



HFSS advertising restrictions

Final Review

Statement

Publication date:

26 July 2010

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Section 1

Summary

Introduction

- 1.1 This section describes the outcome of Ofcom’s final review into the effectiveness of restrictions on advertising for products that are high in fat, salt or sugar (HFSS). It compares the way in which the balance of television advertising of food and drink seen by children has changed, by looking at their exposure to advertisements for HFSS products in 2005 (before advertising restrictions were introduced) and in 2009 (after the restrictions had been fully implemented).

Background

- 1.2 In December 2003, amid growing concerns about child obesity, the Government called for a change in the nature and balance of advertising food and drink products to children. The then Secretary of State for Culture, Media and Sport asked Ofcom to consider proposals for strengthening the rules on television advertising of food and drink products to children. Government elaborated its policy objective in a White Paper published by the Department of Health in November 2004, which said that there was ‘a strong case for action to restrict further the advertising and promotion to children of those foods and drinks that are high in fat, salt and sugar’.
- 1.3 In November 2006, following an extended period of analysis and consultation, Ofcom announced a ban on the scheduling of HFSS advertising during children’s airtime¹ and around programmes with a disproportionately high child audience. HFSS advertising would continue to be allowed at other times. Ofcom’s principal aim was ‘to reduce the exposure of children to HFSS advertising, as a means of reducing opportunities to persuade children to demand and consume HFSS products’².
- 1.4 For this purpose, HFSS products were defined by reference to a nutrient profiling model developed by the Food Standards Agency (FSA). The scheduling rules were phased in from 1 April 2007 (see Annex 1 for the full set of scheduling rules). The final phase came into force on 1 January 2009, when all HFSS advertising was banned from children’s channels.
- 1.5 Ofcom estimated that the advertising restrictions, once fully implemented, would reduce the exposure of 4-15 year olds to HFSS advertising by 41% of the 2005 level (the last year for which we had comprehensive revenue and viewing data at the time) and by 51% for younger children (4-9 year olds)³.
- 1.6 In parallel, the Advertising Standards Authority (ASA)⁴ introduced restrictions on advertising techniques that may be used in promoting food and drink products, including some specific to HFSS products. Section 2 summarises the nature of the restrictions in more detail, and they are set out in full in Annex 2.

¹ The periods within television schedules devoted to children’s programming, including all programming on children’s channels - see Annex 3

² Paragraph 1.9, Television advertising of food and drink products to children – Final statement, Ofcom, February 2007 (http://www.ofcom.org.uk/consult/condocs/foodads_new/statement/statement.pdf)

³ Television Advertising of Food and Drink Products to Children – statement and further consultation, Ofcom, November 2006 (http://www.ofcom.org.uk/consult/condocs/foodads_new/foodads3.pdf)

⁴ The restrictions were codified by the Broadcasting Committee of Advertising Practice of the Advertising Standards Authority – Ofcom’s co-regulator of TV and radio advertising

- 1.7 In announcing the restrictions, Ofcom said that it would carry out a review in due course to assess whether or not the restrictions were having the expected effects in terms of:
- a) the reduction in the amount of HFSS advertising seen by children;
 - b) the use of advertising techniques considered to appeal to children in HFSS advertising; and
 - c) the impact on broadcasting revenues.
- 1.8 The Government asked Ofcom to carry out an interim review in 2008, before the final phase of restrictions came into force. The key findings from this were that, during 2007/8, children⁵ saw around 34% less HFSS advertising than in 2005, with younger children (4-9 year olds) seeing 39% less and older children (10–15 year olds) seeing 28% less⁶.
- 1.9 This final review looks at data from 2009, following the implementation of the final phase of restrictions (a ban on all HFSS advertising on children's channels) and compares it with data for 2005 (prior to the introduction of the restrictions).

The changing context

- 1.10 To understand the significance of changes to the nature and balance of food advertising to children, it is important to look at the context in which these changes are occurring. We examine this in more detail in Section 4. The main contextual changes between 2005 and 2009 are similar to those observed in the interim report and are as follows:
- a) children are watching broadly the same amount of television as in 2005 (around 16 hours a week), and the same proportion of viewing in commercial adult airtime (just over half) and children's airtime (around a third);
 - b) 93%⁷ of households with children had access to multichannel television in 2009 up from 76% in 2005. As a result, children's viewing has shifted somewhat from the main PSB channels to digital channels;
 - c) the main beneficiaries of this shift in children's viewing habits have been children's channels (both commercial and non-commercial) and the commercial PSB portfolio services (e.g. ITV2, Fiver and E4) where children's viewing has increased from 0.5 hours in 2005 to 1.6 hours per week in 2009 (0.6 hours to 2 hours for 10-15 year olds);
 - d) in line with TV advertising in general, the number of HFSS spots on television has increased overall (mainly due to the proliferation of channels). However the share of HFSS adverts as a proportion of all TV advertising has remained stable (10.0% in 2005 compared to 9.8% in 2009); and
 - e) there has been a significant shift in the balance of food and drink advertising on television. In 2005, we estimate over 22% of all food and drink advertising spots were for non-HFSS products; by 2009, this had risen to over 33%.

⁵ Unless otherwise indicated, references to children are to those aged 4-15.

⁶ *Changes in the nature and balance of food advertising to children*, Ofcom, 17 December 2008 (<http://www.ofcom.org.uk/research/tv/reports/hfssdec08/hfssdec08.pdf>) ('interim review')

⁷ Ofcom technology tracker data for Q1 2009

Changes in the amount of HFSS advertising seen by children

- 1.11 For the reasons explained in Section 3, while the amount of food and drink advertising can be directly measured, it is not possible to measure exactly how much HFSS advertising there was in either 2005 or 2009. The best estimate of change requires a comparison between separate assessments or ‘proxies’ of how much HFSS advertising was seen by children in 2005, and how much they saw in 2009. It is important to note that these assessments are prepared on different bases, and the outcome is necessarily approximate and should not be taken as an exact indication.
- 1.12 On that basis, we estimate that overall, compared with 2005, in 2009:
- a) children saw around 37% less HFSS advertising (i.e. a reduction of 4.4bn impacts);
 - b) younger children (4-9 year olds) saw 52% less (3.1bn impacts); older children (10–15 year olds) saw 22% less (1.4bn impacts);
 - c) overall, children saw 40% less HFSS advertising on the commercial PSB channels (2.4bn impacts)⁸ and 33% less advertising on commercial non-PSB channels (2.0bn impacts). These reductions were driven by the decline in impacts during children’s airtime. In adult airtime, children saw 28% (1.4bn impacts) less HFSS advertising on the commercial PSB channels, but saw 46% (1.3bn impacts) more advertising on commercial non-PSB channels. As a result children saw 1% (0.1bn impacts) less HFSS advertising overall in adult airtime;
 - d) exposure to HFSS advertising was eliminated during children’s airtime (including both children’s channels and children’s slots on other channels); and
 - e) despite an increase in the volume of HFSS advertising aired throughout the day, children’s exposure to HFSS advertising fell in all day parts before 9pm and by 25% between the peak hours of 18:00-21:00. These reductions were driven by the decline in impacts during children’s airtime.
- 1.13 It should also be noted that not all of the HFSS advertising seen by children is for products that may appeal to them. Separate analysis carried out by Ofcom suggests that overall just over 56% of all food and drink advertising seen by children was either for non HFSS products or for HFSS products unlikely to appeal to them e.g. spreads, cooking oil and drinks mixers etc.
- 1.14 Broadcasters complied with the restrictions on scheduling HFSS advertising during children’s airtime. Ofcom is aware of two instances where an HFSS advert was mistakenly aired during children’s airtime. By the same token, we found little evidence that advertisers were evading the spirit of the restrictions, by airing advertising and sponsorship during children’s airtime in the names of brands commonly associated with HFSS products. The rules on scheduling HFSS advertising apply equally to sponsorship bumpers. We have found only two broadcasters in breach of the rules in relation to sponsorship between 2005 and 2009 (one on a UK service⁹ and a second broadcaster on two of its channels licensed by Ofcom but targeted at Spain¹⁰). This resulted in the removal of the

⁸ ITV, Channel 4, Five, and in Wales S4C1

⁹ Broadcast Bulletin No. 128, Ofcom, 23 February 2009 (www.ofcom.org.uk/tv/obb/prog_cb/obb128/)

¹⁰ Broadcast Bulletin No. 147, Ofcom, 7 December 2009 (www.ofcom.org.uk/tv/obb/prog_cb/obb147/Issue147.pdf)

sponsorship credits and, for one broadcaster, the implementation of additional staff training.

Changes in the use of advertising techniques seen by children

- 1.15 As in the interim review, Ofcom has looked to ascertain what changes there have been in the use of particular advertising techniques used in food and drink advertising that have been defined as of particular appeal¹¹ to children¹². The analysis includes advertisements for both HFSS and non-HFSS products.
- 1.16 Between Q1 2005 and Q1 2009:
- a) children saw less advertising featuring licensed characters (-84%), brand equity characters (-56%), other characters (-2%) and promotions (-41%);
 - b) children saw more advertising featuring celebrities (143%) and health claims (18%). Almost all of the growth in exposure took place in adult airtime. In line with the interim review, the majority of celebrities featured in these advertisements appeared to be primarily of appeal to adults (e.g. Ian Botham, Gloria Hunniford);
 - c) in children's airtime, use of all of these techniques (with the exception of celebrities) declined, but continued to register a presence as they are sometimes used to promote non-HFSS products; and
 - d) in adult airtime the use of licensed characters also fell, but the use of the other assessed techniques rose.
- 1.17 Overall, our analysis continues to suggest that children are exposed to significantly less HFSS advertising using techniques considered to be of particular appeal to children.
- 1.18 Surveys carried out by the ASA between 2007 and 2009 show that broadcasters are complying with the restrictions on advertising techniques that may be used in food and drink advertising aimed at children. In its latest compliance survey¹³ the ASA found that all of the food and drink advertisements shown on the 67 television services (including regional ITV services) that were monitored complied fully with the HFSS content restrictions.

Impact on broadcasters

- 1.19 In restricting the advertising that broadcasters could carry, Ofcom sought to avoid a disproportionate impact on the revenues of broadcasters. Ofcom estimated that the restrictions would, nonetheless, have an adverse affect on the advertising revenue earned by broadcasters, although some would be able to mitigate that loss to a greater or lesser extent.
- 1.20 The interim review found that the restrictions on HFSS food and drink advertising were not the most significant factor affecting broadcasters in the period under review

¹¹ See Annex 2

¹² Findings are based on Q1 2005 and Q1 2009 data due to limited data availability for 2009. The interim review used 12 month data for 2005 and 2007/8

¹³ *Food and Soft Drink Advertising Survey 2009*, ASA, 22 June 2010 (<http://www.asa.org.uk/Media-Centre/2010/ASA-Food-and-Soft-Drink-Survey-2009.aspx>). Two of the TV advertisements included in the survey were found to be in breach of the BCAP code however these were not breaches of the content restrictions for food and drink products.

2005 -2007/8), but was not able to quantify the impact they had on broadcasting revenues¹⁴.

- 1.21 For the final review, Ofcom sought views from broadcasters on whether they were able to provide advertising revenue data for 2008-9 that would shed light on the impact of the advertising restrictions. All of the broadcasters that responded indicated that it would not be feasible to disentangle the impact of the restrictions from other factors, such as the economic downturn.

Conclusions

- 1.22 Ofcom's 2004 research review¹⁵ suggested that television has a relatively modest impact on children's food preferences, and is only one among a number of factors affecting those preferences. Nonetheless, Ofcom and its co-regulatory partner the Advertising Standards Association put in place rules on both the scheduling and the content of HFSS advertising that are amongst the strictest in the world.

- 1.23 These restrictions have:

- a) reduced children's exposure to HFSS advertising significantly (37% overall), particularly in the case of younger children (52%), who may be more susceptible to the influence of advertising. In the case of older children, the reduction is less marked (22%), and somewhat less than that observed in the interim review (28%). However, this reflects the greater proportion of their viewing in adult airtime, and a shift in their viewing towards channels carrying more HFSS advertising;
- b) led to a sharp drop in HFSS advertising featuring various advertising techniques considered attractive to children, such as popular cartoon characters. While advertisers continued to make use of celebrities, both in children's and adult airtime, most of these are likely to appeal principally to adults; and
- c) contributed to a significant shift in the balance of food and drink advertising on television towards non-HFSS products, which accounted for an estimated 33.1% all food and drink advertising spots in 2009 as against 22.5% in 2005 and 41.1% of all food and drink child impacts in 2009, as against 19.3% in 2005.

- 1.24 We are therefore satisfied that the restrictions have served to reduce significantly the amount of HFSS advertising seen by children, and to reduce the influence of techniques in HFSS advertising that are considered likely to be particularly attractive to children.

- 1.25 Against this background, and given the public policy objectives Ofcom was asked to take into account (see paragraph 1.2 above), we consider it appropriate to maintain the current restrictions, but not to extend them, for the reasons Ofcom stated in November 2006¹⁶. Ofcom will therefore maintain the current restrictions, including:

- a) a ban on advertising HFSS products in programmes made for children aged 4-15;

¹⁴ *Changes in the nature and balance of food advertising to children*, Ofcom, 17 December 2008 see web link page 2

¹⁵ *Children's food choices, parents' understanding and influence, and the role of food promotions. Report*, Ofcom, July 2004 (http://stakeholders.ofcom.org.uk/market-data-research/tv-research/food_ads/)

¹⁶ *Television Advertising of Food and Drink Products to Children – statement and further consultation*, Ofcom, November 2006 [See](#) link page 1

- b) a ban on advertising HFSS products in programmes likely to be of particular appeal to children aged 4-15;
 - c) a ban on sponsorship in the name of HFSS products in programmes made for children or likely to be of particular appeal to them; and
 - d) restrictions on HFSS advertising targeting children of primary school age or younger, including bans on the use of licensed characters and celebrities popular with children, on health claims, and on promotional offers.
- 1.26 Given the resources that were required for the detailed analysis that was undertaken for the interim and final reviews, we do not anticipate conducting a further review unless there is clear evidence of a change in circumstances.

Section 2

Background

Introduction

- 2.1 This section summarises:
- a) Ofcom's role in relation to the regulation of food and drink advertising on television;
 - b) the concerns about obesity which gave rise to the consideration of restrictions on certain types of food and drink advertising;
 - c) the restrictions that Ofcom phased in between 2007 and 2009; and
 - d) Ofcom's plans for a final review.

Ofcom's role

- 2.2 Ofcom is the independent regulator of television, radio, telecommunications and wireless communications services in the UK. Part of our role is to set standards for television advertising. All television broadcasters must comply with these standards in relation to any advertising they transmit. In late 2004 we transferred the responsibility for the Television Advertising Standards Code to the Advertising Standards Authority (ASA), including the functions of complaints handling and code policy development. However, under this co-regulatory scheme Ofcom still retains ultimate responsibility for all television advertising standards as the backstop regulator under the terms of the Communications Act 2003 ('the Act'). In particular, Ofcom retains direct responsibility for advertising scheduling policy.
- 2.3 The relevant objectives to be secured by these standards include protecting under 18's, and preventing the inclusion of harmful advertising and unsuitable sponsorship. In setting these standards Ofcom must have regard, amongst other things, to the degree of harm and offence likely to be caused by the inclusion of any sort of material, the likely size and composition of the audience and to the vulnerability of children. Ofcom must also take into account its principle duty to further the interests of citizens and consumers, and must secure among other things the maintenance of a sufficient plurality of providers of different television services and the availability of a wide range of television services of high quality and calculated to appeal to a variety of tastes and interests. In imposing regulatory measures Ofcom has to act in a proportionate and targeted manner.
- 2.4 As well as setting standards to secure these objectives, the Act permits Ofcom to set standards which prohibit certain advertisements and forms and methods of advertising or sponsorship.

Concerns about obesity

- 2.5 A growing body of research¹⁷ has generated concerns in government and society about rising childhood obesity levels and ill-health due to dietary imbalance,

¹⁷ See for instance: *Tackling Obesity in England*, National Audit Office, 2001; Annual Report of the Chief Medical Officer, 3 July 2003; Obesity Statistics, 12 December 2005.

specifically the over-consumption of food and drinks high in fat or salt or sugar (HFSS) and the under-consumption of fresh foods, fruit and vegetables. Both the Department of Health and the Food Standards Agency (FSA) identified television advertising as an area where action should be considered to restrict the promotion of HFSS foods to children.

- 2.6 In December 2003, the then Secretary of State for Culture, Media and Sport asked Ofcom to consider proposals for strengthening the rules on television advertising of food aimed at children.
- 2.7 In response, in early 2004, Ofcom conducted research into the role that television advertising plays in influencing children's consumption of foods that are HFSS¹⁸. In publishing its research report in July 2004, Ofcom concluded that advertising had a modest, direct effect on children's food preferences and a larger but unquantifiable indirect effect on children's food preferences, consumption and behaviour. Ofcom therefore concluded that there was a case for proportionate and targeted action in terms of rules for broadcast advertising to address the issue of childhood health and obesity. However, Ofcom also noted that one of the conclusions from the independent research was that multiple factors account for childhood obesity. Television viewing/advertising is one among many influences on children's food choices. These other factors include social, environmental and cultural factors, all of which interact in complex ways not yet well understood. In these circumstances, Ofcom considered that a total ban on food advertising would be neither proportionate nor, in isolation, effective.
- 2.8 In November 2004, the Department of Health published a White Paper¹⁹ reiterating the then Government's view that there was 'a strong case for action to restrict further the advertising and promotion to children of those foods and drinks that are high in fat, salt and sugar' in both the broadcasting and non-broadcasting arenas. It made clear that the then Government sought a 'change in the nature and balance of food promotion'.
- 2.9 At the same time the FSA published a consultation on a scheme which would identify HFSS food and drink products by means of nutrient profiling. This model was intended to help Ofcom reach decisions on the restriction of television advertising for less healthy foods. In December 2005, the FSA completed their work on a nutrient profiling scheme and provided it to Ofcom²⁰.
- 2.10 In March 2006 Ofcom proceeded to consult on a range of different options for new restrictions on television advertising to children ('the March 2006 consultation document')²¹.

¹⁸ The full set of research documents published in 2004 can be found at *Children's food choices, parents' understanding and influence, and the role of food promotions. Report Ofcom, July 2004* see page 5 for web link

¹⁹ Paragraph 58, Chapter 2. *Choosing Health: Making Healthier Choices Easier*, Department of Health, November 2004

(http://www.dh.gov.uk/en/publicationsandstatistics/publications/publicationspolicyandguidance/browsable/DH_4955568)

²⁰ An explanation of this model can be found on the FSA's website at

<http://www.food.gov.uk/healthiereating/advertisingtochildren/nutlab/nutprofmod>

²¹ *Television advertising of food and drink products to children - Options for new restrictions*, Ofcom, March 2006 (<http://www.ofcom.org.uk/consult/condocs/foodads/>).

The advertising restrictions

Scheduling restrictions

- 2.11 Following that consultation, Ofcom published a Statement and Further Consultation on 17 November 2006²² ('the November 2006 statement'), setting out a number of decisions, and consulting on whether to extend restrictions on HFSS advertising in children's programming to cover programmes of appeal to under 16s.
- 2.12 In February 2007, Ofcom published its final statement ('the February 2007 statement')²³. In that document, Ofcom concluded that, in the context of its statutory duties, the aims of further regulation in relation to television advertising should be to balance the following regulatory objectives:
- a) reduce significantly the exposure of children under 16 to HFSS advertising, as a means of reducing opportunities to persuade children to demand and consume HFSS products;
 - b) enhance protection for both older and younger children as well as parents by appropriate revisions to advertising content standards, so as to reduce children's emotional engagement with HFSS advertisements, and reduce the risk that children and parents may misinterpret product claims, and to reduce the potential for pester power;
 - c) avoid disproportionate impacts on the revenue of broadcasters;
 - d) avoid intrusive regulation of advertising during adult airtime, given that adults are able to make informed decisions about advertising messages; and
 - e) ensure that any measures that are put in place are appropriate and sufficiently timely to enable Government to observe changes to the nature and balance of food promotion by early 2007.
- 2.13 Ofcom also concluded that:
- a) with effect from 1 April 2007, advertisements for HFSS products should not be shown in or around programmes aimed at children (including pre-school children), or in or around programmes that were likely to be of particular appeal to children aged 4-9; and
 - b) with effect from 1 January 2008, HFSS advertisements should not be shown in or around programmes that are likely to be of particular appeal to children aged 4-15²⁴.
- 2.14 An exception was made for children's channels, to which the following transitional arrangements were applied:

²² 'Television Advertising of Food and Drink Products to Children – Statement and Further Consultation', Ofcom, November 2006 ('November 2006 statement')

(http://www.ofcom.org.uk/consult/condocs/foodads_new/foodads3.pdf)

²³ 'Television Advertising of Food and Drink Products to Children: Final statement', Ofcom, February 2007. (http://www.ofcom.org.uk/consult/condocs/foodads_new/statement/)

²⁴ A programme of particular appeal to children under 16 would be deemed to be one that attracted an audience index of 120 for this age group. If a programme attracts an under-16 audience in a proportion similar to that group's presence in the population as a whole, it is said to index at 100. So an index of 120 is an over-representation of that group by 20%.

- a) for the period from 1 April 2007 until 31 December 2007, not more than 75% of the average minutage devoted by that channel to HFSS advertising in the calendar year 2005 was to be allowed;
- b) for the period from 1 January 2008 to 31 December 2008, not more than 50% of the average minutage devoted by that channel to HFSS advertising in the calendar year 2005 was to be allowed; and
- c) from 1 January 2009 onwards, all HFSS advertising to be excluded from children’s channels.

Content restrictions

2.15 Alongside the scheduling restrictions, changes were introduced to BCAP’s rules on the content of advertisements for food and drink products including some rules specific to HFSS products. Amongst other things, the rules (reproduced in full in Annex 2) now:

- a) prohibit advertisements from encouraging excessive consumption of any food and drink product, and require that portion sizes shown are relevant, particularly if children are involved;
- b) prohibit advertisements that seek to sell by appealing to emotions such as pity, fear, loyalty or self-confidence or suggest that having the advertised product somehow confers superiority, for example making a child more confident, clever, popular, or successful; and
- c) prohibit the use in HFSS product advertisements targeted directly at pre-school or primary school children of:
 - i) promotional offers (e.g. free toys);
 - ii) nutritional and health claims;
 - iii) licensed characters; and
 - iv) celebrities.

Reviews

2.16 At the request of the then Government, Ofcom carried out an interim review in 2008. The review drew on data from July 2007 to June 2008 (the most recent 12 month period for which data was available) and was published in December 2008. The key findings from this were that, during 2007/8, children saw around 34% less HFSS advertising than in 2005, with 4-9 year olds seeing 39% less and 10–15 year olds seeing 28% less²⁵.

2.17 Ofcom also concluded that in order to assess the full effect of the restrictions it would be necessary to conduct a further review once full year data for 2009 was available.

As in the 2008 interim review, the 2010 final review assesses:

²⁵ *Changes in the nature and balance of food advertising to children*, Ofcom, 17 December 2008 see web link page 2

- a) whether scheduling restrictions have achieved the objective of reducing significantly the number of HFSS product advertising impacts (i.e. each occasion when a viewer sees an advert) among children aged 4-15 years;
- b) whether scheduling restrictions and revised content rules are being implemented as intended, or whether unexpected difficulties have emerged in interpretation, implementation and enforcement;
- c) whether the impact on broadcasters has been broadly consistent with the effects that both Ofcom and the broadcasters expected;
- d) whether advertisers are evading the spirit of the restrictions, by airing advertising and sponsorship in the names of brands commonly associated with HFSS products (rather than advertising the products themselves) in children's airtime; and
- e) whether advertisers have significantly increased the amount of HFSS advertising and sponsorship in periods outside children's airtime, at times when significant numbers of children may be watching.

Related issues

FSA's review of nutrient profiling scheme

2.18 As the November 2006 statement noted, the FSA committed to a review of the nutrient profiling model after a year of operation. In 2009 the FSA, having taken into account the recommendations of the independent Nutrient Profiling Review Panel concluded that no changes should be made to the nutrient profile model.

ASA's reviews of advertising code

2.19 During July 2007²⁶, September 2008²⁷, and October 2009²⁸, the ASA carried out assessments of whether broadcasters were complying with the new content rules. The ASA examined food and soft drink television advertisements appearing across a variety of media, including television. Section 6 reports on the outcome of these reviews, and on the most recent review, published in June 2010.

²⁶ *Food and Soft Drink Advertising Survey 2007* Advertising Standards Authority, Jan 2008
<http://www.asa.org.uk/Media-Centre/2010/~media/Files/ASA/Reports/FoodandSoftDrinkAdvertisingSurvey2007.ashx>

²⁷ *Food and Soft Drink Advertising Survey 2008* Advertising Standards Authority, Nov 2008
<http://www.asa.org.uk/Media-Centre/2010/~media/Files/ASA/Reports/FoodandSoftDrinkSurvey2008.ashx>

²⁸ *Compliance report: Food and Soft Drinks Advertising Survey 2009*, Advertising Standards Authority, 22 June 2010. See web link page 4.

Section 3

Data & Methodology

Introduction

- 3.1 This section explains the data sources and key definitions used in analysing and reviewing:
- a) the changing context in which the advertising restrictions apply;
 - b) changes in the balance of food and drink advertising seen by children;
 - c) changes in the nature and balance of food and drink advertising.
- 3.2 For most purposes, we have tracked changes between 2005 (the last full year for which Ofcom had data when finalising decisions on advertising restrictions) and 2009 (the first year in which the restrictions were fully implemented). In our November 2006 consultation document and February 2007 statement, we used 2005 as the base year from which to estimate the effects of the advertising restrictions.
- 3.3 Although Ofcom's advertising restrictions did not come into effect until April 2007, the then Government made clear its intention to seek changes to the nature and balance of food advertising across all media in 2003. In order to set the changes between 2005 and 2009 in context, we have provided data in Section 4 ('The changing context') and Annex 5 ('Changes in the balance of food and drink advertising seen by children') from 2003.
- 3.4 It should be noted that some of the figures in the text of the review differ slightly from those in the graphs; this is due to the rounding of very large numbers in the graphs.

Data definitions: Glossary of terms

- 3.5 The following terms are used in the review:
- a) '120 indexing' and similar terms refer to the method used to determine whether a programme appeals disproportionately to a particular demographic group, in this case children. A programme of particular appeal to children under 16 is deemed to be one that attracts an audience index of 120 for this age group. If a programme attracts an under-16 audience in a proportion similar to that group's presence in the population as a whole, it is said to index at 100. So an index of 120 is an over-representation of that group by 20%;
 - b) the '2005 HFSS proxy' is the approach we used to estimate the amount of HFSS advertising in 2005, in the absence of actual data on what was HFSS advertising. It is explained in more detail in Annex 4;
 - c) the '2009 HFSS proxy' is the approach we have used to estimate the amount of HFSS advertising in 2009, taking account of advertising that had been certified as non-HFSS, and assessments of the remaining uncertified advertisements. It is explained in detail in Annex 4;
 - d) 'adult airtime' means the periods within television schedules that do not consist of children's programming;

- e) an ‘advertising impact’ is measure of viewing to a commercial spot. For example ten impacts could be achieved by ten people viewing a single advertisement, by one person seeing the advertisement ten times, or by five people seeing the advertisement twice etc. In this review, impacts are added together to give a measure of children’s exposure to particular types of advertising. As such, it is a broad measure of advertising exposure. It is possible to segment impacts in various ways, such by age band, time of day, channel or group of channels etc;
- f) ‘advertising spot’ means one occasion on which an advertisement is broadcast;
- g) ‘BARB’ or the British Audience Research Bureau is the industry body that collects audience data for channels;
- h) ‘BBC portfolio channels’ refers to BBC channels other than the analogue channels (i.e. BBCs 1 and 2). Specifically, this includes BBC3, BBC4, BBC News, BBC Parliament, CBBC and CBeebies. CBBC and CBeebies have in some instances in this report been separated out to highlight trends across channels dedicated to children’s programming;
- i) ‘children’s airtime’ means the periods within television schedules devoted to children’s programming, including all programming on ‘children’s channels’ (see detailed definition in Annex 3);
- j) ‘children’s channels’ are the channels listed in Annex 3;
- k) ‘Clearcast’ (formerly the Broadcast Advertising Clearance Centre) is the body which checks advertisements on behalf of most broadcasters to ensure that they comply with relevant advertising regulations²⁹. It requires advertisers to certify food and drink advertisements using the nutrient profiling scheme devised by the FSA if they wish to have their advertisements scheduled during restricted periods;
- l) ‘Commercial non-PSB channels’ means all non-BBC channels available on the multichannel platforms. While it is possible some of these channels do not carry commercial advertising (e.g. some Disney channels), this terminology has been used for ease of comparison with BBC channels; ‘commercial PSB channels’ refers to the following advertising-funded public service channels - ITV1, Channel 4, Five, and in Wales, S4C1;
- m) ‘commercial PSB portfolio channels’ are those commercial non-PSB channels launched by the ‘commercial PSB channels’, such ITV2, E4 and Fiver;
- n) ‘dayparts’ means the following periods within television schedules that have been used in this review to understand in more details trends in advertising activity over the course of a day: 06:00-09:30, 09:30-12:30, 12:30-15:15, 15:15-17:00 17:00-18:00, 18:00-21:00, 21:00-22:30, and 22:30–06:00;
- o) ‘food and drink advertising’ is used to refer to the relevant product categories (sometimes referred to in previous Ofcom publications as ‘core categories’) used by Nielsen Media and Billetts Media to define advertising for all food and drink products. Though broadly equivalent, the Nielsen and Billetts categories differ slightly, as explained in Annex 4;

²⁹ More information on Clearcast can be found at its website (www.clearcast.co.uk).

- p) ‘HFSS’ means food and drink products high in fat or salt or sugar, according to the nutrient profiling scheme (see definition below) developed by the FSA;
- q) ‘main PSB channels’ refers to the following public service channels - BBC One, BBC Two, ITV1, Channel 4, Five, and in Wales, S4C1; and
- r) ‘nutrient profiling’ is the method devised by the FSA to categorise food and drinks products, for the purposes of TV advertising restrictions, as healthy or less healthy³⁰.

The changing context

- 3.6 We have used Ofcom data on trends in the penetration of multi-channel television over time, and specifically within households where children are present. This data is particularly useful for understanding changes in viewing behaviour as a result of the increased choice available to audiences.
- 3.7 Using audience data from the British Audience Research Bureau (BARB), we have looked at changes in the amount of television that children watch, the types of channels they watch, and how much of their viewing takes place during children’s airtime and other times of the day.
- 3.8 In looking at trends in television advertising for food and drink products in Section 4, we have used data from Nielsen Media³¹ based on viewing data collected by BARB. There are two data measures that have been sourced from this database – ‘spots’ which are a measure of the number of commercials aired and ‘impacts’ which provide a measure of the amount of advertising seen. See definitions above.

Changes in the amount of HFSS advertising seen by children

- 3.9 In Section 5, we look at any changes there have been in children’s exposure to food and drink advertising overall, and to advertising for HFSS and non-HFSS products.
- 3.10 The base year for measuring change in HFSS impacts is 2005. At that point, advertising had not been formally classified as either HFSS or non-HFSS, as the nutrient profiling scheme had not been finalised or implemented. We have carried out separate assessments (‘proxies’) of how much HFSS advertising was seen by children in 2005 and in 2009. This review contains assessments based on three measures.

Food and drink (identified as ‘Core Categories’ between 2004 and 2007)

- 3.11 This measure includes advertising of all food products, soft drinks, beverages and chain restaurants (fast food) as classified within the Nielsen Media database. It should be noted that by definition ‘food and drink’ includes both HFSS and non-HFSS products.

2005 HFSS proxy

- 3.12 For the purposes of the modelling undertaken in 2006³² to estimate the amount of HFSS advertising seen by children in 2005, we aggregated data from the Nielsen

³⁰ An explanation of this model can be found on the FSA’s website at <http://www.food.gov.uk/healthiereating/advertisingtochildren/nutlab/nutprofmod>

³¹ www.nielsenmedia.co.uk/

³² Documents can be found at http://www.ofcom.org.uk/consult/condocs/foodads_new/

food and drink minor product categories (e.g. Food - Bakery goods - Biscuits) considered most likely to be comprised wholly or mainly of HFSS products, having regard to the FSA's provisional nutrient profile model³³. The resulting proxy (the '2005 HFSS proxy') was inevitably broad brush in nature, as some of the sub-categories included both HFSS and non-HFSS products. Nevertheless, it represented the best estimate at that time of HFSS impacts.

- 3.13 To allow for detailed comparisons between 2005 and 2009 data to be made (including HFSS spot data) it has been necessary to re-run the 2005 data for this review. Changes to the Nielsen data base and Ofcom's decisions on how to categorise the resulting data (explained in Annex 4) has meant that the 2005 HFSS base figure used in this review is 0.4bn impacts smaller (at 12.1 billion impacts) than the 12.5bn impact base figure reported in the interim review. The lower 2005 base figure means that any comparison with the 2009 data will show slightly smaller reductions in HFSS impacts than would be the case if it had been possible to make comparisons with the original 2005 data.

2009 HFSS proxy

- 3.14 With the introduction of nutrient profiling, it has been possible to make more robust estimates of the amount of food and drink advertising that is for HFSS and non-HFSS products. This estimate (the '2009 HFSS proxy') is based on:
- a) certificates for some advertisements provided by advertisers to Clearcast indicating that they were for non-HFSS products;
 - b) classifications of generic products (e.g. milk, bread, fruit) as HFSS or non-HFSS according to the FSA's conclusions on nutrient profiling; and
 - c) judgements about the remaining product advertisements, based on the certification or classification of products with similar or identical 'brand' labels (see below for details).
- 3.15 The sheer volume of data for individual advertisements, coupled with the fact that some were not certified as either HFSS or non-HFSS, required that we aggregate individual advertisements by product type, and determine whether advertising for products categories should be treated as HFSS or non-HFSS. This approach was necessary for both the interim and final reviews and meant we were able to aggregate the 2009 data at a more granular level than was possible for the 2005 data. Thus, we were able to categorise advertising at 'brand' level as defined by Nielsen Media (e.g. Fox's - Golden Crunch Biscuits) rather than at the broader level of Nielsen's minor product categories (e.g. Food - Bakery goods - Biscuits). For more details on the treatment of brands in the 2009 HFSS proxy see Annex 4.
- 3.16 Some brand categories exclusively contain HFSS or non-HFSS advertisements. But, as explained in Annex 4, where there are both HFSS and non-HFSS advertisements within a single brand category, we have treated all such advertising as HFSS unless there are strong indications that most are non-HFSS. Inevitably, this has meant that some HFSS advertising has been treated as non-HFSS; however, we believe that this is more than offset by the amount of non-HFSS advertising counted as HFSS advertising, because it shares the same brand category. The effect of this conservative approach is to underestimate the likely reduction in HFSS advertising seen by children.

³³ In doing so, we took advice from the Institute of Practitioners of Advertising.

- 3.17 The net result of this approach is that, with one exception, none of the advertising in children’s airtime is counted as being for HFSS products. The exception concerns McDonald’s advertising for non-HFSS products within the brand category “McDonald’s Chain Restaurants”³⁴, which are sometimes shown in children’s airtime. It would be misleading to count these as HFSS advertising; indeed, they are certified as being for non-HFSS products. Accordingly, we have treated them as such.

Measuring Change

- 3.18 The analysis undertaken to arrive at the 2009 HFSS proxy demonstrated that applying the 2005 proxy to 2009 advertising data would significantly overstate the amount of HFSS advertising seen by children in 2009. The main reason for this is that the 2005 proxy is based on entire sub-categories, rather than the more granular approach taken in the 2009 proxy which is based on individual ‘brands’. As the equivalent information at a ‘brand’ level is not available for commercials aired in 2005 it is not possible to create a similar ‘brand’ level proxy for 2005 commercial activity.
- 3.19 For the purposes of this review we have compared the best estimate for HFSS impacts in 2005 (re-run 2005 HFSS proxy) with our best estimate of HFSS impacts in 2009 (2009 HFSS proxy) to assess change in HFSS impacts over that period. Although this does not provide a like-for-like comparison of HFSS advertising, we consider that it represents a better means of assessing change than any available alternative.

Changes in the use of techniques in advertising seen by children

- 3.20 In Section 6, we have looked at the use of techniques considered to appeal to children in food and drink advertising. This analysis is based on data sourced from Billetts Media Monitoring³⁵. As HFSS products were not defined and classified before the advertising restrictions came into force in April 2007, the database covers all food and drink advertising, rather than just HFSS products.
- 3.21 The food and drink categories within the Billetts database differ in some areas from the definition of food and drink advertising used elsewhere in the review (based on Nielsen Media data). See Annex 4 for an explanation of the differences. The Department of Health commissioned bespoke categorisation of this advertising in 2006 to allow it to analyse changes in creative techniques used in food and drink advertising across media over time. The database broadly contains all food and drink product advertising from 2003 to March 2009. Data collection ceased after Q1 2009 (i.e. the first quarter of 2009), so our analysis compares data from Q1 2009 with data from Q1 2005. Inevitably, the short time frame means there is a risk that the seasonality of food and drink advertising and/or individual advertising campaigns could have a disproportionately large impact on our findings, which should be regarded as a snapshot, rather than as definitive evidence of trends.
- 3.22 Each advertisement included in the database has been coded according to the type of creative technique used within it. Changes in the volume of advertising spots and impacts for each creative technique can be analysed over time. It should be noted that adverts may make use of more than one such technique, and so may be counted more than once. For example, if a Frosties cereal advert included an offer for children’s books, the advert would be counted twice; once for using the brand equity character *Tony the Tiger* and once for including a promotion.

³⁴ Nielsen terminology - ‘McDonalds – Restr Chain’

³⁵ <http://www.ebiquity.com/uk/billetts/>

Section 4

The changing context

Introduction

- 4.1 Changes in the television environment and in viewing patterns can affect children's exposure to food and drink advertising, so it is important to understand the nature of these changes. For example, the growth in the number of households able to receive multichannel television has increased choice for all viewers, including children. Growth in viewing to commercial channels may result in increased exposure to advertising, as may an increase in the number of commercials aired.
- 4.2 This section examines the growth in the availability of multichannel television in households with children, as well as trends in children's viewing habits and in the amount and distribution of television advertising for all food and drink and HFSS products. It also reports on changes in food and drink advertising expenditure across all media. In general the 2010 data show a continuation of the trends revealed in the 2008 interim review.

Key findings

- 4.3 The main findings are that between 2005 and 2009:
- a) the amount of time children spent watching television has been fairly consistent at around 16 hours per week. The split in viewing between children's airtime and commercial adult airtime has also remained broadly stable;
 - b) the proportion of households with children with access to multichannel television increased from 76% to 93%³⁶. This has contributed to a shift in children's viewing from the main PSB channels to non-PSB channels (including BBC portfolio channels);
 - c) in children's airtime, viewing has moved away from the main PSBs to children's channels. This trend has been driven by younger viewers aged 4-9;
 - d) in adult airtime, there has been a significant shift in viewing from the main PSBs to non-PSB channels, particularly amongst older children (10-15 year olds);
 - e) children's viewing of commercial PSB portfolio channels (e.g. ITV2, E4 and Fiver) increased from 30 minutes to 1.6 hours per week, pushing up their share of children's viewing from 3.1% to 9.8%. For 10-15 year olds the increase was 1.4 hours (up from 0.6 hours to 2 hours);
 - f) as with all television advertising, the amount of HFSS advertising on television has increased (mainly due to the proliferation of channels). However, HFSS advertising as a proportion of all TV advertising has remained stable (falling fractionally from 10% in 2005 to 9.8% in 2009);

³⁶ Ofcom technology tracker data for Q1 2009

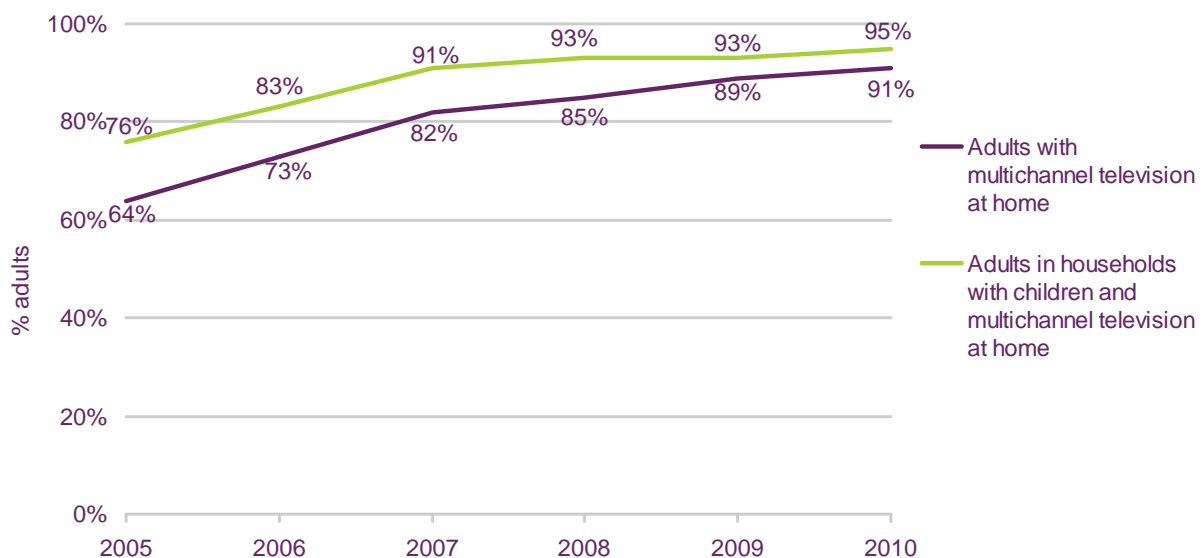
- g) while HFSS advertising activity has been removed from children’s airtime, the number of spots³⁷ during adult airtime increased across the day; and
- h) there has been a shift in the balance of food and drink advertising on television. In 2005, we estimate that 22.5% of all food and drink spots were for non-HFSS products; by 2009, this had risen to 33.1%.

The television landscape

4.4 As Figure 1 shows, the take-up of multichannel television has increased steadily in recent years. Penetration is higher among households with children than across all households in general. The take-up of multichannel television by households with children has increased from 76% in 2005 to 93% in 2009.

Figure 1: Take-up of multichannel television in the UK

Multichannel penetration



Source: Ofcom Technology Tracker, Q1 of each year

- 4.5 The growth in multichannel television take-up has led to greater choice for all viewers, including children. Children in households with digital terrestrial services have access to three dedicated children’s channels (CITV, CBBC, CBeebies) while those in cable and satellite homes may have access to over 20 dedicated children’s channels³⁸. By contrast, children with access only to the main PSB channels now have access to a much reduced volume of children’s programming.
- 4.6 There has also been a rise in the number of channels of all genres over recent years. A key trend has been the growth in portfolio channels launched by all the main PSB channels (e.g. BBC3, ITV4, E4 and Fiver), as well as an increase in the number of time-shifted channels.

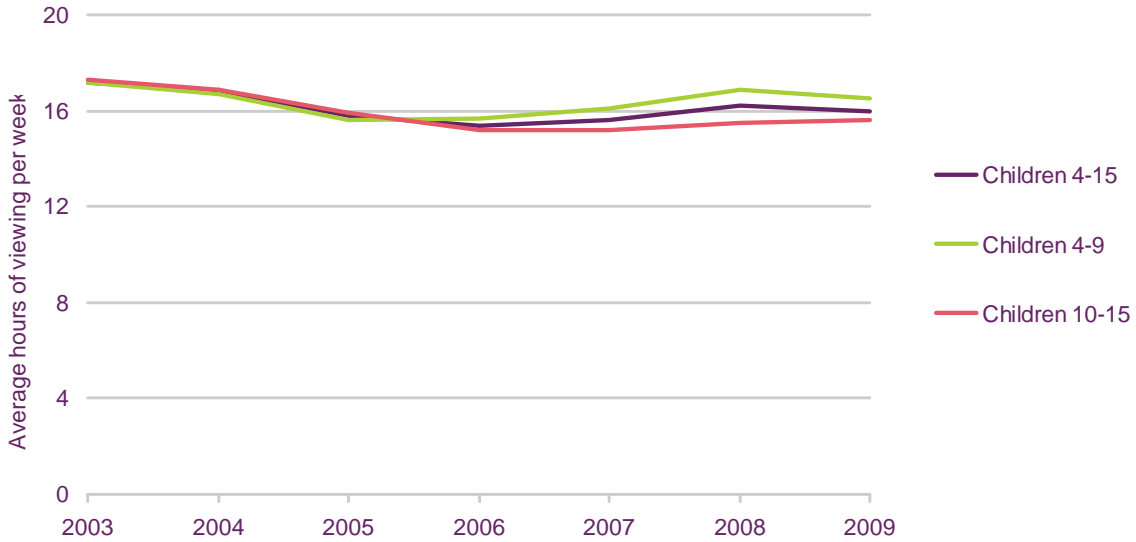
³⁷ See section 3.5 (e) for definition

³⁸ including time-shifted channels

Changes in children’s viewing habits

Figure 2: Average weekly hours of television viewing – Children by age group

Average weekly hours of television viewing



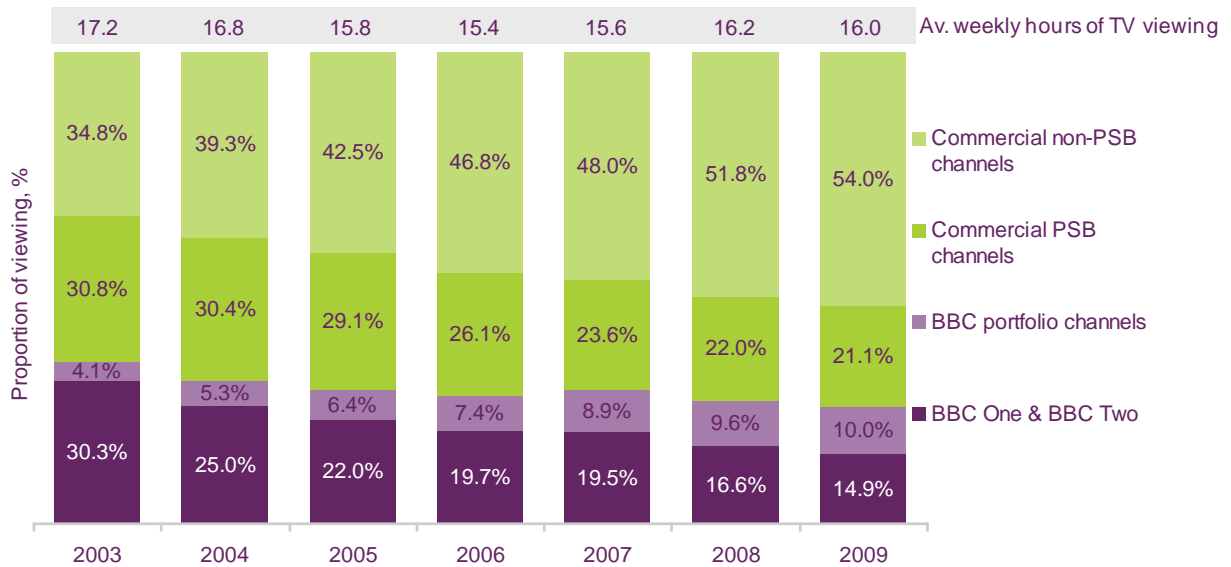
Source: BARB

4.7 The total time children spend watching television between 2005 and 2009 remained fairly stable at around 16 hours per week (Figure 2). On average, younger children (4-9 year olds) saw slightly more (16.5 hours) than 10-15 year olds (15.6 hours) in 2009.

Children’s viewing by channel type

Figure 3: Split in children’s viewing by channel type

Total weekly viewing to main PSB and non-PSB channels: Children 4-15



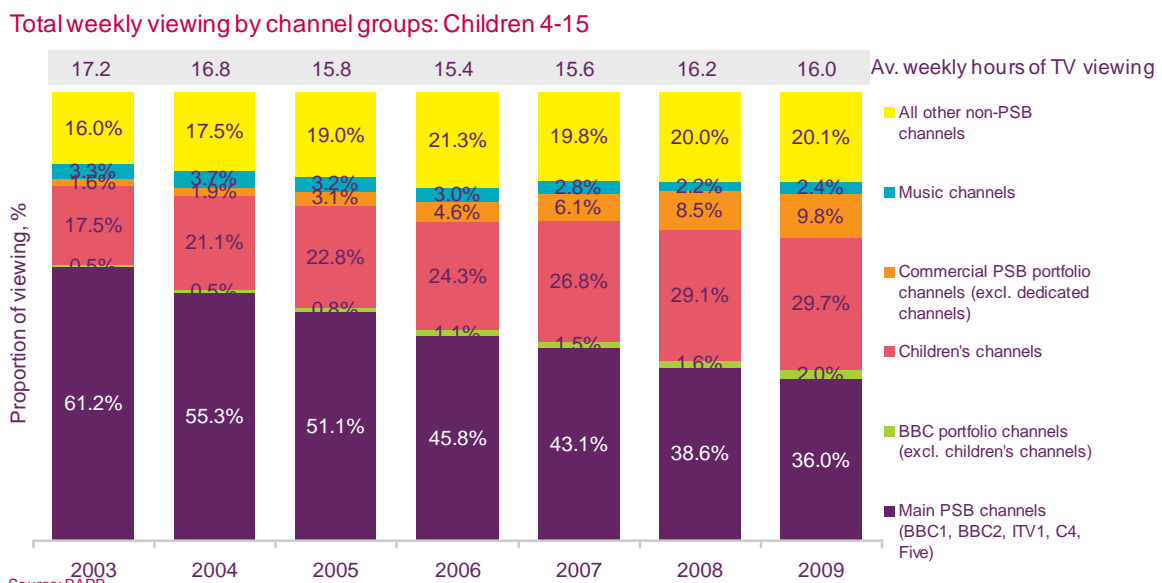
Source: BARB

Note: Minor variations due to rounding

'Commercial channels' include all non-BBC channels and will include channels such as Disney which do not carry any commercial advertising

- 4.8 Children’s viewing patterns by channel changed as their viewing shifted away from the main PSB channels to other channels:
- the proportion of children’s viewing devoted to the main PSB channels declined steadily from 51.1% in 2005 to 36.0% in 2009 (Figure 4);
 - a higher proportion of children’s time was spent viewing commercial non-PSB channels; their share of children’s viewing grew from 42.5% to 54.0% (Figure 3);
 - commercial PSB portfolio channels increased their share of the child audience from 3.1% to 9.8% (Figure 4); and
 - children’s channels (both commercial and non-commercial) accounted for 29.7% of viewing in 2009, up from 22.8% in 2005 (Figure 4).

Figure 4: Split in children’s viewing by channel groups

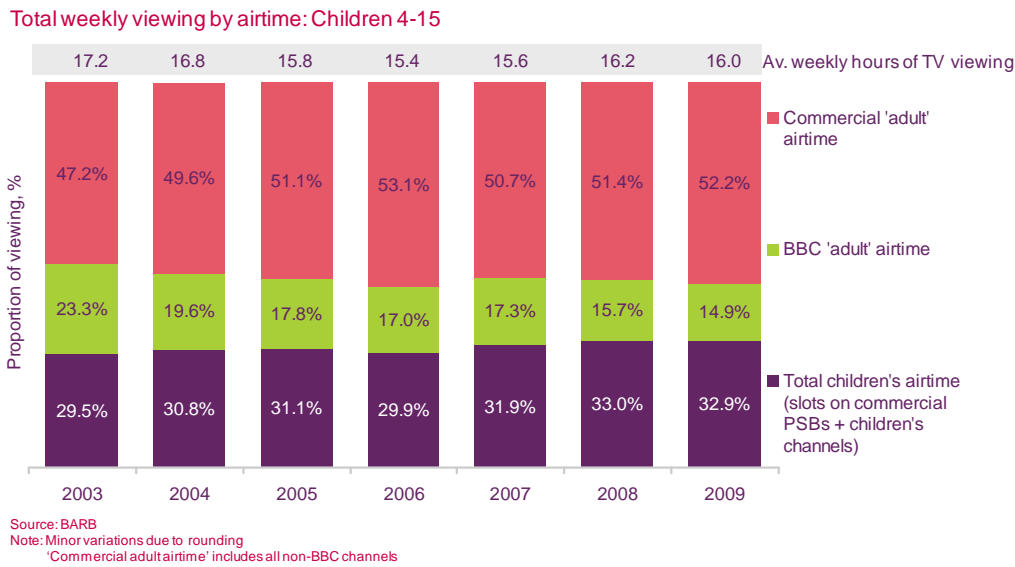


Source: BARB
 Note: Minor variations due to rounding
 4 Music added to the 'Commercial PSB portfolio channels' measure in 2008 – The Hits removed from 'Music Channels' in 2008

Children’s viewing split by children’s and adult airtime

- 4.9 As Figure 5 demonstrates, the overall viewing split between children’s and adult airtime remained fairly constant between 2005 and 2009. However, within these two categories there have been a number of significant developments over time.

Figure 5: Split in children’s viewing by type of airtime: Children’s vs. adult airtime

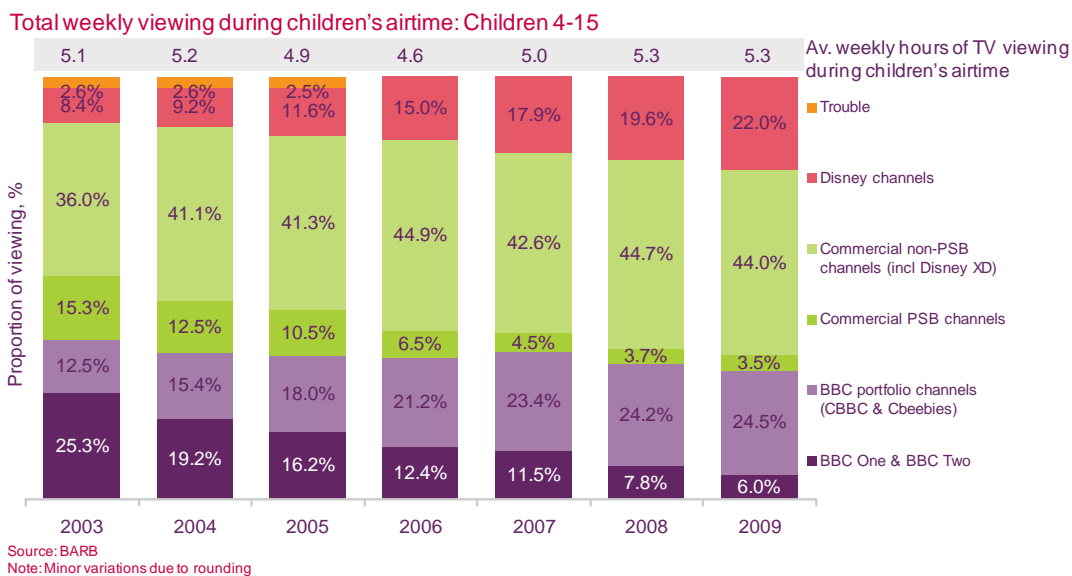


Viewing during children’s airtime

4.10 Figure 5 shows that the overall proportion of viewing time spent in children’s airtime³⁹ has remained fairly stable, increasing marginally from 31.1% in 2005 to 32.9% in 2009. This is despite the increase in children’s viewing to children’s channels (see Figure 4).

4.11 Figures 6 shows that within children’s airtime 4-15 year olds viewing has shifted away from the remaining children’s programming on the main PSB channels (9.5% in 2009 down from 26.7% in 2005) as the choice of dedicated children’s channels available has increased and grown in popularity and the volume of children’s programming on the main PSBs has declined. For example, the CITV strand that used to appear in ITV1’s weekday afternoon schedules has been replaced by adult programming.

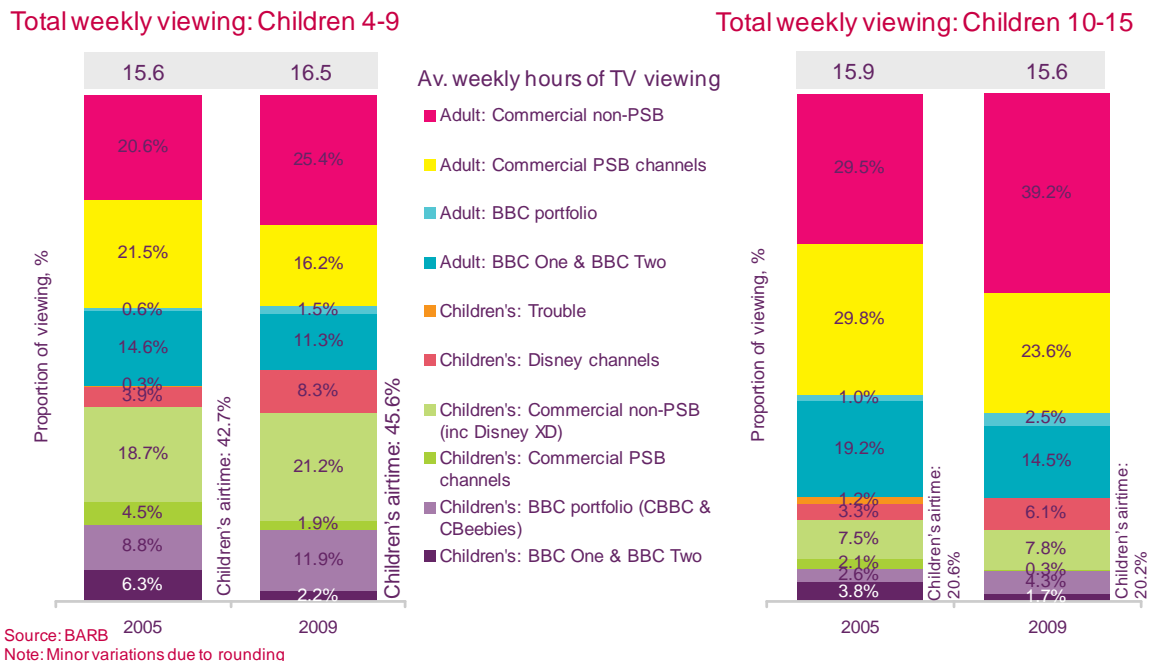
Figure 6: Split in children’s viewing during children’s airtime



³⁹ slots on main PSBs or children’s channels

- 4.12 In 2009, younger children (4-9 year olds) watched slightly more television during children’s airtime than in 2005 (up from 42.7% of their viewing to 45.6%). There has been little change for 10-15 year olds who spent 20.6% of their viewing in children’s airtime in 2005, compared with 20.2% in 2009 (Figure 7).
- 4.13 Similarly, the growth in viewing to children’s channels was driven by 4-9 year olds, accounting for 41.5% of their viewing in 2009 up from 31.8% in 2005. In contrast children’s channels accounted for just 18.1% of 10-15 year olds viewing in 2009 up from 14.6% in 2005 (Figure 7).

Figure 7: Overall split in children’s viewing: Children aged 4-9 and 10-15

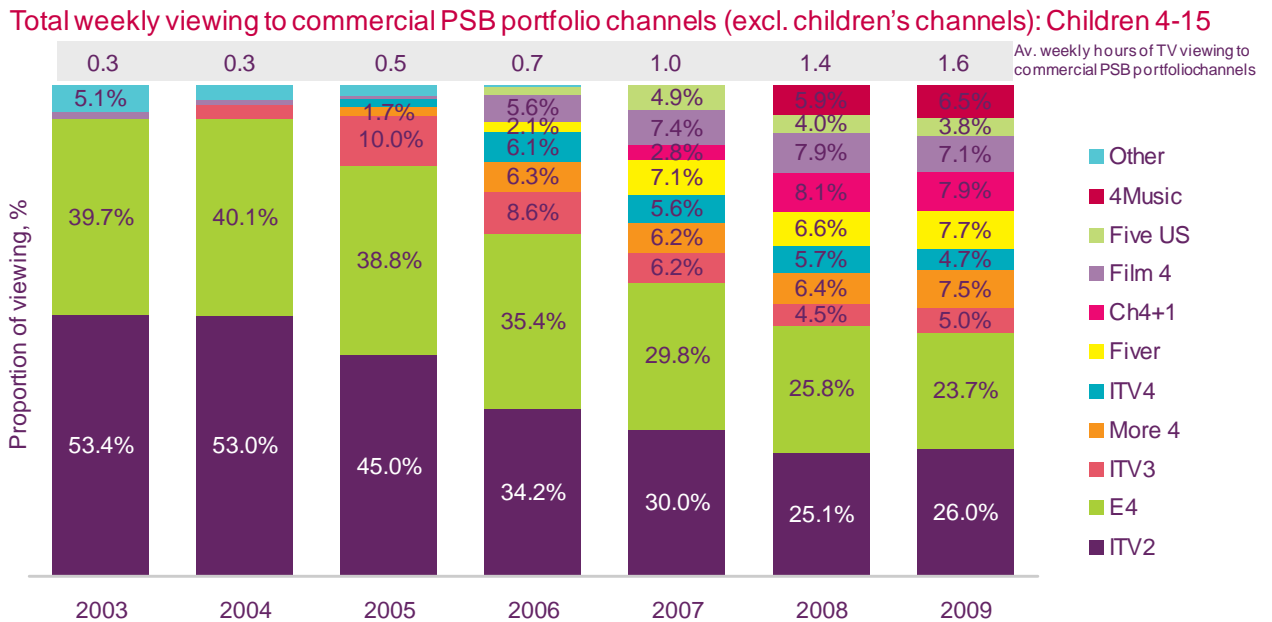


Viewing during adult airtime

- 4.14 Adult airtime (including in non-commercial channels) accounted for 67.2% of children’s viewing in 2009. For 4-9 year olds the figure was lower at 54.4% and higher for 10-15 year olds at 79.8%.
- 4.15 Over the same period, commercial adult airtime accounted for 52.2% of children’s viewing, up marginally from 51.1% in 2005. As with children’s airtime there has been a move away from viewing on the main commercial PSB channels to commercial non-PSB channels. The growth in viewing to commercial non-PSB airtime has been more pronounced among 10-15 year olds (Figure 7) up from 29.5% in 2005 to 39.2% in 2009. For 4-9 year olds the increase was smaller, up from 20.6% in 2005 to 25.4% in 2009.
- 4.16 Within adult airtime there was significant growth in the proportion of children’s viewing represented by the commercial PSB portfolio channels, up from 3.1% in 2005 to 9.8% in 2009 (Figure 4) . These channels accounted for a higher share of older children’s viewing (up from 3.8% in 2005 to 12.6% in 2009). For 4-9 year olds, commercial PSB portfolio channels accounted for 7.0% of viewing in 2009, compared with 2.4% in 2005.

- 4.17 Overall, children’s viewing of commercial PSB portfolio channels went up by one hour from 0.5 hours per week in 2005 to 1.6 hours in 2009 (Figure 8). For 10-15 year olds the increase was 1.4 hours (up from 0.6 hours to 2 hours). For 4-9 year olds the increase was 0.8 hours (up from 0.4 hours to 1.2 hours).
- 4.18 ITV2 and E4 remain the two most popular commercial PSB portfolio channels amongst children but these channels have seen their share of children’s viewing decline as more channels have launched and grown in popularity.

Figure 8: Split in children’s viewing to commercial PSB portfolio channels



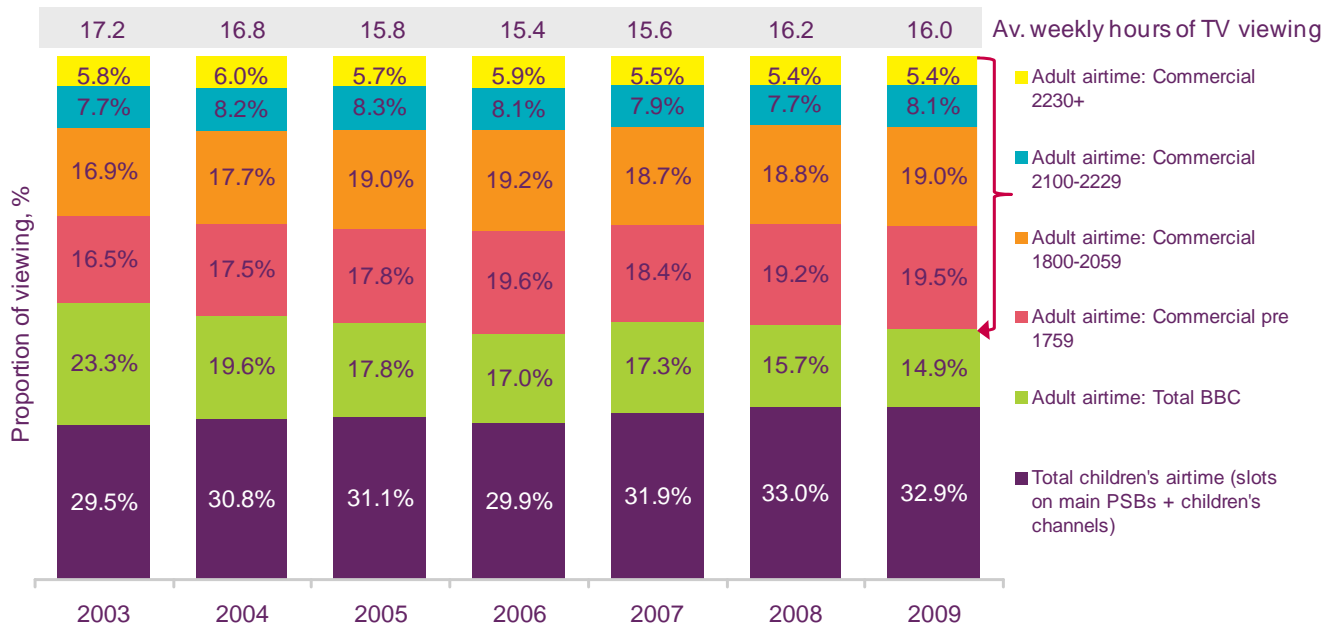
Source: BARB
 Note: Analysis includes +1 channels
 Minor variations due to rounding
 4 Music added to the 'Commercial PSB portfolio channels' measure in 2008 – The Hits removed from 'Music Channels' in 2008

Viewing across the day

- 4.19 Figure 9 suggests that children’s viewing during adult airtime in the pre-watershed peak time slot (18:00-21:00) and post-21:00 has remained fairly consistent over time. This suggests that although children now have access to a wider range of television services, the overall distribution of viewing across the day has remained relatively unchanged.

Figure 9: Split in children’s viewing by daypart

Total weekly viewing by daypart: Children 4-15



Source: BARB

Note: Minor variations due to rounding

'Commercial adult airtime' includes all non-BBC channels

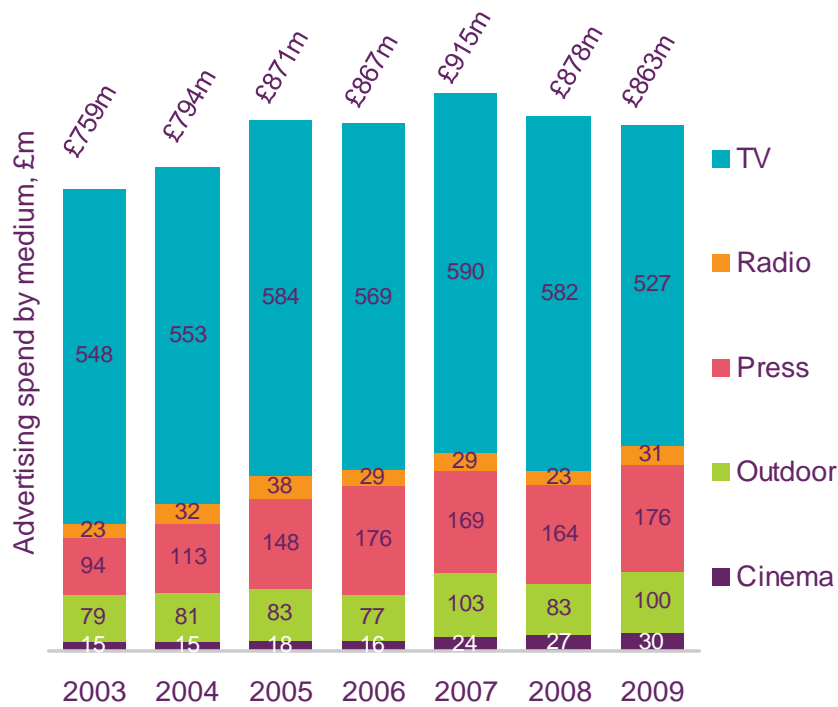
Changes in food and drink advertising activity

Changes in food and drink advertising expenditure across media

- 4.20 The data below (Figures 10 and 11) show trends in all food and drink advertising expenditure⁴⁰ across traditional media (television, radio, press, outdoor and cinema). This is a useful measure to compare activity across media and can provide an indication of areas where advertising activity is increasing and declining. However caution should be exercised in interpreting advertising spend data. Some of the trends observed may result from changing advertising costs rather than a change in the amount of advertising activity taking place.
- 4.21 As in the interim review, the data suggests that following a peak in 2007, total food and drink advertising expenditure across all media fell to £863m in 2009. Advertising spend on television declined to a low of £527m in 2009, while spend on press, outdoor and cinema advertising increased between 2005 and 2009.

⁴⁰ Data on HFSS food and drink expenditure is not available.

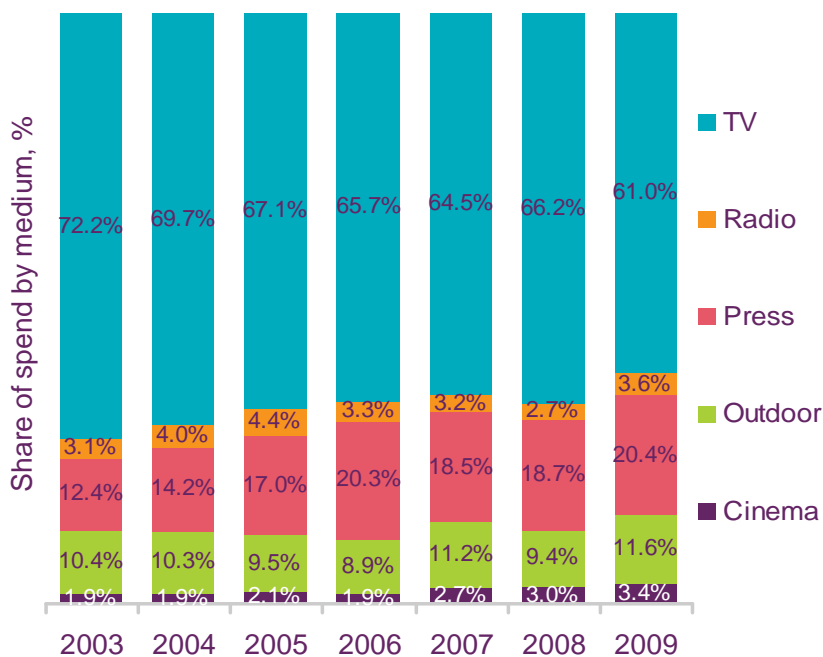
Figure 10: Food and drink advertising expenditure by medium



Source: Nielsen Media
 Note: Minor variations due to rounding

4.22 Figure 11 shows that the proportion of total food and drink advertising spend represented by television fell from 67.1% in 2005 to 61.0% 2009. Over the same period, the proportion of spend allocated to press advertising increased from 17.0% to 20.4%.

Figure 11: Share of expenditure on food and drink advertising by medium



Source: Nielsen Media
 Note: Minor variations due to rounding

4.23 Advertising spend on food and drink products across the internet increased from £1.9m in 2005 to £8.7m in 2009 – a rise of 353%, as compared to a 39% increase in expenditure on internet advertising for all product categories.

Changes in the volume of food and drink advertising on television

4.24 The analysis below covers the amount of both food and drink advertising and HFSS advertising shown on television between 2005 and 2009, and is based on the assessment of television advertising spots.

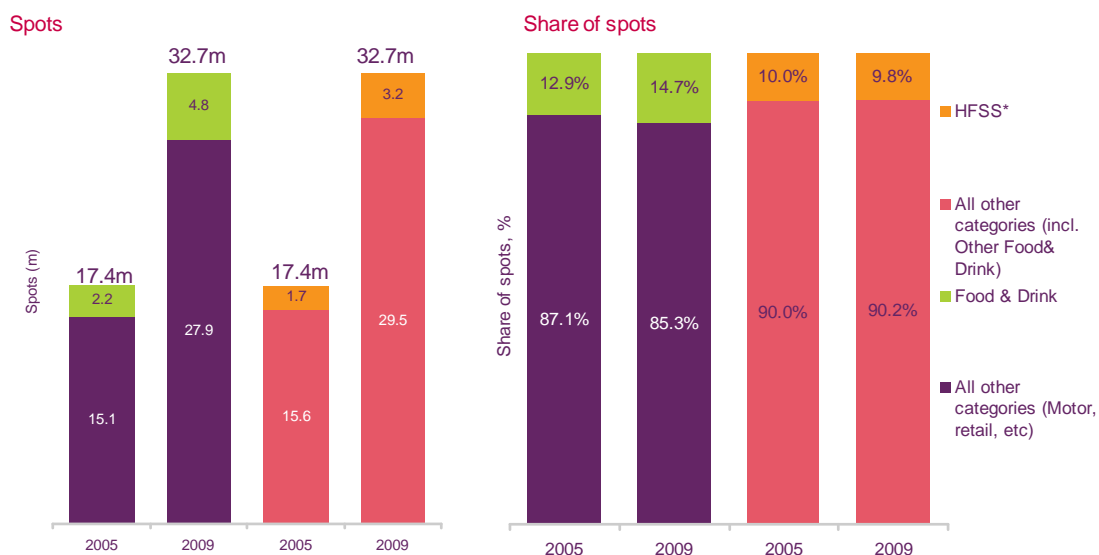
4.25 This data indicates the amount of advertising shown, where it is being broadcast and at what time of day. It is not a measure of exposure to advertising, which is measured in impacts (see Section 5).

4.26 Figure 12 shows that between 2005 and 2009:

- a) there was an 88% increase in the total number of television advertising spots across all product categories on television (from 17.4m to 32.7m). These increases can be attributed in large part to the proliferation of advertising-funded channels over this period;
- b) the absolute number of adverts for all food and drink advertising rose 115% (from 2.2m to 4.8m) and by 85% (from 1.7m to 3.2m) for HFSS advertising; and
- c) as a proportion of all advertising, food and drink advertising increased its share from 12.9% in 2005 to 14.7% in 2009. By contrast, the share of advertising attributable to HFSS products hardly changed (at 9.8%, down fractionally from 10.0%), suggesting that the growth in food and drink advertising came from non-HFSS products.

Figure 12: Total television advertising spots food and drink and HFSS: 2005 vs. 2009

Total television advertising spots



Source: Nielsen Media

Note: Minor variations due to rounding

*HFSS refers to proxy measures

Analysis excludes McDonald's film numbers certified as non-HFSS

4.27 The remaining spot data in this section deals exclusively with HFSS spots, as this provides more insight into the effects of the restrictions on children's exposure to

HFSS advertising than data for all food and drink spots. However in order to provide trend data consistent with previous publications, additional figures on all food and drink advertising spots can be found in Annex 5.

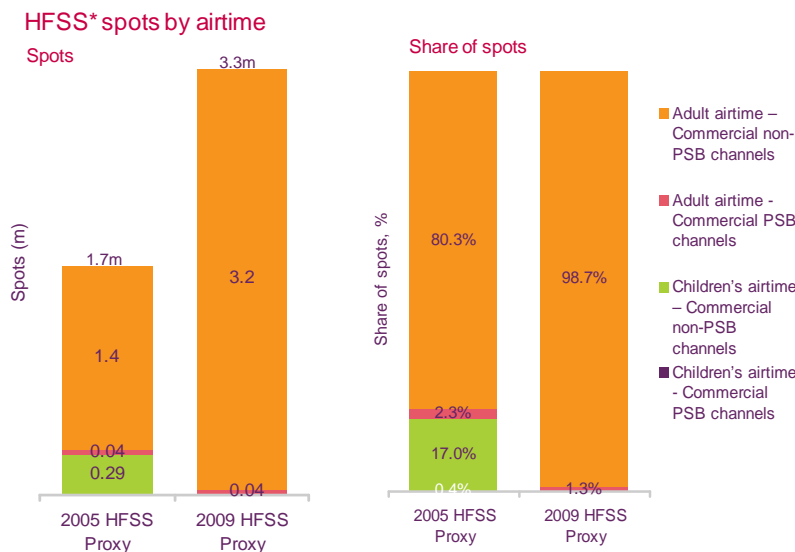
HFSS spots in adult vs children’s airtime

4.28 The data shows that:

- a) by 2009, HFSS advertising spots had been eliminated from children’s airtime as a result of the scheduling restrictions; and
- b) between 2005 and 2009, the total number of HFSS spots in adult airtime rose by 124% from 1.4m to 3.2m. Most of this increase occurred on commercial non-PSB channels (128%), while the number of HFSS spots in adult airtime on commercial PSB channels grew by just 4%.

4.29 Some of the increase in HFSS spots on commercial non-PSB channels is likely to be due to the proliferation of such channels since 2005⁴¹. It is also possible that some displacement of HFSS spots from children’s airtime to adult airtime has occurred. However it is not possible to separate this out from the broader developments described above.

Figure 13: HFSS spots by airtime



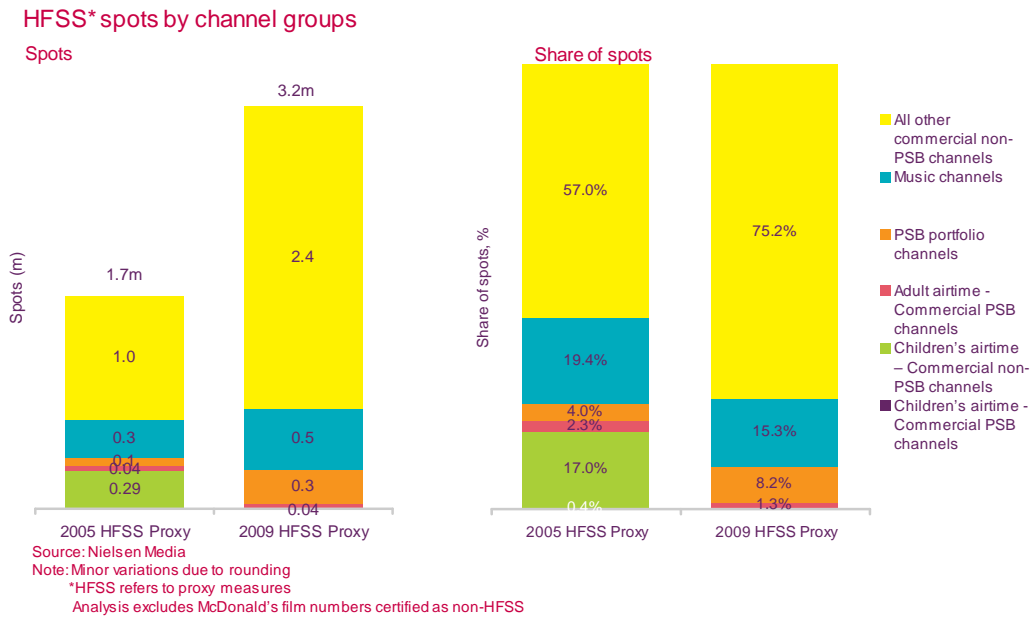
Source: Nielsen Media
 Note: Minor variations due to rounding
 *HFSS refers to proxy measures
 Analysis excludes McDonald’s film numbers certified as non-HFSS

HFSS spots by channel group

4.30 With the exception of children’s airtime on the main PSB channels and children’s channels, the absolute volume of HFSS spots increased across all advertising-funded channels. The proportion of HFSS advertising spots aired on advertising-funded channels (other than music channels and commercial PSB portfolio channels) increased from 57.0% in 2005 to 75.2% in 2009, and on commercial PSB portfolio channels, from 4.0% to 8.2%.

⁴¹ Figure 2.11 Television channel licences issued *Communications Market Report* Ofcom August 2009 gives an indication of the proliferation of channels between 2005 and 2009

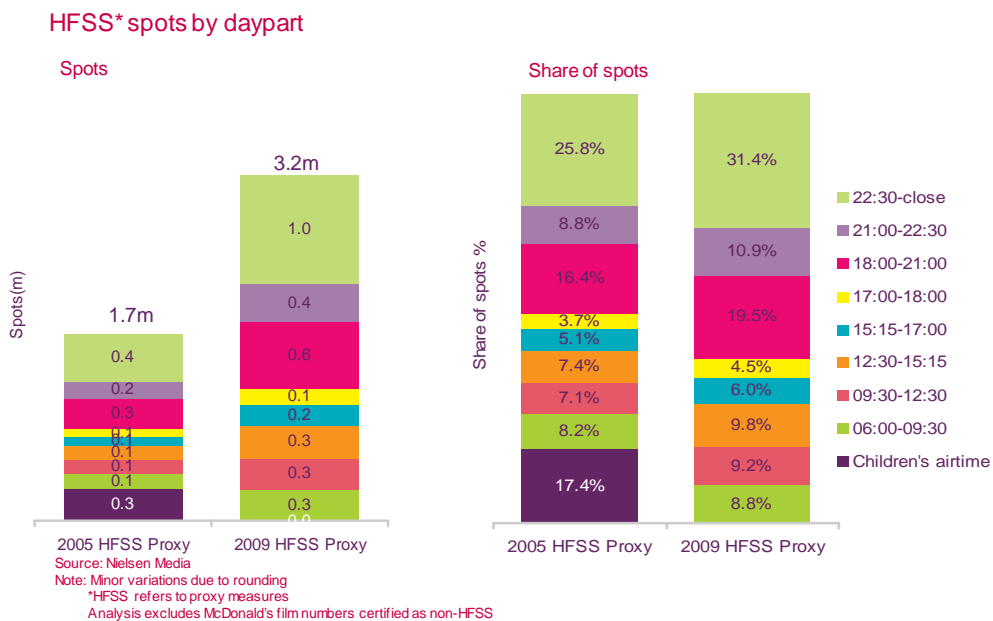
Figure 14: HFSS spots by channel groups



HFSS spots by day part

4.31 An increase in the absolute number of HFSS advertisements is visible across all day parts, particularly the 12:30-15:15 and the post-21:00 slots. Due to the restrictions on children's airtime, all of the additional spots have appeared in adult airtime. This growth can in large part be attributed to the overall increase in advertising resulting from the growth in the number of commercial channels, but may also be the result of more HFSS advertising on existing channels. Another factor may be a shift in advertising spots from children's airtime to adult airtime. The proportion of spots transmitted after 18:00 increased from 56.7% in 2005 to 61.8% in 2009. This increase can also be attributed to the factors listed above.

Figure 15: HFSS spots by day part



- 4.32 Changes in the volume of HFSS advertising spots do not in themselves shed much light on how much HFSS advertising children are seeing. Spots, viewing and exposure data need to be assessed together to understand fully the effects of any changes that may have occurred. This analysis can be found in Section 5.

Section 5

Changes in the amount of HFSS advertising seen by children

Introduction

5.1 The scheduling restrictions for HFSS advertising introduced in 2007 were intended to secure a significant reduction in the amount of HFSS advertising seen by children up to the age of 16. This section sets out the change in children's exposure to this type of advertising between 2005 (the base year used in our analysis) and 2009 (the first year the restrictions were fully implemented); taking into account the changes to both the advertising landscape and to children's viewing habits (see Section 4).

Key findings

- 5.2 Overall children saw significantly less HFSS advertising in 2009 than in 2005. Their exposure to HFSS advertising in children's airtime has been ended, and has remained stable across adult airtime overall.
- 5.3 Between 2005 and 2009:
- a) children saw at least⁴² 37% less HFSS advertising (i.e. a reduction of 4.4bn impacts);
 - b) younger children (4-9 year olds) saw at least 52% less HFSS advertising (3.1bn impacts) and older children (10-15 year olds) saw at least 22% less (1.4bn impacts);
 - c) overall children saw 40% less HFSS advertising on the commercial PSB channels (2.4bn impacts) and 33% less on commercial non-PSBs; (2.0bn impacts);
 - d) during children's airtime, exposure to HFSS advertising was eliminated on both commercial PSBs (i.e. children's slots such as Five's Milkshake) and commercial non-PSBs (i.e. children's channels such as Nick Jr, Tiny POP) as a direct result of the advertising restrictions;
 - e) children saw 28% (1.4bn impacts) less HFSS advertising during adult airtime on the commercial PSB channels. However over the same period exposure to HFSS advertising during adult airtime on commercial non-PSB channels rose 46% (1.3bn impacts), offsetting most of the reductions from the commercial PSB services. As a result children saw 1% (0.1bn impacts) less HFSS advertising overall in adult airtime;
 - f) the growth in HFSS impacts during adult airtime on commercial non-PSB channels was driven by impacts on commercial PSB portfolio channels (up 237% from 0.5bn to 1.8bn) which reflects children's increased viewing to these services over this period (see Section 4); and

⁴² See section 3.14- 3.19

- g) despite an increase in the volume of HFSS advertising aired throughout the day, HFSS exposure fell in all day parts before 21:00 and by 25% between the peak hours of 18:00-21:00. These reductions were driven by the decline in impacts during children's airtime. Looking exclusively at adult airtime it is possible to see that HFSS exposure also dropped 11% during the peak viewing slot 18:00 - 21:00, but increased during most other day parts.
- 5.4 The data suggests that 43.8% (5.7bn) of all the food and drink advertising seen by children in 2009 was for HFSS products likely to appeal to them⁴³. The remaining 2.0bn HFSS impacts were assessed as being for products only likely to appeal to adults.
- 5.5 Ofcom has found very few instances of broadcasters breaking the rules by inserting HFSS commercial messages in children's airtime – whether in the form of advertisements for HFSS products, sponsorship messages in the name of HFSS products, or non-product advertising in the name of brands commonly associated with HFSS products. Ofcom is therefore satisfied that, with very few exceptions, broadcasters are complying with the letter and the spirit of the scheduling restrictions.

Overall changes in children's exposure to HFSS advertising

- 5.6 In the February 2007 statement, Ofcom estimated that once fully implemented, the effect of the advertising restrictions would be to reduce HFSS impacts for children aged 4-15 by 41% of the 2005 level. The statement also estimated that HFSS advertising seen by 4 - 9 year olds could decline by 51%.
- 5.7 As explained in Section 3, the best estimate of change since 2005 requires a comparison of the 2005 HFSS proxy and the 2009 HFSS proxy. As a result the outcome is necessarily approximate, and should not be taken as an exact indication. Moreover, the results of this process are not directly comparable with the 41% reduction estimate we made in February 2007, which was prepared on the basis of the 2005 HFSS proxy, nor with the 2007/8 HFSS proxy developed for the interim review.

⁴³ See Annex 3 for appeal definitions

All Airtime

Figure 16: Children’s exposure to HFSS advertising

All Food & Drink impacts: Children 4-15



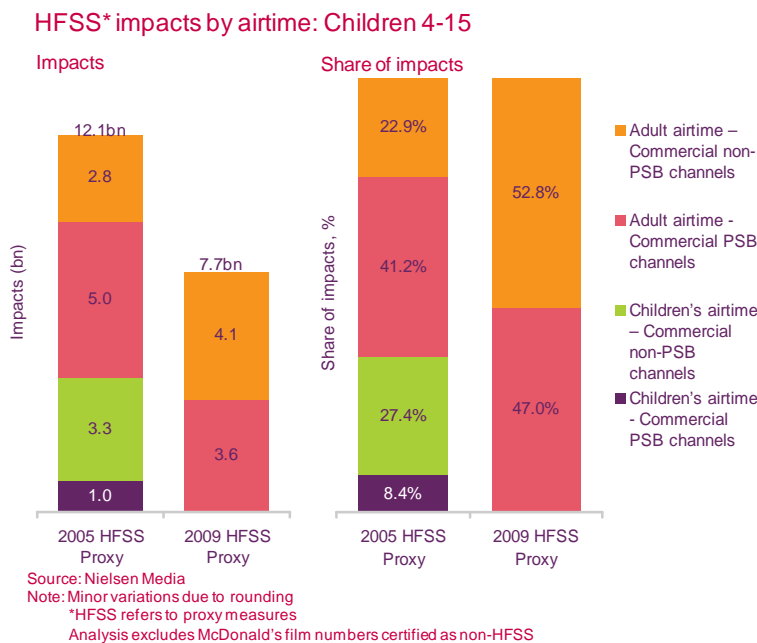
Source: Nielsen Media
 Note: Minor variations due to rounding
 *HFSS refers to proxy measures

5.8 Overall, children’s exposure to HFSS advertising fell by 37% from 12.1bn impacts in 2005 to 7.7bn impacts in 2009. This was driven by the elimination of HFSS impacts during children’s airtime (Figure 16).

5.9 Breaking this down by age group, the data shows that between 2005 and 2009:

- a) HFSS impacts dropped 52% among 4-9 year olds (down from 5.9bn to 2.8bn). The reduction was driven by the removal of all HFSS advertising from children’s airtime where younger children spend 45.6% of their viewing time (Figure 18);
- b) 10-15 year olds HFSS impacts fell 22% (down from 6.2bn to 4.8bn impacts). This smaller reduction reflects older children’s tendency to spend just 20.2% of their viewing time in children’s airtime (Figure 19);
- c) HFSS child impacts dropped by 40% (down from 6.0bn to 3.6bn) on the commercial PSBs channels between 2005 and 2009. The figure was higher for 4-9 year olds (47%, down 1.2bn impacts) and lower for 10-15 year olds (35%, down 1.2bn impacts) who spend a greater proportion of their time watching these predominantly adult content based channels;
- d) on commercial non-PSB channels. there was a 33% fall overall in HFSS exposure during the same period (down from 6.1bn to 4.1bn impacts); and
- e) the reduction was higher for younger children at 56% (1.8bn impacts) due to their propensity to view children’s channels and lower for older children at 7% (0.2bn impacts) who view more adult airtime.

Figure 17: HFSS impacts by airtime



HFSS impacts in children's airtime vs. adult airtime

Children's airtime

5.10 HFSS impacts in children's airtime were eliminated for both age groups as a result of the advertising restrictions. However children's airtime accounted for just 24.3% of all 10-15 year old HFSS impacts back in 2005, compared with almost half (48.0%) for 4-9 year olds. This difference is due to younger children spending a much greater proportion of their viewing in children's airtime than 10-15 year olds (see Fig 7) and explains why the decline in exposure during children's airtime has had a more pronounced effect on the overall exposure of 4-9 year olds than 10-15 year olds.

Figure 18: HFSS impacts for children aged 4-9: adult vs children's airtime

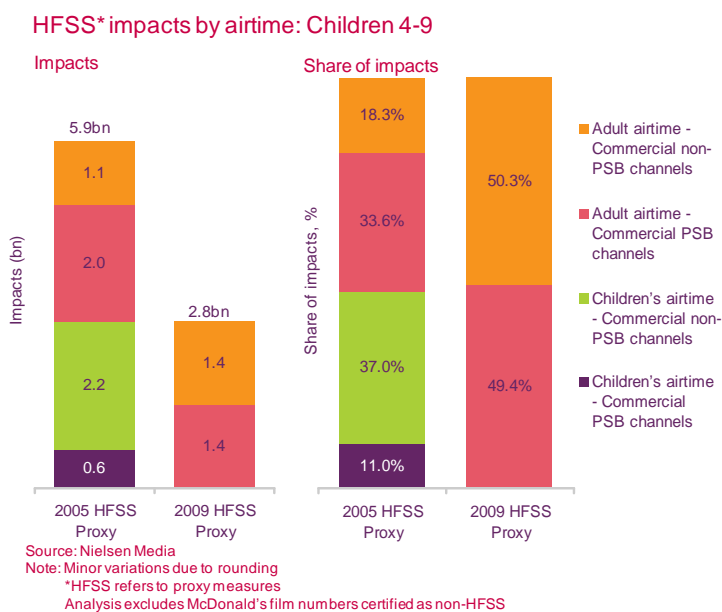
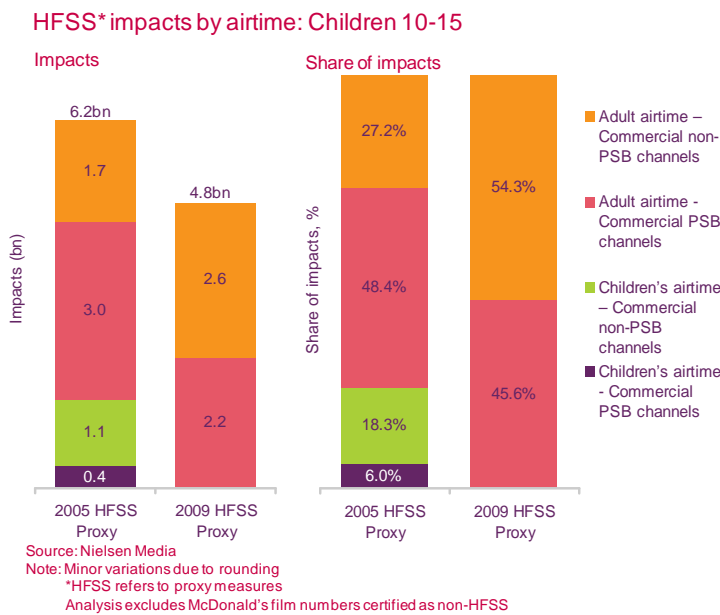


Figure 19: HFSS impacts for children aged 10-15: adult vs children’s airtime



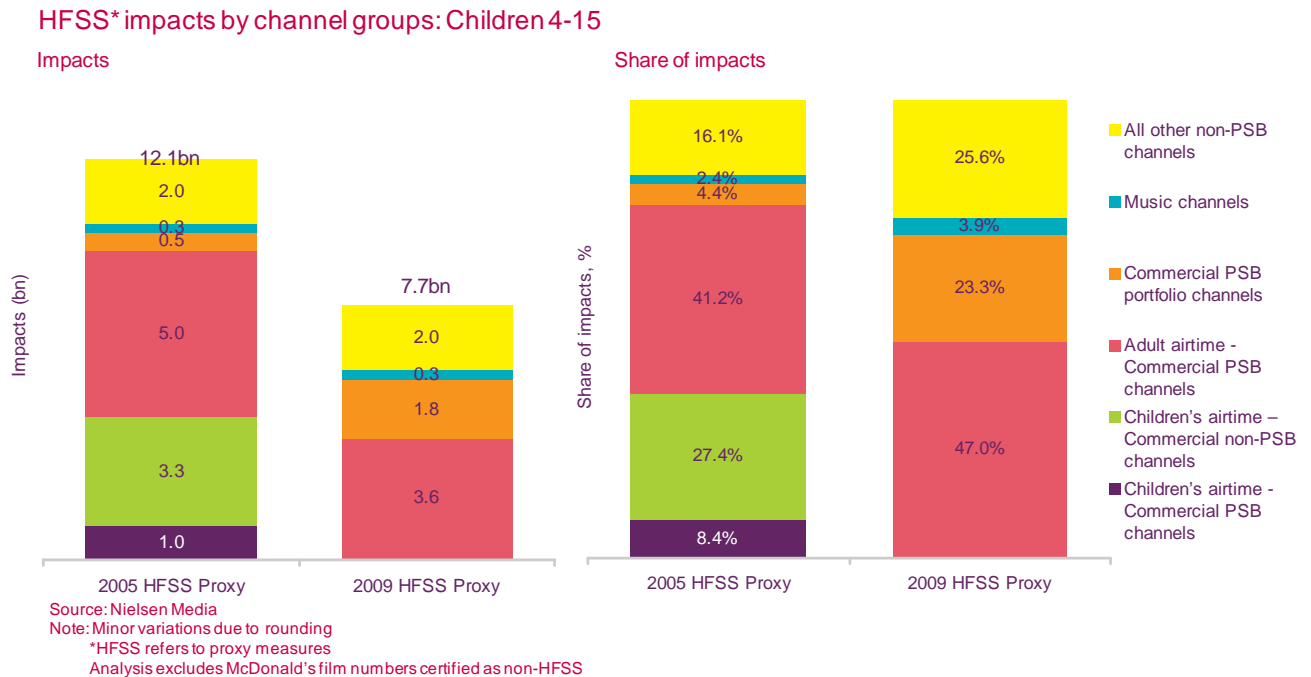
Adult airtime

- 5.11 Between 2005 and 2009 HFSS impacts fell 28% (1.4bn impacts) during adult airtime on the commercial PSBs channels (from 5.0bn to 3.6bn) as children’s viewing migrated to commercial non-PSB channels (Figure 17). The decline was similar for all age groups (-29% and -27% for 4-9 year olds and 10-15 year olds respectively).
- 5.12 This reduction was offset by a corresponding increase in exposure to HFSS advertising during adult airtime on commercial non-PSB channels. Overall, children saw 46% (1.3bn impacts) more HFSS advertising on these services (up from 2.8bn to 4.1bn), with 4-9 year olds viewing 32% (0.3bn impacts) more and 10-15 year olds seeing 55% (0.9bn impacts) more. As Figure 7 in Section 4 shows, non-PSB channels account for a greater proportion of older children’s viewing.
- 5.13 The shift in viewing and exposure from commercial PSB channels to commercial non-PSB channels has resulted in an overall 1% (0.1bn) net reduction in HFSS child impacts across all adult airtime. For 4-9 year olds the overall reduction in HFSS impacts during adult airtime was 8% (0.2bn) but there was a 3% (0.1bn impacts) increase in HFSS exposure for 10-15 year olds.
- 5.14 Within commercial non-PSB adult airtime there was significant growth in children’s exposure to HFSS advertising on commercial PSB portfolio channels with a 237% (1.3bn impacts) increase in HFSS impacts, albeit from a low base (0.5bn in 2005 to 1.8bn in 2009). For 4-9 year olds, the increase was 221% (0.4bn impacts) and for 10-15 year olds it was 246% (0.8bn impacts). This growth can in part be explained by the increase in the number of PSB portfolio channels available across the multichannel platforms⁴⁴, the growth in HFSS advertising spots on this group of channels, and importantly the increase in viewing to these services as illustrated in Section 4.

⁴⁴Figure 4.2 page 18 *Changes in the nature and balance of television food advertising to children 17 December 2008*. See web link on page 2

5.15 When the adult airtime HFSS impacts delivered by the main PSBs and their portfolio channels are combined, the data suggests that the total number of HFSS impacts for these channel groups as a whole fell marginally (by 2% from 5.5bn in 2005 to 5.4bn in 2009). This indicates some displacement of HFSS impacts away from the main PSBs to their portfolio channels. This hypothesis is also supported by the evidence of the changes in children’s viewing habits.

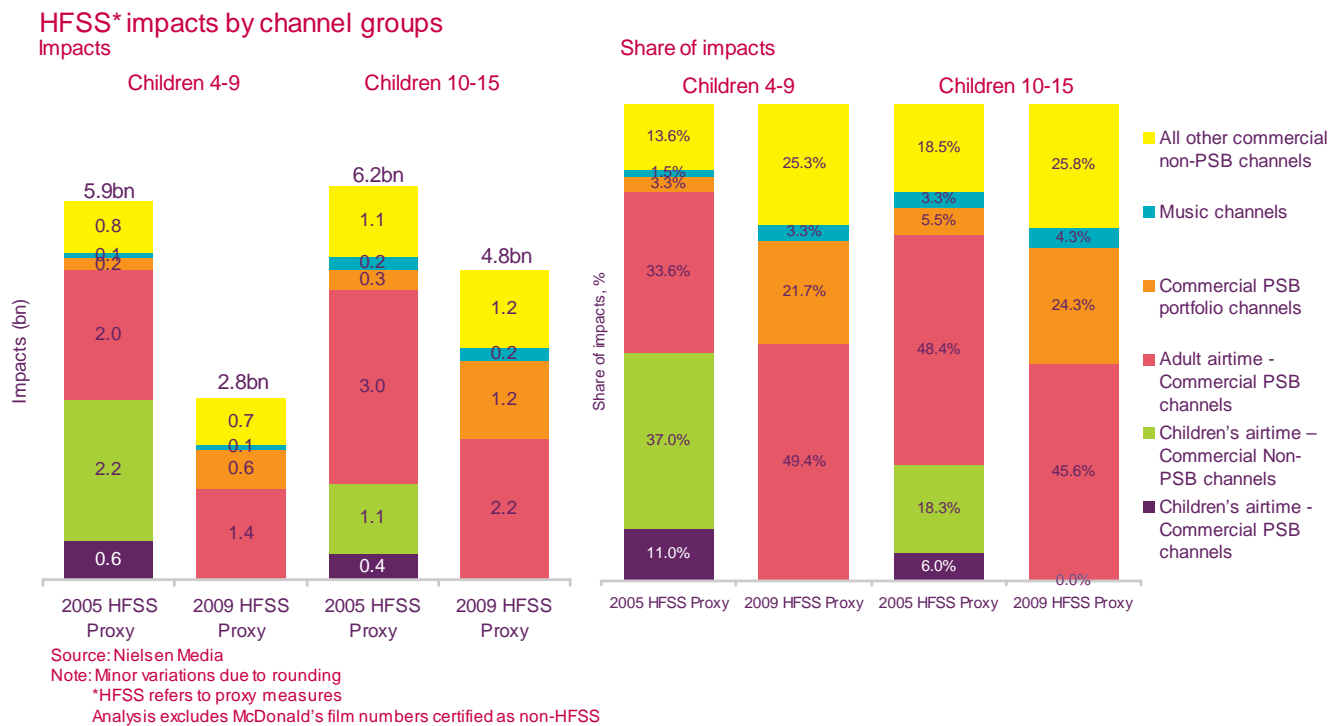
Figure 20: Children’s exposure to HFSS advertising by channel groups



5.16 Considering children’s viewing, HFSS advertising spot data and HFSS impacts in the round also suggests that children’s exposure to HFSS advertising during adult airtime is, in large part, driven by viewing trends. Between 2005 and 2009:

- a) HFSS spots during adult airtime on commercial PSB channels rose by 4% (1,000 spots), however child impacts on these channels fell 28% (1.4bn), as children’s viewing of these channels declined by 21%;
- b) spots also increased on PSB portfolio channels, by 285% (0.2m), but over the same period children’s viewing to these services increased by 222% and impacts increased 237%;
- c) all other commercial non-PSB channels (excluding PSB portfolio channels and music channels) accounted for 75.2% of all HFSS spots in 2009, but only 25.6% of child HFSS impacts. This disparity between the proportion of spots and the share of impacts represented by these channel groups can be explained by the differences in viewing to these channels (see Section 4). While a large number of spots are aired across the numerous other commercial non-PSB channels, relatively more impacts are delivered on channels which are more popular amongst children.

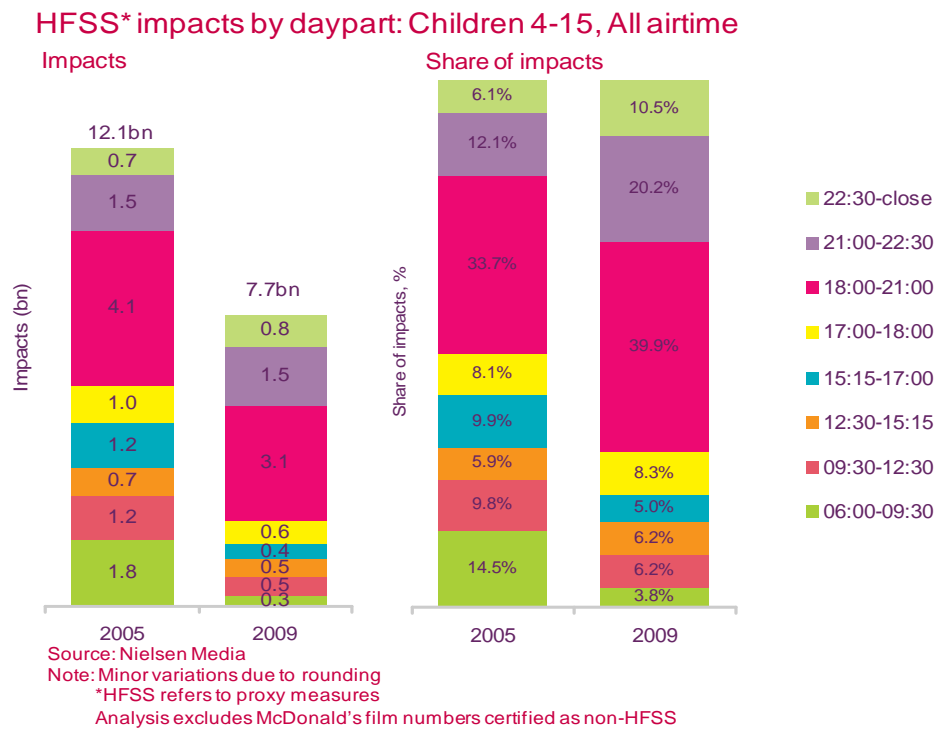
Figure 21: HFSS impacts by channel groups – Children 4-9 and 10-15



Advertising seen by children by time of day

Overall trends across the day for all airtime

- 5.17 Figure 22 below shows that children’s exposure to HFSS advertising declined in all day parts before 21:00 despite the increase in HFSS spots throughout the day. This 46% (4.6bn impacts) reduction was driven by the elimination of HFSS impacts during children’s airtime.
- 5.18 The largest reduction in HFSS exposure occurred during the 06:00-09:30 slot (84% or 1.5bn impacts). There was also a 25% (1.0bn impact) drop in child HFSS impacts during the peak time 18:00-21:00 slot; and
- 5.19 The absolute number of HFSS impacts delivered after 18:00 fell by 14% (0.9bn impacts) between 2005 and 2009 (down from 6.3bn in 2005 to 5.4bn in 2009), driven by the decline in impacts during the 18:00–21:00 slot. As much of the impact reduction occurred in children’s airtime the share of impacts represented by these evening slots (after 18:00) increased from 51.9% in 2005 to 70.6% in 2009.

Figure 22: HFSS impacts by day part: All airtime

Adult airtime

- 5.20 Between 2005 and 2009, HFSS impacts fell 48% (0.3bn) during the 06:00–09:30 slot and 11% (0.4bn) during the 18:00–21:00 slots in adult airtime overall but rose during all other adult day parts.
- 5.21 During adult airtime on the commercial PSBs:
- HFSS impacts fell in all day parts for children aged 4-15;
 - between 17:00 and 18:00 HFSS impacts fell by 8% (0.03bn impacts) for children overall. The reduction was 18% (0.04bn impacts) for children aged 4-9 but there was a 2% (3m impacts) increase in HFSS impacts for older children;
 - HFSS impacts between 18:00 and 21:00 dropped 28% for all children from 2.3bn to 1.7bn. The reduction was 30% (0.3bn) for children aged 4-9 and 27% (0.4bn) for those aged 10-15;
 - during the late evening slot 21:00-22:30 there was a 25% decline in HFSS impacts for children overall (from 1.0bn to 0.7bn impacts). For 4-9 year olds the reduction was 19% (0.06bn impacts); for 10-15 year olds, -27% (0.2bn); and
 - while the number of HFSS advertising spots declined by 10% between 18:00 and 21:00, there were increases of 15% in the 17:00-1800 slot and 2% in the 21:00–22:30 slots. The fall in HFSS impacts across all three sections of the schedule suggests that the reduction results mainly from children watching fewer programmes on these channels during these times.
- 5.22 During adult airtime on the commercial non-PSBs:

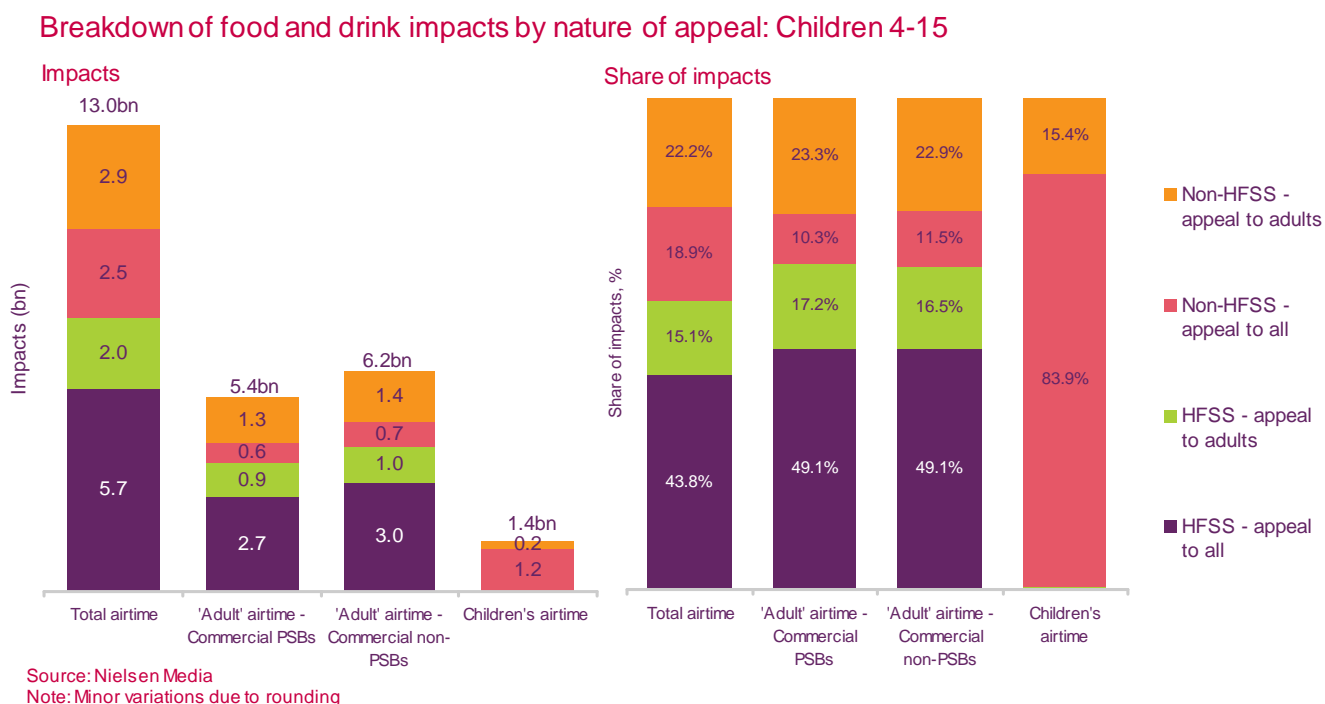
- a) HFSS impacts increased in all day parts in adult airtime, with the exception of the 06:00 – 09:30 slot;
 - b) HFSS impacts between 17:00 and 18:00 increased by 46% (by 0.1bn from 0.2bn to 0.3bn) for children overall. The growth was 33% (0.02bn) for younger children and 54% (0.06bn) for older children;
 - c) between 18:00-21:00 HFSS impacts rose by 26% (up from 1.1bn to 1.4bn) for all children, 22% (0.1bn) for 4-9 year olds and 28% (0.2bn) for 10-15 year olds; and
 - d) the 21:00-22:30 slot saw a 107% increase in impacts for children overall (from 0.4bn to 0.8bn). For younger children HFSS impacts grew by 105% (0.1bn), for older children it was 108% (0.3bn).
- 5.23 HFSS spots on the commercial non-PSBs during adult airtime increased by 128% (around 0.08m spots), between 17:00 and 18:00, and 124% (0.3m spots) between 18:00 and 21:00 and 134% (0.2m spots) between 21:00 and 22:00. In contrast children's exposure grew at a much slower rate, suggesting that much of this advertising may not be targeted at children. The increase in HFSS exposure across all day parts on commercial non-PSBs can be attributed to both the growth in spots and increased viewing to these channels.

HFSS advertising for products of appeal to children

- 5.24 Not all food and drink advertising, whether for HFSS or non-HFSS products, is likely to appeal to children – examples include advertisements for cooking oils, beverages such as tea or coffee, and meal ingredients such as meat or fish. Given that such advertising is unlikely to have a significant effect on children's food preferences, it is important to understand how much food and drink advertising falls into this category.
- 5.25 As described in Section 3, Ofcom classified food and drink 'brands' advertised in 2009 into two categories, HFSS and non-HFSS. To determine appeal, it was then necessary to assess whether each of the 'brands' within these two groups was likely to be attractive to all audiences, including children, or whether it would only appeal to adults. For example we assessed Flora Proactive spread to be of appeal to adults, but Cadbury Wispa to be of appeal to both adults and children⁴⁵. Ofcom estimated that, of the 13.0bn food and drink child impacts delivered in 2009, 7.7bn were for HFSS products, equivalent to 58.9% of all food and drink impacts. Analysis of the appeal of products (Figure 23) suggests that 43.8% (5.7bn) of food and drink advertising was for HFSS products of appeal to both children and adults. The remaining 2.0bn HFSS impacts were assessed as being impacts for products only likely to appeal to adults. Given that the majority of food and drink impacts were delivered during adult airtime, similar patterns are observed across the commercial PSB and commercial non-PSB channels.

⁴⁵ See Annex 4 for full product lists by appeal

Figure 23: Breakdown of food and drink impacts by nature of appeal, 2009:



5.26 83.9% (1.2bn impacts) of the food and drink advertising seen by children during children’s airtime was for non-HFSS products likely to appeal to them. The remaining advertisements were for non-HFSS adverts of appeal to adults, such as tea, soya milk and lean steak mince.

Compliance with scheduling restrictions

5.27 Ofcom is aware of only two instances where an HFSS advertisement was mistakenly aired during children’s airtime, the first of which occurred soon after the restrictions came into force and was reported in the interim review. Ofcom is therefore satisfied that broadcasters are, with very few exceptions, complying with the scheduling restrictions for spot advertising.

Brand advertising and sponsorship

5.28 The terms of reference for the review explain that, amongst other things, we would look at whether advertisers are evading the spirit of the restrictions, by airing advertising and sponsorship in the names of brands commonly associated with HFSS products in children’s airtime.

Brand advertising

5.29 In the November 2006 statement and further consultation, we said that there would be practical difficulties in restricting brand advertising – advertising that promotes a brand rather than a specific product. In particular, we noted that, as brands were often used for a range of both HFSS and non-HFSS products, it would be difficult to conclude that a brand was wholly or mainly used for marketing HFSS products⁴⁶. A number of respondents called for restrictions, but none offered credible ways of overcoming these practical difficulties. For this reason, and the fact that it was not

⁴⁶ Paragraph 5.148 of the November 2006 document. See web link page 1.

clear to what extent advertisers would seek to substitute brand for product advertising, Ofcom concluded that we should not make brand advertising subject to scheduling restrictions at that time. However, we said that we would keep the issue under review.

- 5.30 In guidance produced for advertisers, Ofcom’s co-regulator, the Advertising Standards Authority, makes clear that brand advertising which features products that are identifiable as HFSS products, or uses brand names that are synonymous with HFSS products are likely to be regarded as advertisements for HFSS products⁴⁷.
- 5.31 In publishing our February 2007 statement, Ofcom noted that the Department of Health would be collecting data on brand advertising that would be available for Ofcom’s review⁴⁸. However, as industry data does not separately distinguish commercial messaging that is brand advertising from product advertising, this has not proved possible. As a result, both are included within industry data on advertising spots and impacts. Clearcast assesses all the advertisements submitted for clearance, whether for products or brands, on the same basis. Given that children are seeing less HFSS advertising overall (whether for products or brands), it is clear that even if brand advertising has increased, it has not offset the overall decline in the amount of HFSS advertising seen by children.
- 5.32 The interim review noted that anecdotal indications for the interim review indicated there had not been an increase in the incidence of brand advertising⁴⁹. That position has not changed. Although we do not have the data to enable us to draw definitive conclusions on the extent to which advertisers are using brand advertising, we are not aware of evidence suggesting that advertisers are making widespread use of brand advertising in order to circumvent the rules.

Sponsorship

- 5.33 Both the content and scheduling rules that apply to HFSS product advertising apply equally to sponsorship closely associated with HFSS products⁵⁰. When the rules came into force, there were concerns that advertisers might use sponsorship in the name of brands associated with HFSS products (but not featuring actual products) as a means of circumventing the restrictions. Compliance with the rules as they affect sponsorship is a matter for Ofcom. In considering possible breaches, we have regard to the content rules adopted by BCAP.
- 5.34 Since the rules were put in place, Ofcom has dealt with two breaches of the sponsorship rules:
- a) in the first case, two Spanish-language children’s channels (Cartoon Network and Boomerang Spain) operated by Turner Entertainment Networks International Limited (“Turner”), were found to have accepted sponsorship in the name of food products believed to be HFSS products. Following investigation by Ofcom, the sponsorship was found to be in breach of Rule 4.2.1(b) of the BCAP Rules on the

⁴⁷ Advertising Guidance Note No. 7: Differentiating HFSS product TV advertisements from product TV advertisements

(http://www.asa.org.uk/asa/codes/tv_code/Guidance_Notes/Differentiating+HFSS+product+TV+Advertisements+from+Brand+TV+Advertisements.htm)

⁴⁸ Paragraph A1.59, February 2007 statement

⁴⁹ Paragraph 6.35 *Changes in the nature and balance of food advertising to children* Ofcom Dec 2008. See web link page2

⁵⁰ Paragraph 1.12, February 2007 statement

Scheduling of Television Advertisements. Turner said that it had accepted that a breach had occurred, and instituted training for staff at its Spanish office⁵¹; and

- b) in the second case, Sky One (operated by British Sky Broadcasting Ltd) broadcast episodes of *The Simpsons* sponsored by Domino's Pizzas. Sky argued that this was not sponsorship for a product but sponsorship for a delivery service. Following investigation, Ofcom concluded that this particular sponsorship amounted to product sponsorship promoting HFSS foods in programmes of particular appeal to children under the age of 16. The sponsorship was therefore in breach of Rule 4.2.1(b) of the BCAP Rules on the Scheduling of Television Advertisements and, accordingly, in breach of Rule 9.3 of the Broadcasting Code, which relates to sponsorship⁵².

- 5.35 The first case was reported in the interim review, the second finding was published in early 2009. No further cases have come to light since then.
- 5.36 Ofcom is encouraged that, notwithstanding the extensive use made by broadcasters of sponsorship, only two cases have come to light of inappropriate HFSS sponsorship of programmes for children or of particular appeal to children. Given the high level of awareness about the rules amongst broadcasters and other interested groups, Ofcom is satisfied that any significant HFSS sponsorships of children's programming would come to its attention, and would be dealt with in accordance with its usual procedures⁵³.

⁵¹ *Ofcom Broadcast Bulletin*, Ofcom, 7 December 2008

(<http://stakeholders.ofcom.org.uk/binaries/enforcement/broadcast-bulletins/obb147/Issue147.pdf>)

⁵² *Ofcom Broadcast Bulletin*, Ofcom, 23 February 2009

(<http://stakeholders.ofcom.org.uk/enforcement/broadcast-bulletins/obb128/>)

⁵³ *Ofcom procedures for the consideration of statutory sanctions in broadcasting or other licence-related cases*, Ofcom, 16 December 2009 (<http://stakeholders.ofcom.org.uk/broadcasting/guidance/>)

Section 6

Changes in the food and drink advertising techniques seen by children

Introduction

- 6.1 As in the interim review this section is designed to ascertain what changes there may have been in the *nature* of food and drink advertising, and in particular:
- a) whether the revised content rules are being implemented as intended; and
 - b) what changes there have been to the use of techniques in food and drink advertising that may appeal to children.
- 6.2 As previously, the analysis is based on all food and drink advertising. It has proved impracticable to obtain data on whether individual advertisements broadcast before the HFSS advertising restrictions came into force were for HFSS products or not. Accordingly, the analysis of children's exposure to food and drink advertisements featuring techniques considered to be of appeal to children includes advertisements for both HFSS and non-HFSS products.
- 6.3 Unlike the interim review this analysis is not based on full year data but on Q1 data for both 2005 and 2009⁵⁴. Inevitably, given the limited data period, there is a risk that individual advertising campaigns could have a disproportionately large impact on findings; similarly the findings are likely to reflect the seasonality of some food and drink advertising. Therefore the figures should be regarded as a snapshot, rather than as definitive evidence of trends.

Background

- 6.4 BCAP's Television Advertising Standards Code (see extract at Annex 2) was amended to restrict the use of the following techniques:
- a) licensed characters (that is, characters originally devised for another purpose, such as animated films or cartoons);
 - b) celebrities (such as footballers);
 - c) promotions (such as those offering free gifts or tokens); and
 - d) health claims.
- 6.5 It was decided not to restrict the use of brand equity characters (characters originally devised for marketing purposes, such as those associated with some breakfast cereals), or 'other characters' (e.g. animated talking trees, puppets etc). However, in the light of concerns that advertisers might make more extensive use of these, we looked at the extent to which they had been used in food and drink advertising both in the interim and final reviews.

⁵⁴ The Department of Health stopped commissioning the collection of this data at the end of the first quarter of 2009. To enable a like-for-like comparison, we have compared data for Q1 2009 with data for Q1 2005

Key findings

- 6.6 Surveys carried out by the ASA between 2008 and 2010 show that broadcasters are complying with the restrictions on advertising techniques that may be used in advertising aimed at children for food and drink products. In its latest compliance survey⁵⁵ the ASA found that all food and drink advertisements shown on the 67 television services (including regional ITV services) that were monitored complied fully with the HFSS rules.
- 6.7 By assessing the data on changes in the use of restricted techniques in food and drink advertising considered to be of particular appeal to children it is possible to see that between Q1 2005 and Q1 2009:
- a) there was a reduction in the use of all the techniques analysed (with the exception of celebrities) during children’s airtime. However there was an increase in the use of all these techniques during adult airtime and an increase in the use of these techniques overall (with the exception of licensed characters). Where these techniques were used during children’s airtime, this was to promote non-HFSS products, which is permitted; and
 - b) overall, there was a reduction in children’s exposure to commercials featuring licensed characters, brand equity characters, other characters and promotions. However exposure to commercials featuring celebrities and health claims increased between the two data periods. Children’s exposure to all the creative techniques fell during children’s airtime but increased during adult airtime.

Content Rules

- 6.8 The BCAP content rules set out in Annex 2 came into force for new campaigns in March 2007; any campaigns that were already on air or in planning were required to comply with the new rules from 1 July 2007. Key elements of the content rules include prohibitions in advertisements for HFSS products targeted at pre-school and primary school children of the use of licensed characters and celebrities, health claims, and promotional offers.
- 6.9 Compliance with these rules in relation to spot advertising is monitored by the ASA⁵⁶. It has conducted three surveys of food and drink advertising to assess whether or not broadcasters are complying with the rules:
- a) the first survey⁵⁷, carried out in 2007 (a few months after the rules came into force), found that two television advertisements that appeared had breached BCAP’s rules on health and safety and misleadingness respectively. However, none of the adverts breached BCAP’s restrictions on HFSS advertising;
 - b) similarly, the second survey⁵⁸, carried out in 2008 found that none of the television advertisements surveyed had breached the HFSS advertising restrictions, although one television advertisement breached a general food and drink rule, against encouraging poor dietary practice; and

⁵⁵ *Food and Soft Drink Advertising Survey 2009* ASA June 2010. See web link on page 4

⁵⁶ Application of these rules to sponsorship is the responsibility of Ofcom

⁵⁷ *Food and Soft Drink Advertising Survey 2007* ASA Jan 2008. See web link on page11

⁵⁸ *Food and Soft Drink Advertising Survey 2008* ASA Nov 2008. See web link on page11

- c) finally, the third survey⁵⁹, carried out in 2009, found once again that none of the television advertisements surveyed had breached the HFSS advertising restrictions. Two advertisements were found to have breached general food and drink rules on misleadingness, evidence, and truthfulness.

6.10 Accordingly, Ofcom is satisfied that advertisers are complying with the HFSS content rules set out in Annex 2.

Advertising techniques

6.11 In this final review, Ofcom has looked at what changes there have been in the use of food and drink advertising techniques between Q1 2005 and Q1 2009. In particular, we have looked at the use of those techniques regulated by BCAP's code (see extract at Annex 2) on the grounds that they are calculated to appeal to children. In addition, we looked at the use of brand equity characters (that is, characters originally devised for marketing purposes, such as those associated with particular breakfast cereals); and 'other characters' (whether live or animated e.g. animated talking trees, puppets etc) which are not restricted by the advertising code and therefore could potentially be used in place of other techniques to appeal to children.

6.12 The analysis of changes in creative techniques is based on data for advertising for all products within the Billetts Media food and drink categories, as defined in Annex 3. However, it should be noted that the Billetts definition of food and drink categories differs slightly from the food and drink definition used throughout the rest of the document (which is based on Nielsen Media data), and therefore caution should be exercised when comparing findings in this chapter with those elsewhere. These categories are listed in Annex 3.

6.13 In this analysis, adverts are subject to multiple coding, to take account of adverts in which more than one of the creative techniques is used. For example, in the case of a popular cereal (such as Frosties) including an offer for children's books, the advert would be coded twice; once for the use of a brand equity character (*Tony the Tiger*) and once for the use of promotions.

6.14 It should be noted that:

- a) as explained in Section 4 the growth in the number of channels will tend to lead to a growth in the number of advertising spots; and
- b) advertising spot figures in this section have been rounded to the nearest thousand.

6.15 A more detailed version of this analysis can be found in Annex 7.

Licensed characters

6.16 The volume of food and drink spots featuring a licensed character fell by 23% between Q1 2005 and Q1 2009 (from 25,000 to 19,000). Licensed characters initially accounted for 4.3% of all food and drink spots this fell to 1.7% in Q1 2009. While there has been a 70% (17,000 spots) decline in food and drink spots featuring licensed characters in children's airtime, there has been a 1,869% (11,000 spots) increase during adult airtime. Furthermore, adult airtime accounted for only 2.4%

⁵⁹ *Food and Soft Drink Advertising Survey 2009* ASA June 2010. See web link on page 4

(1,000 spots) of all such commercials in Q1 2005 – this share rose to 61.6% (12,000) in Q1 2009.

- 6.17 Child impacts for food and drink commercials using a licensed character fell by 84% (from 0.39bn impacts to 0.06bn impacts). The share of all food and drink impacts that featured a licensed character fell from 10.7% to 2.2%. The overall reduction was driven by an 88% (0.34bn) drop in impacts during children's airtime, however this was offset slightly by the 69% (0.01bn) increase in impacts during adult airtime. Children's airtime continued to carry 72.9% of all licensed character impacts in Q1 2009, indicating that advertisers are using this technique to market non-HFSS products.
- 6.18 Although there was an increase in the use of licensed characters in food and drink advertising in adult airtime, both the overall reduction in the volume of spots containing this technique and the significant reduction in exposure may suggest that the growth in advertising activity during adult airtime is not targeted at children.

Celebrities

- 6.19 Between Q1 2005 and Q1 2009, there was a 573% increase in the number of food and drink advertisements featuring celebrities (up from 25,000 to 168,000). The share of food and drink advertising accounted for by these spots increased from 4.3% to 14.9%. Spots increased by 245% (2,000) in children's airtime and 583% (141,000) in adult airtime. 98.5% of celebrity food and drink such spots were delivered during adult airtime in Q1 2009. This may suggest that this particular technique may be more likely to be used in commercials for products more likely to appeal to adults. In line with the interim review the majority of celebrities featured in these advertisements during Q1 2009 appeared to be of primary appeal to adults (e.g. Ian Botham, Gloria Hunniford).
- 6.20 Child impacts for food and drink advertisements featuring a celebrity increased by 143% (from 0.2bn to 0.4bn impacts). The share of all food and drink impacts featuring celebrities grew from 4.6% to 14.8%. Impacts in children's airtime fell 4% but increased 153% in adult airtime (0.24bn).

Promotions

- 6.21 There was a 201% increase in the use of promotions in food and drink advertising between Q1 2005 and Q1 2009 (up from 42,000 spots to 125,000 spots). In Q1 2005, this technique appeared in 7.2% of all food and drink advertising spots but in 11.1% in Q1 2009. There was a 67% (16,000 spots) reduction in the use of promotions-based advertising during children's airtime. The effect of this was offset by the 552% (100,000 spots) growth observed during adult' airtime.
- 6.22 There was a 41% fall in child impacts for food and drink advertisements containing promotions (down from 0.5bn to 0.3bn). The incidence of this technique in all food and drink impacts fell from 13.2% to 10.3%. There was a 112% (0.1bn) increase in impacts during adult airtime which partially offset the 82% (0.3bn) reduction in impacts during children's airtime during this period. This reduction in child impacts suggests the increase in spots observed over the same period was not necessarily targeted at children.

Health Claims

- 6.23 Food and drink commercials carrying a health claim increased by 139% between Q1 2005 and Q1 2009 (from 119,000 to 283,000). As a share of all food and drink advertising, those containing a health claim grew from 20.6% of spots to 25.1%. Although spots during children's airtime fell by 14% (2,000), the decline was offset by the 156% (166,000) rise in spots during adult airtime. 96.4% (273,000) of the commercials carrying a health claim were shown in adult airtime in Q1 2009. This may suggest that this type of advertising is more likely to be used in commercials aimed at adults.
- 6.24 Children saw 18% (0.1bn) more commercials featuring a health claim (up from 0.67bn impacts to 0.79bn). As a share of all food and drink impacts those containing health claims grew from 18.7% to 29.1%. Although exposure to this type of advertising fell 40% (0.07bn impacts) during children's airtime, this reduction was cancelled out by the 36% (0.18bn) growth in impacts during adult airtime, resulting an overall increase in exposure. Again the majority of children's exposure to this creative technique took place in adult airtime, where share increased from 75.7% (0.5bn impacts) to 87.7% (0.7bn impacts)

Brand Equity Characters

- 6.25 There was a 58% increase in the number of food and drink spots featuring brand equity characters between Q1 2005 and Q1 2009 (from 66,000 to 105,000). However the share of food and drink advertising represented by this technique fell from 11.5% to 9.3%. Spots in children's airtime dropped by 59% (24,000 spots) but rose in adult' airtime by 238% (62,000 spots) which accounted for 84.4% (88,000 spots) of all brand equity spots aired in Q1 2009.
- 6.26 There was a 56% reduction in children's exposure to food and drink commercials featuring a brand equity character (from 0.7bn to 0.3bn impacts). The overall share of food and drink impacts for such commercials fell from 18.7% to 10.8%. The reduction was driven by the 82% (0.46bn) fall in exposure during children's airtime. This was only partially offset by the 72% (0.1bn) rise in impacts in adult airtime. Two thirds of impacts for this technique were in adult airtime in Q1 2009.

Other characters

- 6.27 Between Q1 2005 and Q1 2009, there was a 174% (from 34,000 to 92,000) increase in the number of food and drink spots featuring other types of characters. The share of all food and drink spots containing this technique also increased from 5.8% to 8.2% over the same period. The growth in spots was driven by a 310% (59,000 spots) increase in activity during adult airtime, while spots during children's airtime fell slightly (down 5%, around 1,000 spots).
- 6.28 Children's exposure to this type of advertising remained stable between the two periods at 0.3bn impacts (-2%). Due to the fall in total food and drink impacts, the share of impacts for food and drink advertisements containing other characters increased from 8.9% to 11.6%. The 26% (0.04bn) reduction in exposure during children's airtime was offset by a 36% (0.05bn) increase during adult airtime. This resulted in growth in the share of impacts (from 38.6% in Q1 2005 to 53.6% in Q1 2009) during adult airtime.

Annex 1

BCAP Scheduling Rules

A1.1 The following rules are included in BCAP's rules on the scheduling of television advertisements⁶⁰.

SECTION 4

Specific Separation Requirements 4.2

GENERAL NOTES:

(i) The term 'adjacent' where used in these rules refers to a break immediately before or after the programme in question.

(ii) The term 'children's programmes' means programmes made for children below the age of 16.

(iii) Channels devoted to children's programmes, or whose programmes are or are likely to be of particular appeal to children, will be unlikely to be able to carry at any time advertising of the kind restricted under 4.2.1 and 4.2.2 below. Such channels should also take particular note of 4.2.3 and 4.2.4. Thus, for instance, dedicated children's channels may not carry any advertising for products or services restricted under 4.2.1(b) below, namely: lotteries, pools and food or drinks assessed as high in fat, salt or sugar (HFSS).

(iv) For the avoidance of doubt, any given timing, programme category or age band restriction subsumes any other less severe restriction. Thus, a 'post 9pm' subsumes both a 'post 7.30 pm' as well as the restriction on scheduling in or adjacent to children's programmes or programmes likely to have a significant child audience. Similarly, a prohibition on transmission in 'children's programmes', includes e.g. programmes made for pre-school children. Particular care needs to be exercised where a programme for, or likely to be of interest to, children is transmitted late in the evening or in the small hours, as for example at Christmas. Where such a programme is transmitted after 9pm, no advertisement carrying a timing restriction may be transmitted in or around that programme.

Children and young people 4.2.1

(a) The following may not be advertised in or adjacent to children's programmes or programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18:

(i) alcoholic drinks containing 1.2 per cent alcohol or more by volume; (See also 4.2.5 below) (See note (iii) below on identification of programmes of particular appeal)

⁶⁰ The complete rules may be found at the ASA's website at http://www.asa.org.uk/cap/codes/broadcast_codes/scheduling/Contents.htm.

(ii) gambling except lotteries, football pools, equal chance gaming (under a prize gaming permit or at a licensed family entertainment centre), prize gaming (at a non-licensed family entertainment centre or at a travelling fair) or Category D gaming machines (see 4.2.1(b) below);

(iii) religious matter subject to the rules on Religious Advertising in the BCAP Television Advertising Standards Code;

(iv) slimming products, treatments or establishments.

(b) The following may not be advertised in or adjacent to children's programmes or programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 16:

(i) lotteries;

(ii) football pools;

(iii) equal chance gaming (under a prize gaming permit or at a licensed family entertainment centre);

(iv) prize gaming (at a non-licensed family entertainment centre or at a travelling fair);

(v) Category D gaming machines.

(vi) food or drink products that are assessed as high in fat, salt or sugar in accordance with the nutrient profiling scheme published by the Food Standards Agency (FSA) on 6 December 2005.

(c) The following may not be advertised in or adjacent to children's programmes or programmes which are of particular appeal to children under 10:

(i) female sanitary protection products.

(d) The following may not be advertised in or adjacent to children's programmes:

(i) drinks containing less than 1.2 per cent alcohol by volume when presented as low or no-alcohol versions of an alcoholic drink;

(ii) liqueur chocolates;

(iii) matches;

(iv) medicines, vitamins and other dietary supplements;

(v) trailers for films or videos carrying an 18- or 15- certificate;

NOTES:

- (i) Full details of the FSA's nutrient profiling scheme are available on the FSA website at: <http://www.food.gov.uk/healthiereating/advertisingtochildren/nutlab/nutprofmod>
- (ii) The restrictions above include sponsorship of the programme.
- (iii) Particular appeal – See ASA Advertising Guidance Note 5 - Audience indexing: identification of programmes likely to appeal to children and young people.
- (iv) Depending on content and, in particular, on the extent and nature of any portrayal of violence or sexual activity, an alternative timing restriction such as post 7.30pm, post 9pm or even later may often be appropriate for material in category (d)(v), particularly that which is 18 rated.
- (v) Again subject to content, this does not preclude the scheduling in or adjacent to children's programmes of advertisements containing brief extracts from films where these are used in connection with promotional offers derived from films for other types of product or service.

Annex 2

BCAP Content Rules

A2.1 The following rules are included in BCAP's current TV Advertising Standards Code⁶¹. A new version of the BCAP code comes into force on 1 September 2010, however both the scheduling rules (Annex 1) and the content rules (below) for HFSS advertising remain unchanged.

A2.2 Food and Soft Drink Advertising and Children

On 1 July 2007, a new and important regulation governing nutrition and health claims for foods came into force. The regulation is complex and mandatory. BCAP encourages broadcasters to take advice on the effect of the regulation and to consult the Food Standards Agency's Guidance to Compliance with Regulation (EC) 1924/2006 on Nutrition and Health Claims on Foods, which is available at <http://www.food.gov.uk>

Notes:

1. The rules in 7.2 must be read in conjunction with the other rules in this Code, especially section 8.3, 'Food and Dietary Supplements'. For rules on the scheduling of HFSS product advertisements, please see the BCAP Rules on the Scheduling of Television Advertisements. References to food apply also, where relevant, to beverages.

2. The spirit, as well as the letter, of the rules in this section applies to all advertisements that promote, directly or indirectly, a food or soft drink product.

3. These definitions apply in rule 7.2:

- Children - refers to persons below the age of 16.*
- Advertisements targeted directly at pre-school or primary school children – advertisements that directly target pre-school or primary school children through their content as opposed to their scheduling. For rules on the scheduling of HFSS product advertisements, please see the BCAP Rules on the Scheduling of Television Advertisements.*
- Licensed Characters - those characters that are borrowed equities and have no historical association with the product.*
- Equity Brand Characters - those characters that have been created by the advertiser and have no separate identity outside their associated product or brand.*
- HFSS products - those food or drink products that are assessed as high in fat, salt or sugar in accordance with the nutrient profiling scheme published by the Food Standards Agency (FSA) on 6 December 2005. Information on the FSA's nutrient profiling scheme is available on the FSA website at: <http://www.food.gov.uk/healthiereating/advertisingtochildren/nutlab/nutprofmod>*

7.2.1 Diet and lifestyle

⁶¹ The complete Code may be found at the ASA's website at <http://www.asa.org.uk/cap/codes/>.

Advertisements must avoid anything likely to encourage poor nutritional habits or an unhealthy lifestyle in children.

Notes:

- (1) This rule does not preclude responsible advertising for any products including those that should be eaten only in moderation.*
- (2) In particular, advertisements should not encourage excessive consumption of any food or drink, frequent eating between meals or eating immediately before going to bed.*
- (3) It is important to avoid encouraging or condoning attitudes associated with poor diets, for example, a dislike of green vegetables.*
- (4) Portion sizes or quantities of food shown should be responsible and relevant to the scene depicted, especially if children are involved. No advertisement should suggest that a portion intended for more than one person is to be consumed by a single individual or an adult's portion, by a small child.*
- (5) Advertisements for food should not suggest that an inactive or sedentary lifestyle is preferable to physical activity.*

7.2.2 Pressure to purchase

Note: Please see also 7.3 (Pressure to purchase)

(a) Although children may be expected to exercise some preference over the food they eat or drink, advertisements must be prepared with a due sense of responsibility and should not directly advise or ask children to buy or to ask their parents or other adults to make enquiries or purchases

Notes:

- (1) This extends to behaviour shown: for example, a child should not be shown asking for a product or putting it into the parent's trolley in the supermarket.*
 - (2) Phrases such as "Ask Mummy to buy you" are not acceptable.*
- (b) Nothing in an advertisement may seem to encourage children to pester or make a nuisance of themselves.
- (c) Advertisements must not imply that children will be inferior to others, disloyal or will have let someone down, if they or their family do not buy, consume or use a product or service.
- (d) Advertisements must neither try to sell to children by appealing to emotions such as pity, fear, loyalty or self-confidence nor suggest that having the advertised product somehow confers superiority, for example making a child more confident, clever, popular, or successful.
- (e) Advertisements addressed to children should avoid 'high pressure' and 'hard sell' techniques, i.e. urging children to buy or persuade others to buy. Neither the words used nor the tone of the advertisement should suggest that young viewers are being bullied, cajoled or otherwise put under pressure to acquire the advertised item.

(f) If an advertisement for a children’s product contains a price, the price must not be minimised by the use of words such as “only” or “just”.

Note:

Products and prices should not be presented in a way that suggests children or their families can easily afford them.

7.2.3 Promotional offers

Promotional offers should be used with a due sense of responsibility. They may not be used in HFSS product advertisements targeted directly at pre-school or primary school children.

(a) Advertisements featuring promotional offers linked to food products of interest to children must avoid creating a sense of urgency or encouraging the purchase of excessive quantities for irresponsible consumption.

(b) Advertisements should not seem to encourage children to eat or drink a product only to take advantage of a promotional offer: the product should be offered on its merits, with the offer as an added incentive. Advertisements featuring a promotional offer should ensure a significant presence for the product.

(c) Advertisements for collection-based promotions must not seem to urge children or their parents to buy excessive quantities of food. They should not directly encourage children only to collect promotional items or emphasise the number of items to be collected. If promotional offers can also be bought, that should be made clear. Closing dates for collection-based promotions should enable the whole set to be collected without having to buy excessive or irresponsible quantities of the product in a short time. There should be no suggestion of “Hurry and buy”.

(d) If they feature large pack sizes or promotional offers, e.g. “3 for the price of 2”, advertisements should not encourage children to eat more than they otherwise would.

(e) The notion of excessive or irresponsible consumption relates to the frequency of consumption as well as the amount consumed.

7.2.4 Use of characters and celebrities

Licensed characters and celebrities popular with children must be used with a due sense of responsibility. They may not be used in HFSS product advertisements targeted directly at pre-school or primary school children.

Notes:

(1) Advertisements must not, for example, suggest that consuming the advertised product will enable children to resemble an admired figure or role-model or that by not doing so children will fail in loyalty or let someone down.

(2) This prohibition does not apply to advertiser-created equity brand characters (puppets, persons or characters), which may be used by advertisers to sell the products they were designed to sell.

(3) Persons such as professional actors or announcers who are not identified with characters in programmes appealing to children may be used as presenters.

(4) Celebrities and characters well-known to children may present factual and relevant generic statements about nutrition, safety, education, etc.

8.3 Food and dietary supplements

Notes:

(1) The rules in 8.3 must be read in conjunction with the relevant legislation including the Food Labelling Regulations 1996 (as amended) and especially Schedule 6. They apply to all advertising for food products. If an advertisement is targeted at children, Section 7 of this Code also applies. For HFSS product advertisements scheduled in and around programmes of particular appeal to children, please see the BCAP Rules on the Scheduling of Television Advertisements.

(2) Public health policy increasingly emphasises good dietary behaviour and an active lifestyle as a means of promoting health. Commercial product advertising cannot reasonably be expected to perform the same role as education and public information in promoting a varied and balanced diet but should not undermine progress towards national dietary improvement by misleading or confusing consumers or by setting bad examples, particularly to children. Advertisements for food should not suggest that an inactive or sedentary lifestyle is preferable to physical activity.

(3) The spirit, as well as the letter, of the rules in this section applies to all advertisements that promote, directly or indirectly, a food or soft drink product.

8.3.1 Accuracy in food advertising

(a) Nutrition claims (e.g. “high in vitamin C”) or health claims (e.g. “aids a healthy digestion”) must be supported by sound scientific evidence. Advertising must not give a misleading impression of the nutritional or health benefits of the product as a whole and factual nutrition statements should not imply a nutritional or health claim that cannot be supported. Ambiguous wording that could be understood as a health claim must be avoided. For example, “goodness” should not be used as a synonym for “wholesomeness” and, if a claim relates to taste, that should be made clear, e.g. “It tastes good”, not “It is good”. The scientific meaning of the word “energy”, i.e. calorific value, should not be confused with its colloquial meaning of physical vigour

(b) Nutritional claims and health claims should relate to benefits that are significant. Claims should be presented clearly and without exaggeration

(c) No nutritional or health claim may be used in HFSS product advertisements targeted directly at pre-school or primary school children

Notes:

(1) Advertisements targeted directly at pre-school or primary school children are advertisements that directly target pre-school or primary school children through their content as opposed to their scheduling. For rules on the scheduling of HFSS product advertisements, please see the BCAP Rules on the Scheduling of Television Advertisements.

(d) The fact that a food product is a good source of certain nutrients does not justify generalised claims of a wider nutritional benefit

Notes:

(1) Claims of nutritional or health benefits should be considered in the context of a balanced diet or lifestyle or both. For the avoidance of doubt, HFSS product advertisements may make nutritional or health claims in accordance with 8.3.1.

8.3.2 Excessive consumption

Advertisements must not encourage or condone excessive consumption of any food

Notes:

(1) Interpretation of this rule should be by reference to generally accepted nutritional advice. It would clearly not be inconsistent with shots of someone enjoying a chocolate bar; it would, however, preclude someone being shown eating whole boxes of chocolates in one sitting.

(2) Portion sizes or quantities of food shown should be suitable for the occasion and the people portrayed, especially if children are involved. Advertisements should not suggest that a portion intended for more than one person is to be consumed by a single individual or an adult's portion, by a small child.

(3) If they feature large pack sizes or promotional offers, e.g. "3 for the price of 2", advertisements should not encourage people to eat more than they otherwise would.

(4) The notion of excessive consumption relates to the frequency of consumption as well as the amount consumed.

8.3.3 Comparisons and good dietary practice

Advertisements must not disparage good dietary practice. Comparisons between products must not discourage the selection of options such as fresh fruit and vegetables, which accepted dietary opinion recommends should form a greater part of the average diet

Notes:

(1) Advertisements should not seem to contradict or ignore good dietary practice.

(2) To reflect generally accepted good dietary practice, a reasonable variety of other foods should be shown if the advertised product is presented as part of a meal.

(3) Food products not intended as substitutes for meals should not be presented as such.

8.3.4 Oral health

Advertisements must not encourage or condone damaging oral health care practices

Note:

For instance, advertisements must not encourage frequent consumption throughout the day, particularly of potentially cariogenic products such as those containing sugar. This rule has children's dental health particularly in mind.

8.3.5 Dietary supplements

(a) Advertisements must not suggest that it is necessary for the average person to augment the diet or, unless the claim is authorised by the European Commission, that dietary supplements can enhance normal good physical or mental condition. Claims about higher vitamin or mineral intake for a specific function are permitted if authorised by the European Commission.

(b) Advertisements may offer vitamin and mineral supplements to certain groups as a safeguard to help maintain good health. If the claim made for a vitamin or mineral supplement is relevant only to a group that is at risk of inadequate intake, the advertisement must state clearly the group likely to benefit from a particular form of supplement

Note to 8.3.5(b):

Only certain groups are likely to benefit from particular vitamin or mineral supplements. They might include people on a restricted dietary regimen, those eating unsupplemented, low-energy diets, women of child-bearing age (particularly if they are planning to have a baby, are pregnant or lactating), growing children and some individuals over 50.

Annex 3

Channel & airtime definitions

Children’s airtime definition

- A3.1 Children’s airtime is defined by combining specific children’s slots/strands on the main PSB channels with dedicated children’s channels. There are no dedicated children’s slots on the non-PSB mixed genre channels.
- A3.2 Figure A1 lists the children’s channels available between 2003-2009. Some channels have changed brand names over time (such as Jetix), some (like Pop+1) have ceased transmission. It should be noted that some channels do not carry commercial advertising (e.g. CBBC and most Disney channels).

Figure A1: Children’s channels

Dedicated children’s channels		
Baby TV	Disney Cinemagic	Playhouse Disney
Boomerang	Disney Cinemagic +1	Playhouse Disney +1
Boomerang+1	Disney XD (formerly Fox Kids/Jetix)	Pop
Cartoon Network	Disney XD+1	Pop+1
Cartoon Network Plus	Kix	Pop Girl
Cartoon Network Too (formerly Toonami)	Nick Jr	Pop Girl+1
Cartoonito (formerly Cartoon Network Too)	Nick Jr2	Tiny Pop
CBBC	Nickelodeon	Tiny Pop+1
CBeebies	Nickelodeon Replay	Toon Disney
CITV	Nicktoons	Trouble (excluded from 2006+)
Discovery Kids	Nicktoons Replay (formerly Nicktoons 2/ NickToonsters)	Trouble +1 (excluded from 2006+)
Disney Channel	Nicktoonster	
Disney Channel +1		

Note: Disney channels apart from Disney XD do not carry commercial advertising

- A3.3 Figure A2 below shows those periods of the PSB channel schedules comprising children’s airtime between 2003 and 2009. It is important to note that day parts may vary throughout the year due to changes in schedules. The definitions are designed to enable us capture as much of the airtime during which children’s programming is broadcast as possible for our analysis. It may be that on occasions schedules have changed and children’s programming has been replaced with another programme genre (e.g. football or motor racing on weekend mornings); as a consequence commercials for HFSS products may have been shown – this may result in data suggesting some HFSS advertising has aired during “children’s airtime” in 2009⁶².

⁶² The analysis presented in Annex 5 does not suggest there are many instances where HFSS advertising has appeared around adult programming at times when children’s programmes are normally scheduled.

Figure A2: Children’s airtime definitions

2003		2004		2005		2006	
BBC1	Mon-Fri 1525-1735	BBC1	Mon-Fri 1525-1735	BBC1	Mon-Fri 1525-1735	BBC1	Mon-Fri 1525-1735
BBC1	Sat 0600-1200	BBC1	Sat 0600-1200	BBC1	Sat 0600-1200		
BBC2	Mon-Fri 0600-1030	BBC2	Mon-Fri 0600-1030	BBC2	Mon-Fri 0600-1030	BBC2	Mon-Fri 0700-1030
BBC2	Sun 0600-1030	BBC2	Sun 0600-1030	BBC2	Sun 0600-1030	BBC2	Sat 0600-1200
						BBC2	Sun 0600-1000
ITV1	Mon-Fri 1515-1700	ITV1	Mon-Fri 1515-1700	ITV1	Mon-Fri 1515-1700	ITV1	Mon-Fri 1500-1630
ITV1	Sat 0600-1300	ITV1	Sat 0600-1300	ITV1	Sat 0600-1300	ITV1	Sat 0600-1130
ITV1	Sun 0600-1100	ITV1	Sun 0600-1100	ITV1	Sun 0600-1100	ITV1	Sun 0700-1030
C4	Mon-Fri 0600-0700	C4	Mon-Sun 0600-0700	C4	Mon-Sun 0600-0700	C4	Mon-Sun 0600-0700
C4	Sat 0600-0700						
C4	Sun 0600-0900						
Five	Mon-Fri 0630-0930	Five	Mon-Fri 0630-0930	Five	Mon-Fri 0630-0930	Five	Mon-Fri 0600-0900
Five	Sat 0700-1330	Five	Sat 0700-1330	Five	Sat 0700-1330	Five	Sat 0700-1130
Five	Sun 0630-1230	Five	Sun 0630-1230	Five	Sun 0630-1230	Five	Sun 0600-1230

2007		2008		2009	
BBC1	Mon-Fri 1525-1735	BBC1	Mon-Fri 1505-1710	BBC1	Mon-Fri 1505-1710
BBC2	Mon-Fri 0700-1030	BBC2	Mon-Fri 0600-1100	BBC2	Mon-Fri 0600-1100
BBC2	Sat 0600-1200	BBC2	Sat 0600-1300	BBC2	Sat 0600-1400
BBC2	Sun 0600-1000	BBC2	Sun 0600-1000	BBC2	Sun 0600-1000
ITV1	Sat 0600-1200	ITV1	Sat 0600-1100	ITV1	Sat 0600-1000
ITV1	Sun 0600-1130	ITV1	Sun 0600-1030	ITV1	Sun 0600-1000
C4	Mon-Sun 0600-0700	C4	Mon-Sun 0600-0700	C4	Mon-Sun 0600-0700
Five	Mon-Fri 0600-0900	Five	Mon-Fri 0600-0900	Five	Mon-Fri 0600-0915
Five	Sat 0700-1000	Five	Sat 0700-1000	Five	Sat 0700-1000
Five	Sun 0600-1000	Five	Sun 0600-1000	Five	Sun 0700-1030

Note: 2008 dayparts may vary from the 2008 review (which covered the January-June 2008 period) due to changes in children’s airtime during the second half of the year

Other channel definitions

A3.4 All other airtime (i.e. that which excludes children’s channels and children’s strands on the main PSB channels) has been referred to as ‘adult’ airtime. This definition covers airtime not specifically targeted at children, but during which children may be watching, on the main PSB channels as well as on all other channels. Within adult airtime there are some specific channel groups that have been created to understand trends in more detail. These groups are:

Figure A3: BBC portfolio channels

BBC
BBC3
BBC4
BBC News 24
BBC Parliament (CBBC)
(CBeebies)

Note: When analysing ‘adult’ airtime, children’s channels CBBC and CBeebies have been excluded from the definition of BBC portfolio channels.

Figure A4: Commercial PSB portfolio channels

ITV	Channel 4	Five
ITV2	Channel 4+1	Fiver/Five Life
ITV2 +1	Film4	Fiver +1
ITV3	Film4 +1	Five US
ITV3 +1	FilmFour Extreme	Five US +1
ITV4	FilmFour Weekly	
ITV4+1	FilmFour World	
ITV Play	E4	
(CITV)	E4+1	
ITV News	More4	
	More4 +1	
	4Music(2008+)	

Note: Channel 4+1 has been treated as a commercial PSB portfolio channel throughout this analysis. When analysing adult airtime, children’s channel CITV has been excluded from the definition of commercial PSB portfolio channels.

Figure A5: Music channels

Music channels		
Bedroom TV	MTV/MTV One	p-rock
Bliss	MTV +1/MTV Flux	Q Channel/Box TV
Bubble Hits	MTV Base	Rockworld TV
Channel AKA/Channel U	MTV Dance	Scuzz
Channel Starz/Channel Fizz	MTV Hits	Smash Hits
Chart Show TV	MTV R	The Box
Clubland TV	MTV Two	The Vault
Flaunt	Musflash TV	VH1
Flava/B4	Music Choice	VH1 Classic
Kerrang	NME TV	VIVA/TMF
Kiss TV	Omusic	The Hits (4Music from 2008)
Magic TV		

Note: The Hits was removed from the music channels group in 2008 and 4Music added to the commercial PSB portfolio channels group

Annex 4

Food and Drink definitions used in the review

A4.1 In Section 3 we explain why it has been necessary to update the way we measure HFSS impacts. The following subsections in this annex provide a detailed inventory of each of the product categories or actual products that are included in each measure.

Data definitions: Food and drink

A4.2 Industry databases (such as those provided by Nielsen Media or Billets Media) classify food and drink advertising by product and retail category. The difficulty in establishing the nutrient profile status of adverts means these databases have not classified products by whether or not they are HFSS.

Nielsen Media

A4.3 Since 2004, Ofcom has based its analysis of food and drink advertising on the Nielsen Media product categories listed in Figure A6. In broad terms, these comprise all food products, soft drinks and beverages. They also include advertising for so-called ‘chain restaurants’⁶³ such as those operated by Burger King or McDonald’s. In Ofcom publications between 2004 and 2007, these food and drink categories have been referred to as ‘core categories’.

A4.4 Analysis is based on Nielsen Media ‘*product*’ categories as opposed to ‘*advertiser*’ categories, for example a commercial for Kelloggs Coco Pops advertised by Sainsbury’s is found in the *product* category ‘Food’ rather than in ‘Retail’. In this way all food and drink supermarket advertising is captured.

A4.5 Data on food and drink advertising will include both HFSS and non-HFSS products. Therefore analysis of food and drink advertising by different types of airtime may show food and drink advertising activity during children’s airtime.

Figure A6: Food and drink advertising – Nielsen product categories

02 FOOD				
01 Bakery Goods	05 Biscuits	10 Bread & Bakeries	15 Cakes & Fruit Pies	20 Cakes (frozen)
	25 Crispbrd/Crackers			
02 Confectionery	05 Cereal Bars	10 Chewing Gum	15 Choc Bars &Count	20 Chocolate-Boxed
	25 Chocolate-Other	30 Ice Cream & Lollies	35 Sugar Confection	40 Mixed/Gen confect

⁶³ The Nielsen Media database, which was used in the 2004 analysis (and subsequent analysis), does not contain a ‘fast food’ product category. ‘Fast food’ advertising is classified under Nielsen’s ‘Chain Restaurants’ sub-category and has therefore been the label used across all Ofcom’s analysis in this area.

03 CookingProd & Seasoning	05 Cakes & Pastry Mix	10 Condiments, Sauces & Dressings	15 Cooking Fats	20 Flour & Baking Pow
	25 Meat & Veg Extract	30 Sauce (Cook & Mix)	45 Sugars	46 Artificial Sweetener
04 Dairy Products & Substitutes	05 Butter	10 Cheese	15 Cream & Subs	20 Eggs
	25 Margarine	30 Milk & Milk Prod	35 Yoghurt/FromFrais	99 Dairy Range
06 Fruit, Veg, Pasta	05 Fruit (Canned)	10 Fruit (Dried)	15 Fruit (Fresh)	25 Rice Pasta (Dr&Fr)
	30 Veg & Pasta (Can)	35 Vegetable (Fresh)	40 Vegetable(Frozen)	
07 Meat, Fish & Poultry	05 Bacon	10 Fish (Canned)	15 Fish (Fresh Frozn)	20 Sl Meat, Sprd, Pate
	25 Meat Poultry (Can)	30 Meat(Fresh Frozn)	35 Meat Pies Sausage	40 Poult (Fresh Frozn)
08 Prepared & Convenience Foods	05 Baby Foods	10 Cereal(Ready Eat)	15 Cereal (Prepare)	20 Conven. Desserts
	25 Deh,CanReadyEat	27 Pizza – Frozen	30 Prep Food Range	35 Froz Ready Meals
	40 Jams & Spreads	45 Soup (Canned)	50 Soup(Pack)Dry&Fr	55 PotatoCrispSnack
	56 Dips/DipperSnack	91 Pre/Con Food Gen		
09 Organic Rnge	05 Organic Foods			
90 Food-Sponsor	15 Other Sponsorshp			
99 Food Corp	99 Food Corp			
04 DRINK				
02 Soft Drinks	05 Soft Drink Mixer	07 Mineral Water	10 Cordials/squash	15 Fr Juice/St FrDrink
	20 Other Carbonated	25 Athlete/Hlth/Energ	95 Soft Drinks Gen	
04 Beverages	05 Coffee (Fresh)	10 Coffee (Instant)	15 Health Drinks	20 Tea
	25 Other Beverages			
30 RETAIL				
01 Ent & Leisure	15 Chain Restaurant			

Note: Some category names have been abbreviated from the original Nielsen Media labels. Some category labels may vary from previous analysis.

Billets Media

A4.6 In addition to the scheduling restrictions introduced in 2007, rules restricting the use of particular techniques calculated to appeal to children in food and drink advertising (including some applying specifically to HFSS advertising) were also adopted (see Annex 2).

- A4.7 We have used data from Billets Media (formerly known as Thomson Intermedia) for the purposes of analysing the use of these techniques (Section 6 and Annex 7). The database contains data on creative techniques for all food and drink product advertising from 2003 to March 2009. As only Q1 data is available for 2009 we have compared this with the same period in 2005. It should be noted that due to seasonality in food and drink advertising trends, this analysis based on data for Q1 2005 and Q1 2009 provides a snapshot of activity over that period.
- A4.8 In this analysis, adverts are subject to multiple coding, to take account of adverts in which more than one of the creative techniques is used. For example, in the case of a popular cereal (such as Frosties) including an offer for children’s books, the advert would be coded twice; once for the use of a brand equity character (*Tony the Tiger*) and once for the use of promotions. Billets’ food and drink categories differ in some details from the definition of food and drink advertising used elsewhere in the review.
- A4.9 The full list of Billets food and drink product and retail categories is set out in Figure A7. In summary, they cover almost all food and drink advertising, including:
- all food and drink categories (except tea and coffee);
 - department stores (advertisements for food and drink products, as well as restaurants);
 - supermarkets (advertisements for specific food and drink products, as well as food and drink ranges); and
 - other (advertising for fast food, confectionery, restaurants and bars).

Figure A7: All food and drink – definition based on Billets’ categories

FMCG			
	Confectionery	Cereal Bars	Chewing Gum
		Chocolate	Potato Crisps & Snacks
		Sugar Confectionery	
	Drinks – Beverages	Chocolate	
	Drinks – Non Alcoholic	Carbonated Soft Drinks	Cordial & Squash ⁶⁴
		Energy Drinks	Fresh Fruit Juice
		Milk Shakes & Derivatives	Mineral Water
	Food - Bakery Goods	Biscuits	Breads & Bakeries
		Cakes & Fruit Pies	Crispbreads & Savoury Biscuits
	Food - Canned	Fish	Fruit
		Meat & Poultry	Vegetables & Pasta
	Food - Cereal	Ready to Eat	Requiring Preparation
	Food - Cooking Ingredients	Cakes & Pastry Mixes	Cooking Oils & Fats
		Flour	Herbs & Spices
		James & Preserves	Rice & Pasta
		Sugar & Sweeteners	

⁶⁴There has been a name change to the category previously listed as '04.02.10 Cordials' to '04.02.10 Cordials/squash'

	Food - Dairy	Butter/Margarine	Cheese
		Cream & Substitutes	Eggs
		Ice Cream	Milk & Milk Products
		Yoghurt & F/Frais	
	Food - Food Range	Food Range	
	Food - Fresh	Fish	Fruit & Nuts
		Meat & Poultry	Pasta
		Spreads, Pates & Sliced Meats	Vegetables
	Food - Frozen	Desserts	Fish
		Frozen – Range	Meat & Poultry
		Vegetables	
	Food - Ready To Eat Meals	Baby Food	Convenience Dessert
		Dehydrated	Fresh Chilled
		Frozen	Microwave
	Food – Sauces & Condiments	Bottled Sauces	Salad Dressings
	Food - Soup	Bottled	Canned
		Packet	
	Food - Vegetarian	Vegetarian – Range	
Retail			
	Department	Drink	Food
		Restaurant	Food & Drink
	Mail Order	Drink	Food
		Food & Drink	
Price Comparison Sites			
	Stores	Drink	Food
		Food & Drink	Stores (Fast Food/ Restaurants)
	Stores - Supermarket	Drink	Food
		Supermarket – Range	Food & Drink

Data definitions: 2005 HFSS proxy

- A4.10 In 2006, Ofcom modelled the potential effects of different approaches to restricting advertising of HFSS products. For this purpose, it was necessary for Ofcom to reach a view on how much food and drink advertising in 2005 (the latest year for which full data was available) was for HFSS products.
- A4.11 As the FSA's nutrient profile model was not finalised and because it would have been impracticable to profile several thousand food and drink products, Ofcom sought the help of the Institute of Practitioners of Advertising (IPA) in reaching a view on which Nielsen product categories were likely to consist predominantly of HFSS products on the basis of the FSA's provisional nutrient profiling model. As a result, the Nielsen food and drink minor product categories listed in Figure A8 were assumed to comprise non-HFSS products, and the remainder to comprise HFSS products. Ofcom used this definition as a proxy ('the 2005 HFSS proxy') for modelling how much food and drink advertising in 2005 was for HFSS products. This proxy was used to estimate the likely impact of the restrictions on children's exposure to HFSS advertising (i.e. a 41% reduction in exposure for children aged 4-15).

- A4.12 The 2005 proxy was necessarily approximate – some of the minor product categories excluded by the IPA (such as ‘meat and vegetable extracts’) may have included HFSS products, while some of those included (such as ‘ready-to-eat cereals’) may have included non-HFSS products. However, in the absence of definitive data, it represented the best available basis for estimating how much advertising in 2005 was for HFSS or non-HFSS products. This measure has been used again in this review as an estimate of HFSS advertising in 2005 – the base year against which 2009 activity has been compared.

Figure A8: 2005 HFSS proxy – Nielsen Media minor product categories excluded from the food and drink definition (Figure A6) to derive the 2005 HFSS proxy

Products excluded	
02.03.10 Condiments, Sauces & Dressings	02.03.25 Meat & Vegetable Extracts
02.06.25 Rice & Pasta (dried & fresh)	02.06.30 Vegetables & Pasta (canned)
02.06.35 Vegetables (fresh)	02.06.40 Vegetables (frozen)
02.07.10 Fish (canned)	02.07.15 Fish (fresh & frozen)
02.07.30 Meat (fresh & frozen)	02.08.05 Baby foods
02.08.25 Dehydrated, Canned Ready to Eat	
04.02.07 Mineral Water	04.02.10 Cordials/squash
04.02.15 Fruit Juice/Still Fruit Drink	04.04.10 Coffee (instant)
04.04.15 Health Drinks	04.04.20 Tea

- A4.13 In order to compare aspects of the data in 2005 and 2009 (including HFSS spot data) for this review, it has been necessary to re-run the 2005 data. Since the 2008 review, which reported changes in exposure to HFSS advertising using the 2005 HFSS proxy definition there has been a change in one of the Nielsen product categories that affect the definition of the 2005 HFSS proxy used in this review.
- A4.14 The minor product category referred to in both Ofcom’s 2006 modelling work to determine the volume of HFSS advertising in 2005⁶⁵ and in the interim review as ‘02.03.10 Condiments’, has now changed to ‘02.03.10 Condiments, Sauces and Dressings’. This new category brings together the previously separate minor product categories ‘02.03.10 Condiments’ and ‘02.03.35 Sauces’.
- A4.15 Based on the definition of the 2005 HFSS proxy used in the 2008 review, ‘02.03.10 Condiments’ would have been treated as non-HFSS and therefore excluded from the proxy definition – while the ‘02.03.35 Sauces’ category was treated as HFSS and included in the proxy definition.
- A4.16 As a result of the change in Nielsen categories the ‘02.03.10 Condiments, Sauces and Dressings’ category has been treated as non-HFSS in this review. Therefore data based on the 2005 HFSS proxy definition excludes all products within the new ‘02.03.10 Condiments, Sauces and Dressings’ sub-category. As a result of this, figures based on the 2005 HFSS proxy in this review vary from those reported in the 2008 review. The total figure for HFSS advertising in 2005 used in this review is 0.4bn impacts smaller (at 12.1 billion impacts) than the 12.5bn impact base figure reported in the interim review. The lower 2005 base figure means that any comparison with the 2009 data will show slightly smaller reductions in HFSS

⁶⁵ Documents can be found at http://www.ofcom.org.uk/consult/condocs/foodads_new/

impacts than would be the case if it had been possible to make comparisons with the original 2005 data.

Data definitions: 2009 HFSS proxy

- A4.17 Since the introduction of the HFSS advertising restrictions in 2007, it has been possible to make more robust estimates of what constitutes HFSS advertising. Advertisers wishing to place their products in children's airtime are now obliged to certify in accordance with the FSA's nutrient profiling scheme that their advertisements are for non-HFSS products. Clearcast, the body entrusted by many broadcasters with checking that advertisements comply with these restrictions will only advise broadcasters that an advertisement may be shown in children's airtime on this basis. It is for broadcasters to ensure they comply. Clearcast have provided Ofcom with data on which individual advertisements were certified as non-HFSS in 2009. By comparing this with a list of the products advertised in 2009 at a 'brand' level⁶⁶ from the Nielsen Media database, it was possible to determine how much advertising seen by children had been certified as non-HFSS. The process of matching Clearcast data with Nielsen Media data was conducted at the granular, advert-by-advert, level using 'film numbers' – these are codes assigned to individual advert creatives.
- A4.18 However the majority of advertisements are not certified. If an advertiser has products that they do not want to place in children's airtime or around programmes of particular appeal to children (e.g. sparkling water or coffee), it is not necessary for those advertisements to be certified and they will be scheduled in adult airtime. In these cases, it was necessary to assess whether the products advertised were likely to be HFSS or non-HFSS.
- A4.19 As data on an advert-by-advert basis is too granular to be used in our analysis of children's exposure to HFSS advertising, we had to make some simplifying assumptions, and aggregate the individual advert data at 'brand level'. We looked at all uncertified food and drink brands (as labelled by Nielsen Media), and made an assessment as to whether they were likely to be for HFSS or non-HFSS products. In many cases, it was apparent whether or not a product was HFSS from the 'brand' label. For example, it is reasonable to assume that well-known chocolate bars are HFSS products, but that spring water is not. Where there was doubt, we classified products as HFSS.
- A4.20 There are cases in the Nielsen database where data at the 'brand' level is used to describe a range of products or include a range of advertisements, some of which are for HFSS products, others for non-HFSS products. In these instances, it was necessary to decide whether the products described by the 'brand' label should be regarded as HFSS or non-HFSS (accepting that a number of advertisements would be miscategorised as a result). The attribution was determined by whether the majority of adverts within the relevant 'brand' were assessed as HFSS or non-HFSS advertising. It is likely that the net effect of this approach is to slightly overstate the proportion of advertising in 2009 that was for HFSS products.

⁶⁶Data available on the Nielsen Media database at the 'brand' level varies in form across advertisers. For example, at the 'brand' level there is only one brand to cover all television advertising conducted by McDonald's ('McDonalds - Restr Chain') but advertising for KitKat products is broken down to a number of brands ('KitKat-Chocolate Bar', 'KitKat- Chunky Caramel Bar', 'KitKat – Senses'). Each 'brand' may consist of a number of different commercials or film numbers.

A4.21 Having categorised the ‘brands’ in this way and generated data on HFSS advertising activity we found that the data suggested children were being exposed to HFSS commercials during children’s airtime in 2009⁶⁷ (in the region of 0.4bn impacts). On further investigation we found that these commercials fell under the ‘McDonalds – Restr Chain’ brand. This particular ‘brand’ comprises over 100 different commercials. Based on the approach described above, the entire ‘brand’ was classified as HFSS. However as the McDonalds’ commercials shown in children’s airtime were certified as non-HFSS, we have counted them as such to avoid misrepresenting the position and to present the most accurate picture possible of advertising activity during children’s airtime. These specific non-HFSS McDonald’s commercials were therefore considered non-HFSS for the analysis of children’s exposure to HFSS advertising in 2009. It is important to note that some of these certified non-HFSS McDonald’s commercials were also shown during adult airtime and by excluding these specific commercials from the definition of HFSS brands, they will have been considered non-HFSS wherever they appeared in adult airtime.

A4.22 The categorisation of brands is detailed in Figure A9 and Figure A10.

Figure A9: 2009 HFSS proxy – Brands assessed as non-HFSS

Non-HFSS brands		
ALBERT BARTLETT - ROOSTER POTATOES	HOVIS - ROLLS RGE	QUORN - PROD RGE
ALPRO - SOYA MILK	HOVIS - SEED SENSATIONS BREAD	RED BULL - SUGARFREE
ALPRO SOYA - LIGHT MILK	ICELAND - FROZEN VEGETABLES	ROBINSONS - FRUIT SHOOT
ASDA - BREAD RGE	ICELAND - KING PRAWN KEBAB SELECTIO	ROOSTER - IRISH POTATOES
ASDA - FRUIT	INNOCENT - SMOOTHIES	SAINSBURYS - EGGS
ASDA - RUMP STEAK	INNOCENT - SMOOTHIES FOR KIDS	SAINSBURYS - FRESH FRUIT
ASDA - TURKEY	INNOCENT - VEG POTS	SAINSBURYS - GRAPES
AUNT BESSIES - PROD RGE	ISKLAR - MINERAL WATER	SAINSBURYS - JERSEY ROYAL POTATOES
AVONMORE SUPERMILK	JOHN WEST - NO DRAIN TUNA	SAINSBURYS - RED LABEL TEA
BARRYS GOLD BLEND TEA	JOHN WEST - TINNED TUNA	SAINSBURYS - SALMON
BARRYS TEA/GOLD BLEN	KELLOGGS - OPTIVITA	SAINSBURYS - STRAWBERRIES
BATCHELORS SQUEEZ	KENCO - INSTANT COFFEE	SAINSBURYS - TASTE DIFF KING PRAWNS
BENECOL - FRUIT & DAIRY SMOOTHIE	KENCO - PURE RGE	SAINSBURYS - VEG RGE
BIO SYNERGY - SKINNY WATER	KINGSMILL - 50 50 BREAD	SCHWEPPE OASIS DRINK
BIRDS EYE - FIELD FRESH GDN PEAS	KINGSMILL - GREAT EVERYDAY BREAD	SCOTTISH DAIRY MRKTG - MILK
BIRDS EYE - OMEGA 3 FISH FINGERS	KINGSMILL - LITTLE BIG LOAF RGE	SHARWOODS - BOMBAY POTATOES
BIRDS EYE - REGGAE REGGAE CHICKEN C	KINGSMILL WHOLEMEAL	SHARWOODS - CANTONESE CURRY SAUCE
BLUEBERRIES FROM SOUTH - BLUEBERRY	LACTOFREE - SEMI SKIMMED MILK	SHARWOODS - MICROWAVE NOODLES
BRACE'S BAKERY	LAILA - FLOUR RGE	SIMPLY FISH
BRENNANS BREAD	LAVAZZA - ESPRESSO COFFEE	SMA - FOLLOW ON MILK
BROOKE BOND PG TIPS	LIDL - FRUIT & VEG	SMA - PROGRESS MILK
BUXTON SPRING WATER	LITTLE DISH - READY MEALS	SMA - TODDLER MILK
CAPRI-SUN FRT DRINK	LYONS IRELAND - TEA	SOMERFIELD - BEEF
COCA COLA - COCA COLA ZERO	MAXWELL HOUSE	SOMERFIELD - CHICKEN
COCA COLA - DIET COKE	MCCAIN - PROD RGE	SOMERFIELD - COOKED HAM
COOP - BAKING POTATOES	MCCAIN - RUSTIC OVEN CHIPS	SOMERFIELD - DRY CURED HAM
COOP - CLEMENTINES	MCCAIN - SMILES	SOMERFIELD - LEAN STEAK MINCE

⁶⁷ Since 1 January 2009, the scheduling rules have prohibited the advertising of HFSS foods during any children’s airtime.

COOP - COX APPLES	MCCAIN - SWEET POTATO	SOMERFIELD - PORK
COOP - FRESH CHICKEN	MCCAIN - WEDGES	SOMERFIELD - POTATOES
COOP - FRESH VEG	MCCAIN HOME FRIES	SOMERFIELD - STEAK
COOP - HOVIS BREAD	MCCAIN OVEN CHIPS	SOMERFIELD - STRAWBERRIES
COOP - JOHN WEST WILD RED SALMON	MCDONALDS - RESTR CHAIN*	SOMERFIELD - TETLEY TEA BAGS
COOP - NESCAFE ORIG COFFEE	MEAT & LIVESTOCK COMM - MINCE	SOMERFIELD - YOUNGS SALMON FILLETS
COOP - PG TIPS	MILUPA - APTAMIL FOLLOW ON	STARBUCKS COFFEE - COFFEE
COOP - SALMON	MORRISONS - BREAD RGE	STRATHMORE - SPRING WATER
COOP - WARBURTONS BREAD	MORRISONS - BRIT NEW POTATOES	SUNNY DELIGHT
COOP - WARBURTONS SLICED WHITE ROLL	MORRISONS - COD FILLETS	SUSO - DRINKS RGE
COW & GATE - BABY BALANCE PORRIDGE	MORRISONS - COX APPLES	TAYLORS - YORKSHIRE TEA
COW & GATE - BABY BALANCE RGE	MORRISONS - DRINK RGE	TAYLORS - YORKSHIRE TEA HARD WATER
COW & GATE - COMP CARE FOLLOW ON	MORRISONS - FRESH FISH RGE	TESCO - HOT CROSS BUNS
COW & GATE - COMP CARE GROWING UP	MORRISONS - FRESH SCOT SALMON	TETLEY - REDBUSH
CRAVENDALE - MILK	MORRISONS - FRESH VEGETABLES	TETLEY GREEN TEA RGE
DALE FARM - ONE PERCENT MILK	MORRISONS - FRUIT	TIPPERARY - NATURAL MINERAL WATER
DANONE - ACTIMEL	MORRISONS - FRUIT & VEG	TREBOR BASSETT - EXTRA STRONG GUM
DANONE - ACTIVIA FIBRE YOGHURT RGE	MORRISONS - HADDOCK FILLETS	TRIDENT - SUGARFREE GUM
DANONE - ACTIVIA INTENSELY CREAMY	MORRISONS - JERSEY ROYALS	TROPICANA
DANONE - ACTIVIA YOGURTS RGE	MORRISONS - KING PRAWNS	TWININGS - ENGLISH BREAKFAST TEA
DANONE - BIO ACTIVIA YOGHURT	MORRISONS - PG TIPS	TWININGS - LADY GREY TEA
DANONE DANACOL YOGHURT	MORRISONS - PRINCES RED SALMON	TWININGS - SPECIALITY TEA
DANONE DANONINO	MORRISONS - SALMON FILLETS	TWININGS - TEA RANGE
DANONE SHAPE YOGURT	MORRISONS - SCOTCH BEEF	TWININGS EVERY DAY TEA
DENNY IRE - HAM	MULLER - CORNER HEALTHY BALANCE YOG	TYPHOO TEA
DOLMIO - BOLOGNESE SAUCE	MULLER - LITTLE STARS RGE	UNCLE BENS - BOIL IN A BAG RICE
DOLMIO - LASAGNE SAUCE RGE	MULLER - MULLER LIGHT YOGHURT	VOLVIC
DOLMIO - MY DOLMIO KIDS RGE	MULLER - MULLERICE	WARBURTONS BREAD
DOLMIO - SAUCE RANGE	MUNCH BUNCH - DOUBLE UP YOGHURT	WARBURTONS CRUMPETS
DOLMIO - STIR IN SAUCE	MUNCH BUNCH - YOGHURTS	WEETABIX - ALPEN BARS
DOUWE EGBERTS - INSTANT COFFEE	NESCAFE - COFFEE RGE	WEETABIX - ALPEN CEREAL
DOUWE EGBERTS - PURE GOLD INSTANT	NESCAFE - INTENSE AROMA COLLN	WEETABIX - BITESIZE WHOLEGRAIN
DR STUARTS - TEAS	NESCAFE - ORIGINAL	WEETABIX - CEREAL
ELLAS KITCHEN - ORGANIC PASTA SAUCE	NESCAFE GOLD BLEND	WEETABIX - MINIS
ELLAS KITCHEN - SMOOTHIE FRUITS	NESTLE - SHREDDED WHEAT BITESIZE	WEETABIX - OATIBIX BITESIZE CEREAL
EVIAN WATER	NESTLE - SHREDDED WHEAT CEREAL	WEETABIX - OATY BARS RGE
FEEL GOOD DRINKS CO - RGE	NETTO - PRINCES CHOPPED TOMATOES	WEETABIX READY BREK
FINDUS - PASTA MEALS	NEW YORK BAGELS	WEETABIX WEET-OS
FLAHAUVANS N IRE - PORRIDGE OATS	NEW YORK BAKERY - BAGELS	WELSH LAMB & BEEF PROMOTIONS - BEEF
FLAHAUVENS PORRIDGE	NOORJAHAN - BASMATI RICE	WESTMILL FOODS - HABIB BASMATI RICE
FLORETTE - CRISPY SALAD	NUTRICIA - APTAMIL MILK	WILSONS COUNTRY - GDN POTATOES
FYFFES BANANAS	OCEAN SPRAY - CRANBERRY JUICE RANGE	WRIGLEY - 5 CHEWING GUM RGE
GALAXY - PROBIOTIC DRINK	OMSCO ORGANIC MILK - PROD RGE	WRIGLEY - EXTRA CHEWING GUM
GATORADE	OXO - CONCENTRATED LIQUID STOCK	WRIGLEY - ORBIT COMPLETE
GOOD EARTH - ORGANIC TEA	PEPSI MAX	YOPLAIT - FRUBES LTD EDITION
GREEN GIANT - SOUP RGE	PG TIPS	YOPLAIT - MIXED SEEDS YOGHURT RGE
GREEN GIANT - SWEET CORN	POT NOODLE CO - POT NOODLE RGE	YOPLAIT - PETITS FILOUS
GREGGS BAKERS - OVAL BITES SANDWHIC	POWERADE	YOPLAIT - PETITS FILOUS FRUBES
HAPPY EGG CO - FREE RGE EGGS	QUAKER - OATSO SIMPLE	YOPLAIT - WILDLIFE FROMAGE FRAIS

HEINZ - BEANZ SNAP POTS	QUAKER OATS - PAW RIDGE	YOUNGS - CHIP SHOP FISH FILLET
HEINZ BAKED BEANS	QUAL MEAT SCOT - SCOTCH LAMB	YOUNGS - NATURALLY DELICIOUS FISH
HOVIS	QUORN - MINCE	

Note: Brands in bold denote those wholly certified as non-HFSS or a mix of certified and estimated non-HFSS. Brands not in bold are wholly estimated to be non-HFSS.

*McDonald's commercials which are certified as non-HFSS have been included in this definition

Figure A10: 2009 HFSS proxy – Brands assessed as HFSS

HFSS brands		
AERO - BUBBLES	JORDANS - COUNTRY CRISP CEREAL	NESTLES MILKY BAR
AERO - CHOCOLATE BAR	KAVLI PRIMULA CHEESE	OAKHOUSE FOODS - FROZEN MEAL
AFTER EIGHT - CHOCOLATE MINTS	KELLOGGS - BRAN FLAKES	OCEAN SPRAY - CRANBERRY JUICE
ALPRO - SOYA RGE	KELLOGGS - CEREAL RANGE	OLD EL PASO - CRISPY CHICKEN FAJITA
AMBROSIA - CRUMBLE PUDS RGE	KELLOGGS - COCO POPS MOONS & STARS	OLD EL PASO - ENCHILADAS
AMBROSIA - JELLY PUDS	KELLOGGS - CRUNCHY NUT BITES	OLD EL PASO - FAJITA DINNER KIT
ANCHOR BUTTER	KELLOGGS - NUTRI GRAIN BAR	OLD EL PASO - STAND N STUFF TACO KI
ARLA FOODS - LURPAK BUTTER RGE	KELLOGGS - NUTRI GRAIN ELEVENSES	OLD JAMAICA - GINGER BEER
ARLA FOODS - LURPAK SPREADABLE	KELLOGGS - RICE KRISPIES	ORMO BREAD
ASDA - CHOCOLATES	KELLOGGS - RICE KRISPIES SQUARES	PAKEEZA DAIRIES - DAIRY PROD RGE
ASDA - CHRISTMAS PUDDING	KELLOGGS - SPEC K CEREAL	PAPA JOHNS - PIZZA RESTR CHAIN
ASDA - CRISPS RGE	KELLOGGS - SPEC K CEREAL RGE	PATAKS INDIAN CUSINE
ASDA - DRINKS RGE	KELLOGGS - SPEC K FRUIT & NUT CLUST	PEPERAMI - BBQ PEPERAMI
ASDA - EASTER EGGS	KELLOGGS - SPEC K MINI BREAKS	PERFETTI VAN MELLE - FRUIT TELLA
ASDA - EXTRA SPEC CHOC RASP BOMB	KELLOGGS - SPEC K OATS & HONEY	PHILEAS FOGG
ASDA - EXTRA SPEC MINCE PIES	KELLOGGS - SPECIAL K BLISS CEREAL	PILGRIMS CHOICE EXTRA MATURE
ASDA - FROZEN FOOD RGE	KELLOGGS CEREAL BARS	PIZZA HUT - RESTR CHAIN
ASDA - HELLMANNS MAYONNAISE	KELLOGGS COCO POPS	PIZZA RISTORANTE
ASDA - ICE CREAM & LOLLIES	KELLOGGS COCO POPS COCO ROCKS	POOJA - FOOD RGE
ASDA - MEAT RGE	KELLOGGS CORN FLAKES	POOLES WIGAN - PIES RGE
ASDA - PARTY FOOD RGE	KELLOGGS CRUNCHY NUT	PRINGLES - CRISPS
ATKINS - DAY BREAK BAR RGE	KELLOGGS CRUNCHY NUT CLUSTERS	QUAKER SNACK A JACKS
BAHLEN - CHOCO LEIBNIZ BISCUITS	KELLOGGS FROSTIES	QUICK ENERGY - DRINK
BARRS IRN BRU	KELLOGGS SPECIAL K CEREAL BAR	RED BULL
BATCHELORS BEANS	KELLOGGS SPECIAL K RED BERRIES	RELENTLESS - ENERGY DRINK
BENECOL - FOOD RGE	KELLOGGS - RICE KRISPIES/CORNFLAKES	RELENTLESS - ENERGY SHOT
BERTOLLI - SPREAD	KELLOGGS - CLOTTED CREAM ICE CREAM	RIBENA - DRINKS RANGE
BETTY CROCKER CAKE MIX	KERRY EASI SINGLES	RICHMOND SAUSAGES
BIKANO FOODS - PROD RGE	KERRY FDS LOW LOW/SP	ROBINSONS - BE NAT
BIRDS EYE - PROD RGE	KERRY FOODS - DENNYS SLICED MEATS	ROBINSONS - CORDIALS RGE
BIRDS EYE - SALMON FISH FINGERS	KERRY FOODS - GOLD MEDAL MEAT	ROBINSONS - JUICE RGE
BIRDS EYE STEAKHOUSE	KERRY FOODS - LOW LOW CHEESE	ROOK & SONS BUTCHERS
BISTO	KERRYGOLD BUTTER	ROWN/QUAL STREET
BLITZ - ENERGIZER SHOTS	KETTLE FOODS - KETTLE CHIPS	ROWNTREES - RANDOMS
BOURSIN CHEESE	KFC KENTUCKY FRIED CHICKEN - RESTR	ROYAL SWEETS - INDIAN SWEETS
BRAND POWER - JUS ROL PASTRY	KILMEADEN - CHEESE	RUBICON - WATERMELON JUICE
BRAND POWER - SCHWARTZ FLAVOURFUL	KINGSBURY BUTCHER - BUTCHER	RUBICON EXOTIC - MANGO JUICE DRINK
BRITVIC - DRENCH WATER	KITKAT - CHOCOLATE BAR	RUSTLERS - MICROWAVE FOOD RGE
BRITVIC J20	KITKAT - CHUNKY CARAMEL BAR	RYVITA - PROD RGE
BURGER KING - RESTR CHAIN	KITKAT - SENSES	S&S HALAL MEATS - GROCERS
BURN - ENERGY DRINK	KNORR - SOUP RANGE	SACLA - CLASSIC PESTO
C&B - BRANSTON RELISH RGE	KNORR - STOCK POT BEEF	SAINSBURYS - BACON

CADBURY - CHOCOLATE BAR RGE	KNORR - STOCK POT RGE	SAINSBURYS - BEEF
CADBURY - CLUSTERS	KOOL CAKES - BAKERY	SAINSBURYS - BEN & JERRYS ICE CREAM
CADBURY - CREME EGG	KP HULA HOOPS	SAINSBURYS - BISCUITS
CADBURY - CREME EGG TWISTED	KP REAL MCCOYS	SAINSBURYS - BRIT SWEETCORN
CADBURY - DIGESTIVES	KRAFT - DAIRYLEA CHEDDAR SLICES	SAINSBURYS - BUTCHERS CHOICE SAUSAG
CADBURY CRUNCHIE	KRAFT - DAIRYLEA DUNKERS	SAINSBURYS - CARTE DOR RGE
CADBURY DAIRY MILK	KRAFT - DAIRYLEA DUNKERS FROMAGE	SAINSBURYS - CEREAL RGE
CADBURY WISPA	KRAFT - DAIRYLEA DUNKERS RITZ	SAINSBURYS - EASTER EGG RGE
CAMPBELLS - GATEAUX	KRAFT - DAIRYLEA TRIANGLES	SAINSBURYS - FROZEN FOOD RGE
CAMPBELLS OXO CUBES	KRAFT - MIKADO BISCUIT STICKS	SAINSBURYS - FUN SIZE CHOC PACKS
CANTRELL & COCHRANE - CLUB ENERGISE	KRAFT - PHILADELPHIA CHEESE	SAINSBURYS - HOT CROSS BUNS
CATHEDRAL CITY - CHEDDAR CHEESE	KRAFT - PHILADELPHIA LIGHT BASIL	SAINSBURYS - KELLOGGS COCO POPS
CATHEDRAL CITY - LIGHTER CHEESE	KRAFT - PHILADELPHIA LIGHT CHIVES	SAINSBURYS - LAMB
CEREAL PART - WHOLEGRAIN AWARENESS	KRAFT LIGHT PHILI	SAINSBURYS - MEAT
CHARLEVILLE CHEESE	KRAFT PHILADELPHIA GARLIC & HERB	SAINSBURYS - MINCE PIES
CLOVER	KRAFT PHILADELPHIA SPLENDIPS	SAINSBURYS - NESTLE CEREAL RGE
COCA COLA - COKE RGE	KWALITY FOODS - FOOD RGE	SAINSBURYS - NESTLE CHEERIOS
COCA COLA - DRINKS RGE	LACTALIS - PRESIDENT EMMENTAL CHEES	SAINSBURYS - PARTY FOOD
COCA COLA - ORIGINAL COKE	LAUGHING COW - GIGGLES CHEESE	SAINSBURYS - PEPSI
COOKSTOWN MEATS	LAUGHING COW - PROD RGE	SAINSBURYS - QUAL STREET
COOP - BEEF	LE GRUYERE - EURO CURLING CHAMPS	SAINSBURYS - RUMP STEAK
COOP - COCA COLA RGE	LEERDAMMER CHEESE	SAINSBURYS - SIRLOIN STEAK
COOP - GAMMON	LIDL - ALFREDO PIZZAS	SAINSBURYS - TASTE DIFF MINCE
COUNTRY LIFE - BUTTER RGE	LIDL - BACON RGE	SAINSBURYS - TASTE DIFF PORK
COUNTRY LIFE - ENGLISH BUTTER	LIDL - FROZEN FOOD RGE	SAINSBURYS - WALKERS CRISPS
COVENT GARDEN SOUP	LIDL - GOODY MUESLI	SAINSBURYS PORK SAUS
COW & GATE - OLVARIT RANGE	LIDL - READY MEALS RGE	SCHWAN - CHICAGO TOWN DEEP DISH
COW & GATE - PROD RGE	LINDT - EXCELLENCE CHOCOLATE RGE	SCHWAN - CHICAGO TOWN PIZZA
DAIRY COUN N IRE	LINDT - GOLD BUNNY	SCHWAN - CHICAGO TOWN TAKEAWAY PIZZ
DAIRY CREST - CLOVER LIGHTER	LINDT - LINDOR CHOCOLATE	SCHWEPPEES - GINGER ALE
DAIRY GOLD	LINDT CHOCOLATE	SCHWEPPEES - INDIAN TONIC WATER
DAIRYGOLD - BACON	LO SALT	SCHWEPPEES - TONIC
DAIRYGOLD - GALTEE MEATS	LOYD GROSSMAN - SAUCE RGE	SHANA - ETHNIC FOOD PROD RGE
DAIRYGOLD - SPREAD	LUCOZADE - DRINK	SHARWOODS - BIRYANI SAUCE RGE
DALE FARM	LUCOZADE - SPORT	SHARWOODS - SAUCE RGE
DANONE VITALINEA	LUCOZADE ENERGY	SHAZAN FOODS - PROD RGE
DENNY IRE - BACON	LURPAK - SPREADABLE UNSALTED	SIMON HOWIE - BUTCHERS
DENNY IRE - MEAT RGE	M&S - INDIAN FOOD RGE	SNICKERS - BAR
DENNYS - COOKED MEATS	M&S - PARTY FOOD	SOMERFIELD - BACON
DENNYS - SAUSAGES	MACKIES ICE CREAM	SOMERFIELD - CADBURY ROSES
DIET CHEF - READY MEALS	MAINE MINERAL WATER COMPANY	SOMERFIELD - CATHEDRAL CITY
DOMINOS PIZZA - RESTR CHAIN	MALTESERS - SWEETS	SOMERFIELD - COCA COLA RGE
DON CARLOS OLIVE OIL	MARMITE - SQUEEZE ME SPREAD	SOMERFIELD - CRUMBED HAM
DONEGAL CATCH - SEAFOOD RGE	MARS - CELEBRATIONS	SOMERFIELD - DANEPAK BACON
DR OETKER - HOME CAKE BAKING RGE	MARS - CHOCOLATE DRINKS RGE	SOMERFIELD - GOLDEN WONDER CRISPS
DR OETKER - TARTE CAKE MIXES	MARS - CHOCOLATE RGE	SOMERFIELD - GOODFELLAS PIZZA
DR PEPPER	MARS - GOURMET HOT CHOCOLATE RGE	SOMERFIELD - HONEY ROAST HAM
ELEPHANT CHAPATI FLR	MARS - M&MS	SOMERFIELD - LURPAK
ERIN FOODS - SOUP	MARS - MARS BAR	SOMERFIELD - MCVITIES DIGESTIVES
FANTA - DRINK	MARS - PLANETS	SOMERFIELD - MCVITIES VICTORIA BISC

FANTA - ORANGE	MARS - PROD RGE	SOMERFIELD - NESTLE DAIRY BOX
FARMFOODS - FROZEN FOOD RANGE	MARYLAND - CHOC CHIP COOKIES	SOMERFIELD - NESTLE QUAL STREET
FERRERO - KINDER BUENO	MASH DIRECT - PROD RGE	SOMERFIELD - PEPSI RGE
FERRERO - KINDER BUENO WHITE	MATTESSONS - FRIDGE RAIDERS CHICKEN	SOMERFIELD - PRINGLES
FERRERO - NUTELLA	MATTESSONS - PROD RGE	SOMERFIELD - TERRYS ALL GOLD CHOC
FERRERO ROCHER CHOC	MATTESSONS - SMOKED PORK SAUSAGE	SOMERFIELD - UNSMOKED GAMMON
FERRERO TIC TAC	MATTHEW WALKER - CHRISTMAS PUDDING	SOMERFIELD - WALKERS CRISPS
FILIPPO BERIO	MCDONALDS - RESTR CHAIN*	SOMERFIELD - WALKERS SENSATIONS
FIVE ALIVE FRT DRINK	MCLELLAND SERIOUSLY STRONG CHEDDAR	SOUNAS - ETHNIC BREAD RGE
FLORA - BUTTERY SPREAD	MCVITIES - BISCUITS RANGE	SPAM - FRITTERS
FLORA - MARGARINE	MCVITIES - DIGESTIVE RGE	SPRITE
FLORA - PRO ACTIV RGE	MCVITIES - GO AHEAD YOGHURT BREAKS	ST.AGUR CHEESE
FLORA - PRO ACTIV SPREAD	MCVITIES - MINI CHOCOLATE DIGESTIVE	STARBURST - SWEETS
FOOD MASTERS - GIA GARLIC PUREE	MCVITIES GO AHEAD	STRATHROY - FRESH CREAM
FOX'S BISCUITS	MENTOS - PURE FRESH GUM	SUBWAY SANDWICH SHOP
FOX'S BISCUITS ROCKY	MI WADI	SUNCREST - FRUIT DRINKS RGE
FOXES - GOLDEN CRUNCH BISCUITS	MIGHTY SPICE CO - SPICE RGE	SUNSWEET PRUNES
FRUITFIELD CHEF KETCHUP	MILKY WAY - CONFICTIONERY	SURYA FOODS - PROD RGE
GALAXY - BOOK CLUB	MILLIONS	SUSSEX FARMHOUSE MEALS - DELIVERY
GALAXY - CHOCOLATE	MINI BABYBEL - CHEESE	TABASCO
GALAXY - MINSTRELS CHOCOLATES	MINI CHEDDARS	TERRYS CHOC ORANGE
GALBANI - SANTA LUCIA MAXI MOZZAREL	MISS MILLIES	TESCO - ADVENT CALENDARS
GALTEE PROD RGE	MISSION FOODS - FOOD RGE	TESCO - CHRISTMAS PUDDING
GEN MILLS - WANCHAI FERRY RECIPE KI	MORRISONS - BEN & JERRYS ICE CREAM	TESCO - FROZEN FOOD RGE
GINSTERS - CORNISH PASTY	MORRISONS - BRANSTON BAKED BEANS	TESCO - PREPARED PARTY FOOD RGE
GINSTERS - PIES RGE	MORRISONS - BRIT LAMB CHOPS	TESCO - THORNTONS CLASSIC CHOCOLATE
GIOVANNI RANA - PASTA RGE	MORRISONS - BRIT PORK	TESCO EASTER EGGS
GLANBIA - PETIT FILOUS YOGHURT	MORRISONS - BRIT RUMP STEAK	TGI FRIDAYS
GOLDEN COW BUTTER	MORRISONS - CADBURY ASSORTED BISCUITS	THORNTONS - CHOCOLATE RGE
GOLDEN VALE - CHEESTRINGS SNACK	MORRISONS - CADBURY ROSES	TOBLERONE - TOBELLE
GREGGS BAKERS - CHEESE & ONION PAST	MORRISONS - CADBURY SELECTION BOX	TOPPS - JUICY DROP POP
GREGGS BAKERS - CHILLI STEAK LATTIC	MORRISONS - CADBURY TREAT SIZE PACK	TOPPS - PUSH POP SLIDERZ
GREGGS BAKERS - CHOCOLATE MUFFINS	MORRISONS - CHICKEN	TOPPS MEGA MOUTH
GREGGS BAKERS - PROD RGE	MORRISONS - CHOCOLATES	TUNNOCKS - CARAMEL LOG
GREGGS BAKERS - SPOOKY RING BUNS	MORRISONS - EASTER EGGS	TUNNOCKS - CARAMEL WAFER
GREGGS BAKERS - STEAK BAKE	MORRISONS - GOODFELLAS PIZZA	TWIX - BAR
GREGGS BAKERS - YUM YUMS	MORRISONS - I CANT BELIEVE ITS NOT	UNCLE BENS - COOKING SAUCES
GUYLIAN CHOCOLATES	MORRISONS - MCVITIES BISCUITS	UNCLE BENS - EXPRESS RICE
HAAGEN DAZS - ICE CREAM	MORRISONS - MCVITIES JAFFA CAKES	UNCLE BENS - INDIAN SAUCES
HAAGEN DAZS - ICE CREAM SMOOTHIE	MORRISONS - MEAT RANGE	UNCLE BENS - ORIENTAL SAUCES
HALF POUNDERS - CONF RGE	MORRISONS - MR KIPLING MINCE PIES	UNCLE BENS - RISOTTO
HARIBO - SMALL PACKET SWEET RGE	MORRISONS - MULLER RGE	UNCLE BENS - SAUCE & RICE
HARIBO - STARMIX	MORRISONS - PHILEAS FOGG SNACK RGE	UNCLE BENS - STIR FRY RGE
HAZELBROOK FARM - ICE CREAM	MORRISONS - PORK RGE	UNCLE BENS - WOK RICE
HEINZ	MORRISONS - PUFF PASTRY MINCE PIES	UNILEVER - SAT FAT NATION DEBATE
HEINZ SALAD CREAM	MORRISONS - ROBINSONS DRINKS RGE	VB WHOLESALE - CONFECTIONERY
HEINZ TOMATO KETCHUP	MORRISONS - WALKERS CRISPS	VIMTO CORDIAL
HELLMANN'S - DRESSINGS RGE	MORRISONS PARTY	WALKERS - DORITOS
HELLMANN'S - LIGHT MAYONNAISE	MR KIPLING	WALKERS - DORITOS CORN CHIPS & DIPS

HELLMANN'S - REAL MAYONNAISE	MULLER - CORNER YOGURT RGE	WALKERS - RED SKY CRISPS RGE
HONEY MONSTER - HARVEST CHEWEE BAR	MULLER - FRUIT CORNER YOGHURT	WALKERS - SENSATIONS CRISPS RGE
HORMEL FOODS SPAM	MULLER MASTERBRAND	WALKERS CRISPS
HOTEL CHOCOLAT - PROD RGE	NABISCO - OREO COOKIES	WALLS - CARTE DOR CARAMEL CINNAMON
I CANT BELIEVE/BUTTR	NAT CONFECTIONERY CO - SWEET RGE	WALLS - MAGNUM BOXED TEMPTATION RGE
ICELAND - FROZEN DESSERT RGE	NATURE VALLEY - CRUNCHY GRANOLA	WALLS - MAGNUM MINI
ICELAND - ICE CREAM	NESTLE - CEREAL RGE	WALLS - SAUSAGE RGE
ICELAND - PARTY FOODS	NESTLE - HONEY OATS & MORE CEREAL	WALLS CARTE D'OR
ICELAND - PIZZA	NESTLE - OAT CHEERIOS	WELCHS - PURPLE GRAPE JUICE
ICELAND - PLATTERS RGE	NESTLE - OATS & MORE RGE	WENSLEYDALE DAIRY PROD - CHEESE RGE
ICELAND - PRAWNS	NESTLE - RAISIN OATS & MORE CEREAL	WYKE FARMS - CHEDDAR CHEESE RGE
ICELAND - QUARTER POUND	NESTLE - SHREDDIES CEREAL	WYKE FARMS - JUST DELICIOUS XM CHDR
ICELAND - READY MEAL RGE	NESTLE - WHOLE GRAIN CEREAL RGE	YAKULT YOGHURT
IRWINS BAKERY	NESTLE CHEERIOS	YOPLAIT - PROD RGE
JACOBS CREAM CRACKER		

**McDonald's commercials which are certified as non-HFSS have been excluded from this definition*

Products of appeal to children

- A4.23 Given that not all food and drink advertising, whether for HFSS or non-HFSS products, is likely to be targeted at children and in the light of concerns that HFSS advertising makes a modest contribution to forming children's food preferences, we also sought to assess how much of the HFSS advertising that they saw was for 'brands' likely to appeal to them.
- A4.24 Clearly, any such assessment must be subjective, and can only be regarded as indicative. Nevertheless, we considered that it would be helpful to understand in broad terms the balance between HFSS adverts likely to appeal to both children and adults and those likely to appeal to adults only. It is difficult to make similar judgements about adverts only likely to appeal to children as adults may be as fond of particular brands, such as Kelloggs Coco Pops or Mars M&Ms, as children.
- A4.25 Taking the 'brands' classified as HFSS or non-HFSS (as listed in Figures A9 & A10 above) we assessed each 'brand' label to make a judgement on whether the products were likely to appeal to all audiences or adults only. The classification of these 'brands' is listed in Figures A11 and A12.

Figure A11: HFSS brands (based on the 2009 HFSS proxy) assessed as likely to appeal to all audiences

HFSS brands of appeal to all		
AERO - BUBBLES	KELLOGGS - CRUNCHY NUT BITES	NESTLE - RAISIN OATS & MORE CEREAL
AERO - CHOCOLATE BAR	KELLOGGS - NUTRI GRAIN BAR	NESTLE - SHREDDIES CEREAL
AFTER EIGHT - CHOCOLATE MINTS	KELLOGGS - NUTRI GRAIN ELEVENSES	NESTLE - WHOLE GRAIN CEREAL RGE
AMBROSIA - CRUMBLE PUDDS RGE	KELLOGGS - RICE KRISPIES	NESTLE CHEERIOS
AMBROSIA - JELLY PUDDS	KELLOGGS - RICE KRISPIES SQUARES	NESTLES MILKY BAR
ASDA - CHOCOLATES	KELLOGGS CEREAL BARS	OAKHOUSE FOODS - FROZEN MEAL
ASDA - CHRISTMAS PUDDING	KELLOGGS COCO POPS	OCEAN SPRAY - CRANBERRY JUICE
ASDA - CRISPS RGE	KELLOGGS COCO POPS COCO ROCKS	OLD JAMAICA - GINGER BEER
ASDA - DRINKS RGE	KELLOGGS CORN FLAKES	PAKEEZA DAIRIES - DAIRY PROD RGE
ASDA - EASTER EGGS	KELLOGGS CRUNCHY NUT	PAPA JOHNS - PIZZA RESTR CHAIN

ASDA - EXTRA SPEC CHOC RASP BOMB	KELLOGGS CRUNCHY NUT CLUSTERS	PEPERAMI - BBQ PEPERAMI
ASDA - EXTRA SPEC MINCE PIES	KELLOGGS FROSTIES	PERFETTI VAN MELLE - FRUIT TELLA
ASDA - FROZEN FOOD RGE	KELLYS - CLOTTED CREAM ICE CREAM	PHILEAS FOGG
ASDA - ICE CREAM & LOLLIES	KERRY EASI SINGLES	PIZZA HUT - RESTR CHAIN
ASDA - PARTY FOOD RGE	KETTLE FOODS - KETTLE CHIPS	PIZZA RISTORANTE
ATKINS - DAY BREAK BAR RGE	KFC KENTUCKY FRIED CHICKEN - RESTR	PRINGLES - CRISPS
BAHLESEN - CHOCO LEIBNIZ BISCUITS	KITKAT - CHOCOLATE BAR	QUICK ENERGY - DRINK
BARRS IRN BRU	KITKAT - CHUNKY CARAMEL BAR	RED BULL
BATCHELORS BEANS	KITKAT - SENSES	RELENTLESS - ENERGY DRINK
BETTY CROCKER CAKE MIX	KOOL CAKES - BAKERY	RELENTLESS - ENERGY SHOT
BIKANO FOODS - PROD RGE	KP HULA HOOPS	RIBENA - DRINKS RANGE
BIRDS EYE - PROD RGE	KP REAL MCCOYS	RICHMOND SAUSAGES
BIRDS EYE - SALMON FISH FINGERS	KRAFT - DAIRYLEA CHEDDAR SLICES	ROBINSONS - BE NAT
BIRDS EYE STEAKHOUSE	KRAFT - DAIRYLEA DUNKERS	ROBINSONS - CORDIALS RGE
BLITZ - ENERGIZER SHOTS	KRAFT - DAIRYLEA DUNKERS FROMAGE	ROBINSONS - JUICE RGE
BRITVIC - DRENCH WATER	KRAFT - DAIRYLEA DUNKERS RITZ	ROWNTREES - RANDOMS
BRITVIC J20	KRAFT - DAIRYLEA TRIANGLES	ROYAL SWEETS - INDIAN SWEETS
BURGER KING - RESTR CHAIN	KRAFT - MIKADO BISCUIT STICKS	RUBICON - WATERMELON JUICE
BURN - ENERGY DRINK	KWALITY FOODS - FOOD RGE	RUBICON EXOTIC - MANGO JUICE DRINK
CADBURY - CHOCOLATE BAR RGE	LAUGHING COW - GIGGLES CHEESE	RUSTLERS - MICROWAVE FOOD RGE
CADBURY - CLUSTERS	LAUGHING COW - PROD RGE	SAINSBURYS - BEN & JERRYS ICE CREAM
CADBURY - CREME EGG	LIDL - ALFREDO PIZZAS	SAINSBURYS - BISCUITS
CADBURY - CREME EGG TWISTED	LIDL - FROZEN FOOD RGE	SAINSBURYS - BUTCHERS CHOICE SAUSAG
CADBURY - DIGESTIVES	LIDL - READY MEALS RGE	SAINSBURYS - CARTE DOR RGE
CADBURY CRUNCHIE	LINDT - EXCELLENCE CHOCOLATE RGE	SAINSBURYS - CEREAL RGE
CADBURY DAIRY MILK	LINDT - GOLD BUNNY	SAINSBURYS - EASTER EGG RGE
CADBURY WISPA	LINDT - LINDOR CHOCOLATE	SAINSBURYS - FROZEN FOOD RGE
CAMPBELLS - GATEAUX	LINDT CHOCOLATE	SAINSBURYS - FUN SIZE CHOC PACKS
CANTRELL & COCHRANE - CLUB ENERGISE	LUCOZADE - DRINK	SAINSBURYS - HOT CROSS BUNS
CEREAL PART - WHOLEGRAIN AWARENESS	LUCOZADE - SPORT	SAINSBURYS - KELLOGGS COCO POPS
COCA COLA - COKE RGE	LUCOZADE ENERGY	SAINSBURYS - MINCE PIES
COCA COLA - DRINKS RGE	M&S - INDIAN FOOD RGE	SAINSBURYS - NESTLE CEREAL RGE
COCA COLA - ORIGINAL COKE	M&S - PARTY FOOD	SAINSBURYS - NESTLE CHEERIOS
COOP - COCA COLA RGE	MACKIES ICE CREAM	SAINSBURYS - PARTY FOOD
DENNYS - SAUSAGES	MALTESERS - SWEETS	SAINSBURYS - PEPSI
DOMINOS PIZZA - RESTR CHAIN	MARMITE - SQUEEZE ME SPREAD	SAINSBURYS - QUAL STREET
DR OETKER - HOME CAKE BAKING RGE	MARS - CELEBRATIONS	SAINSBURYS - WALKERS CRISPS
DR OETKER - TARTE CAKE MIXES	MARS - CHOCOLATE DRINKS RGE	SAINSBURYS PORK SAUS
DR PEPPER	MARS - CHOCOLATE RGE	SCHWAN - CHICAGO TOWN DEEP DISH
FANTA - DRINK	MARS - GOURMET HOT CHOCOLATE RGE	SCHWAN - CHICAGO TOWN PIZZA
FANTA - ORANGE	MARS - M&MS	SCHWAN - CHICAGO TOWN TAKEAWAY PIZZ
FARMFOODS - FROZEN FOOD RANGE	MARS - MARS BAR	SCHWEPPESS - GINGER ALE
FERRERO - KINDER BUENO	MARS - PLANETS	SNICKERS - BAR
FERRERO - KINDER BUENO WHITE	MARS - PROD RGE	SOMERFIELD - CADBURY ROSES

FERRERO - NUTELLA	MARYLAND - CHOC CHIP COOKIES	SOMERFIELD - COCA COLA RGE
FERRERO ROCHER CHOC	MASH DIRECT - PROD RGE	SOMERFIELD - GOLDEN WONDER CRISPS
FERRERO TIC TAC	MATTESSONS - PROD RGE	SOMERFIELD - GOODFELLAS PIZZA
FIVE ALIVE FRT DRINK	MATTHEW WALKER - CHRISTMAS PUDDING	SOMERFIELD - MCVITIES DIGESTIVES
FOX'S - GOLDEN CRUNCH BISCUITS	MCDONALDS - RESTR CHAIN*	SOMERFIELD - MCVITIES VICTORIA BISC
FOX'S BISCUITS	MCVITIES - BISCUITS RANGE	SOMERFIELD - NESTLE DAIRY BOX
FOX'S BISCUITS ROCKY	MCVITIES - DIGESTIVE RGE	SOMERFIELD - NESTLE QUAL STREET
FRUITFIELD CHEF KETCHUP	MCVITIES - GO AHEAD YOGHURT BREAKS	SOMERFIELD - PEPSI RGE
GALAXY - BOOK CLUB	MCVITIES - MINI CHOCOLATE DIGESTIVE	SOMERFIELD - PRINGLES
GALAXY - CHOCOLATE	MCVITIES GO AHEAD	SOMERFIELD - TERRYS ALL GOLD CHOC
GALAXY - MINSTRELS CHOCOLATES	MENTOS - PURE FRESH GUM	SOMERFIELD - WALKERS CRISPS
GALBANI - SANTA LUCIA MAXI MOZZAREL	MI WADI	SOMERFIELD - WALKERS SENSATIONS
GALTEE PROD RGE	MILKY WAY - CONFICTIONERY	SPRITE
GEN MILLS - WANCHAI FERRY RECIPE KI	MILLIONS	STARBURST - SWEETS
GINSTERS - CORNISH PASTY	MINI BABYBEL - CHEESE	SUBWAY SANDWICH SHOP
GINSTERS - PIES RGE	MINI CHEDDARS	SUNCREST - FRUIT DRINKS RGE
GLANBIA - PETIT FILOUS YOGHURT	MISS MILLIES	SURYA FOODS - PROD RGE
GOLDEN VALE - CHEESTRINGS SNACK	MISSION FOODS - FOOD RGE	TERRYS CHOC ORANGE
GREGGS BAKERS - CHEESE & ONION PAST	MORRISONS - BEN & JERRYS ICE CREAM	TESCO - ADVENT CALENDARS
GREGGS BAKERS - CHILLI STEAK LATTIC	MORRISONS - BRANSTON BAKED BEANS	TESCO - CHRISTMAS PUDDING
GREGGS BAKERS - CHOCOLATE MUFFINS	MORRISONS - CADBURY ASSORTED BISCUI	TESCO - FROZEN FOOD RGE
GREGGS BAKERS - PROD RGE	MORRISONS - CADBURY ROSES	TESCO - PREPARED PARTY FOOD RGE
GREGGS BAKERS - SPOOKY RING BUNS	MORRISONS - CADBURY SELECTION BOX	TESCO - THORNTONS CLASSIC CHOCOLATE
GREGGS BAKERS - STEAK BAKE	MORRISONS - CADBURY TREAT SIZE PACK	TESCO EASTER EGGS
GREGGS BAKERS - YUM YUMS	MORRISONS - CHOCOLATES	TGI FRIDAYS
GUYLIAN CHOCOLATES	MORRISONS - EASTER EGGS	THORNTONS - CHOCOLATE RGE
HAAGEN DAZS - ICE CREAM	MORRISONS - GOODFELLAS PIZZA	TOBLERONE - TOBELLE
HAAGEN DAZS - ICE CREAM SMOOTHIE	MORRISONS - MCVITIES BISCUITS	TOPPS - JUICY DROP POP
HALF POUNDERS - CONF RGE	MORRISONS - MCVITIES JAFFA CAKES	TOPPS - PUSH POP SLIDERZ
HARIBO - SMALL PACKET SWEET RGE	MORRISONS - MR KIPLING MINCE PIES	TOPPS MEGA MOUTH
HARIBO - STARMIX	MORRISONS - MULLER RGE	TUNNOCKS - CARAMEL LOG
HAZELBROOK FARM - ICE CREAM	MORRISONS - PHILEAS FOGG SNACK RGE	TUNNOCKS - CARAMEL WAFER
HEINZ	MORRISONS - PUFF PASTRY MINCE PIES	TWIX - BAR
HEINZ TOMATO KETCHUP	MORRISONS - ROBINSONS DRINKS RGE	VB WHOLESALE - CONFECTIONERY
HONEY MONSTER - HARVEST CHEWEE BAR	MORRISONS - WALKERS CRISPS	VIMTO CORDIAL
HOTEL CHOCOLAT - PROD RGE	MORRISONS PARTY	WALKERS - DORITOS
ICELAND - FROZEN DESSERT RGE	MR KIPLING	WALKERS - DORITOS CORN CHIPS & DIPS
ICELAND - ICE CREAM	MULLER - CORNER YOGURT RGE	WALKERS - RED SKY CRISPS RGE
ICELAND - PARTY FOODS	MULLER - FRUIT CORNER YOGHURT	WALKERS - SENSATIONS CRISPS RGE
ICELAND - PIZZA	MULLER MASTERBRAND	WALKERS CRISPS
ICELAND - QUARTER POUND	NABISCO - OREO COOKIES	WALLS - CARTE DOR CARAMEL CINNAMON
ICELAND - READY MEAL RGE	NAT CONFECTIONERY CO - SWEET RGE	WALLS - MAGNUM BOXED TEMPTATION RGE
IRWINS BAKERY	NATURE VALLEY - CRUNCHY GRANOLA	WALLS - MAGNUM MINI
KAVLI PRIMULA CHEESE	NESTLE - CEREAL RGE	WALLS - SAUSAGE RGE

KELLOGGS - BRAN FLAKES	NESTLE - HONEY OATS & MORE CEREAL	WALLS CARTE D'OR
KELLOGGS - CEREAL RANGE	NESTLE - OAT CHEERIOS	WELCHS - PURPLE GRAPE JUICE
KELLOGGS - RICE KRISPIES/CORNFLAKES	NESTLE - OATS & MORE RGE	YOPLAIT - PROD RGE
KELLOGGS - COCO POPS MOONS & STARS	ROWN/QUAL STREET	

**McDonald's commercials which are certified as non-HFSS have been excluded from this definition*

Figure A12: HFSS brands (based on the 2009 HFSS proxy) assessed as likely to appeal to adults only

HFSS brands of appeal to adults		
ALPRO - SOYA RGE	HORMEL FOODS SPAM	ORMO BREAD
ANCHOR BUTTER	ICELAND - PLATTERS RGE	PATAKS INDIAN CUSINE
ARLA FOODS - LURPAK BUTTER RGE	ICELAND - PRAWNS	PILGRIMS CHOICE EXTRA MATURE
ARLA FOODS - LURPAK SPREADABLE	I CANT BELIEVE/BUTTR	POOJA - FOOD RGE
ASDA - HELLMANNS MAYONNAISE	JACOBS CREAM CRACKER	POOLES WIGAN - PIES RGE
ASDA - MEAT RGE	JORDANS - COUNTRY CRISP CEREAL	QUAKER SNACK A JACKS
BENECOL - FOOD RGE	KELLOGGS - SPEC K CEREAL	ROOK & SONS BUTCHERS
BERTOLLI - SPREAD	KELLOGGS - SPEC K CEREAL RGE	RYVITA - PROD RGE
BISTO	KELLOGGS - SPEC K FRUIT & NUT CLUST	S&S HALAL MEATS - GROCERS
BOURGIN CHEESE	KELLOGGS - SPEC K MINI BREAKS	SACLA - CLASSIC PESTO
BRAND POWER - JUS ROL PASTRY	KELLOGGS - SPEC K OATS & HONEY	SAINSBURYS - BACON
BRAND POWER - SCHWARTZ FLAVOURFUL	KELLOGGS - SPECIAL K BLISS CEREAL	SAINSBURYS - BEEF
C&B - BRANSTON RELISH RGE	KELLOGGS SPECIAL K CEREAL BAR	SAINSBURYS - BRIT SWEETCORN
CAMPBELLS OXO CUBES	KELLOGGS SPECIAL K RED BERRIES	SAINSBURYS - LAMB
CATHEDRAL CITY - CHEDDAR CHEESE	KERRY FOODS - DENNY'S SLICED MEATS	SAINSBURYS - MEAT
CATHEDRAL CITY - LIGHTER CHEESE	KERRY FOODS - GOLD MEDAL MEAT	SAINSBURYS - RUMP STEAK
CHARLEVILLE CHEESE	KERRY FOODS - LOW LOW CHEESE	SAINSBURYS - SIRLOIN STEAK
CLOVER	KERRY FDS LOW LOW/SP	SAINSBURYS - TASTE DIFF MINCE
COOKSTOWN MEATS	KERRYGOLD BUTTER	SAINSBURYS - TASTE DIFF PORK
COOP - BEEF	KILMEADEN - CHEESE	SCHWEPPE'S - INDIAN TONIC WATER
COOP - GAMMON	KINGSBURY BUTCHER - BUTCHER	SCHWEPPE'S - TONIC
COUNTRY LIFE - BUTTER RGE	KNORR - SOUP RANGE	SHANA - ETHNIC FOOD PROD RGE
COUNTRY LIFE - ENGLISH BUTTER	KNORR - STOCK POT BEEF	SHARWOODS - BIRYANI SAUCE RGE
COVENT GARDEN SOUP	KNORR - STOCK POT RGE	SHARWOODS - SAUCE RGE
COW & GATE - OLVARIT RANGE	KRAFT - PHILADELPHIA CHEESE	SHAZAN FOODS - PROD RGE
COW & GATE - PROD RGE	KRAFT - PHILADELPHIA LIGHT BASIL	SIMON HOWIE - BUTCHERS
DAIRY COUN N IRE	KRAFT - PHILADELPHIA LIGHT CHIVES	SOMERFIELD - BACON
DAIRY CREST - CLOVER LIGHTER	KRAFT LIGHT PHILI	SOMERFIELD - CATHEDRAL CITY
DAIRY GOLD	KRAFT PHILADELPHIA GARLIC & HERB	SOMERFIELD - CRUMBED HAM
DAIRYGOLD - BACON	KRAFT PHILADELPHIA SPLENDIPS	SOMERFIELD - DANEPAK BACON
DAIRYGOLD - GALTEE MEATS	LACTALIS - PRESIDENT EMMENTAL CHEES	SOMERFIELD - HONEY ROAST HAM
DAIRYGOLD - SPREAD	LE GRUYERE - EURO CURLING CHAMPS	SOMERFIELD - LURPAK
DALE FARM	LEERDAMMER CHEESE	SOMERFIELD - UNSMOKED GAMMON
DANONE VITALINEA	LIDL - BACON RGE	SOUNAS - ETHNIC BREAD RGE
DENNY IRE - BACON	LIDL - GOODY MUESLI	SPAM - FRITTERS
DENNY IRE - MEAT RGE	LO SALT	ST.AGUR CHEESE

DENNYS - COOKED MEATS	LOYD GROSSMAN - SAUCE RGE	STRATHROY - FRESH CREAM
DIET CHEF - READY MEALS	LURPAK - SPREADABLE UNSALTED	SUNSWEEP PRUNES
DON CARLOS OLIVE OIL	MAINE MINERAL WATER COMPANY	SUSSEX FARMHOUSE MEALS - DELIVERY
DONEGAL CATCH - SEAFOOD RGE	MATTESSONS - FRIDGE RAIDERS CHICKEN	TABASCO
ELEPHANT CHAPATI FLR	MATTESSONS - SMOKED PORK SAUSAGE	UNCLE BENS - COOKING SAUCES
ERIN FOODS - SOUP	MCLELLAND SERIOUSLY STRONG CHEDDAR	UNCLE BENS - EXPRESS RICE
FILIPPO BERIO	MIGHTY SPICE CO - SPICE RGE	UNCLE BENS - INDIAN SAUCES
FLORA - BUTTERY SPREAD	MORRISONS - BRIT LAMB CHOPS	UNCLE BENS - ORIENTAL SAUCES
FLORA - MARGARINE	MORRISONS - BRIT PORK	UNCLE BENS - RISOTTO
FLORA - PRO ACTIV RGE	MORRISONS - BRIT RUMP STEAK	UNCLE BENS - SAUCE & RICE
FLORA - PRO ACTIV SPREAD	MORRISONS - CHICKEN	UNCLE BENS - STIR FRY RGE
FOOD MASTERS - GIA GARLIC PUREE	MORRISONS - I CANT BELIEVE ITS NOT	UNCLE BENS - WOK RICE
GIOVANNI RANA - PASTA RGE	MORRISONS - MEAT RANGE	UNILEVER - SAT FAT NATION DEBATE
GOLDEN COW BUTTER	MORRISONS - PORK RGE	WENSLEYDALE DAIRY PROD - CHEESE RGE
HEINZ SALAD CREAM	OLD EL PASO - CRISPY CHICKEN FAJITA	WYKE FARMS - CHEDDAR CHEESE RGE
HELLMANN'S - DRESSINGS RGE	OLD EL PASO - ENCHILADAS	WYKE FARMS - JUST DELICIOUS XM CHDR
HELLMANN'S - LIGHT MAYONNAISE	OLD EL PASO - FAJITA DINNER KIT	YAKULT YOGHURT
HELLMANN'S - REAL MAYONNAISE	OLD EL PASO - STAND N STUFF TACO KI	

Figure A13: Non-HFSS brands (based on the 2009 HFSS proxy) likely to appeal to all audiences

Non-HFSS brands of appeal to all		
AUNT BESSIES - PROD RGE	MCCAIN - RUSTIC OVEN CHIPS	TESCO - HOT CROSS BUNS
BATCHELORS SQUEEZ	MCCAIN - SMILES	TREBOR BASSETT - EXTRA STRONG GUM
BENECOL - FRUIT & DAIRY SMOOTHIE	MCCAIN - SWEET POTATO	TRIDENT - SUGARFREE GUM
BIO SYNERGY - SKINNY WATER	MCCAIN - WEDGES	TROPICANA
BIRDS EYE - OMEGA 3 FISH FINGERS	MCCAIN HOME FRIES	WEETABIX - ALPEN BARS
BIRDS EYE - REGGAE REGGAE CHICKEN C	MCCAIN OVEN CHIPS	WEETABIX - BITESIZE WHOLEGRAIN
BRACE'S BAKERY	MCDONALDS - RESTR CHAIN*	WEETABIX - CEREAL
CAPRI-SUN FRT DRINK	MORRISONS - DRINK RGE	WEETABIX - MINIS
COCA COLA - COCA COLA ZERO	MULLER - LITTLE STARS RGE	WEETABIX - OATIBIX BITESIZE CEREAL
COCA COLA - DIET COKE	MULLER - MULLERICE	WEETABIX - OATY BARS RGE
DOLMIO - MY DOLMIO KIDS RGE	MUNCH BUNCH - DOUBLE UP YOGHURT	WEETABIX READY BREK
ELLAS KITCHEN - SMOOTHIE FRUITS	MUNCH BUNCH - YOGHURTS	WEETABIX WEET-OS
FEEL GOOD DRINKS CO - RGE	OCEAN SPRAY - CRANBERRY JUICE RANGE	WRIGLEY - 5 CHEWING GUM RGE
GATORADE	PEPSI MAX	WRIGLEY - EXTRA CHEWING GUM
GREEN GIANT - SWEET CORN	POT NOODLE CO - POT NOODLE RGE	WRIGLEY - ORBIT COMPLETE
GREGGS BAKERS - OVAL BITES SANDWHIC	POWERADE	YOPLAIT - FRUBES LTD EDITION
HEINZ - BEANZ SNAP POTS	RED BULL - SUGARFREE	YOPLAIT - MIXED SEEDS YOGHURT RGE
HEINZ BAKED BEANS	ROBINSONS - FRUIT SHOOT	YOPLAIT - PETITS FILOUS
INNOCENT - SMOOTHIES	SCHWEPPE OASIS DRINK	YOPLAIT - PETITS FILOUS FRUBES
INNOCENT - SMOOTHIES FOR KIDS	SUNNY DELIGHT	YOPLAIT - WILDLIFE FROMAGE FRAIS
MCCAIN - PROD RGE	SUSO - DRINKS RGE	YOUNGS - CHIP SHOP FISH FILLET

**McDonald's commercials which are certified as non-HFSS have been included in this definition*

Figure A14: Non-HFSS brands (based on the 2009 HFSS proxy) likely to appeal to adults only

Non-HFSS brands of appeal to adults		
ALBERT BARTLETT - ROOSTER POTATOES	GREEN GIANT - SOUP RGE	PG TIPS
ALPRO - SOYA MILK	HAPPY EGG CO - FREE RGE EGGS	QUAKER - OATSO SIMPLE
ALPRO SOYA - LIGHT MILK	HOVIS	QUAKER OATS - PAW RIDGE
ASDA - BREAD RGE	HOVIS - ROLLS RGE	QUAL MEAT SCOT - SCOTCH LAMB
ASDA - FRUIT	HOVIS - SEED SENSATIONS BREAD	QUORN - MINCE
ASDA - RUMP STEAK	ICELAND - FROZEN VEGETABLES	QUORN - PROD RGE
ASDA - TURKEY	ICELAND - KING PRAWN KEBAB SELECTIO	ROOSTER - IRISH POTATOES
AVONMORE SUPERMILK	INNOCENT - VEG POTS	SAINSBURYS - EGGS
BARRYS TEA/GOLD BLEN	ISKLAR - MINERAL WATER	SAINSBURYS - FRESH FRUIT
BARRYS GOLD BLEND TEA	JOHN WEST - NO DRAIN TUNA	SAINSBURYS - GRAPES
BIRDS EYE - FIELD FRESH GDN PEAS	JOHN WEST - TINNED TUNA	SAINSBURYS - JERSEY ROYAL POTATOES
BLUEBERRIES FROM SOUTH - BLUEBERRY	KELLOGGS - OPTIVITA	SAINSBURYS - RED LABEL TEA
BRENNANS BREAD	KENCO - INSTANT COFFEE	SAINSBURYS - SALMON
BROOKE BOND PG TIPS	KENCO - PURE RGE	SAINSBURYS - STRAWBERRIES
BUXTON SPRING WATER	KINGSMILL - 50 50 BREAD	SAINSBURYS - TASTE DIFF KING PRAWNS
COOP - BAKING POTATOES	KINGSMILL - GREAT EVERYDAY BREAD	SAINSBURYS - VEG RGE
COOP - CLEMENTINES	KINGSMILL - LITTLE BIG LOAF RGE	SCOTTISH DAIRY MRKTG - MILK
COOP - COX APPLES	KINGSMILL WHOLEMEAL	SHARWOODS - BOMBAY POTATOES
COOP - FRESH CHICKEN	LACTOFREE - SEMI SKIMMED MILK	SHARWOODS - CANTONESE CURRY SAUCE
COOP - FRESH VEG	LAILA - FLOUR RGE	SHARWOODS - MICROWAVE NOODLES
COOP - HOVIS BREAD	LAVAZZA - ESPRESSO COFFEE	SIMPLY FISH
COOP - JOHN WEST WILD RED SALMON	LIDL - FRUIT & VEG	SMA - FOLLOW ON MILK
COOP - NESCAFE ORIG COFFEE	LITTLE DISH - READY MEALS	SMA - PROGRESS MILK
COOP - PG TIPS	LYONS IRELAND - TEA	SMA - TODDLER MILK
COOP - SALMON	MAXWELL HOUSE	SOMERFIELD - BEEF
COOP - WARBURTONS BREAD	MEAT & LIVESTOCK COMM - MINCE	SOMERFIELD - CHICKEN
COOP - WARBURTONS SLICED WHITE ROLL	MILUPA - APTAMIL FOLLOW ON	SOMERFIELD - COOKED HAM
COW & GATE - BABY BALANCE PORRIDGE	MORRISONS - BREAD RGE	SOMERFIELD - DRY CURED HAM
COW & GATE - BABY BALANCE RGE	MORRISONS - BRIT NEW POTATOES	SOMERFIELD - LEAN STEAK MINCE
COW & GATE - COMP CARE FOLLOW ON	MORRISONS - COD FILLETS	SOMERFIELD - PORK
COW & GATE - COMP CARE GROWING UP	MORRISONS - COX APPLES	SOMERFIELD - POTATOES
CRAVENDALE - MILK	MORRISONS - FRESH FISH RGE	SOMERFIELD - STEAK
DALE FARM - ONE PERCENT MILK	MORRISONS - FRESH SCOT SALMON	SOMERFIELD - STRAWBERRIES
DANONE - ACTIMEL	MORRISONS - FRESH VEGETABLES	SOMERFIELD - TETLEY TEA BAGS
DANONE - ACTIVIA FIBRE YOGHURT RGE	MORRISONS - FRUIT	SOMERFIELD - YOUNGS SALMON FILLETS
DANONE - ACTIVIA INTENSELY CREAMY	MORRISONS - FRUIT & VEG	STARBUCKS COFFEE - COFFEE
DANONE - ACTIVIA YOGURTS RGE	MORRISONS - HADDOCK FILLETS	STRATHMORE - SPRING WATER
DANONE - BIO ACTIVIA YOGHURT	MORRISONS - JERSEY ROYALS	TAYLORS - YORKSHIRE TEA
DANONE DANACOL YOGHURT	MORRISONS - KING PRAWNS	TAYLORS - YORKSHIRE TEA HARD WATER
DANONE DANONINO	MORRISONS - PG TIPS	TETLEY - REDBUSH
DANONE SHAPE YOGURT	MORRISONS - PRINCES RED SALMON	TETLEY GREEN TEA RGE

DENNY IRE - HAM	MORRISONS - SALMON FILLETS	TIPPERARY - NATURAL MINERAL WATER
DOLMIO - BOLOGNESE SAUCE	MORRISONS - SCOTCH BEEF	TWININGS - ENGLISH BREAKFAST TEA
DOLMIO - LASAGNE SAUCE RGE	MULLER - CORNER HEALTHY BALANCE YOG	TWININGS - LADY GREY TEA
DOLMIO - SAUCE RANGE	MULLER - MULLER LIGHT YOGHURT	TWININGS - SPECIALITY TEA
DOLMIO - STIR IN SAUCE	NESCAFE - COFFEE RGE	TWININGS - TEA RANGE
DOUWE EGBERTS - INSTANT COFFEE	NESCAFE - INTENSE AROMA COLLN	TWININGS EVERY DAY TEA
DOUWE EGBERTS - PURE GOLD INSTANT	NESCAFE - ORIGINAL	TYPHOO TEA
DR STUARTS - TEAS	NESCAFE GOLD BLEND	UNCLE BENS - BOIL IN A BAG RICE
ELLAS KITCHEN - ORGANIC PASTA SAUCE	NESTLE - SHREDDED WHEAT BITESIZE	VOLVIC
EVIAN WATER	NESTLE - SHREDDED WHEAT CEREAL	WARBURTONS BREAD
FINDUS - PASTA MEALS	NETTO - PRINCES CHOPPED TOMATOES	WARBURTONS CRUMPETS
FLAHAVANS N IRE - PORRIDGE OATS	NEW YORK BAGELS	WEETABIX - ALPEN CEREAL
FLAHAVENS PORRIDGE	NEW YORK BAKERY - BAGELS	WELSH LAMB & BEEF PROMOTIONS – BEEF
FLORETTE - CRISPY SALAD	NOORJAHAN - BASMATI RICE	WESTMILL FOODS - HABIB BASMATI RICE
FYFFES BANANAS	NUTRICIA - APTAMIL MILK	WILSONS COUNTRY - GDN POTATOES
GALAXY - PROBIOTIC DRINK	OMSCO ORGANIC MILK - PROD RGE	YOUNGS - NATURALLY DELICIOUS FISH
GOOD EARTH - ORGANIC TEA	OXO - CONCENTRATED LIQUID STOCK	

Annex 5

Changes in children's exposure to food and drink advertising

Introduction

- A5.1 In considering whether there has been a change in the amount of HFSS food and drink advertising seen by children between 2005 and 2009 ('the reference period'), it is also useful to look at changes that have occurred in child impacts for all 'food and drink' advertising, of which HFSS advertising is a proportion. This enables us to look at trend data over the time period for the entire food and drinks category. Many of the trends seen at the food and drink category level are reflected in changes to HFSS advertising. This measure, referred to as 'Core Categories' in documents between 2004–2007, was used by Ofcom across all its analysis in this area to understand the entire food and drink market. This was necessary in the absence of any nutrient profiling measures during the initial stages of this work.
- A5.2 This section looks at the following:
- a) how much food and drink advertising children are seeing now, as compared to 2005;
 - b) on which channels/types of channels children are seeing food and drink advertising now compared with 2005; and
 - c) what time of day are children seeing food and drink advertising now compared with 2005.

Data sources

- A5.3 This annex covers all 'food and drink' advertising and is based on the Nielsen product categories listed in Annex 4. In brief, these comprise all food and drink products, including chain (fast food) restaurants, but excluding alcoholic drinks. The amount of food and drink advertising seen by children is measured in 'impacts'⁶⁸.
- A5.4 It should also be noted that by definition all 'food and drink' advertising includes both HFSS and non-HFSS products. This means that even after the introduction of restrictions, food and drink advertising still occurs during airtime when HFSS advertising is restricted.

Key findings

- A5.5 The amount of 'food and drink' advertising children are seeing has fallen since 2005, despite a substantial increase in the number of 'food and drink' advertising spots broadcast over the same period (due in large part to an increase in the number of TV channels). The amount of TV children watch has not changed significantly.
- A5.6 Comparing 2009 to 2005:

⁶⁸ See definition in section 3.

- a) children saw 13% less food and drink advertising overall;
- b) younger children (4-9 year olds) saw 25% less food and drink advertising and older children (10-15 year olds) saw 2% less;
- c) overall children saw 27% less food and drink advertising on the commercial PSB channels but 1% more on commercial non-PSBs;
- d) during children’s airtime, exposure to food and drink advertising fell 92% on commercial PSBs (i.e. children’s slots such as Five’s Milkshake) and by 65% on commercial non-PSBs (i.e. children’s channels such as Nick Jr, and Tiny POP);
- e) children saw 14% less food and drink advertising during adult airtime on the commercial PSB channels. However over the same period exposure to food and drink advertising during adult airtime on commercial non-PSB channels rose 71%. As a result children saw 17% more food and drink advertising overall in adult airtime; and
- f) the growth in food and drink advertising impacts during adult airtime on commercial non-PSB channels was driven by a 279% increase in impacts on commercial PSB portfolio channels, which reflects children’s increased viewing to these services over this period (see section 4).

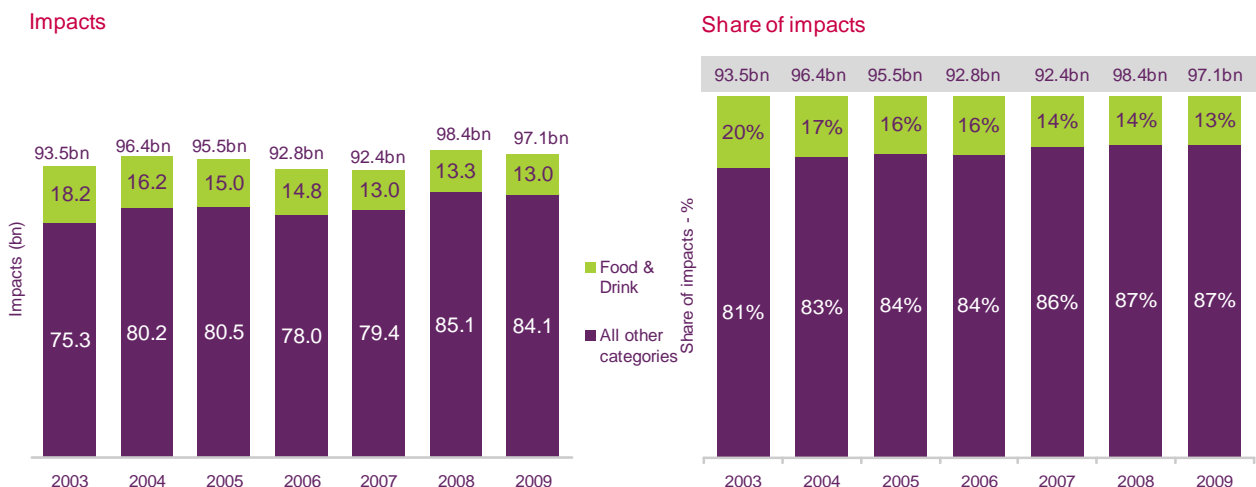
Changes in children’s exposure to food and drink advertising

All Airtime

A5.7 In 2003, the year when the Government called for a change in the nature and balance of food advertising to children, food and drink advertising accounted for 18.2bn child impacts – 20% of all advertising seen by 4-15 year olds. Impacts have been in steady decline since then, falling to 13.0bn in 2009. Food and drink advertising accounted for 13% of the advertising seen by children in 2009, down from 16% in 2005.

Figure A15: Total television impacts – Children 4-15

Total television advertising impacts: Children 4-15



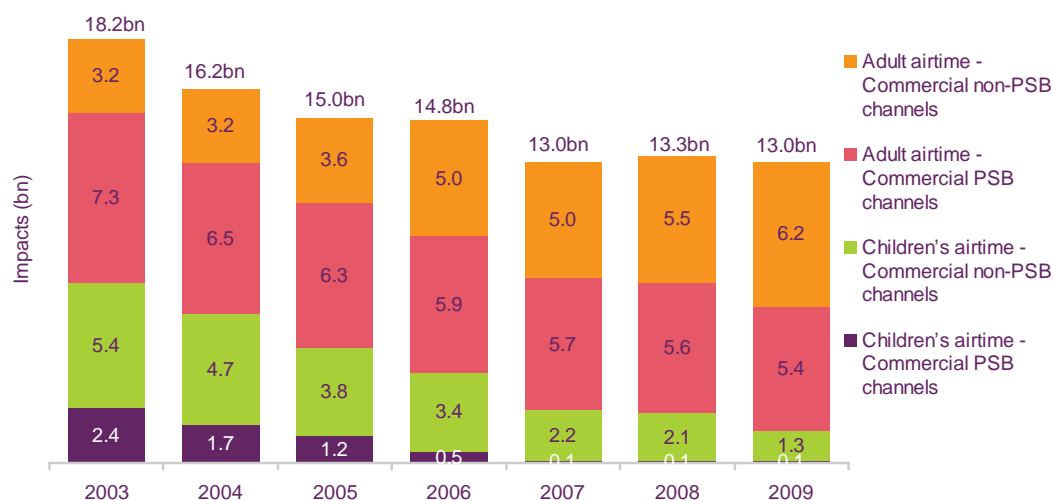
Source: Nielsen Media
 Note: Minor variations due to rounding

Children’s exposure to food and drink advertising in children’s airtime vs adult airtime.

A5.8 As with the trends observed across HFSS advertising between 2005 and 2009, exposure to food and drink advertising declined during children’s airtime and on the commercial PSB channels. However there was an increase in impacts during adult airtime on the commercial non-PSB channels. These channels accounted for 3.6bn child impacts in 2005, rising to 6.2bn impacts in 2009.

Figure A16: Food and drink impacts by airtime – Children 4-15

Food & Drink impacts by airtime: Children 4-15

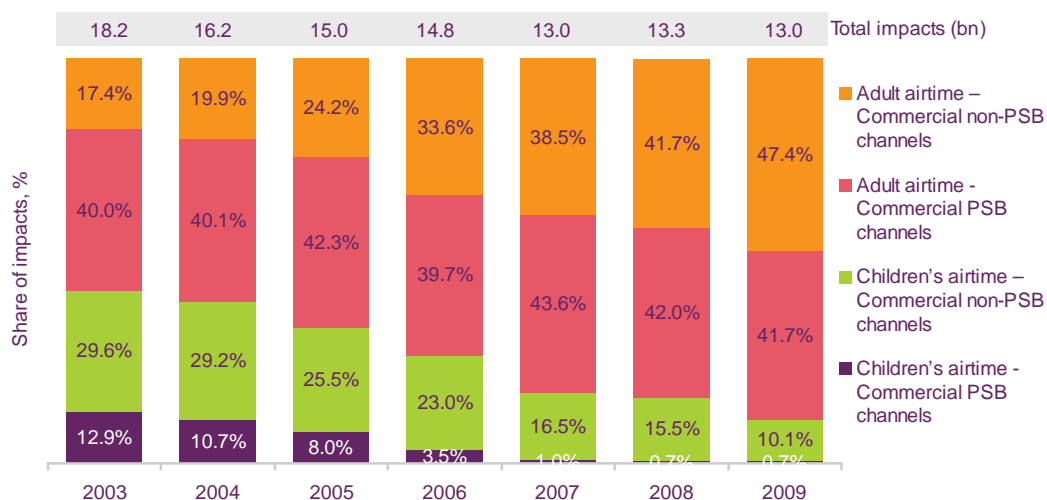


Source: Nielsen Media
Note: Minor variations due to rounding

A5.9 Children’s airtime accounted for 33.5% of all food and drink impacts in 2005; this figure fell steadily to 10.8% in 2009. Over the same period the share of impacts represented by the commercial PSB channels (during adult airtime) remained fairly stable while the commercial non-PSB channels increased their share from 24.2% to 47.4%. As can be seen by comparing Figures A16 and A17, there was an increase in both the volume and share of impacts across these channels).

Figure A17: Share of food and drink impacts by airtime – Children 4-15

Share of Food & Drink impacts by airtime: Children 4-15



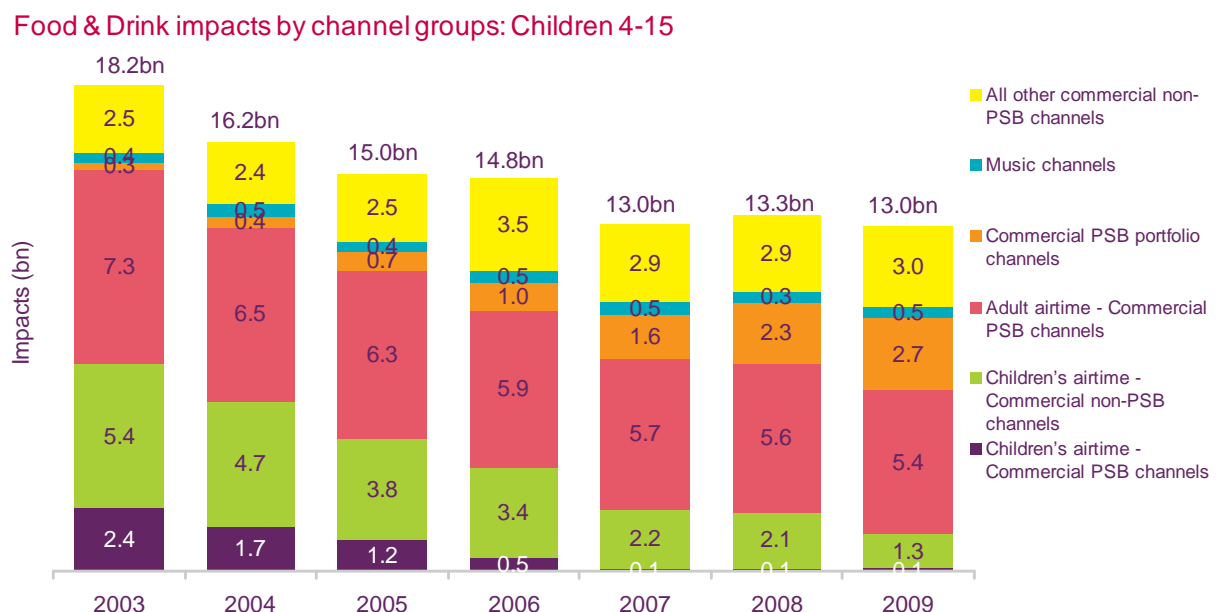
Source: Nielsen Media
Note: Minor variations due to rounding

- A5.10 The 13% overall reduction in food and drink impacts was driven by trends during children’s airtime (down 72%) and the commercial PSB channels (down 14%). The effect of these reductions was offset, to some extent, by the 71% increase during adult airtime on commercial non-PSB channels.
- A5.11 Over the same period, food and drink impacts for 4-9 year olds fell 25% overall, from 7.2bn to 5.4bn impacts – this was driven by a 69% decline in children’s airtime. The 60% increase in exposure to food and drink advertising between 2005 and 2009 on the commercial non-PSB channels led to an overall 11% rise in exposure for younger children during adult airtime.
- A5.12 The exposure of 10-15 year olds to food and drink advertising fell 2% overall between 2005 and 2009. Although impacts fell 78% during children’s airtime, this was offset by a 20% rise in adult airtime driven by the increase in impacts on the commercial non-PSB channels (up 78%).

Children’s exposure to food and drink advertising - by channel groups.

- A5.13 Figures A18 and A19 show that similar trends to those observed in our analysis of children’s viewing habits and their exposure to HFSS advertising are present when looking at food and drink advertising. The launch of more commercial PSB portfolio channels and their increased popularity led to a growth in food and drink impacts on these channels from 0.7bn impacts in 2005 to 2.7bn impacts in 2009 – an increase of 279%. These channels accounted for 20.8% of food and drink impacts in 2009, up from 4.8% in 2005.
- A5.14 There appears to be some displacement of food and drink impacts from the commercial PSB channels to the commercial PSB portfolio channels. The total number of food and drink impacts during adult airtime on the commercial PSB channels and the commercial PSB portfolio channels increased from 7.1bn in 2005 to 8.2bn in 2009 – a rise of 15%.

Figure A18: Food and drink impacts by channel groups – Children 4-15



Source: Nielsen Media

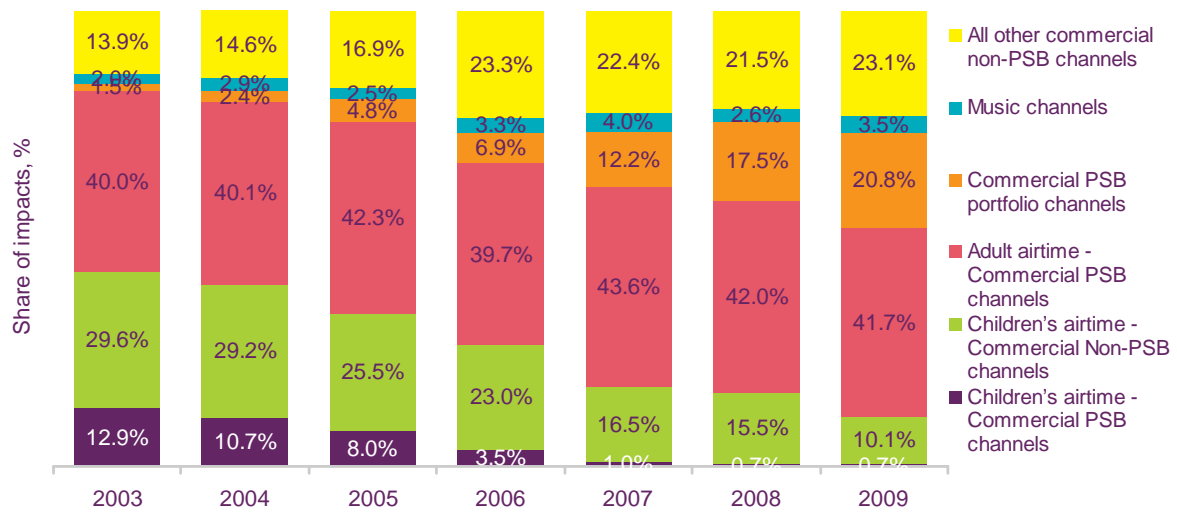
Note: Minor variations due to rounding

4 Music added to the 'PSB portfolio channels' measure in 2008 – The Hits removed from 'Music Channels' in 2008

* Main PSB channels + PSB portfolio channels

Figure A19: Share of food and drink impacts by channel groups – Children 4-15

Share of Food & Drink impacts by channel groups: Children 4-15



Source: Nielsen Media

Note: Minor variations due to rounding

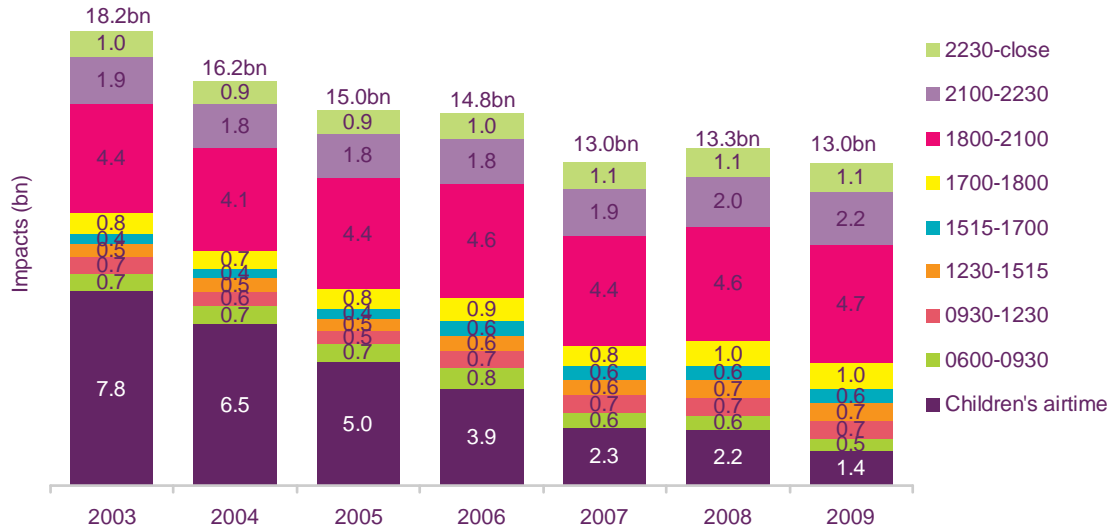
4 Music added to the 'PSB portfolio channels' measure in 2008 – The Hits removed from 'Music Channels' in 2008

Children’s exposure to food and drink advertising - by time of day.

- A5.15 While food and drink impacts fell during children’s airtime there was no significant increase during any particular daypart in adult airtime – impacts increased across all dayparts except the 06:00-09:30 slot.
- A5.16 Analysis of the share of food and drink impacts by daypart shows that the proportion of impacts delivered during children’s airtime fell 22.7 percentage points from 33.5% in 2005 to 10.8% in 2009. Given the restrictions we can assume this remaining advertising is for non-HFSS products. Over the same period the share of impacts delivered after 18:00 increased by 15 percentage points from 47.3% to 62.2%. In volume terms the number of impacts delivered after 18:00 increased from 7.1bn impacts to 8.1bn impacts.

Figure A20: Food and drink impacts by daypart – Children 4-15

Food & Drink impacts by daypart: Children 4-15



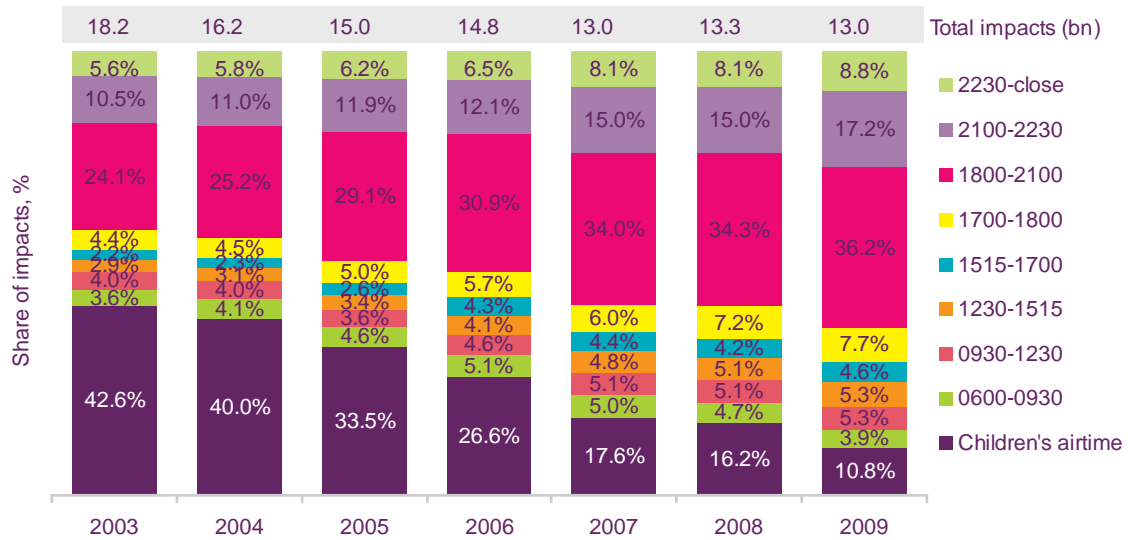
Source: Nielsen Media

Note: Minor variations due to rounding

'Children's airtime' consists of children's slots on main PSB channels and dedicated children's channels

Figure A21: Share of food and drink impacts by daypart – Children 4-15

Share of Food & Drink impacts by daypart: Children 4-15



Source: Nielsen Media

Note: Minor variations due to rounding

'Children's airtime' consists of children's slots on main PSB channels and dedicated children's channels

Annex 6

Changes in advertising impacts by different measures

Summary of changes in children's exposure to advertising

A6.1 The table below summarises the changes in child impacts by age group across the key measures used in this review (details of each have been set out in Annex 3). In summary the measures are as follows:

- 2005 HFSS Proxy vs. 2009 HFSS Proxy – this compares 2005 impacts data using the 2005 HFSS Proxy definition with 2009 impacts data based on the 2009 HFSS Proxy definition. The 2009 HFSS Proxy definition is based on the classification of products at a 'brand' level as HFSS or non-HFSS and excludes specific McDonald's commercials which have been certified as non-HFSS;
- 2005 HFSS Proxy: 2005 vs. 2009 – this compares 2005 and 2009 data using the 2005 HFSS Proxy definition for both 2005 and 2009. This assumes that certain Nielsen food and drink categories were wholly comprised of HFSS products, while others were wholly comprised of non-HFSS products and is therefore based on excluding specific sub-categories from the food and drink measure; and
- All food and drink – this compares 2005 and 2009 child impacts for all food and drink advertising. More detailed analysis of changes in food and drink advertising can be found in Annex 5.

Figure A22: Summary of changes in advertising impacts by different measures

% change in impacts, 2005 vs. 2009		Children, by age group		
Airtime	Measure	4-15	4-9	10-15
All airtime	2005 HFSS Proxy vs. 2009 HFSS Proxy	-37	-52	-22
	2005 Proxy : 2005 vs. 2009	-15	-29	-3
	All food and drink	-13	-25	-2
Children's airtime	2005 HFSS Proxy vs. 2009 HFSS Proxy	-100	-100	-100
	2005 Proxy : 2005 vs. 2009	-74	-72	-78
	All food and drink	-72	-69	-78
Adult airtime	2005 HFSS Proxy vs. 2009 HFSS Proxy	-1	-8	+3
	2005 Proxy : 2005 vs. 2009	+17	+11	+21
	All food and drink	+17	+11	+20
Commercial PSB channels	2005 HFSS Proxy vs. 2009 HFSS Proxy	-40	-47	-35
	2005 Proxy : 2005 vs. 2009	-28	-34	-23
	All food and drink	-27	-33	-22
All commercial non-PSB channels	2005 HFSS Proxy vs. 2009 HFSS Proxy	-33	-56	-7
	2005 Proxy : 2005 vs. 2009	-4	-24	+21
	All food and drink	+1	-18	+21
Children's airtime commercial PSB channels	2005 HFSS Proxy vs. 2009 HFSS Proxy	-100	-100	-100
	2005 Proxy : 2005 vs. 2009	-92	-89	-97
	All food and drink	-92	-90	-97
Children's airtime children's channels	2005 HFSS Proxy vs. 2009 HFSS Proxy	-100	-100	-100
	2005 Proxy : 2005 vs. 2009	-69	-67	-72
	All food and drink	-65	-62	-71

Adult airtime commercial PSB channels	2005 HFSS Proxy vs. 2009 HFSS Proxy	-28	-29	-27
	2005 Proxy : 2005 vs. 2009	-15	-16	-14
	All food and drink	-14	-16	-13
Adult airtime commercial non-PSB channels	2005 HFSS Proxy vs. 2009 HFSS Proxy	+46	+32	+55
	2005 Proxy : 2005 vs. 2009	+74	+61	+83
	All food and drink	+71	+60	+78
Adult airtime – commercial PSB portfolio channels	2005 HFSS Proxy vs. 2009 HFSS Proxy	+237	+221	+246
	2005 Proxy : 2005 vs. 2009	+301	+287	+308
	All food and drink	+279	+267	+286
Adult airtime – music channels	2005 HFSS Proxy vs. 2009 HFSS Proxy	+4	+10	+2
	2005 Proxy : 2005 vs. 2009	+25	+34	+22
	All food and drink	+23	+31	+19
Adult airtime – all other commercial non-PSB channels	2005 HFSS Proxy vs. 2009 HFSS Proxy	+1	-10	+9
	2005 Proxy : 2005 vs. 2009	+20	+10	+28
	All food and drink	+19	+11	+24

Source: Nielsen Media

Note: Minor variations due to rounding

Annex 7

Changes in the use of advertising techniques of appeal to children

Introduction

A7.1 In section 6, we provided the key findings of the analysis of changes in the use of advertising techniques assessed to appeal to children in food and drink advertising. This annex summarises the analysis and deals in turn with:

- a) changes in the volume of advertising spots featuring these advertising techniques;
- b) changes in the volume of advertising impacts featuring these advertising techniques; and
- c) use of each advertising technique by type of content, daypart and by type of product.

A7.2 It should be noted that:

- a) the analysis included in this annex is based on Billet's data for all food and drink adverts (i.e. not simply HFSS advertising, which is a subset of all food and drink advertising) as is not possible to retrospectively apply the nutrient profile model to determine the nutrient profile status of products in 2005;
- b) advertisers make use of the techniques discussed in this annex to promote both HFSS and non-HFSS products⁶⁹;
- c) the analysis is based on Q1 data for both 2005 and 2009⁷⁰. Inevitably, given the limited data period, there is a risk that individual advertising campaigns could have a disproportionately large impact on findings. Similarly the findings are likely to reflect the seasonality of some food and drink advertising. Therefore the figures should be regarded as a snapshot, rather than as definitive evidence of trends;
- d) some advertisements make use of more than one of the advertising techniques calculated to appeal to children, and would therefore be counted more than once (e.g. in the case of a popular cereal including an offer for children's books, the advert would be coded twice; once for the use of a brand equity character and once for promotions);
- e) increases in the use of these creative techniques during adult airtime may not necessarily be targeted at children;

⁶⁹ The evidence for this is the continuing presence in children's airtime of techniques prohibited in advertisements for HFSS products targeting younger children. It is clear that, in these cases, such techniques are being used to promote non-HFSS products.

⁷⁰ The Department of Health stopped commissioning the collection of this data at the end of the first quarter of 2009. To enable a like-for-like comparison, we have compared data for Q1 2009 with data for Q1 2005.

- f) advertising spot figures in this section have been rounded to the nearest thousand; and
- g) all data relates to children aged 4-15.

- A7.3 The Billetts database contains all food and drink product advertising from 2003 to March 2009. As full year data is not available for 2009 (the first year that the full restrictions were implemented) we have, for the purposes of this analysis, compared data from Q1 2005 and Q1 2009. As explained above, the analysis should be treated as a snapshot of advertising activity over that period. Analysis of children's exposure to food and drink advertising (Annexes 5 and 6) is based on full year data for 2005 and 2009 sourced from Nielsen Media. Given the differences between the two databases (see Annex 3) and the analysis periods, it is not advisable to compare the overall trends in food and drink advertising between the two sets of analysis – although it does illustrate the general direction of change.
- A7.4 The analysis of trends by product category was done to see if particular types of advertisers are likely to use the different techniques. In 2004, prior to the development of any nutrient profiling methodology, the FSA highlighted a number of product categories which were of particular concern. These were referred to as the 'Big 5' and consisted of confectionery, soft drinks, cereals, fast food⁷¹ and savoury snacks. The category analysis presented in this annex looks at each of these categories, which are based on the relevant Billetts sub-categories or combinations of sub-categories, but also includes dairy products and convenience foods – all other food and drink advertising has been combined into 'other'.

Figure A23: Specific Product Category definitions based on Billetts' sub-categories

Cereals	
Foods – Cereals	Ready To Eat
	Requiring Preparation
Confectionery	
Food – Confectionery	Cereal Bars
	Chewing Gum
	Chocolate
	Sugar Confectionery
Soft Drinks	
Drinks – Non-Alcoholic	Carbonated Soft Drinks
	Cordials & Squash
	Energy Drinks
	Fresh Fruit Juice
	Milkshakes & Derivatives
	Mineral Water

⁷¹ The Nielsen Media database, which was used in the 2004 analysis (and subsequent analysis), does not contain a 'fast food' product category. 'Fast food' advertising is classified under Nielsen's 'Chain Restaurants' sub-category and has therefore been the label used across all Ofcom's analysis in this area.

Dairy	
Food – Dairy	Butter/Margarine
	Cheese
	Cream & Substitutes
	Eggs
	Milk & Milk Products
	Yoghurt/Fromage Frais
Savoury Snacks	
Food – Confectionery	Potato Crisps & Snacks
Convenience Foods	
Food – Ready To Eat Meals	Baby Food
	Dehydrated
	Frozen
	Convenience Dessert
	Fresh Chilled
	Microwave
Fast Food	
Stores – Other	Fast Food
	Restaurants & Bars

Key findings

A7.5 Comparing 2009 to 2005:

- a) the Billetts data indicates that there was a 96% increase in food and drink spots between Q1 2005 and Q1 2009 – over the same period child impacts fell 24%. Although, for the reasons set out above, this analysis is not directly comparable with the food and drink analysis presented in Annex 4 and Annex 5 (which is based on full year data for 2005 and 2009 sourced from Nielsen Media) the Nielsen data shows total food and drink spots went up 115% between 2005 and 2009 while child impacts fell by 13%;
- b) during children’s airtime the volume of spots containing the techniques analysed fell (with the exception of celebrities) during children’s airtime. By contrast the use of all of these techniques increased during adult airtime. Overall, with the exception of licensed characters, the number of food and drink spots featuring the various creative techniques increased between Q1 2005 and Q1 2009; and
- c) overall, children’s exposure to commercials featuring licensed characters, promotions, brand equity characters and ‘other’ characters fell between Q1 2005 and Q1 2009; however exposure to commercials featuring celebrities and health claims increased between the two data periods. Exposure to all creative techniques increased during adult airtime and decreased during children’s airtime.

Overall trends

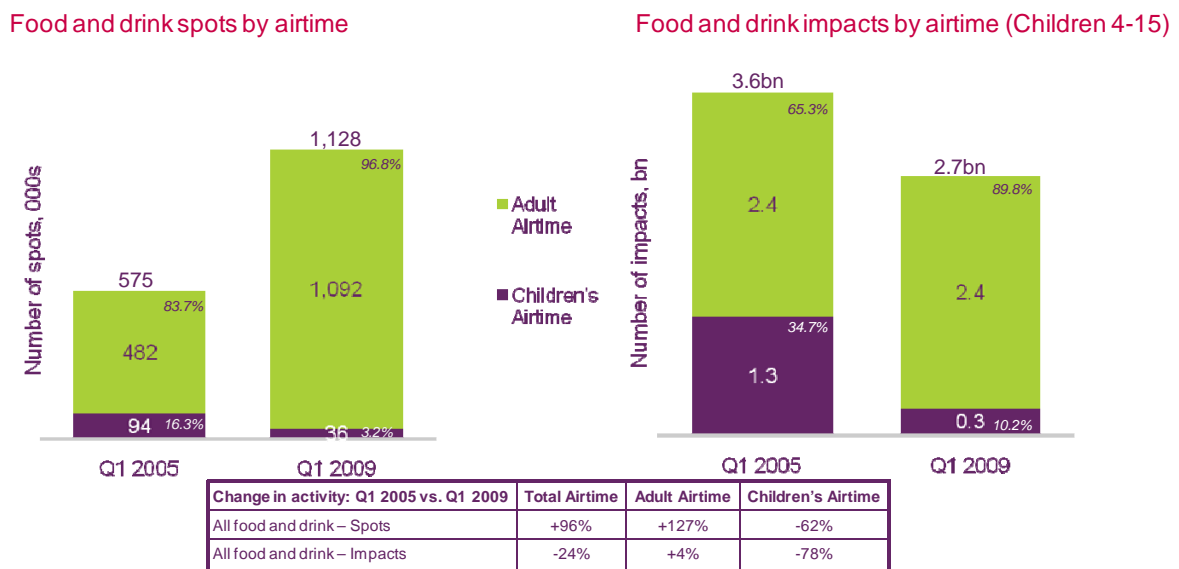
Food and drink spots

A7.6 The Billetts data suggests that there was a 96% increase in the volume of food and drink television advertising spots between Q1 2005 and Q1 2009, from 575,000 spots to 1.1m spots. As discussed in previous sections, this increase in the volume of spots may be partly explained by the rise in the number of commercial television channels, but may also result from more advertising on existing channels. The growth in spots was driven by an increase in activity during adult airtime (up 127%), whereas the number of food and drink advertisements fell by 62% in children’s airtime as a result of the restrictions introduced in 2007.

Food and drink impacts

A7.7 Over the same period, food and drink impacts among children aged 4-15 fell by 24%, from 3.6bn to 2.7bn, driven by the 78% fall in children’s airtime (from 1.3bn impacts to 0.3bn impacts). Furthermore, in Q1 2005 the share of all food and drink impacts represented by exposure during children’s airtime stood at 34.7% - this fell to 10.2% in Q1 2009. Exposure to food and drink advertising increased marginally (up 4%) during adult airtime.

Figure A24: Food and drink advertising activity: Q1 2005 vs. Q1 2009



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

Changes in the volume of food and drink advertising containing specific techniques

A7.8 Figure A25 below summarises changes in the volume of food and drink advertising spots using the various advertising techniques. Overall, there was a 96% rise in food and drink spots between Q1 2005 and Q1 2009 – this was led by the 127% rise during adult airtime, while the number of spots aired during children’s airtime fell by 62%.

- A7.9 The data shows, that with the exception of licensed characters, there was an overall increase in the use of all techniques between Q1 2005 and Q1 2009 – these increases were driven by changes in activity during adult airtime. As the data covers all food and drink, it is important to note that the increased use of all the creative techniques during adult airtime may be a result of increased use of these techniques in commercials for HFSS products not directly targeted at children, as well as increased use in commercials for non-HFSS products.
- A7.10 The use of all techniques, except celebrities, fell during children’s airtime – although as illustrated in the detailed analysis on celebrities, the actual volume of spots using celebrities during children’s airtime was small and the use of these techniques in commercials for non-HFSS products is not restricted.

Figure A25: Summary of changes in food and drink spots by creative technique

% change in food and drink advertising spots by creative technique	Total Airtime	Adult Airtime	Children’s Airtime
Change in Spots Q1 2005 vs. Q1 2009			
All food and drink – Billetts Media	+96%	+127%	-62%
<i>All food and drink – Nielsen Media (2005 vs. 2009)</i>	<i>+115%</i>	<i>+147%</i>	<i>-53%</i>
Celebrity Advertising	+573%	+583%	+245%
Licensed Character Advertising	-23%	+1,869%	-70%
Promotions Based Advertising	+201%	+552%	-67%
Health Claim Advertising	+139%	+156%	-14%
Brand Equity Advertising	+58%	+238%	-59%
Other Character Advertising	+174%	+310%	-5%

Source: Billetts Media Monitoring
Note: Minor variations due to rounding

Changes in children’s exposure to food and drink advertising containing specific techniques

- A7.11 Between Q1 2005 and Q1 2009, children’s exposure to food and drink advertising fell by 24%. The 78% decline in impacts during children’s airtime was offset to some extent by the 4% rise in impacts during adult airtime.
- A7.12 As shown in Figure A26 below, children’s exposure to food and drink commercials featuring celebrities and health claims increased between Q1 2005 and Q1 2009, whereas exposure to the other advertising techniques analysed fell. Food and drink impacts for all of the advertising techniques increased during adult airtime; particularly for commercials using celebrities and promotions. There was a reduction in impacts for all techniques during children’s airtime.

Figure A26: Summary of changes in food and drink impacts by creative technique

% change in food and drink impacts by creative technique (Children 4-15)	Total Airtime	Adult Airtime	Children's Airtime
Change in Impacts Q1 2005 vs. Q1 2009			
All food and drink – Billetts Media	-24%	+4%	-78%
<i>All food and drink – Nielsen Media (2005 vs. 2009)</i>	<i>-13%</i>	<i>+17%</i>	<i>-72%</i>
Celebrity Advertising	+143%	+153%	-4%
Licensed Character Advertising	-84%	+69%	-88%
Promotions Based Advertising	-41%	+112%	-82%
Health Claim Advertising	+18%	+36%	-40%
Brand Equity Advertising	-56%	+72%	-82%
Other Character Advertising	-2%	+36%	-26%

Source: Billetts Media Monitoring

Note: Minor variations due to rounding

- A7.13 Figure A25 and Figure A26 show that while the use of promotions-based advertising, brand equity characters and other characters increased as a result of more spots being aired in adult airtime, children's overall exposure to commercials featuring these techniques declined. Furthermore, while the overall level of food and drink spots featuring licensed characters declined by 23%, exposure to these commercials fell at a faster rate, by 84%. The marked increase in adult airtime was offset by the decline in children's airtime.
- A7.14 These findings could suggest that the growth in advertising activity in adult airtime is not necessarily being used to 'target' children. The two techniques (celebrity advertising and health claims) to which exposure increased were already more likely to be used in adult airtime prior to the content restrictions being implemented – suggesting these techniques maybe more likely to be used in commercials for products of particular appeal to adults and therefore any increased activity maybe driven by these types of products.
- A7.15 Furthermore, while the use of brand equity characters and other characters has not been restricted in children's airtime, the decline in the number of spots using these techniques is likely to be as a result of the restrictions in HFSS advertising during this airtime – commercials for HFSS products that may have previously used these techniques can no longer feature during children's airtime, resulting in a decline in the use of these techniques.

Changes in the volume of spots by product category

- A7.16 Figure A27 below shows the volume of, and exposure to, food and drink advertising by product category⁷². The analysis shows there were above-average increases in

⁷² The analysis of trends by product category has been conducted to provide more detail around which particular types of advertisers are likely to use the different techniques. In 2004, prior to the development of any nutrient profiling methodology, the FSA highlighted a number of product categories which were of particular concern – these were referred to as the 'Big 5' and consisted of confectionery, soft drinks, cereals, fast food⁷² and savoury snacks. The category analysis presented here is based on these categories but also includes dairy products and convenience foods – all other food and drink advertising has been combined into 'other'.

the volume of cereal and chain restaurant advertising spots between Q1 2005 and Q1 2009.

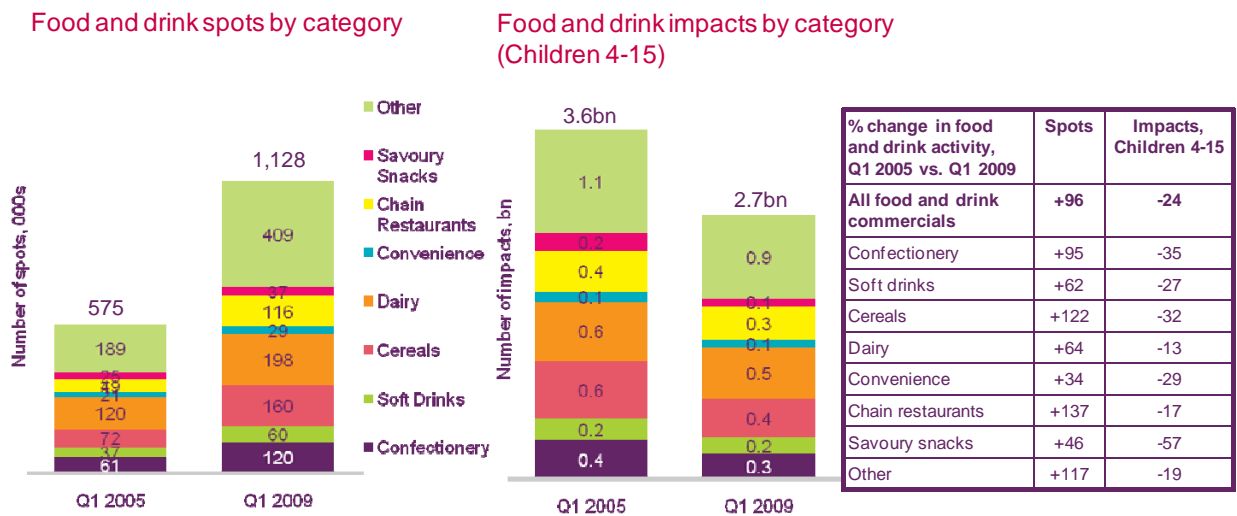
A7.17 Advertising spots for cereal products increased by 122%, from 72,000 to 160,000 in Q1 2009. Chain restaurants spots increased from 49,000 in Q1 2005 to 116,000 in Q1 2009 – a rise of 137%.

Changes in children’s exposure by product category

A7.18 Child impacts fell across all product categories, although lower than average falls were observed across the dairy and chain restaurant categories. While overall exposure to food and drink advertising fell by 24%, impacts for commercials featuring dairy products fell 13% and for chain restaurants fell by 17%.

A7.19 While this analysis is based on the advertising of all food and drink products across all airtime, our analysis in Annex 5 highlights that a number of commercials for McDonalds (which would be classified under the ‘chain restaurants’ category) were certified as advertising non-HFSS products. It is therefore necessary to exercise some caution in interpreting the below-average fall in children’s exposure to chain restaurant advertising as this will include commercials for both HFSS and non-HFSS products.

Figure A27: Food and drink activity by product category



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

Changes in the use of creative techniques by airtime, daypart and product categories

Celebrities

Summary - Spots

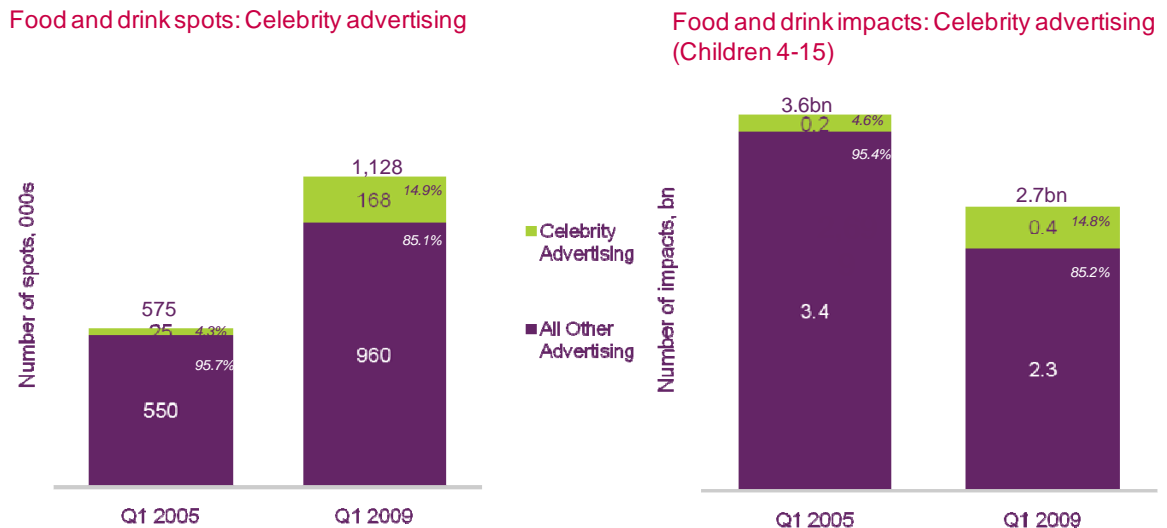
A7.20 Between Q1 2005 and Q1 2009 there was an increase in the volume of food and drink commercials featuring celebrities. The data in Figure A28 shows 25,000

(4.3%) of the 575,000 food and drink spots aired in Q1 2005 were for commercials featuring a celebrity – this rose to 168,000 spots in Q1 2009 (14.9% of all food and drink advertising).

Summary - Impacts

A7.21 Over the same period, child impacts for food and drink advertisements featuring a celebrity increased from 0.2bn to 0.4bn impacts, accounting for 14.8% of all food and drink impacts in Q1 2009 compared with 4.6% in Q1 2005.

Figure A28: Celebrities: Overall change in spots and impacts



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

Spots by airtime

A7.22 Overall, spots featuring a celebrity increased by 573% (Figure A29), driven by the significant increase during adult airtime from 24,000 spots to 166,000 spots (up 583%). The majority of food and drink commercials featuring a celebrity continue to be aired during adult airtime, with 98.5% in Q1 2009). This may suggest that this particular technique may be more likely to be used in commercials for products more likely to appeal to adults. In line with the interim review the majority of celebrities featured in these advertisements during Q1 2009 appeared to be of primary appeal to adults (e.g. Ian Botham, Gloria Hunniford).

A7.23 Although figures suggest an increase in the use of this technique during children’s airtime, the actual number of spots remains very small and would be for non-HFSS advertising.

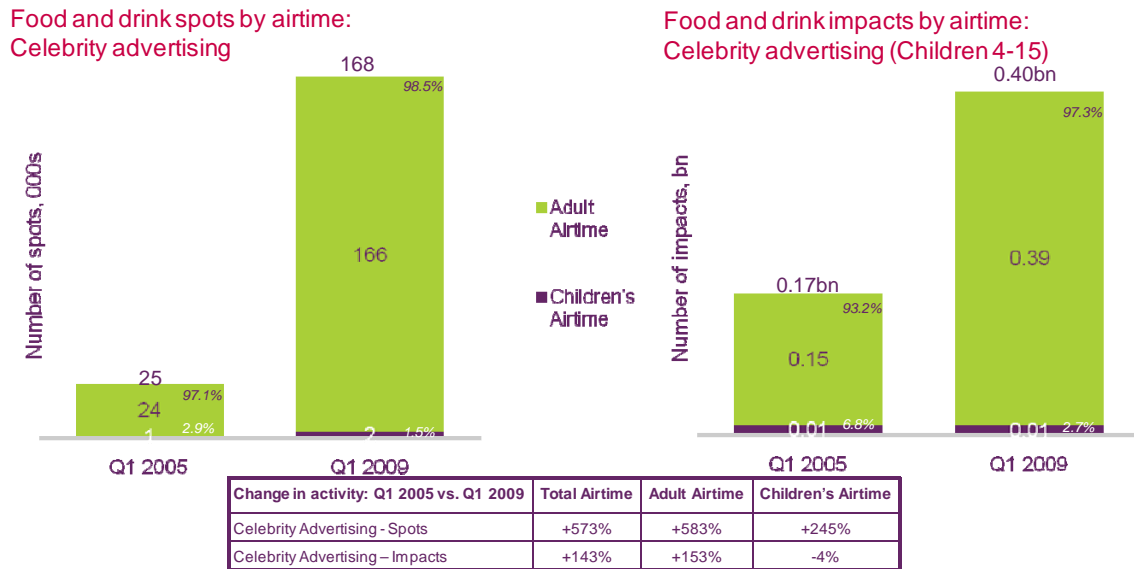
Impacts by airtime

A7.24 Impacts for food and drink commercials featuring a celebrity rose by 143%, from 0.2bn in Q1 2005 to 0.4bn impacts in Q1 2009.

A7.25 Adult airtime accounted for 97.3% of all celebrity advertising impacts in Q1 2009 – up from 93.2% in Q1 2005. The overall increase in exposure to this type of

advertising was driven by activity in adult airtime during which impacts increased by 153% from 0.15bn to 0.39bn.

Figure A29: Celebrities: Spots and impacts by airtime



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

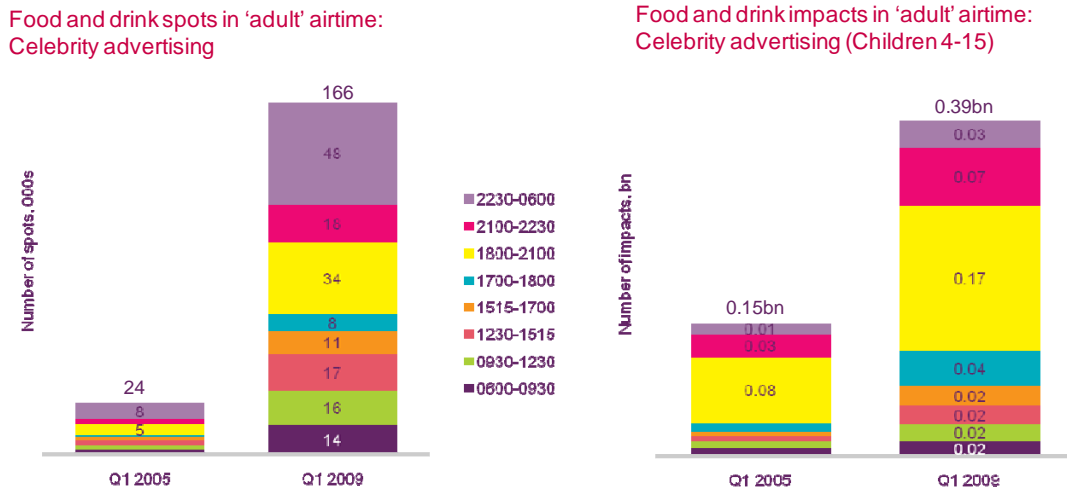
Spots by daypart

- A7.26 The growth in the use of commercials featuring celebrities was spread across all dayparts in adult airtime.
- A7.27 The volume of food and drink spots featuring celebrities aired after 18:00 increased from 15,000 in Q1 2005 to almost 100,000 in Q1 2009 – however as a proportion of all celebrity based food and drink spots in adult airtime the proportion aired after 18:00 fell slightly from 62.0% to 60.2% due to substantial growth throughout the earlier dayparts.

Impacts by daypart

- A7.28 Similarly children’s exposure to celebrities in food and drink commercials increased across all dayparts during adult airtime. The number of impacts delivered after 18:00 increased from 0.1bn to 0.3bn impacts – although the share of all celebrity food and drink impacts in adult airtime delivered across these dayparts fell from 74.8% in Q1 2005 to 68.7% in Q1 2009.

Figure A30: Celebrities: Spots and impacts by daypart in adult airtime



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

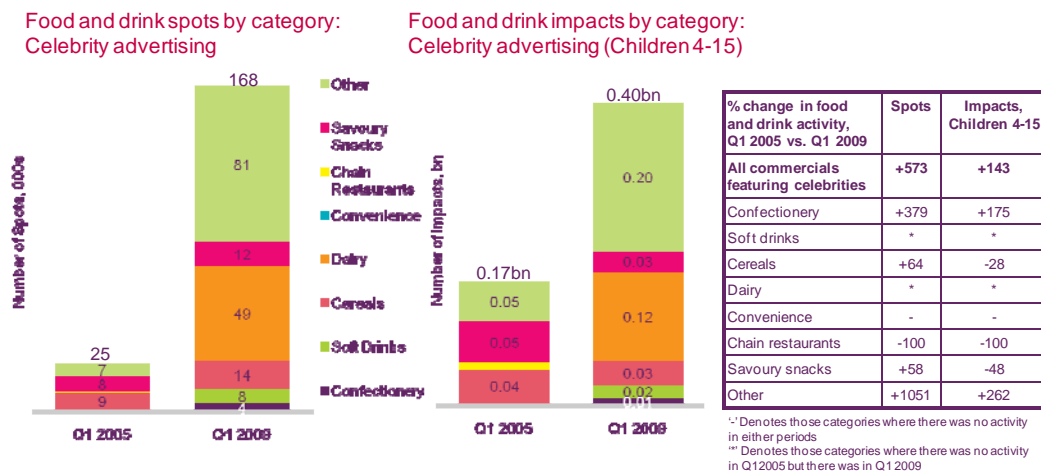
Spots by product category

- A7.29 The rise in the number of celebrity spots was driven by increased advertising activity within the dairy and 'other' food and drink product categories.
- A7.30 While there were no dairy commercials featuring a celebrity in Q1 2005, this category accounted for 49,000 spots in Q1 2009. Spots for products in the 'other' category increased from 7,000 in Q1 2005 to 81,000 in Q1 2009.

Impacts by product category

- A7.31 Similarly, the increase in children's exposure to celebrities in food and drink commercials was driven by the dairy and 'other' food and drink categories. Dairy advertising accounted for 0.1bn impacts in Q1 2009 and the 'other' product category represented 0.2bn impacts in Q1 2009, up by 262% from 0.05bn in Q1 2005.

Figure A31: Celebrities: Spots and impacts by product category



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

Licensed characters

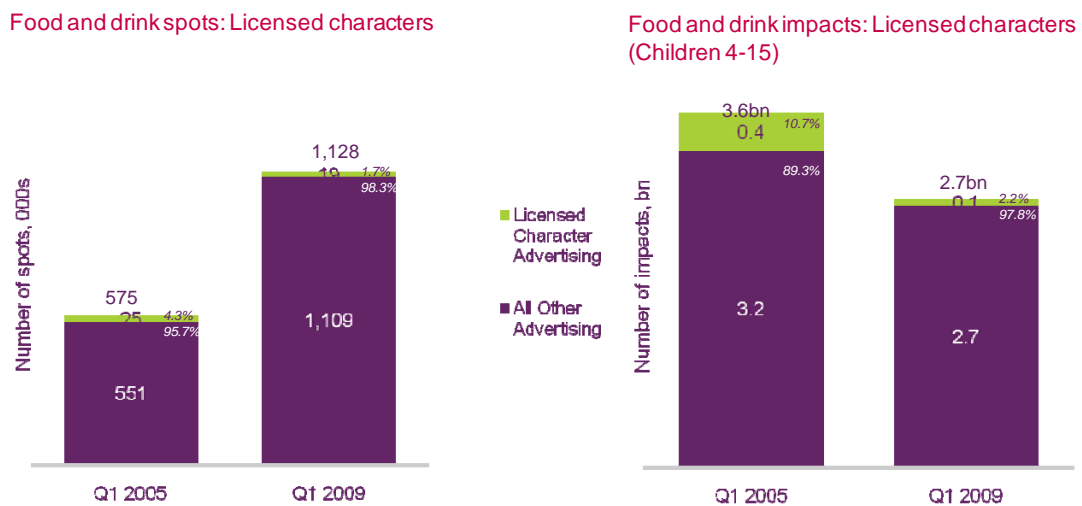
Summary – Spots

A7.32 The use of licensed characters accounted for 4.3% (25,000 spots) of food and drink spots in Q1 2005 – this fell to 1.7% (19,000 spots) of all food and drink spots in Q1 2009.

Summary – Impacts

A7.33 Over the same period the share of all food and drink impacts that featured a licensed character fell from 10.7% (0.4bn impacts) to 2.2% (0.1bn impacts).

Figure A32: Licensed characters: Overall change in spots and impacts



Source: Billetts Media Monitoring

Note: Minor variations due to rounding

Spots by airtime

A7.34 The volume of food and drink spots featuring a licensed character fell by 23% from 25,000 in Q1 2005 to 19,000 in Q1 2009. This overall decline in food and drink spots featuring licensed characters was driven by the reduction in spots during children’s airtime, as there was an increase in such advertising during adult airtime. As a result the share of food and drink spots featuring licensed characters accounted for by adult airtime increased from 2.4% of all such commercials in Q1 2005 to 61.6% in Q1 2009.

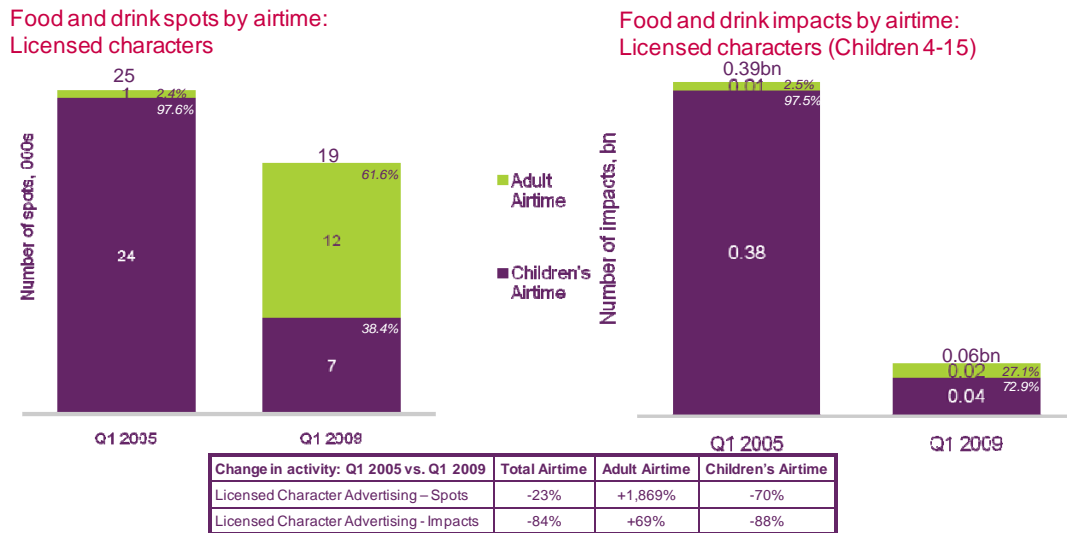
Impacts by airtime

A7.35 Impacts for food and drink commercials using a licensed character fell by 84% from 0.39bn to 0.06bn impacts in Q1 2005 – this was driven by the marked decline during children’s airtime.

A7.36 While impacts during adult airtime increased, they did so at a slower rate (up 69%) than the increase in the volume of spots aired during this airtime (up 1,869%). Although this increase in the use of licensed characters in adult airtime was significant, the overall reduction in the use of this technique, the significant

reduction in exposure, and the slower growth of child impacts in adult airtime, may suggest that the increase in advertising activity during adult airtime is not targeted at children.

Figure A33: Licensed characters: Spots and impacts by airtime



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

Spots by daypart

A7.37 Adult airtime accounted for a small amount of licensed character food and drink commercials in Q1 2005 and the increase in activity in Q1 2009 was distributed across all dayparts. With this increased activity during adult airtime, the share of food and drink spots featuring a licensed character aired after 18:00 increased from 6.4% to 57.3%.

Impacts by daypart

A7.38 Impacts for this type of advertising fell dramatically during the 06:00-09:30 slot; however there was an increase in exposure across all other dayparts as a result of increased advertising activity across these dayparts. The share of impacts for food and drink commercials featuring a licensed character that were delivered after 18:00 increased from 3.2% to 58.5%, accounting for 9.6m impacts in Q1 2009.

Figure A34: Licensed characters: Spots and impacts by daypart in adult airtime



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

Spots by product category

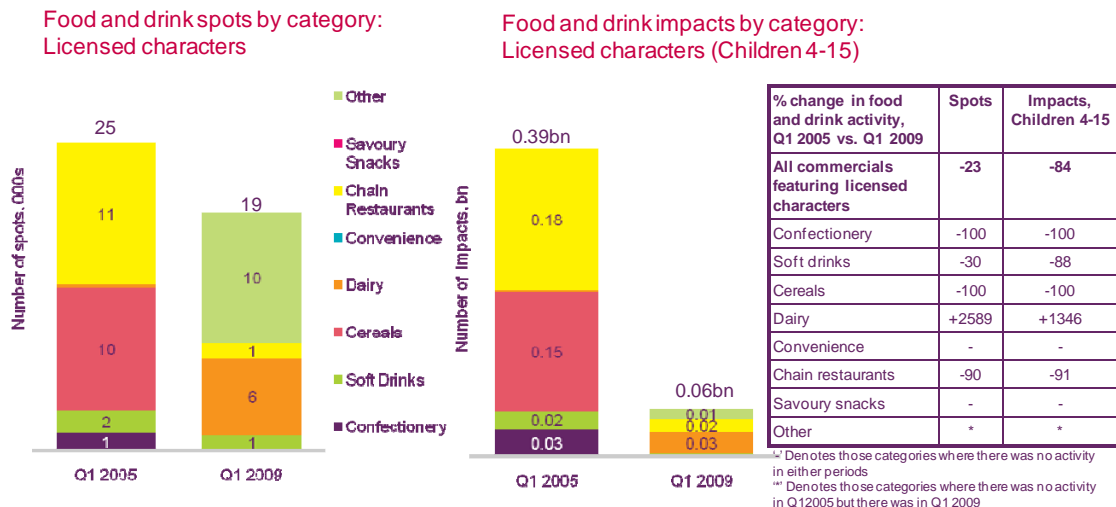
A7.39 Although the use of licensed characters fell overall between the two analysis periods, there was an increase in the use of this technique by dairy product advertisers and those in the 'other' category, with a fall in use among cereal and chain restaurants advertisers.

A7.40 Dairy products accounted for 6,000 spots in Q1 2009 and the 'other' product category accounted for 10,000 spots – together the two categories represented 87.3% of food and drink commercials with a licensed character in Q1 2009.

Impacts by product category

A7.41 Similarly the fall in impacts was led by the significant drop in exposure to cereal and chain restaurant commercials using this technique.

Figure A35: Licensed characters: Spots and impacts by product category



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

Promotions

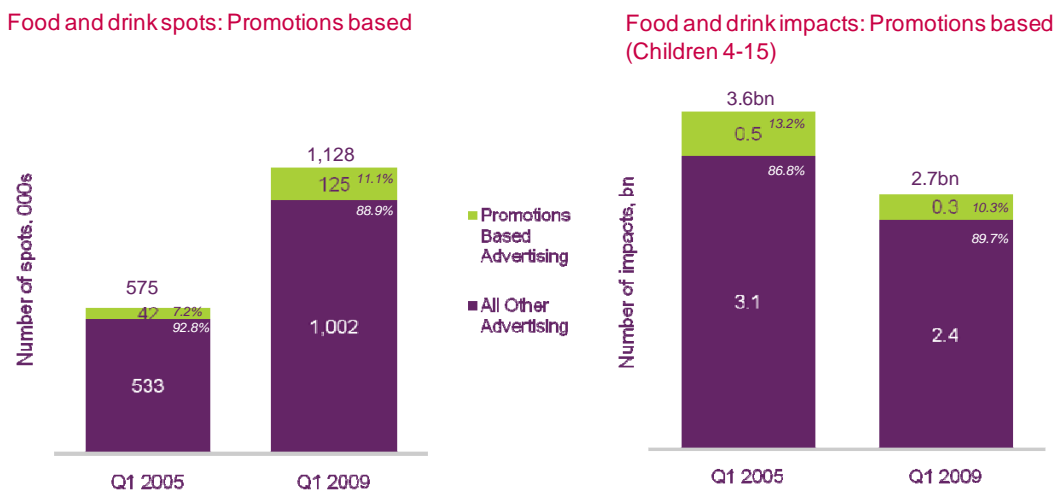
Summary – Spots

A7.42 Promotions based food and drink advertising accounted for 11.1% (125,000 spots) of all food and drink advertising spots in Q1 2009 – up from 7.2% (42,000 spots) in Q1 2005.

Summary – Impacts

A7.43 Over the same period the share of all food and drink impacts containing promotions fell from 13.2% (0.5bn impacts) to 10.3% (0.3bn impacts). This reduction in child impacts suggests the increase in spots observed over the same period may not necessarily be targeted at children.

Figure A36: Promotions: Overall change in spots and impacts



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

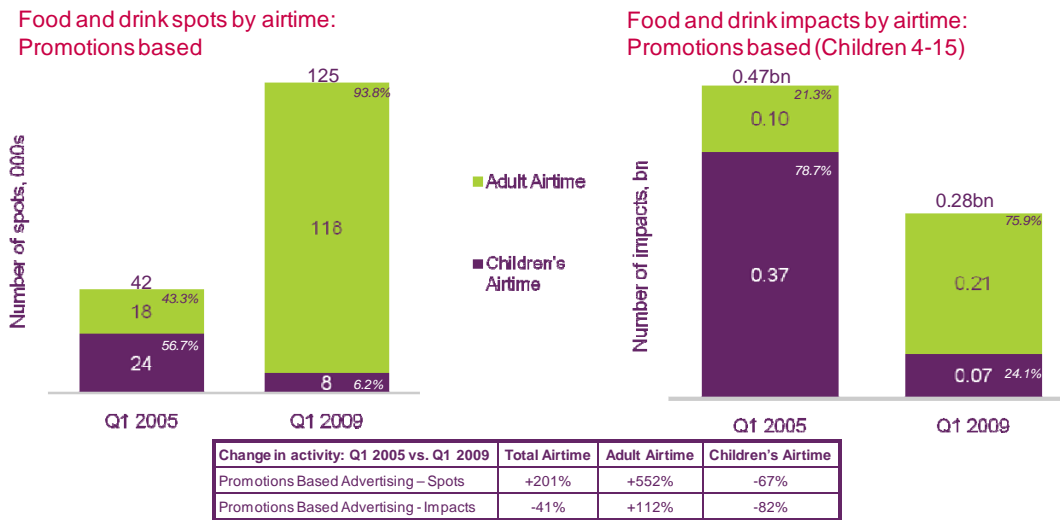
Spots by airtime

A7.44 43.3% (18,000 spots) of food and drink spots containing promotions were aired during adult airtime in Q1 2005 – this figure rose to 93.8% (118,000 spots) in Q1 2009. The significant increase in the use of this technique during adult airtime (spots up 552%) offset the decline in such spots observed during children’s airtime (down 67%), resulting in an overall increase in spots of 201%.

Impacts by airtime

A7.45 In Q1 2005, 21.3% of child impacts for commercials featuring a promotion were delivered in adult airtime – the corresponding figure in Q1 2009 was 75.9%. Although children’s exposure to this technique fell overall by 41% (from 0.5bn impacts to 0.3bn impacts), the effect of the 82% fall in impacts during children’s airtime (from 0.4bn to 0.1bn impacts) was limited due to an increase of 112% (from 0.1bn impacts to 0.2bn impacts) during adult airtime.

Figure A37: Promotions: Spots and impacts by airtime



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

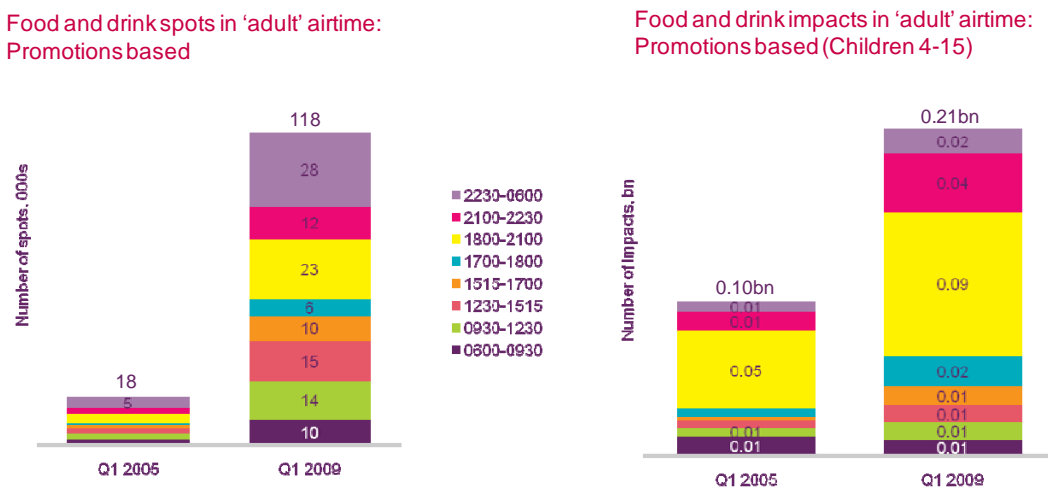
Spots by daypart

A7.46 As observed across the other techniques, the growth in the use of promotions-based food and drink advertising during adult airtime was distributed across all dayparts. The proportion of these spots aired after 18:00 in adult airtime fell marginally from 55.4% (10,000 spots) in Q1 2005 to 53.2% (63,000 spots) in Q1 2009.

Impacts by daypart

A7.47 The increase in impacts for commercials featuring a promotion delivered during adult airtime was also spread across the dayparts with the exception of the 06:00-09:30 slot, during which impacts fell from 12m in Q1 2005 to 10m in Q1 2009.

Figure A38: Promotions: Spots and impacts by daypart in adult airtime



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

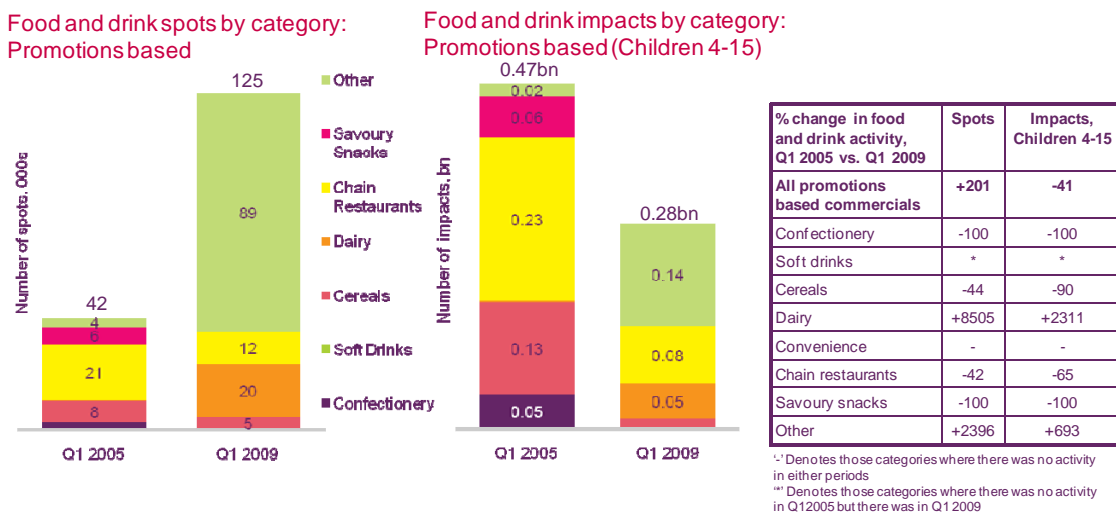
Spots by product category

A7.48 The increase in food and drink advertisements containing promotions between Q1 2005 and Q1 2009 was driven by dairy and ‘other’ products. Around 20,000 dairy product commercials featuring a promotion aired in Q1 2009 and 89,000 commercials for ‘other’ products using this technique.

Impacts by product category

A7.49 While there was an increase in children’s exposure to the dairy and ‘other’ product category commercials containing promotions, the overall decline in promotions-based impacts was driven by a reduction in the use of the technique by confectionery, cereal, chain restaurant and savoury snack advertisers.

Figure A39: Promotions: Spots and impacts by product category



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

Health claims

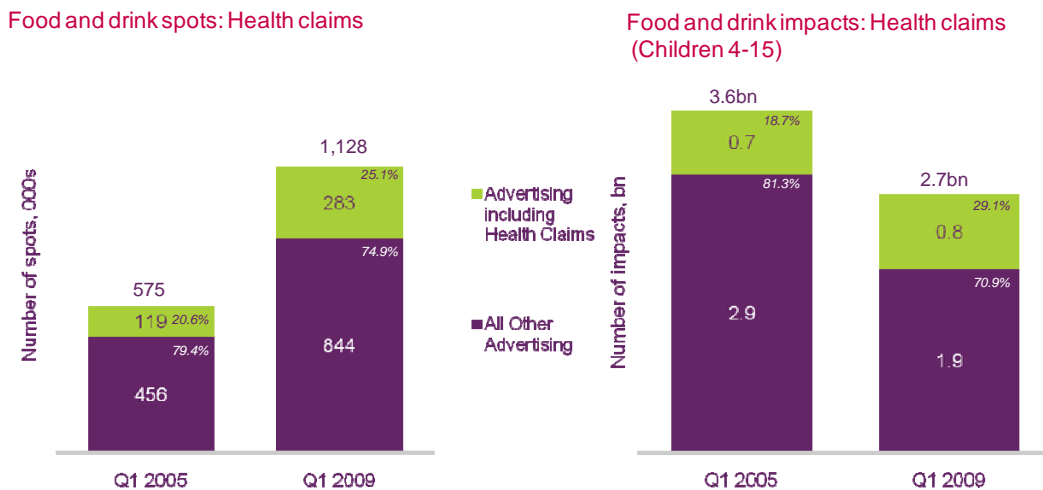
Summary – Spots

A7.50 Food and drink commercials carrying a health claim increased from 119,000 in Q1 2005 to 283,000 in Q1 2009. As a share of all food and drink advertising, those containing a health claim accounted for 20.6% of food and drink spots in Q1 2005 and 25.1% in Q1 2009.

Summary – Impacts

A7.51 While overall exposure to food and drink advertising among children fell between the two periods, this audience saw more commercials featuring a health claim. Impacts increased in volume terms from 0.7bn to 0.8bn – and in share terms from 18.7% to 29.1% of all food and drink impacts.

Figure A40: Health claims: Overall change in spots and impacts



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

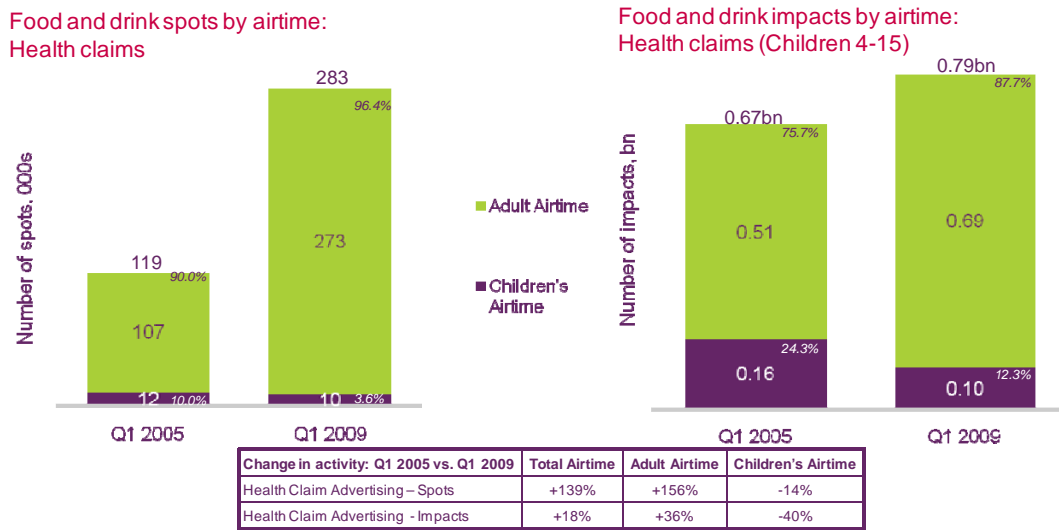
Spots by airtime

- A7.52 In both periods the majority of commercials containing a health claim were shown in adult airtime – representing 90% (107,000 spots) of food and drink spots aired in Q1 2005 and 96.4% (273,000 spots) in Q1 2009. This could suggest that this type of advertising may be used in commercials for products more likely to appeal to adults.
- A7.53 Although spots during children’s airtime fell 14% between the two periods, this decline was offset by the 156% increase in spots containing health claims during adult airtime, resulting in an overall increase of 139%.

Impacts by airtime

- A7.54 Although the use of, and exposure to, food and drink advertising containing health claims fell during children’s airtime (down 40%), the 36% growth in impacts during adult airtime led to an overall increase in children’s exposure to food and drink commercials with a health claim (up 18%).
- A7.55 The majority of children’s exposure to this creative technique took place in adult airtime which accounted for 87.7% (0.7bn impacts) in Q1 2009 up from 75.7% in Q1 2005.

Figure A41: Health claims: Spots and impacts by airtime



Source: Billets Media Monitoring
 Note: Minor variations due to rounding

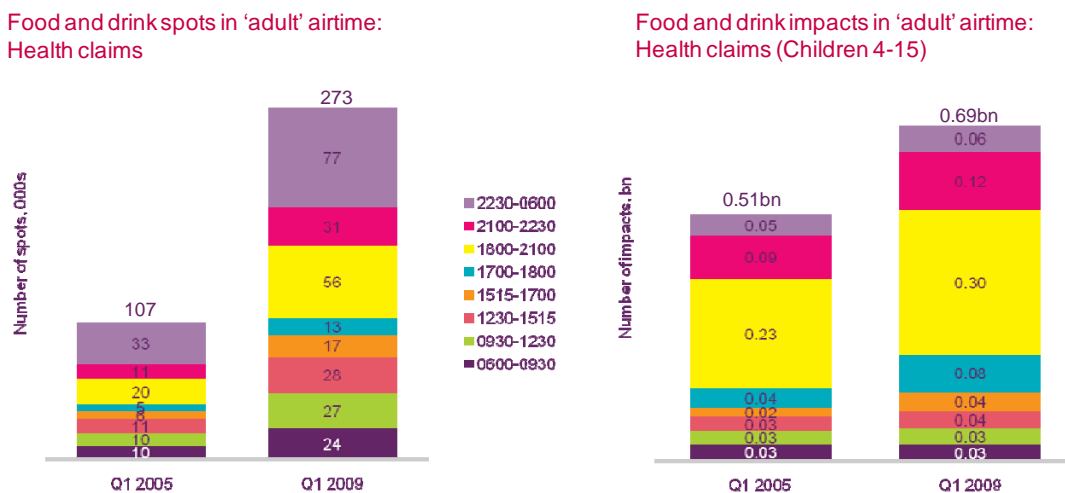
Spots by daypart

A7.56 The increase in the volume of commercials featuring a health claim was distributed across all dayparts during adult airtime. Although the majority of health claim spots were aired after 18:00, the share of spots shown during this daypart remained steady – 60.2% (64,000 spots) in Q1 2005 and 59.7% (163,000 spots) in Q1 2009.

Impacts by daypart

A7.57 Similarly, the share of health claim impacts delivered after 18:00 stood at 70.9% (0.4bn impacts) in Q1 2005 and 68.5% (0.5bn impacts) in Q1 2009.

Figure A42: Health claims: Spots and impacts by daypart in adult airtime



Source: Billets Media Monitoring
 Note: Minor variations due to rounding

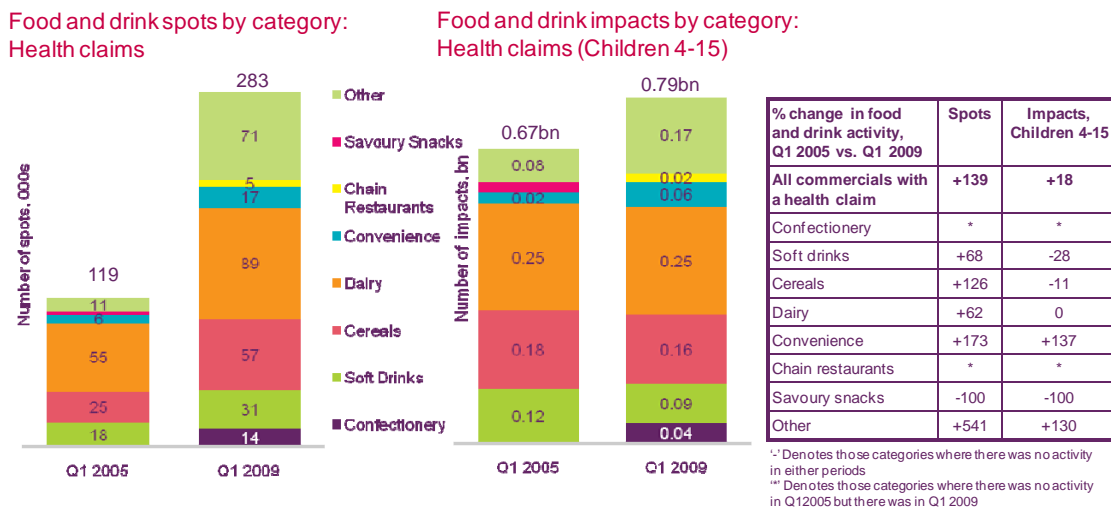
Spots by product category

A7.58 As Figure A43 illustrates there was an increase in the use of commercials featuring a health claim across a number of product categories – however there were above-average increases in activity by convenience food (up 173%) and ‘other’ product (up 541%) advertisers. Dairy product commercials accounted for the greatest number of food and drink commercials using a health claim (89,000 spots in Q1 2009).

Impacts by product category

A7.59 Similarly, there were above-average increases in children’s exposure to this type of advertising across the convenience food (up 137%) and ‘other’ product category (up 130%) commercials – however dairy commercials using this technique accounted for the largest number of impacts delivered (0.25bn impacts).

Figure A43: Health claims: Spots and impacts by product category



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

Brand equity characters

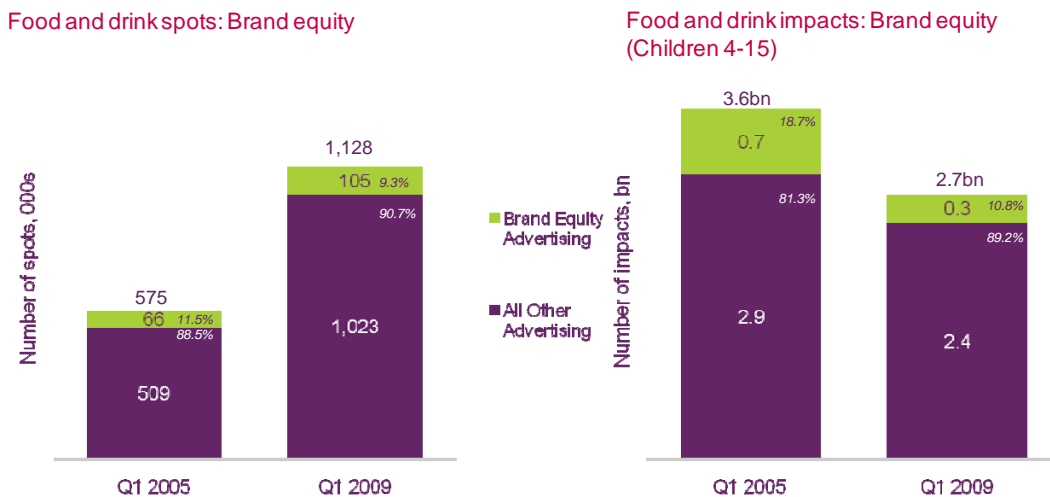
Summary – Spots

A7.60 Between Q1 2005 and Q1 2009 the number of food and drink spots featuring brand equity characters increased from 66,000 (11.5% of all food and drink spots) to 105,000 (9.3% of all food and drink spots).

Summary – Impacts

A7.61 Over the same period there was an overall reduction in children’s exposure to this technique in food and drink advertising. Impacts for such commercials fell from 0.7bn (18.7% share of all food and drink impacts) to 0.3bn (10.8% share). This disparity between a decline in child impacts for commercials containing a brand equity character and an increase in spots using this technique could suggest this change in activity is not necessarily targeted at children.

Figure A44: Brand equity: Overall change in spots and impacts



Source: Billetts Media Monitoring

Note: Minor variations due to rounding

Spots by airtime

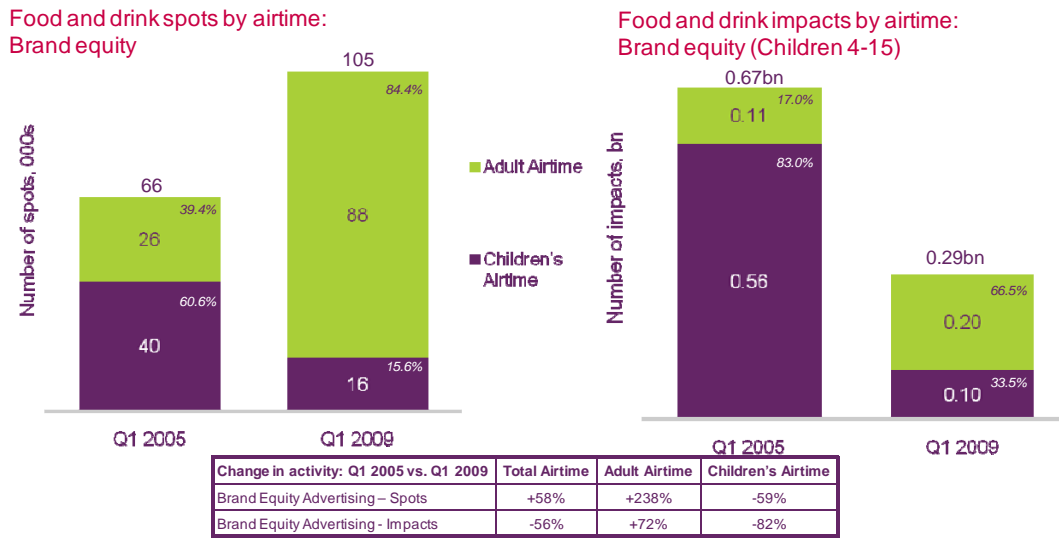
A7.62 Despite a 59% fall in the number of brand equity food and drink spots in children's airtime, the overall volume of these spots has increased by 58%, driven by the use of the technique in adult airtime. As a result adult airtime accounted for 84.4% of all brand equity food and drink spots in Q1 2009 compared with just 39.4% in Q1 2005.

Impacts by airtime

A7.63 Children's exposure to food and drink commercials featuring a brand equity character fell by 56% between Q1 2005 (0.7bn impacts) and Q1 2009 (0.3bn impacts). This decline was led by the fall in exposure during children's airtime which accounted for 0.6bn impacts (83.0%) of all food and drink brand equity impacts in Q1 2005 and 0.1bn impacts (33.5%) in Q1 2009.

A7.64 The increase in spots during adult airtime led to a 72% increase in children's exposure during this airtime from 0.1bn impacts to 0.2bn impacts and accounted for two-thirds of all brand equity impacts in Q1 2009.

Figure A45: Brand equity: Spots and impacts by airtime



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

Spots by daypart

A7.65 The increase during adult airtime in the use of advertising spots featuring a brand equity character was distributed across all dayparts. In both periods, the majority of these commercials were aired after 18:00 – accounting for 58.6% of spots (52,000 spots) in Q1 2009, up slightly from 55.0% (14,000 spots) in Q1 2005.

Impacts by daypart

A7.66 The post-18:00 dayparts also accounted for the majority of impacts, increasing from 64.4% (0.07bn impacts) of all food and drink impacts featuring a brand equity character in Q1 2005 to 69.2% (0.14bn impacts) in Q1 2009.

Figure A46: Brand equity: Spots and impacts by daypart in adult airtime



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

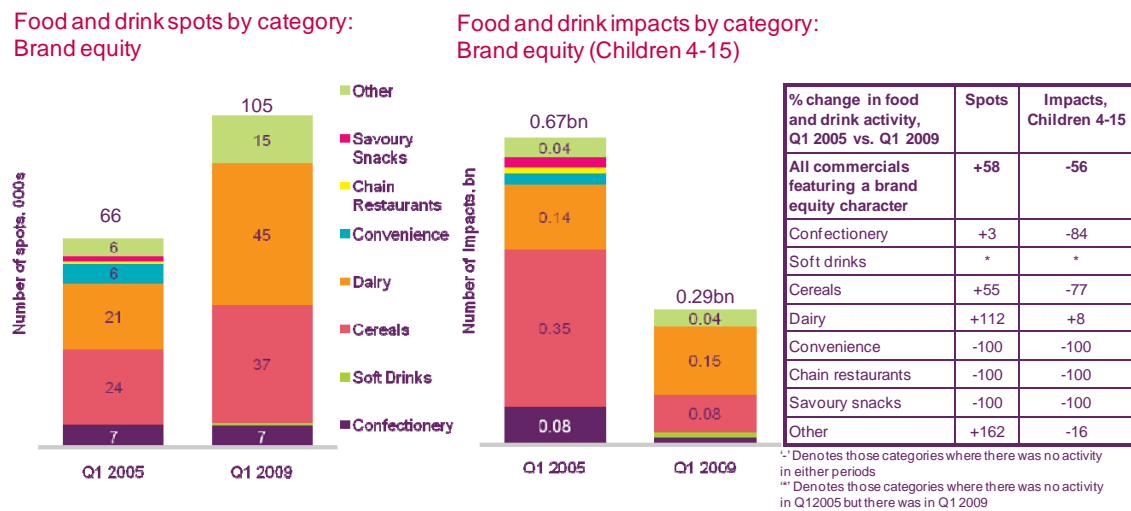
Spots by product category

A7.67 The use of brand equity characters increased notably among cereal (up 55%), dairy (up 112%) and ‘other’ product (up 162%) advertisers with dairy commercials accounting for the greatest number of these types of commercials in Q1 2009 (45,000 spots).

Impacts by product category

A7.68 However the increase in cereal and ‘other’ product commercials featuring brand equity characters did not lead to a subsequent increase in exposure. There was a decline in children’s exposure to this advertising technique across all product categories with the exception of dairy products. Impacts for dairy product advertising featuring a brand equity character increased from 0.14bn impacts to 0.15bn impacts – a rise of 8%.

Figure A47: Brand equity: Spots and impacts by product category



Source: Billets Media Monitoring
 Note: Minor variations due to rounding

Other characters

Summary – Spots

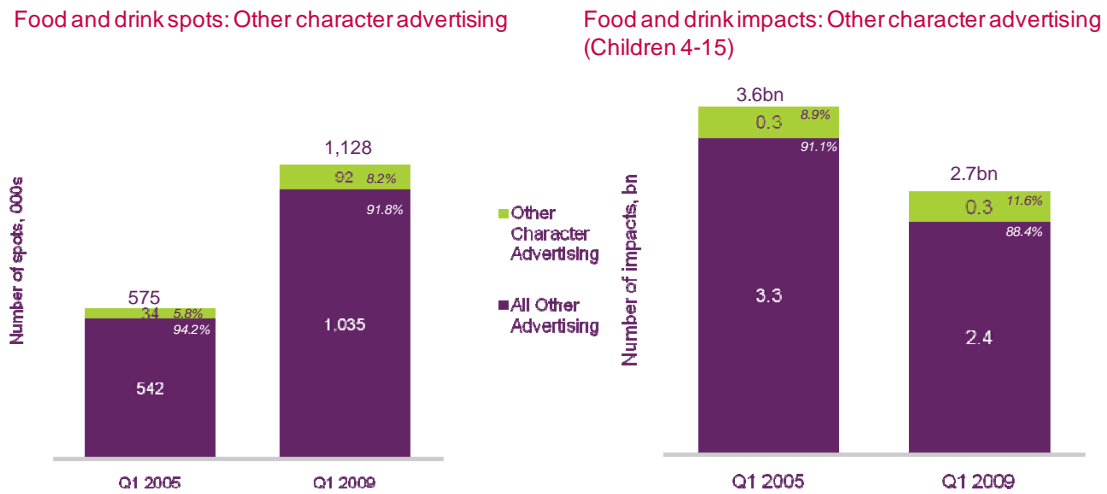
A7.69 The number of food and drink spots featuring other types of characters increased from 34,000 spots in Q1 2005 to 92,000 in Q1 2009 – the share of all food and drink spots using this technique also increased from 5.8% to 8.2% over the same period.

Summary – Impacts

A7.70 Children’s exposure to this type of advertising remained unchanged between the two periods (0.3bn impacts), but (as a result of the overall decline in food and drink impacts) impacts for advertisements containing other characters accounted for a greater share of all food and drink impacts, up from 8.9% to 11.6%. The disparity between unchanged in child impacts for commercials containing other characters

and an increase in spots using this technique could suggest this growth in advertising activity is not necessarily targeted at children

Figure A48: Other characters: Overall change in spots and impacts



Source: Billetts Media Monitoring

Note: Minor variations due to rounding

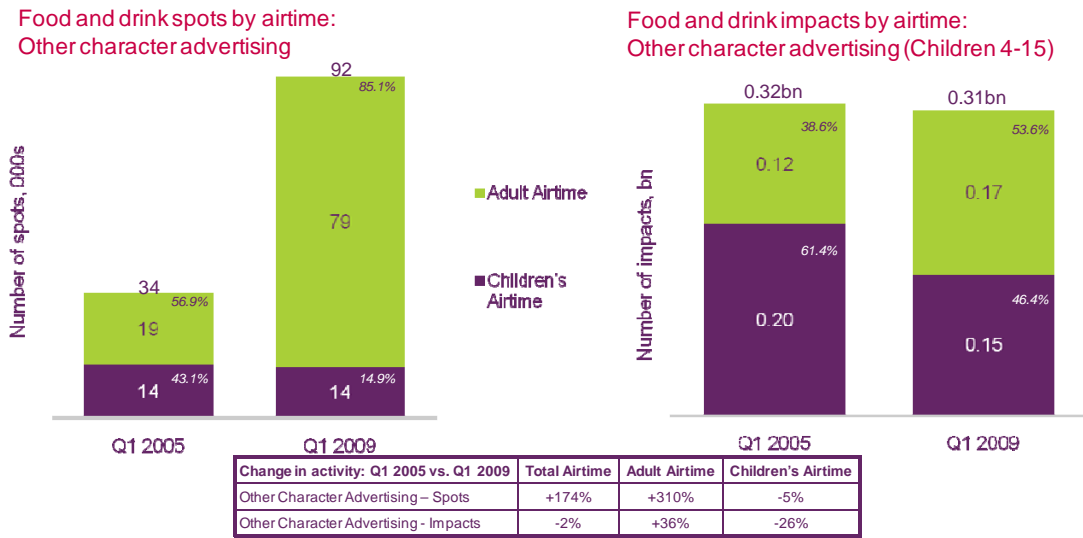
Spots by airtime

A7.71 The overall increase in the volume of spots featuring other characters (up 174% from 34,000 spots to 92,000 spots) was driven by activity during adult airtime (up 310% from 19,000 spots to 79,000 spots), while spots during children’s airtime fell slightly (down 5%).

Impacts by airtime

A7.72 Although child impacts remained fairly stable between the two periods (down 2%), the increased use of this technique during adult airtime led to an increase in children’s exposure to advertisements containing other characters during this airtime (up 36%) and consequently growth in share (from 38.6% in Q1 2005 to 53.6% in Q1 2009). The volume of impacts in children’s airtime shows that this technique is being used by some advertisers to promote non HFSS products.

Figure A49: Other characters: Spots and impacts by airtime



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

Spots by daypart

A7.73 The number of commercials featuring other characters increased across all dayparts during adult airtime. The majority of spots were aired post-18:00 – these dayparts accounted for 57.1% (11,000 spots) of all other character spots in adult airtime during Q1 2005 compared with 56.8% (45,000 spots) in Q1 2009.

Impacts by daypart

A7.74 Children’s exposure to this type of advertising increased across all dayparts with the exception of the 06:00-09:30 slot (down 23%) - the largest increase occurred during the 15:15-17:00 daypart (up 153%).

Figure A50: Other characters: Spots and impacts by daypart in adult airtime



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

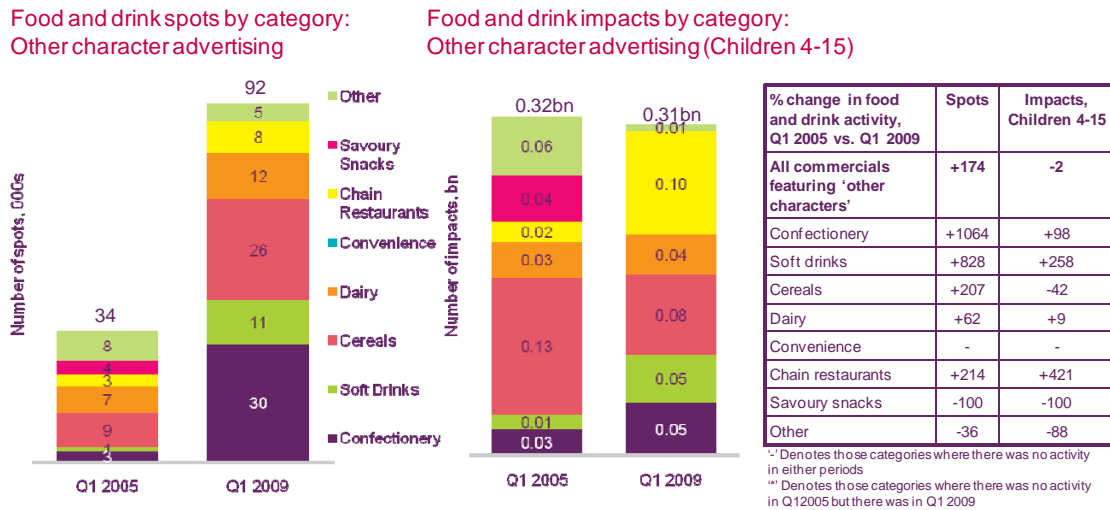
Spots by product category

A7.75 The growth in the use of other types of characters was driven by above-average increases in activity among confectionery (up 1064%), soft drinks (up 828%), cereal (up 207%) and chain restaurant (up 214%) advertisers. Confectionery products accounted for the greatest number of these types of commercials shown in Q1 2009 (30,000 spots).

Impacts by product category

A7.76 While children’s exposure to this type of advertising remained fairly consistent between the two periods, there was a fall in savoury snack and cereal impacts (despite an increase in cereal spots between Q1 2005 and Q1 2009) and a rise in confectionery, soft drinks and chain restaurant impacts.

Figure A51: Other characters: Spots and impacts by product category



Source: Billetts Media Monitoring
 Note: Minor variations due to rounding

A7.77 The following table summarises the use of, and children’s exposure to, each of the advertising techniques detailed above.

Figure A52: Summary of changes in the use of creative techniques

Spots, 000s	Total Airtime			Adult airtime			Children's airtime		
	Q1 2005	Q1 2009	% change	Q1 2005	Q1 2009	% change	Q1 2005	Q1 2009	% change
All food and drink									
Spots, 000s	575	1,128	+96	482	1,092	+127	94	36	-62
Impacts, bn	3.6	2.7	-24	2.4	2.4	+4	1.3	0.3	-78
Celebrity advertising									
Spots, 000s	25	168	+573	24	166	+583	1	2	+245
Impacts, bn	0.2	0.4	+143	0.15	0.39	+153	0.01	0.01	-4
Licensed character advertising									
Spots, 000s	25	19	-23	1	12	+1,869	24	7	-70
Impacts, bn	0.4	0.1	-84	0.01	0.02	+69	0.38	0.04	-88
Promotions based advertising									
Spots, 000s	42	125	+201	18	118	+552	24	8	-67
Impacts, bn	0.5	0.3	-41	0.10	0.21	+112	0.37	0.07	-82
Health claim advertising									
Spots, 000s	119	283	+139	107	273	+156	12	10	-14
Impacts, bn	0.7	0.8	+18	0.51	0.69	+36	0.16	0.10	-40
Brand equity advertising									
Spots, 000s	66	105	+58	26	88	+238	40	16	-59
Impacts, bn	0.7	0.3	-56	0.11	0.20	+72	0.59	0.10	-82
Other character advertising									
Spots, 000s	34	92	+174	19	79	+310	14	14	-5
Impacts, bn	0.3	0.3	-2	0.12	0.17	+36	0.20	0.15	-26