals to children. For example:
  - Includes a toy, gift or prize
  - Uses licensed characters, cartoons, animals or fairy tales
  - Has a child-friendly product name
  - Uses colourful exaggerated graphics

### References

1. The GLA's Healthy Food Advertisements Policy presentation

# The Council will review all advertisements if the advertiser or brand does not believe the product contributes to childhood obesity

## EXAMPLE

### Fever-tree tonic water

- It is a HFSS product but is consumed mainly by adults as a mixer for alcoholic drinks. It would be the responsibility of Fever-Tree to provide evidence of average consumption age to justify the advert being allowed.



Typical Values	Typical Values (per 100ml):
Energy:	159kJ, 37kcal
Total Fat:	0g
of which saturates:	0g
Carbohydrate:	8.2g
of which sugars:	7.8g
Protein:	0g
Salt:	0.02g

#### References

1. The GLA's Healthy Food Advertisements Policy presentation

# The healthy advertising policy in Southwark will include a sponsorship approach

## SPONSORSHIP & IMPLEMENTATION

The proposed policy will also consider the sponsorship of events or activities led by, or associated, with Southwark Council

- The proposal is that sponsorship from any organisation or brand that has strong connotations with food an/or non-alcoholic drinks that are rated HFSS will not be permitted
- This is formalising practice that is already adopted across the Council

### Implementation of the policy

- In acknowledgement of contracts already in place, this policy will only affect all new or renewal of leases
- The policy is to be reviewed on an annual basis
- TfL's policy is to be implemented from 25<sup>th</sup> February 2019

# APPENDIX

**Appendix 1 – Policy development group**

**Appendix 2 – London boroughs' advertising policies**

## References

1. [https://shiftdesign.org/content/uploads/2018/06/Families\\_and\\_food.pdf](https://shiftdesign.org/content/uploads/2018/06/Families_and_food.pdf)

# Appendix 1

## POLICY DEVELOPMENT GROUP

Group members:

- Paul Cowell, Culture and Events Manager
- Aileen Cahill, Head of Culture
- Louise Neilan, Head of Communications
- Stephen Gaskell, Head of Chief Executive's Office
- Matt Jackson, Head of Property
- Luke Taylor, Planning Policy Officer
- Dale Foden, Head of Service
- Juliet Seymour, Planning Policy Manager
- Jin Lim, Deputy Director of Public Health
- Paul Stokes, Public Health Programme Manager – Health Improvement
- Rosie Dalton-Lucas, Public Health Programme Manager - Place
- Becky Steele, Public Health Policy Officer (Obesity & Physical Activity)

### References

1. The GLA's Healthy Food Advertisements Policy presentation

## Appendix 2

### LONDON BOROUGHS' ADVERTISING POLICIES

Other boroughs have implemented a ban on alcohol advertisement:

- [Merton's](#) advertising and sponsorship protocol
- [Haringey's](#) advertising and sponsorship policy