



# Changes in the nature and balance of television food advertising to children

A review of HFSS advertising restrictions

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## Section 1

# Summary

## Introduction

- 1.1 In April 2007, Ofcom began phasing in restrictions on the advertising of food and drink that is high in fat or salt or sugar (HFSS). 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'<sup>1</sup>.
- 1.2 In announcing the restrictions, Ofcom said that it would carry out a review in late 2008 to assess whether or not the restrictions were having the expected effects, in terms of:
  - a) the reduction in HFSS advertising seen by children;
  - b) use of advertising techniques considered to appeal to children in HFSS advertising; and
  - c) the impact on broadcasting revenues.
- 1.3 At the request of the Government, we brought forward the start of the review to July 2008. Immediately before the review, we held a seminar for key stakeholders (including Government departments, broadcasters, advertisers and interest groups) to explain the approach we were taking. This document reports on the outcome of the review, which looks at changes in the television advertising of HFSS products between 2005 (the last year for which Ofcom had comprehensive full year data when reaching decisions on the advertising restrictions) and July 2007 to June 2008 (2007/8 - the latest 12 month period for which we have data).
- 1.4 The final phase of restrictions do not take effect until 1 January 2009, so this review does not reflect changes which may result from those restrictions. For this reason, we intend to carry out a further review in early 2010, when full year data for 2008 and 2009 is available.

## Background

- 1.5 In December 2003, amid growing concerns about child obesity, the Government called for a change in the nature and balance of advertising to children of food and drink products. The Secretary of State for Culture, Media and Sports asked Ofcom to consider proposals for strengthening the rules on television advertising of food and drink products to children.
- 1.6 In 2004, the Food Standards Agency (FSA) started developing a nutrient profiling (NP) model to distinguish foods that were HFSS from those which were not, so that this could be applied to television advertising. The NP model was completed at the end of 2005.

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<sup>1</sup> Paragraph 1.9, *Television advertising of food and drink products to children – Final statement*, Ofcom, February 2007 ('February 2007 statement') ([http://www.ofcom.org.uk/consult/condocs/foodads\\_new/statement/statement.pdf](http://www.ofcom.org.uk/consult/condocs/foodads_new/statement/statement.pdf))

- 1.7 In November 2006, following an extended period of analysis and consultation, Ofcom announced a progressive ban on the scheduling of HFSS advertising in children's airtime<sup>2</sup>. This began to be phased in from 1 April 2007 (Annex 1). The final phase will come into force on 1 January 2009, when all HFSS advertising will be banned from children's channels. On other channels, it has already been banned from children's airtime and around programmes with a disproportionately high child audience. HFSS advertising continues to be allowed at other times.
- 1.8 In parallel, BCAP<sup>3</sup> introduced restrictions on techniques that may be used in promoting food and drink products, including HFSS products. Section 2 summarises the nature of the restrictions in more detail, which are set out in full in Annex 2.

### **The changing context**

- 1.9 To understand the significance of changes to the nature and balance of food advertising to children, it is helpful to look at the context in which these changes are occurring. We examine these in more detail in Section 4; the main contextual changes have been as follows in 2007/8:
- a) children are watching broadly the same amount of television as in 2005, and the same proportion of viewing in adult airtime (just over half) and children's airtime; however
  - b) many more households with children have access to multichannel television in 2008 than was the case in 2005. As a result, children's viewing has moved to digital channels away from the PSB channels;
  - c) the main beneficiaries of changes in children's viewing habits have been digital children's channels (both commercial and non commercial) and the main commercial channels' digital spin-off services (e.g. ITV2, Fiver and E4);
  - d) the number of food and drink advertising spots on television overall has increased (mainly due to the proliferation of channels); however the share of food and drink adverts as a proportion of all TV advertising has remained relatively stable at 13.3%;
  - e) food and drink advertising spots have shifted from children's airtime to adult airtime. This appears to have been driven in part by the restrictions on food and drink advertising during children's airtime; and
  - f) the net effect of increased viewing to digital services (which are allowed to show slightly more advertising than the main commercial channels) overall is that in 2007/8 children were exposed to slightly more advertising (0.5% more impacts) than in 2005.

### **Changes in the amount of HFSS advertising seen by children**

- 1.10 The current indications are that, in the context of a gradual decrease in food and drink advertising in children's airtime since 2003, the scheduling restrictions are contributing to a significant reduction in HFSS impacts for 4-15 year olds, with scope

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<sup>2</sup> The periods within television schedules devoted to children's programming, including all programming on children's channels - see Annex 3.

<sup>3</sup> BCAP is the Broadcasting Committee of Advertising Practice of the Advertising Standards Authority – Ofcom's co-regulator of TV and radio advertising.

for further reductions when the final phase of the advertising restrictions is implemented in January 2009.

- 1.11 For the reasons explained in section 3 of the document, 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 today. The best estimate of change requires a comparison between separate assessments of how much HFSS advertising was seen by children in 2005, and how much they saw in 2007/8. We call these two assessments the 2005 and 2007/8 'proxies'. It is important to note that these assessments are prepared on different bases, because more detailed data is available for 2007/8 than was available in 2005. For this reason, the outcome is necessarily approximate, and should not be taken as a precise indication.
- 1.12 On that basis, we estimate that overall, compared with 2005, in 2007/8:
- a) children<sup>4</sup> saw around 34% less HFSS advertising;
  - b) younger children (4-9 year olds) saw 39% less; older children (10–15 year olds) saw 28% less;
  - c) overall, children saw 41% less advertising on the main commercial channels (ITV, Channel 4, Five, and in Wales S4C1) and 27% less advertising on digital commercial channels;
  - d) children saw 63% less HFSS advertising during children's airtime (including both children's channels and children's slots on other channels);
  - e) children saw 35% less HFSS advertising in adult airtime on the main commercial channels, but 7% more on digital commercial channels. The biggest increases occurred on the main commercial channels' spin-off services<sup>5</sup>, whose share of HFSS child impacts grew from 4% to 16%; and
  - f) overall children saw 29% less HFSS advertising between 18:00 and 21:00.
- 1.13 Separate analysis carried out by Ofcom suggests that only about 40% of all food and drink advertising seen by children was for HFSS products likely to appeal to them. The remainder was either for non-HFSS products, or HFSS products such as spreads, cooking oil and drinks mixers.
- 1.14 Ofcom estimated that the advertising restrictions, once fully implemented, would reduce child HFSS impacts (the number of times an HFSS advert is seen by a child aged 4-15) by some 41% of the 2005 level (the last year for which we had comprehensive revenue and viewing data at the time). This estimate was prepared using the 2005 proxy.
- 1.15 If we look at the change between 2005 and 2007/8 measured by the 2005 proxy, then it suggests that there has been an 18% reduction in the amount of HFSS advertising seen by children, with further reductions likely when the final phase of restrictions is implemented in January 2009. However, for the reasons set out in Section 3, Ofcom considers that the estimates summarised in paragraph 1.12 above better reflect the change in the amount of HFSS advertising seen by children.

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<sup>4</sup> Unless otherwise indicated, references to children are to those aged 4-15.

<sup>5</sup> Commercial spin off services are ITV2, ITV3, ITV4, Men and Motors, Channel 4+1, E4, More 4, Film Four, Fiver, Five US and +1 time shifted versions of the channels

## Changes in the use of advertising techniques seen by children

- 1.16 Surveys carried out by Ofcom's co-regulator the Advertising Standards Authority (ASA) show that broadcasters are complying with the HFSS content rules.
- 1.17 Children saw fewer food and drink advertisements using techniques considered to be of appeal specifically to children in 2007/8 than in 2005<sup>6</sup>. In particular:
- a) children saw less advertising featuring licensed characters (-69%), brand equity characters (- 36%), other characters (- 4%), promotions (- 36%) and health claims (- 18%). Children saw more advertising featuring celebrities (22%), but the growth all took place in adult airtime, and included advertisements featuring celebrities mainly of appeal to adults (e.g. Ian Botham and William Shatner);
  - b) in children's airtime, advertising impacts for children all these techniques declined and, with the exception of 'other characters' and 'celebrities', also declined in adult airtime; and
  - c) further changes are likely when HFSS advertising is removed from children's channels.
- 1.18 Overall, our analysis suggests that children are exposed to significantly less advertising using techniques considered to be of appeal to children.
- 1.19 In relation to brand advertising and sponsorship, there is no evidence which supports the view that advertisers are using these techniques to circumvent the restrictions on HFSS advertising, although the paucity of data makes definitive conclusions impossible.

## Impact on broadcasters

- 1.20 In restricting the advertising that broadcasters could carry, Ofcom sought to avoid a disproportionate impact on the revenues of broadcasters, and to avoid intrusive regulation of advertising during adult airtime, on the grounds that adults are able to make informed decisions about advertising messages. Ofcom estimated that the restrictions would affect the advertising revenue earned by broadcasters, although some would be able to mitigate that loss to a greater or lesser extent.
- 1.21 The review found that restrictions on food and drink advertising have not been the most significant factor affecting broadcasters in the period under review. In particular, on the basis of data supplied by broadcasters:
- a) children's channels saw a significant decline in food and drink advertising revenue. However data provided by broadcasters indicates that total advertising revenue on children's channels has nevertheless increased overall;
  - b) main commercial channels (ITV1, GMTV, Channel 4 and Five) have seen a 6% decline in food and drink advertising revenue. They have also experienced a reduction in overall advertising revenues;

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<sup>6</sup> Our analysis mirrors the findings of the Department of Health report which used a different measure (advertising spend) to establish the reductions in children's exposure. Both pieces of analysis show a fall in impacts for all techniques considered to appeal to children.

- c) most other digital commercial channels have been able to increase their revenue from food and drink advertising, so mitigating the effects of restrictions to a greater degree than we expected.

### Future review

- 1.22 The final phase of restrictions will be implemented on 1 January 2009, when children's channels will be required to remove all HFSS advertising from their schedules.
- 1.23 Under transitional arrangements, children's channels have been allowed to include a progressively declining amount of HFSS advertising in their schedules between April 2007 and December 2008. Unlike other channels, they have no scope to move HFSS advertising out of children's airtime to other parts of the schedule. The purpose of the transitional arrangements was to allow them time to seek alternative sources of revenue to mitigate the loss of revenue from HFSS advertising.
- 1.24 In 2007/8, children's channels accounted for 17% of HFSS advertising seen by children. If none of this advertising was displaced to other channels, we could expect a further overall 11 percentage point reduction in impacts since 2005 on top of the 34% reduction that we estimate has occurred.
- 1.25 The actual outcome is likely to be influenced by a number of factors, including the requirements of the advertising restrictions, the evolution of scheduling and viewing patterns, the changing emphasis of advertising campaigns, and the extent to which HFSS advertising displaced from children's channels re-appears in adult airtime on other channels. Other factors that may influence the outcome include the extent to which product reformulation (a long term process) contributes to changes in the balance of HFSS and non-HFSS products advertised on television, and possible changes to the nutrient profiling scheme stemming from the FSA's 2008 review.
- 1.26 For these reasons, we need to look at actual data from 2009 in order to gauge the full effects of the restrictions. Accordingly, we intend to carry out a further review in early 2010, once we have full-year data from both 2008 and 2009. As with the current review, the focus will be on whether the advertising restrictions are having the anticipated effects, rather than attempting to identify the direct impact of the restrictions on child obesity levels.



## Section 2

# Background

## Introduction

2.1 In this section, we summarise:

- 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 began to phase in last year; and
- d) Ofcom's plans for a 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. Ofcom also has a number of other duties which it must take into account including to further the interests of citizens and consumers, to maintain a sufficient plurality of providers of different television services and to secure the availability of a wide range of television services of high quality and calculated to appeal to a variety of tastes and interests. In performing these duties Ofcom must have regard, amongst other things, to the vulnerability of children and to the degree of harm and offence likely to be caused by the inclusion of any sort of material, and the likely size and composition of the audience. 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 research<sup>7</sup> has generated concerns in government and society about rising childhood obesity levels and ill-health due to dietary imbalance,

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<sup>7</sup> 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 (DH) 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 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 HFSS. 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, DH published a White Paper<sup>8</sup> reiterating the 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 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 Ofcom<sup>9</sup>.
- 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')<sup>10</sup>.

## The advertising restrictions

### Scheduling restrictions

- 2.11 Following that consultation, Ofcom published a Statement and Further Consultation on 17 November 2006<sup>11</sup> ('the November 2006 statement'), setting out a number of

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<sup>8</sup> Paragraph 58, Chapter 2. *Choosing Health: Making Healthier Choices Easier*, Department of Health, November 2004 ([http://www.dh.gov.uk/en/publicationsandstatistics/publications/publicationspolicyandguidance/browse/DH\\_4955568](http://www.dh.gov.uk/en/publicationsandstatistics/publications/publicationspolicyandguidance/browse/DH_4955568))

<sup>9</sup> An explanation of this model can be found on the FSA's website at <http://www.food.gov.uk/healthiereating/advertisingtochildren/nutlab/nutprofmod>

<sup>10</sup> *Television advertising of food and drink products to children - Options for new restrictions*, Ofcom, March 2006 (<http://www.ofcom.org.uk/consult/condocs/foodads/>).

decisions, and consulting on whether to extend restrictions on HFSS advertising in children's programming to cover those of appeal to under 16s.

2.12 In February 2007, Ofcom published its final statement ('the February 2007 statement')<sup>12</sup>. 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:

- 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;
- 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;
- avoid disproportionate impacts on the revenue of broadcasters;
- avoid intrusive regulation of advertising during adult airtime, given that adults are able to make informed decisions about advertising messages; and
- 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 4-15<sup>13</sup>.

2.14 An exception was made for children's channels, to which the following transitional arrangements were applied:

- 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 calendar year 2005 was to be allowed; and

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<sup>11</sup> '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](http://www.ofcom.org.uk/consult/condocs/foodads_new/foodads3.pdf))

<sup>12</sup> *Television Advertising of Food and Drink Products to Children: Final statement*, Ofcom, February 2007 ('February 2007 statement'). ([http://www.ofcom.org.uk/consult/condocs/foodads\\_new/statement/](http://www.ofcom.org.uk/consult/condocs/foodads_new/statement/))

<sup>13</sup> 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%.

- 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 calendar year 2005 was to be allowed.

2.15 From 1 January 2009 onwards, the scheduling restrictions will apply in full to children's channels.

### Content restrictions

2.16 Alongside the scheduling restrictions, BCAP introduced changes to its rules on the content of advertisements for food and drink 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.

### The review

2.17 In publishing our February 2007 statement, we said that we would review the effectiveness and scope of new restrictions in autumn 2008, one year after the full implementation of the new content rules<sup>14</sup>.

2.18 In December 2007, we briefed stakeholders on the experiences of the first six months of restrictions<sup>15</sup>. For the purposes of this interim briefing, the findings were based on all food and drink advertising as this was the only data readily available at the time. The main findings were that food and drink advertising (referred to at the time as core category advertising) seen by children had declined in line with Ofcom's estimates (particularly for children aged 4-9), and that food and drink advertising in children's airtime had fallen significantly, particularly on the main commercial channels.

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<sup>14</sup> Press statement, Ofcom, 22 February 2007 ([http://www.ofcom.org.uk/media/news/2007/02/nr\\_20070222](http://www.ofcom.org.uk/media/news/2007/02/nr_20070222))

<sup>15</sup> *Update on impact of restrictions on advertising food and drink products to children*, Ofcom, December 2007 (<http://www.ofcom.org.uk/research/tv/reports/update/>)

- 2.19 At the request of the Government, we brought forward the start of the current review to July 2008. Drawing on data from July 2007 to June 2008 (the most recent 12 month period for which data is available), the review has examined:
- a) whether scheduling restrictions are achieving 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 the impact on broadcasters has been broadly consistent with the effects that both Ofcom and the broadcasters expected;
  - c) whether scheduling restrictions and revised content rules are being implemented as intended, or whether unexpected difficulties have emerged in interpretation, implementation and enforcement;
  - 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 (contrary to our expectations) 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

- 2.20 As the November 2006 statement noted, the FSA has already committed to a review of the nutrient profiling model after a year of operation, and Ofcom has said that it would consider the implications of that review and, if appropriate, take steps to adopt any revised version of the model<sup>16</sup>.
- 2.21 The FSA has commissioned an independent Nutrient Profiling Review Panel to examine the nutrient profiling scheme, and has consulted on some proposed changes to the scheme. The Panel's proposals will be considered by the Scientific Advisory Committee on Nutrition before its final recommendations are submitted to the FSA for a decision in early 2009.

### ASA's reviews of advertising code

- 2.22 During July 2007 and September 2008, the ASA carried out assessments of whether broadcasters were complying with the new content rules<sup>17</sup>. The ASA Compliance team examined food or soft drink television advertisements appearing across a variety of media, including television. Section 6 reports on the outcome of these reviews.

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<sup>16</sup> See paragraph 5.55 of the November 2006 statement.

<sup>17</sup> *Compliance report: Food and Soft Drinks Survey 2007*, Advertising Standards Authority, January 2008 (<http://www.asa.org.uk/NR/rdonlyres/120B91FD-FB23-4551-A554-776822DEE333/0/FoodandSoftDrinkAdvertisingSurvey2007.pdf>)

## Section 3

# Data and definitions

## Introduction

- 3.1 In this section, we describe the data sources and definitions used in reviewing:
- a) the changing context in which the advertising restrictions apply;
  - b) changes in the balance of food and drink advertising, as between HFSS and non-HFSS products;
  - c) changes in the nature of food and drink advertising, including advertising techniques, brand and sponsorship activity; and
  - d) the impact of the advertising restrictions on broadcasters.
- 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 July 2007 to June 2008, the latest 12 month period for which we have data. 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. For this reason, the period from 2005 to 2007/8 covers changes that occurred both before and after these restrictions came into force.
- 3.3 As the final phase of restrictions does not come into effect until 1 January 2009, this review cannot provide a full assessment of the effect of the restrictions. It should also be noted that the 2007/8 period straddles two phases of the restrictions – phase one, which restricted advertising in and around programmes for, or of particular appeal to children aged 4-9, and phase two, which extended these restrictions to cover children aged 10-15, and which came into effect on 1 January 2008.
- 3.4 Although Ofcom's advertising restrictions did not come into effect until April 2007, the 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 2007/8 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.

## Definitions

- 3.5 The following terms are used in the review:
- a) '120 indexing' and similar terms refer 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 estimating the amount of HFSS advertising in 2005, in the absence of actual data on HFSS advertising. It is explained in more detail in Annex 4;
- c) the '2007/8 HFSS proxy' is the approach we used to estimating the amount of HFSS advertising in 2007/8, taking account of product advertising that had been certified as non-HFSS, and assessments of the remaining uncertified advertisements. It is explained in more detail in Annex 4;
- d) 'adult airtime' means the periods within television schedules that do not comprise children's programming;
- e) an 'advertising impact' is one member of the target audience viewing one advertisement. 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) 'children's airtime' means the periods within television schedules devoted to children's programming, including all programming on 'children's channels' (see definition below);
- i) 'children's channels' are the channels listed in Annex 3;
- j) '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 regulations<sup>18</sup>. It requires advertisers to certify HFSS adverts using the nutrient profiling (NP) scheme devised by the Food Standards Agency (FSA) if they wish to have their advertisements scheduled during restricted periods;
- k) 'commercial spin-off channels' means those launched by the 'main commercial channels' (see definition below), such as ITV2, E4 and Fiver. These are not PSB channels;
- l) 'dayparts' means the following periods within television schedules that are used by broadcasters and advertisers in analysing audiences: 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;
- m) 'digital commercial channels' means those channels available only through digital transmissions (whether terrestrial, cable or satellite) that are funded by advertising and / or subscriptions. The definition includes but is not limited to 'commercial spin-off channels', but excludes the 'main commercial channels' (ITV1, Channel 4, Five, and in Wales, S4C1) and the BBC's digital-only channels;

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<sup>18</sup> More information on Clearcast can be found at its website ([www.clearcast.co.uk](http://www.clearcast.co.uk)).

- n) 'food and drink advertising' is used to refer to the relevant categories of product and retail categories (sometimes referred to in previous Ofcom publications as 'core categories') used by analysts Nielsen Media and Billets Media to define advertising for food and drink products. Though broadly equivalent, the Nielsen and Billets categories differ slightly, as explained in Annex 4;
- o) 'HFSS' means food and drink high in fat or salt or sugar, according to the 'nutrient profiling' scheme (see definition below) of the Food Standards Agency (FSA);
- p) 'main commercial channels' refers to ITV1, Channel 4, Five, and in Wales, S4C1;
- q) 'multi-channel broadcasters' are those broadcasters such as BSkyB, Discovery, UKTV and Virgin Media that operate a range of digital commercial channels';
- r) 'nutrient profiling' (NP) is the method devised by the FSA to categorise food and drinks products for the purposes of TV advertising restrictions as healthy or less healthy<sup>19</sup>; and
- s) 'PSBs' means public service broadcasters. The public service channels are the BBC channels, ITV1, Channel 4, Five, and in Wales, S4C1.

## Data sources

### The changing context

- 3.6 We have used Ofcom data on the changes to the television environment, including the availability of multi-channel television, and changes in the number of popular non-public service channels to track changes in the availability of commercial television.
- 3.7 Using audience data from the British Audience Research Bureau (BARB), we have looked at changes in the amount of television that children are watching, the type of channels they are watching, and how much of their viewing is in children's airtime and other times.
- 3.8 In looking at television advertising of food and drink products, we have used data from Nielsen Media. The categories that make up food and drink advertising for these purposes are explained in Annex 4.

### Changes in the amount of HFSS advertising seen by children

- 3.9 In section 5, we look at what changes there have been in the balance of food and drink advertising to children, as between 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 NP 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 2007/8.

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<sup>19</sup> An explanation of this model can be found on the FSA's website at <http://www.food.gov.uk/healthiereating/advertisingtochildren/nutlab/nutprofmod>



### **The 2005 HFSS proxy**

- 3.11 For the purpose of the modelling we did in 2006 to estimate the amount of HFSS advertising seen by children in 2005, we aggregated data on the Nielsen food and drink sub-categories considered most likely to be comprised wholly or mainly of HFSS products, having regard to the FSA's provisional NP model<sup>20</sup>. 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.
- 3.12 Using this proxy, we estimated that the proportion of food and drink impacts that were HFSS in 2005 would have been 83% for 4-15 year olds. As a result of the further modelling we undertook, we estimated that the proposed scheduling restrictions, if fully implemented, would result in a 41% reduction in HFSS impacts for 4-15 year olds.

### **The 2007/8 HFSS proxy**

- 3.13 With the introduction of nutrient profiling, we have been able to make a more reliable estimate of how much advertising is for HFSS and for non-HFSS products. This estimate (the '2007/8 HFSS proxy') is based on:
- a) certificates for some advertisements provided by advertisers to Clearcast indicating which advertisements 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 product descriptors.
- 3.14 Instead of aggregating data at the level of sub-categories (e.g. ready to eat cereals), we were able to do so at a more granular level, using product descriptors (e.g. Weetabix). Using this approach (the '2007/8 proxy'), we estimate that, HFSS products accounted for 64% of all food and drink advertising seen by children in 2007/8, significantly less than in 2005.
- 3.15 As explained in Annex 4, where we have exercised judgement, we have taken a conservative approach and assumed products to be HFSS if there are not reasonable indications that the products are non-HFSS.

### **Measuring change**

- 3.16 The analysis undertaken to arrive at the 2007/8 proxy demonstrated that applying the 2005 proxy to 2007/8 advertising data would significantly overstate the amount of HFSS advertising seen by children in 2007/8. The main reason for this is that the 2005 proxy is based on higher level product and retail categories, rather than the more granular product descriptors.
- 3.17 For the purposes of this review we have compared the best estimate for HFSS impacts in 2005 (using the 2005 HFSS proxy) with our best estimate of HFSS

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<sup>20</sup> In doing so, we took advice from the Institute of Practitioners of Advertising.

impacts in 2007/8 (using the 2007/8 HFSS proxy) to derive our estimates of changes in HFSS impacts over that period.

### **Changes in the use of techniques in advertising seen by children**

- 3.18 In section 6, we have looked at use of techniques considered to appeal to children in food and drink advertising seen by children. As HFSS products were not defined and classified before the advertising restrictions came into force in March 2007, the data deals with all food and drink advertising, rather than just HFSS products. We have also considered whether there have been changes in brand advertising and sponsorship activity.
- 3.19 Analysis in this section uses data from Billets' food and drink categories, which differ in some details from the definition of food and drink advertising used elsewhere in the review (see paragraph 3.8 above). The Department of Health commissioned bespoke categorisation of this advertising in 2006 to allow it to analyse changes in creative activities used in food and drink advertising across media over time<sup>21</sup>. The database broadly contains all food and drink product advertising from 2003 to date.
- 3.20 The content of each advertisement included in the database is coded according to the type of creative technique used within each advertisement. 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 Tiger* and once for including a promotion.
- 3.21 Neither Nielsen nor Billets had separate data on brand advertising or sponsorship. As a result, we had limited evidence on which to make an assessment, and have had to rely on partial information from broadcasters on changes in sponsorship revenue, as well as Clearcast's assessment based on the advertising they were asked to clear.

### **Impact on broadcasters**

- 3.22 In section 7, we seek to assess the impact on broadcasters in the light of the effects we anticipated in our February 2007 statement. It should be noted that these anticipated effects assumed a steady state in the television advertising market. Clearly, there have been changes in the market, and these make it impossible to be sure of the precise impact of one set of factors (the advertising restrictions) by comparison with others.
- 3.23 We asked broadcasters to provide us with information on advertising and sponsorship revenue, including revenue from food and drink advertising, and the value of sponsorship arrangements. We also asked them to assess the impact of the advertising restrictions on their businesses, including shifts in advertising revenue towards brand advertising, non-HFSS products and sponsorship, and any other impacts. Not all of them were able to provide comprehensive data; for instance, some do not split out advertising revenue by source.

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<sup>21</sup> See DH Report.

## Section 4

# The changing context

### Introduction

- 4.1 To understand the significance of any changes to the nature and balance of food advertising to children, it is helpful to understand the context in which these changes are occurring. For example, an increase in the number of commercial television channels is likely to lead to an increase in the overall amount of advertising, but not necessarily in the amount of advertising that a viewer sees. Changes in viewing patterns can also alter the amount of advertising to which a viewer is exposed. The amount of advertising a viewer sees is a product of how much television they watch, what proportion of that is on commercial channels and how much advertising those channels are showing.
- 4.2 This section examines whether the context is changing, and if so, how, exploring recent changes to the television landscape, to children's viewing habits, and finally to the amount and distribution of television advertising for food and drink products. The main focus is on changes since 2005 - the base year that Ofcom has adopted for measuring changes to advertising stemming from its restrictions<sup>22</sup>. However, in some cases, we provide data going back to 2003, at the end of which year the Government asked Ofcom to consider tightening advertising restrictions.

### Key findings

- 4.3 The main findings are that in 2007/8:
- a) children are watching broadly the same amount of television as in 2005, and the same proportion of viewing in adult airtime (just over half) and children's airtime; however
  - b) many more households with children have access to multichannel television in 2008 than was the case in 2005. As a result, children's viewing has moved to digital channels away from the PSB channels;
  - c) the main beneficiaries of changes in children's viewing habits have been digital children's channels (both commercial and non commercial) and the main commercial channels' digital spin-off services (e.g. ITV2, Fiver and E4);
  - d) the number of food and drink advertising spots on television overall has increased (mainly due to the proliferation of channels); however the share of food and drink adverts as a proportion of all TV advertising has remained relatively stable at 13.3%;
  - e) food and drink advertising spots have shifted from children's airtime to adult airtime. This appears to have been driven, in part, by the restrictions on food and drink advertising during children's airtime; and
  - f) the net effect of increased viewing to digital services (which are allowed to show slightly more advertising than the main commercial channels) is that in 2007/8

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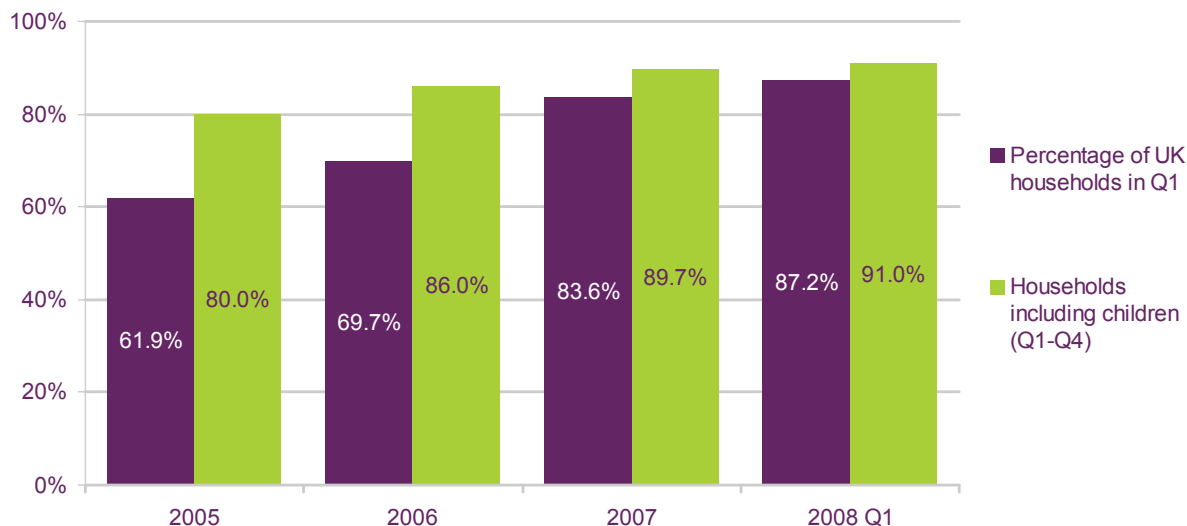
<sup>22</sup> At the time Ofcom published its final statement, 2005 was the most recent year for which full year data was available.

children were exposed to slightly more advertising (0.5% more impacts) overall than in 2005.

### Changes to the television landscape

4.4 As Figure 4.1 shows, penetration of multi-channel television in households with children is higher than in the population as a whole. The proportion of households with children that have access to multichannel television grew from 80% in 2005 to 91% in the first quarter of 2008.

**Figure 4.1: Percentage of UK households with access to multi-channel television**



Source: Ofcom's Communication Market Review<sup>23</sup>. Data on households with children taken from Ofcom's Residential Tracker.

4.5 This growth has helped to increase audiences for new digital commercial channels, particularly children's channels and digital spin-off channels launched by the main commercial channels, such as ITV2, Five US and E4 (see Fig 4.2). Since 2005, these channels have become increasingly accessible, with many either becoming free-to-air, increasing the number of hours they broadcast or now forming part of the basic tier of cable and satellite pay TV packages. In addition many of these services have also launched +1 hour time delay versions of their channels.

4.6 In contrast the amount of children's programming shown on BBC One<sup>24</sup>, ITV1 and Five has declined over the last few years, but the number of children's channels has increased. Some of these are PSB spin-off channels, such as CBBC and CBeebies and CITV. This change in programme delivery is reflected in changes in children's viewing habits.

<sup>23</sup> Ofcom's 2008 Communications Market Review <http://www.ofcom.org.uk/research/cm/cmr08/tv/>

<sup>24</sup> There is correspondingly more children's programming on BBC Two.

**Figure 4.2: Spin-off channels launched by the main commercial channels**

Operator	Channel	Launch
ITV	ITV4	November 2005
	CITV	March 2006
	ITVPlay	March 2006 (closed March 2007)
	ITV2+1	October 2006
	ITV3+1	October 2006
Channel 4	More 4	October 2005
	Film4*	Relaunched July 2006
	Film4+1	July 2006
	Channel 4+1 <sup>25</sup>	August 2007
Five	Five Life <sup>26</sup>	October 2006
	Five US	October 2006
	Five Life+1	August 2007
	Five US+1	August 2007

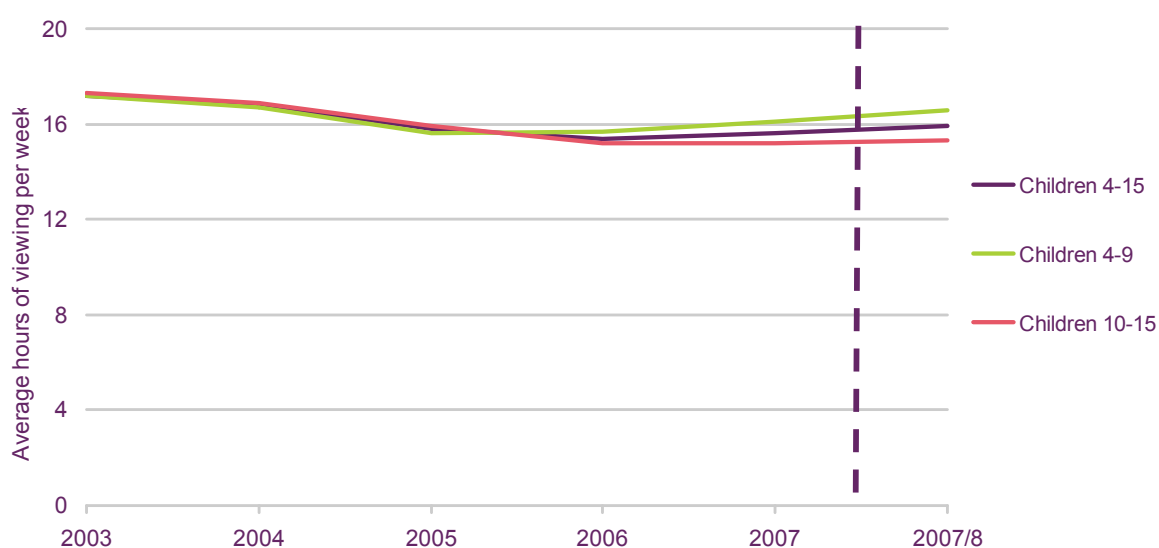
\*Originally subscription-only service

### Changes in children's viewing habits

4.7 As can be seen in Figure 4.3, the amount of television watched by children has remained relatively constant over time. In 2007/8 children aged 4-15 watched an average of 15.9 hours a week, as compared with 15.8 hours a week in 2005. Older children aged 10-15 years were watching slightly less (15.3 hours), and younger children aged 4-9 years watched slightly more (16.6 hours) on average each week in 2007/8.

**Figure 4.3: Average weekly hours of television viewing**

Average weekly hours of television viewing



Source: BARB

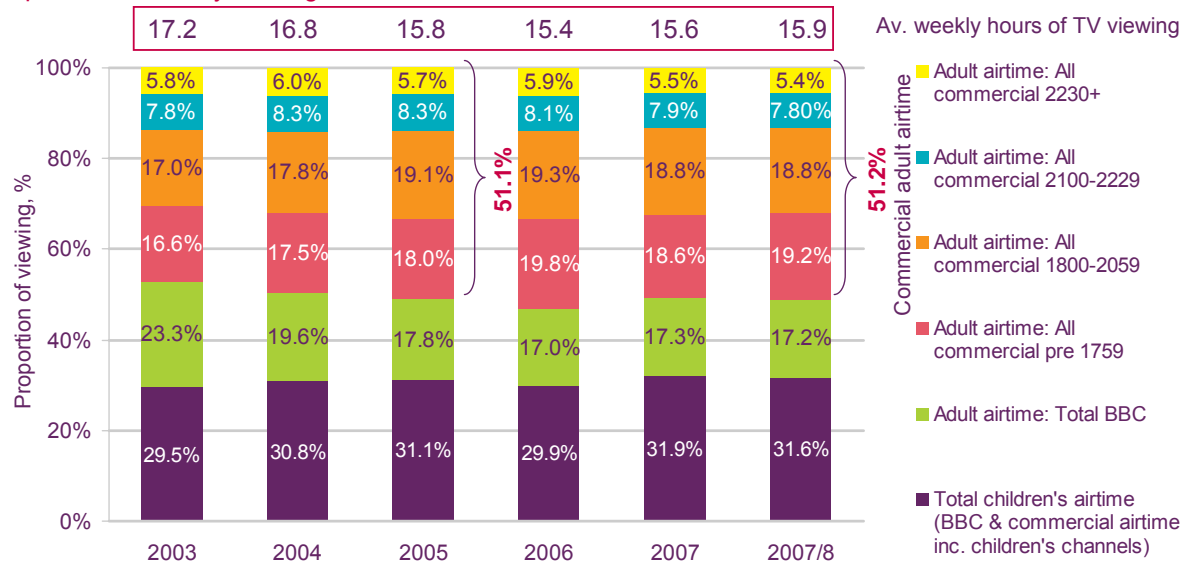
<sup>25</sup> Channel 4 +1 has been treated as a digital spin off channel throughout this analysis

<sup>26</sup> Branded Fiver since April 2008

4.8 As Figure 4.4 reveals, the amount of viewing in children’s airtime and commercial adult airtime has also remained relatively constant. In 2005, just over half (51.1%) of children’s viewing was in adult airtime on commercial channels, and this remained the case in 2007/8 (51.2%). In addition, older children aged 10 -15 spent more of their viewing time (59.8%) in commercial adult airtime than younger children (42.6%). The proportion of children’s viewing in adult commercial airtime before 18:00 has increased slightly from 18.0% to 19.2%.

**Figure 4.4: Children’s viewing in adult airtime by daypart**

Split in total weekly viewing: **Children 4-15**



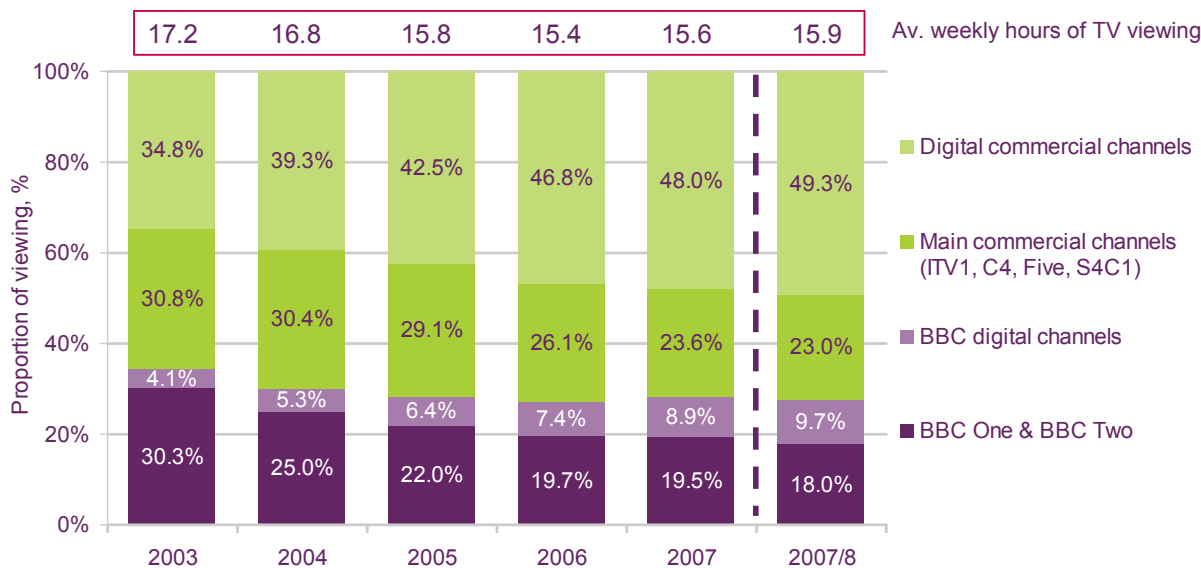
Source: BARB \*2008 includes January to June only

4.9 However as Figure 4.5 shows, the channel groups that children watch have changed between 2005 and 2007/8. In particular:

- a) children spent less time watching the PSB channels (BBC One, BBC Two, ITV1, Channel 4 and Five). The share of viewing on the main commercial channels (ITV1, Channel 4 and Five) fell from 29.1% in 2005 to 23.0% in 2007/8;
- b) instead, a higher proportion of children’s viewing time was spent on digital channels (both commercial and BBC services); and
- c) between 2005 and 2007/8, the proportion of children’s viewing on commercial digital channels increased from 42.5% to 49.3%.

**Figure 4.5: Split of children’s viewing by type of channel: BBC vs. commercial**

Split in total weekly viewing: **Children 4-15**



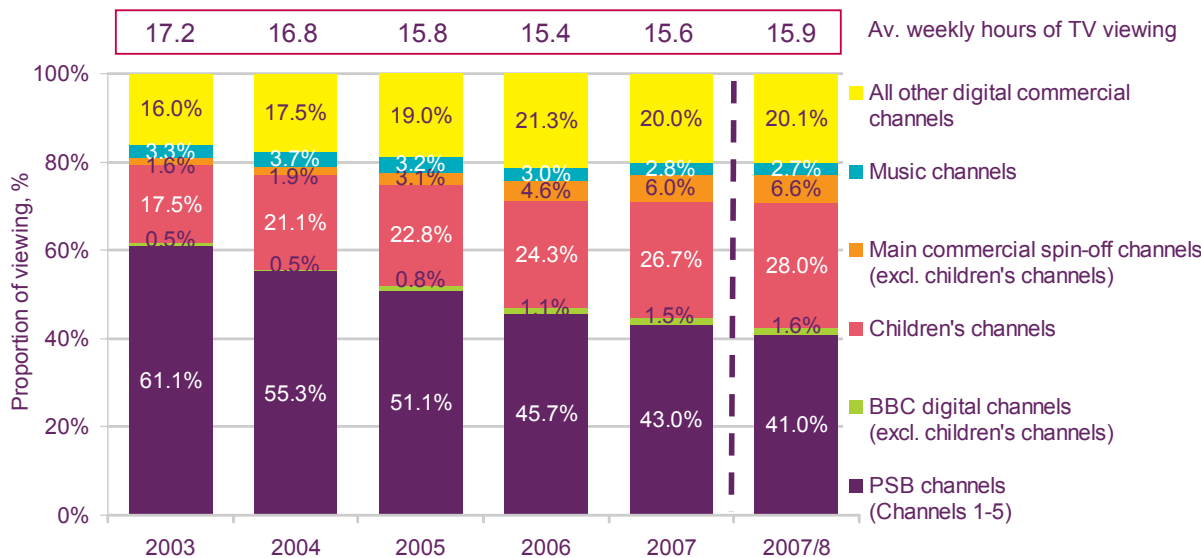
Source: BARB \*2008 includes January to June only

4.10 As Figure 4.6 shows, two types of channel have particularly benefited from the switch away from the PSB channels.

- a) children’s channels increased their share of children’s viewing from 22.8% in 2005 to 28% in 2007/8; and
- b) digital commercial spin-off channels launched by the main commercial broadcasters (ITV2, E4 and Fiver) have also increased their share of 4-15 viewing from 3.1% in 2005 to 6.6% in 2007/8.

**Figure 4.6: Split of children’s viewing by type of channel: PSB vs. commercial digital**

Split in total weekly viewing: **Children 4-15**



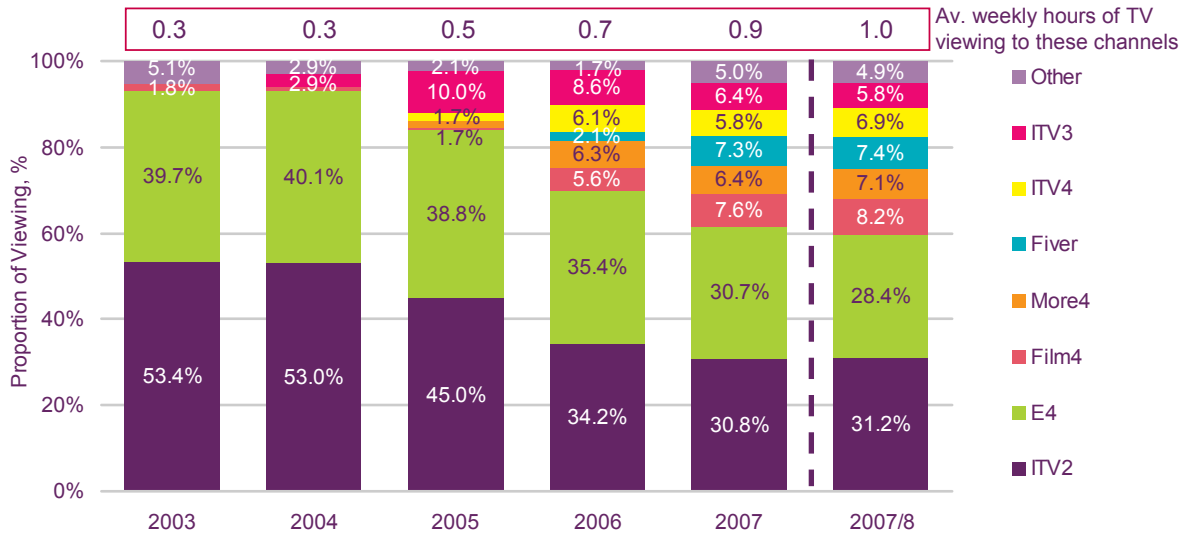
Source: BARB \*2008 includes January to June only

4.11 More detailed analysis of all of the digital spin-off channels indicates that E4 and ITV2 attract the greatest proportion of children’s viewing to these services. Figure 4.7

below shows that both E4 and ITV2 have seen reductions in their audience share, as more channels launch and compete for audiences. However, this reduction in share has been more than offset by an increase in children’s viewing time, which for all digital spin off channels has increased from 0.5 hours in 2005 to 1.0 hours in 2007/08.

**Figure 4.7: Children’s viewing of spin-off channels**

Total weekly viewing to spin-off channels: **Children 4-15**



Source: BARB. Includes all +1 channels

4.12 The net effect of increased viewing to digital services (which are allowed to show slightly more advertising than the main commercial channels) is that in 2007/8 children were exposed to slightly more advertising (0.5% more impacts) than in 2005.

### Food and drink advertising

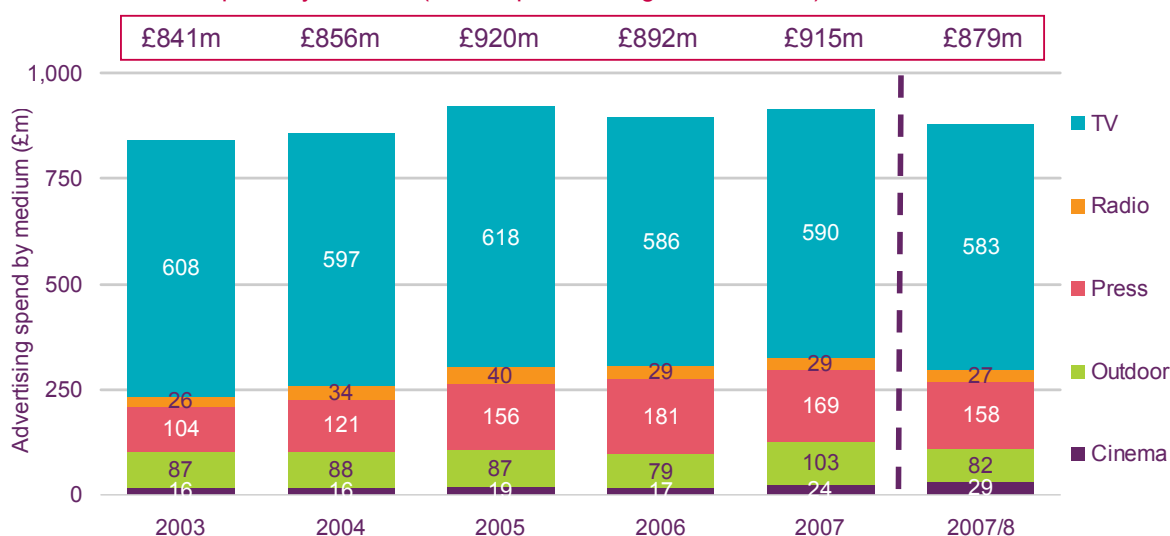
#### Advertising spend across different media

4.13 The latest data available to Ofcom for food and drink advertising excludes expenditure on internet advertising, but suggests that expenditure on TV advertising is declining in real terms (see Figure 4.8). However, as indicated in Figure 4.9, it is not yet clear whether it is declining as a proportion of overall media expenditure.



**Figure 4.8: Expenditure on food and drink advertising by media (excluding Internet)**

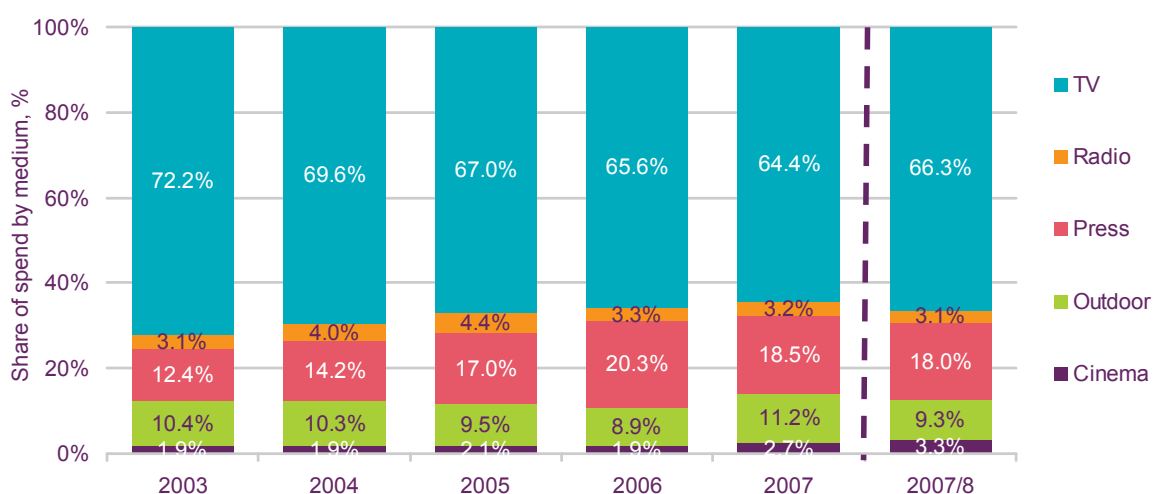
Food and drink: Spend by medium (2007/8 prices using GDP deflator)



Source: Nielsen Media

**Figure 4.9: Share of expenditure on food and drink advertising by media (excluding Internet)**

Food and drink: Share of spend by medium

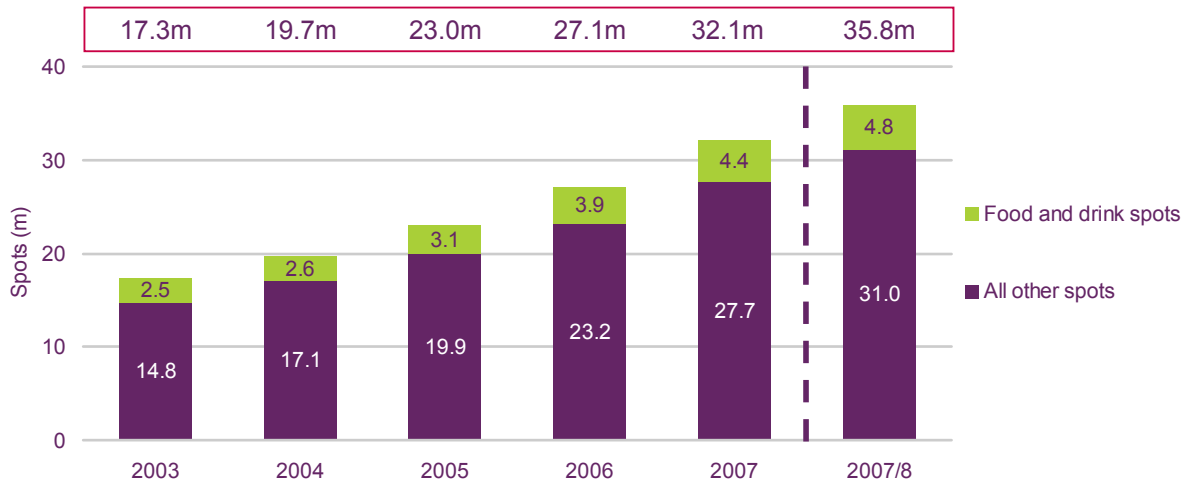


Source: Nielsen Media

4.14 It should be noted that although expenditure on TV advertising for food and drink products has fallen, the number of advertising spots has increased, suggesting that overall the price of spots has fallen.

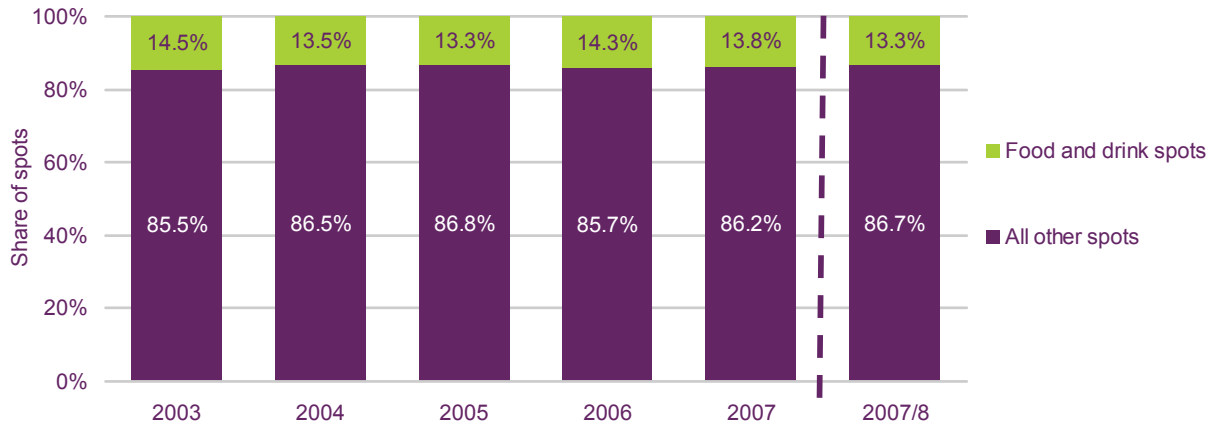
4.15 As Figure 4.10 shows, the number of food and drink spots on television increased by 56% (1.7bn) between 2005 and 2007/8, mainly as a result of the proliferation of digital channels. However as Figure 4.11 reveals, as a proportion of all television advertising, food and drink advertising has remained unchanged at 13.3% since 2005.

**Figure 4.10: Growth in TV advertising spots**



Source: Nielsen Media

**Figure 4.11: Food and drink spots as a proportion of all TV advertising spots**

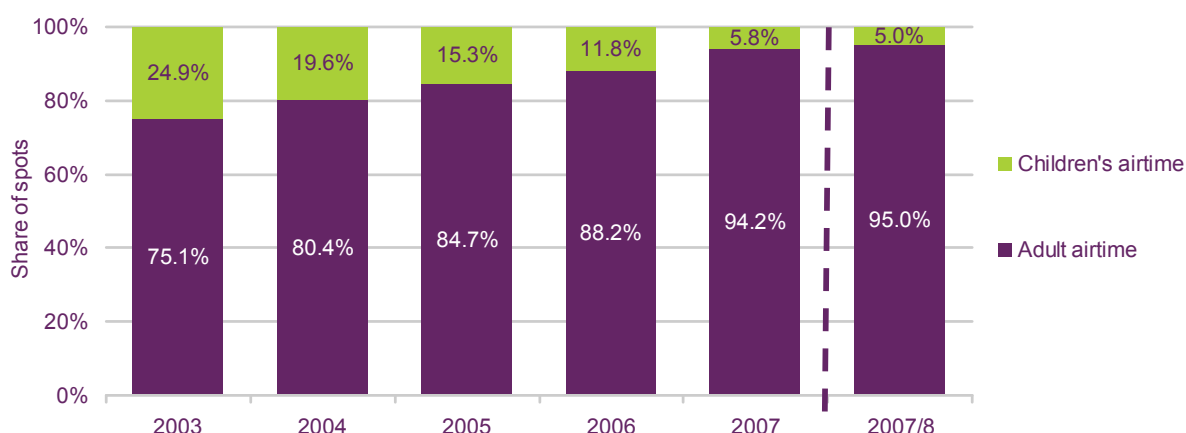


Source: Nielsen Media

4.16 The growth in the absolute number of food and drink spots is driven entirely by adult airtime. Between 2005 and 2007/8 food and drink spots increased 73% from 3.1m to 4.8m. As a result the share of food and drink spots accounted for by adult airtime grew from 84.7% to 95% (see Fig 4.12). In contrast, food and drink spots in children’s airtime have fallen dramatically.

4.17 Over the same period, the number of food and drink spots in children’s airtime fell 40% from 0.5 to 0.3m. In 2005 children’s airtime accounted for 15.3% of all food and drink spots. By 2007/8, children’s airtime accounted for just 5%.

**Figure 4.12: Proportion of food and drink TV advertising spots in children’s airtime**

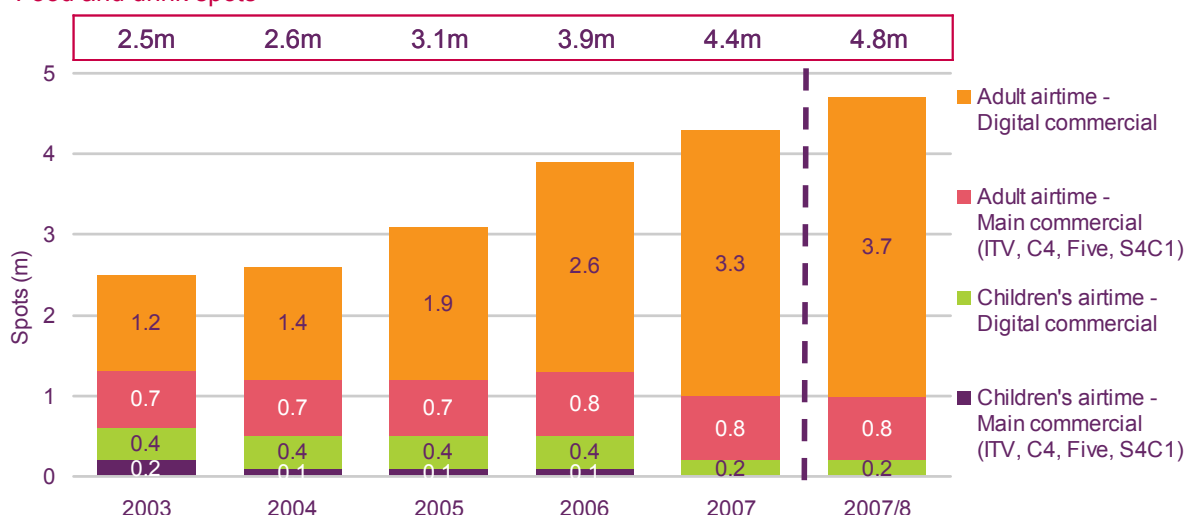


Source: Nielsen Media

4.18 Figure 4.13 illustrates that food and drink spots during adult airtime on digital channels almost doubled from 1.9m in 2005 to 3.7m in 2007/8. There has also been growth of 14% in food and drink spots during adult airtime on the main commercial channels (0.7m in 2005 to 0.8m in 2007/8).

**Figure 4.13: Food and drink TV spots on digital commercial channels**

Food and drink spots



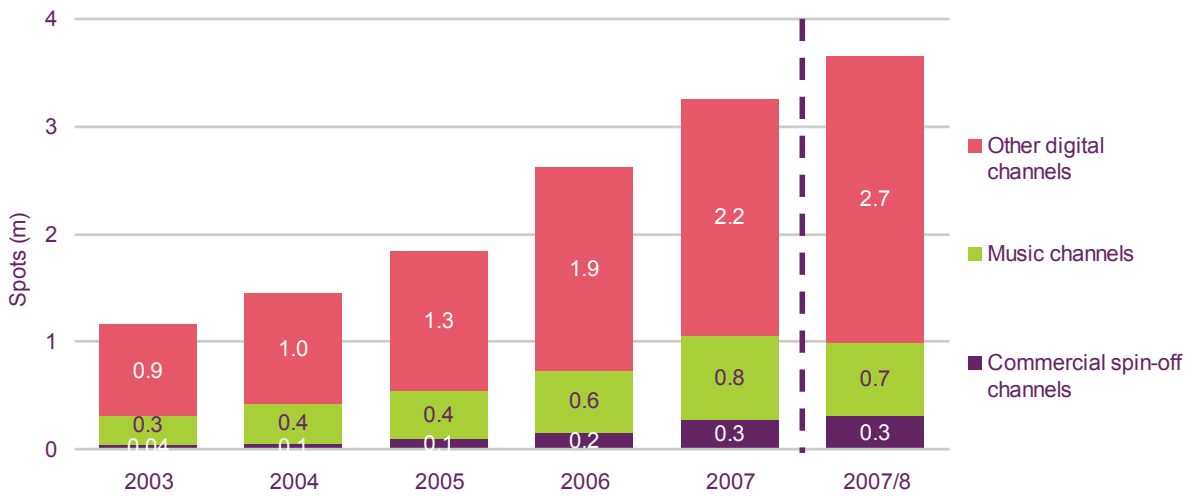
Source: Nielsen Media. Minor variations due to rounding

4.19 As Figure 4.14 shows, food and drink spots have increased on all digital commercial channels (excluding children’s channels), with the strongest growth occurring on commercial spin-off channels – an increase of some 210% between 2005 and 2007/8, albeit from a low base.

4.20 In adult airtime on digital channels, the largest increase occurred on the commercial spin off channels, with growth of 210% between 2005 and 2007/8 from 0.1m to 0.3m, though in absolute terms, other digital channels (excluding children’s and spin-off channels) broadcast the greatest amount of spots (2.66m in 2007/8).

**Figure 4.14: Food and drink spots on adult digital channel groups**

Food and drink spots on digital channels (excl. dedicated children's channels)



Source: Nielsen Media. Minor variations due to rounding

4.21 Of themselves, TV advertising spots do not indicate how much food and drink advertising children may be seeing, nor how much of that advertising is for HFSS products. We examine these issues in section 5, where we also consider how much of the HFSS advertising that children see is for products that may be of appeal to them.

## Section 5

# Changes in the amount of HFSS advertising seen by children

## Introduction

5.1 The scheduling restrictions (Annex 3) introduced in April 2007 were anticipated to secure a significant reduction in the amount of HFSS advertising that children aged 4-15 might see. This section explores how children's exposure to HFSS advertising has changed between 2005 and 2007/8, taking into account the section 4 findings on changes to both the advertising landscape and to children's viewing habits.

## Key findings

5.2 Overall, children are seeing significantly less HFSS advertising now than in 2005. Impacts have fallen in both children's and adult airtime, including in the early evening between 18.00 and 21.00. Some of the HFSS advertising that children see is for products that are unlikely to appeal to them.

5.3 For the reasons explained in section 3, the best estimate of change requires a comparison of the 2005 and 2007/8 proxies, so the outcome is necessarily approximate, and should not be taken as a precise indication. On that basis, we estimate that overall, compared with 2005, in 2007/8:

- a) children<sup>27</sup> saw around 34% less HFSS advertising (as measured in impacts);
- b) younger children (4-9 year olds) saw 39% less; older children (10–15 year olds) saw 28% less;
- c) overall, children saw 41% less advertising on the main commercial channels (ITV, Channel 4, Five, and in Wales, S4C1) and 27% less advertising on digital commercial channels
- d) children saw 63% less HFSS advertising during children's airtime (including both children's channels and children's slots on other channels);
- e) children saw 35% less HFSS advertising in adult airtime on the main commercial channels, but 7% more on digital commercial channels. The biggest increases occurred on the main commercial channels' digital spin-off services<sup>28</sup>, whose share of HFSS child impacts grew from 4% to 16%; and
- f) children saw 29% less HFSS advertising between 18.00 and 21.00.

5.4 Separate analysis carried out by Ofcom suggests that only about 40% of all food and drink advertising seen by children was for HFSS products likely to appeal to them. The remainder were either for non-HFSS products, or for HFSS products such as spreads, cooking oil and drinks mixers.

5.5 Ofcom is satisfied that broadcasters have complied with the current scheduling restrictions. Further reductions in HFSS impacts are likely once the restrictions have been fully implemented from 1 January 2009.

<sup>27</sup> Unless otherwise indicated, references to children are to those aged 4-15.

<sup>28</sup> Digital spin off services are ITV2, ITV3, ITV4, Men and Motors, Channel 4+1, E4, More 4, Film Four, Fiver, Five US and +1 time shifted versions of the channels

## Overall amount of HFSS advertising seen by children

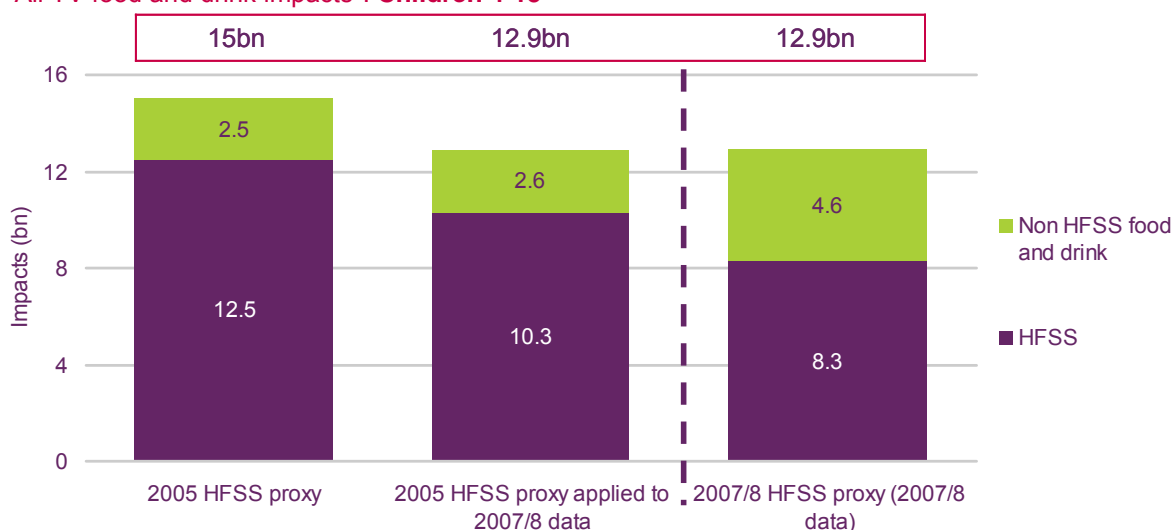
- 5.6 In the February 2007 statement, Ofcom estimated, that once fully implemented, the effect of the advertising restrictions would be to reduce HFSS impacts for children aged 4-15 by 41% of the 2005 level (the last year for which we had full data at the time). This would include a reduction of up to 51% in relation to 4 - 9 year olds.
- 5.7 For the reasons explained in section 3 of the document, the best estimate of change since 2005 requires a comparison of the 2005 and 2007/8 proxies, so the outcome is necessarily approximate, and should not be taken as a precise 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 proxy.
- 5.8 The differences in the scale of change as measured by different approaches can be seen in Figures 5.1 and 5.2. In Figure 5.1 below:
- column two shows the reductions in the amount of all food and drink advertising seen by children;
  - column three shows the estimated reductions in terms of the 2005 HFSS proxy, that is the same basis on which the forecasts included in the February 2007 statement were made; and
  - column four shows the estimated reductions in terms of the 2007/8 proxy, that is the approach we consider gives a better indication of the scale of change. However, as indicated above, it should not be taken as a precise indication.

**Figure 5.1: Reduction in child advertising impacts (2005 – 2007/8)**

Age group	All food and drink	2005 HFSS proxy	2007/8 HFSS proxy
4-15	-14%	-18%	-34%
4-9	-20%	-24%	-39%
10-15	-9%	-12%	-28%

**Figure 5.2: The split between HFSS and non HFSS food and drink impacts using the 2005 and 2007/8 proxies**

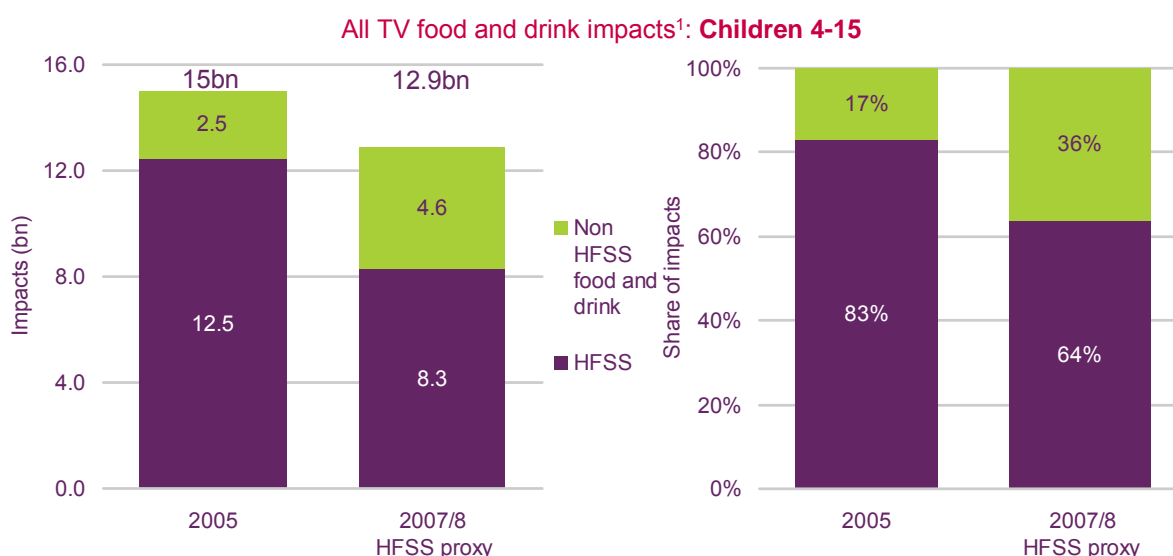
All TV food and drink impacts<sup>1</sup>: **Children 4-15**



Source: Nielsen Media/Ofcom. Distribution of HFSS child impacts across dayparts and channels

5.9 Using the 2007/8 HFSS proxy, we estimate that between 2005 and 2007/8, the volume of HFSS advertising seen by children aged 4-15 (measured in impacts) fell by around 34%. In January 2009 all HFSS advertising will be removed from children’s airtime, which, (based on the 2007/8 data) could reduce impacts by a further 11 percentage points. While this indicates the reduction in impacts for children aged 4-15 could be as much as 45% between 2005 and 2009, such a calculation disregards any other factors, including the possibility that a proportion of impacts will be displaced into adult airtime on other channels.

**Figure 5.3: Proportion of all food impacts accounted for by HFSS impacts**



Source: Nielsen Media/Ofcom  
Distribution of HFSS child impacts across dayparts and channels

### All Airtime

- 5.10 Breaking down the 34% overall reduction in HFSS child impacts by age group, the analysis reveals that the restrictions have been most effective in reducing younger children’s exposure to HFSS advertising. This reflects the preference of younger children for children’s programming where food and drink spots have fallen sharply.
- 5.11 The overall reduction in impacts for 4-9 year olds was 39%, greater than for 10–15 year olds at 28% (see Figure 5.4) who tend to view more programming in adult airtime where food and drink advertising has grown. However it should also be noted that the restrictions targeting 10-15 year olds came into effect part way through the analysis period (from 1 January 2008) and therefore the data set (July 2007 – June 2008) will not fully reflect the impact of the restrictions now in place.

**Figure 5.4: Total HFSS child impacts split by age**HFSS impacts: **Children 4-15**

Source: Nielsen Media/Ofcom

- 5.12 Overall, HFSS impacts for children aged 4-15 fell 41% on the main commercial channels between 2005 and 2007/8. The impacts reduction was slightly higher for 4-9 year olds at 43% and slightly lower for 10-15 year olds at 39%.
- 5.13 On digital channels HFSS impacts also fell overall between 2005 and 2007/8. The reduction was 27% for all children, again this drop was higher for younger children at 36%, than for older children at 16%.

### Children's airtime vs. adult airtime

- 5.14 The overall declines in HFSS child impacts described above, were driven by the reductions in children's airtime, where HFSS advertising is now banned (with the temporary exception of children's channels). Children also saw fewer adverts overall in adult airtime, however the reductions on the main commercial channels during adult airtime were partially offset by the increases in HFSS child impacts on digital commercial channels during adult airtime.
- 5.15 In children's airtime:
- for all children's airtime, HFSS child impacts fell by 63% for all three splits by age from 2005 to 2007/8. This compares with a 56% reduction in all food and drink advertising impacts in children's airtime for over the same period;
  - on the main commercial channels during children's airtime HFSS child impacts have fallen by 94%<sup>29</sup>; and
  - HFSS impacts on children's channels fell 57% between 2005 and 2007/8 amongst all children. The percentage reductions were almost identical for all age groups with a 58% fall in impacts for 4-9 year olds and 56% drop amongst

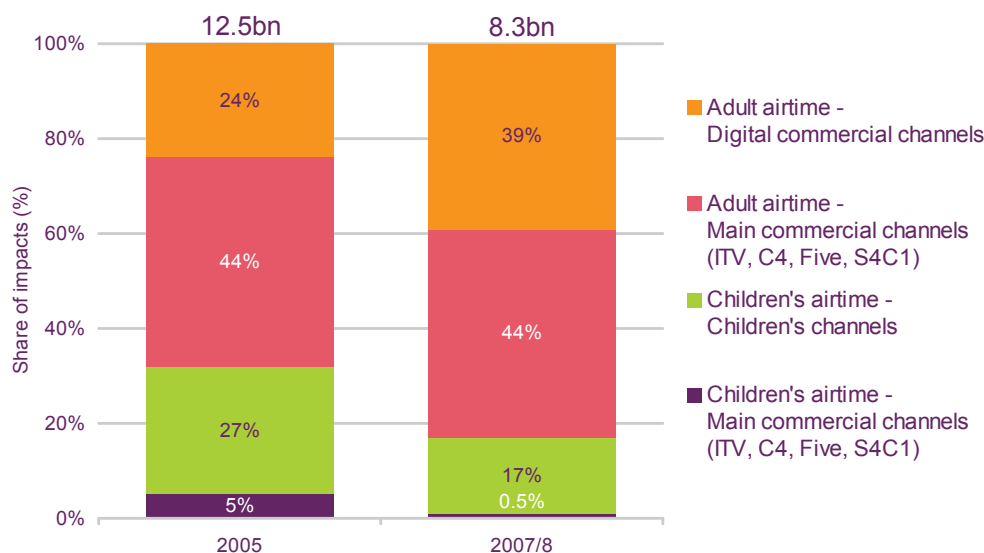
<sup>29</sup> The remaining 6% is likely to reflect limitations of the modelling (including the inability to take account of calendar /sporting event anomalies in periods normally considered children's airtime, as opposed to real impacts caused by breaches to the rules).



children aged 10-15. The scale of the impact reduction on children's channels compared to that for the main commercial channels reflects the fact that children's channels are still allowed to show HFSS advertising during children's airtime; this transitional arrangement will come to an end with effect from 1 January 2009 removing all remaining HFSS impacts from children's airtime.

**Figure 5.5: Share of HFSS impacts split by airtime and channel groups**

HFSS impacts: **Children 4-15**



Source: Nielsen Media/Ofcom

Note: Minor variations due to rounding

#### 5.16 In adult airtime:

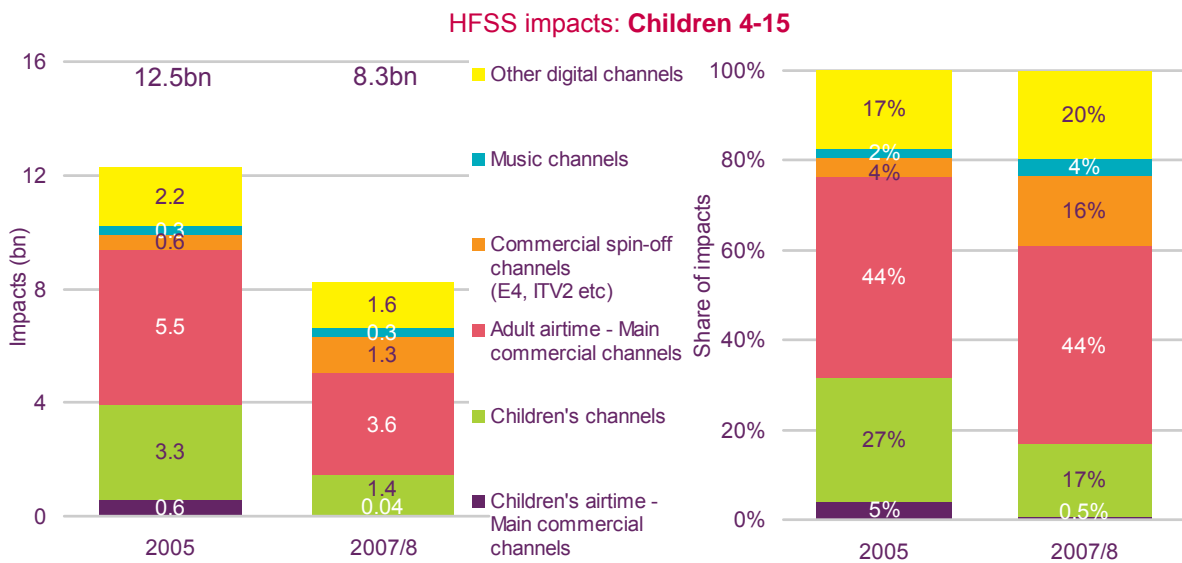
- for all adult airtime HFSS impacts have fallen by 20% for children aged 4-15 across all channels. Impacts dropped 21% for 4-9s and 20% for 10-15s;
- on the main commercial channels HFSS impacts fell by 35% for each of the three age groups during adult airtime. Despite this substantial reduction, these channels continue to account for 44% of all HFSS child impacts in 2007/8, unchanged since 2005;
- however, the impact reduction on the main commercial channels was partially offset by a 7% increase up in HFSS impacts during adult airtime on digital commercial services. The growth in HFSS impacts was higher for younger children at 10% with a smaller increase for older children at 5%;
- the shift of impacts from adult airtime on the main commercial channels to adult airtime on digital commercial channels reflects the migration of both food and drink advertising spots<sup>30</sup> and young audiences to these services (particularly those such as ITV2, E4 and Fiver) away from the main commercial channels (see Figures 4.13 and 4.6). This growth also reflects in part the wider availability of these channels, as a result of Freeview and the continuing uptake of pay TV services;
- there was a sharp increase in HFSS child impacts on the main commercial channels' digital spin off services, albeit from a low base. This represented a

<sup>30</sup> HFSS data unavailable

133% increase in HFSS impacts for 4-15s. The percentage growth was larger for 4-9s at 151% than for 10-15 year olds at 123%. However in terms of absolute impacts, the findings show the impact increase for spin off channels was slightly larger for 10-15 year olds than for younger children, probably because older children spend more time viewing these services;

- f) spin-off services were the only channel group to experience a sizeable increase in the number of child impacts. They also increased their share of all HFSS impacts from 4% in 2005 to 16% in 2007/8; and
- g) HFSS impacts fell on music channels by 3% for 4-15 year olds. While impacts for 4-9's fell by 1%, impacts for 10-15 year olds fell 4%.

**Figure 5.6: Child impacts by channel group**



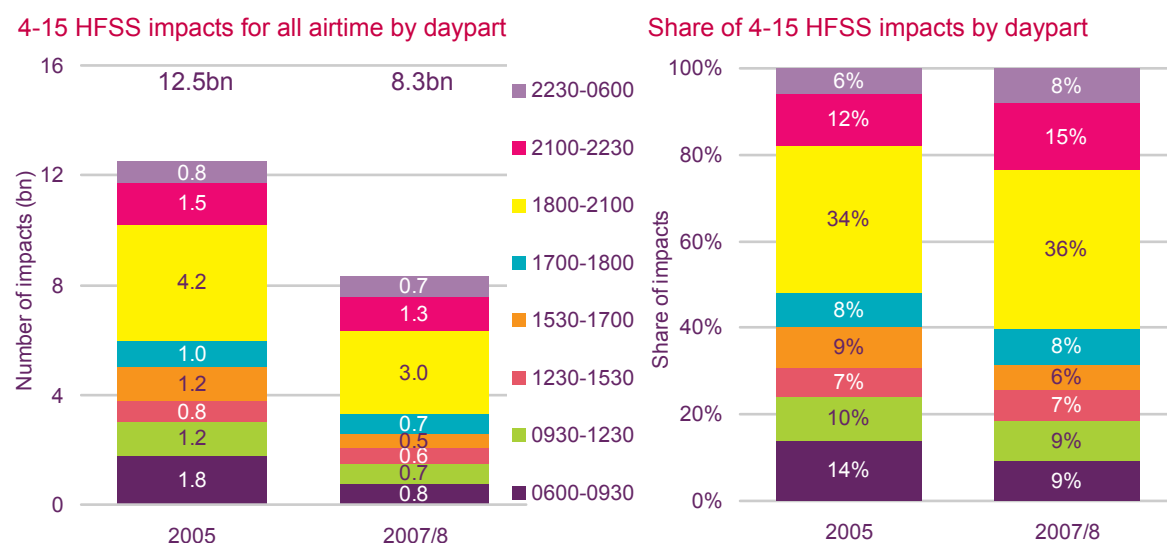
Source: Nielsen Media/Ofcom  
 Note: Minor variations due to rounding

**Advertising seen by children by time of day**

**Overall trends across the day**

- 5.17 The early evening (17:00 to 18:00), mid-evening (18:00 to 21:00) and late evening (21:00 to 22:30) periods attract the most television viewers, including children. As a result, children are exposed to more HFSS spots in these periods than at other times of the day. Nonetheless, between 2005 and 2007/8, the number of HFSS impacts for children aged 4-15 fell for all three slots during the evening.
- 5.18 In mid-evening (18:00 – 21:00), impacts fell by 29% across all channels. In the early evening period (17:00 to 18:00) child impacts dropped 32% overall. In the late evening period (21:00 to 22:30), impacts fell by 16% overall.
- 5.19 The significant decreases in HFSS impacts on the main commercial channels were partly offset by small (in absolute terms) increases on some of the digital commercial channels.

**Figure 5.7: Child impacts by daypart – all airtime**



Source: Nielsen Media/Ofcom

### Adult airtime on the main commercial channels: 17:00-22:30

5.20 In adult airtime (i.e. all times minus children's slots) on the main commercial channels:

- HFSS impacts fell during all three evening slots (between 17:00 and 22:30) for all age groups during adult airtime on the main commercial services;
- between 17:00-18:00 HFSS impacts for 4-15 year olds fell by 26% between 2005 and 2007/8. The impact reduction was higher for 4-9s at 29% than for 10-15 year olds at 23%;
- HFSS impacts have dropped 30% between 18:00 – 21:00 for 4-15 year olds on the main commercial channels, however unlike the 17:00-18:00 slot, the fall for younger children was smaller at 28% than for 10-15 year olds at 31%; and
- there was a 35% fall in impacts for all children between 21:00 and 22:30, again the reduction by age was smaller for younger children at 28% than for 10-15 year olds at 38%; and
- as the number of advertising spots has remained steady between 2005 and 2007/8 during these day parts it is likely that the reduction in HFSS child impacts on the main commercial channels is driven by children viewing less on these channels.

### Adult airtime on digital commercial channels: 17:00-22:30

5.21 In adult airtime on digital commercial channels (excluding spin-off channels) the impact trends for all digital commercial channels are less consistent than for the main commercial channels:

- HFSS impacts fell 36% between 17:00 -18:00 for 4-15 year olds. The impact reduction was higher for 4-9s at 40% than for 10-15 year olds at 30%. Viewing data indicates that the larger impact reduction for younger children can be

explained in part by younger children still viewing less during this day part than older children and are therefore exposed to less advertising;

- b) between 18:00-21:00 impacts fell 27% for 4-15s. The reduction was 34% for 4-9s and 20% for 10-15 year olds. As above, the larger falls in impacts for younger children is partly due to younger children viewing less in this day part;
- c) impacts for 4-15s grew during the late evening slot (21:00-22:30) by 23%. The increase in HFSS impacts was greater for older children at 28% than for younger children at 15%. This can partly be attributed to younger children watching less television late in the evening; and
- d) the reduction in impacts between 17:00 and 21:00 has been achieved despite increases in both spots and viewing. This indicates that potentially the additional spots are being scheduled around programmes which are not attracting children, which in turn may suggest that children are not the primary target of many of these advertisements.

### **Adult airtime on spin-off channels**

5.22 In adult airtime on spin-off channels (e.g. ITV3, Five US, More 4):

- a) the sharp growth in HFSS impacts throughout the evening echoes the other impact findings for spin off channels throughout section 5;
- b) HFSS impacts on the digital spin off channels have increased for all three evening slots. Between 17:00 -18:00 impacts increased 111% for 4-15% year olds. The growth was greater for younger children at 126% than for older children at 104%;
- c) between 18:00-21:00, HFSS impacts increased 134% for 4-15 year olds on digital spin off channels. Growth for 4-9s at 144%, and was higher than for 10-15 year olds at 128%; and
- d) there was a 103% increase in impacts for all children between 21:00 and 22:30. The increase by age was greater for younger children at 122% than for 10 – 15 year olds at 95%.

### **HFSS advertising for products of appeal to children**

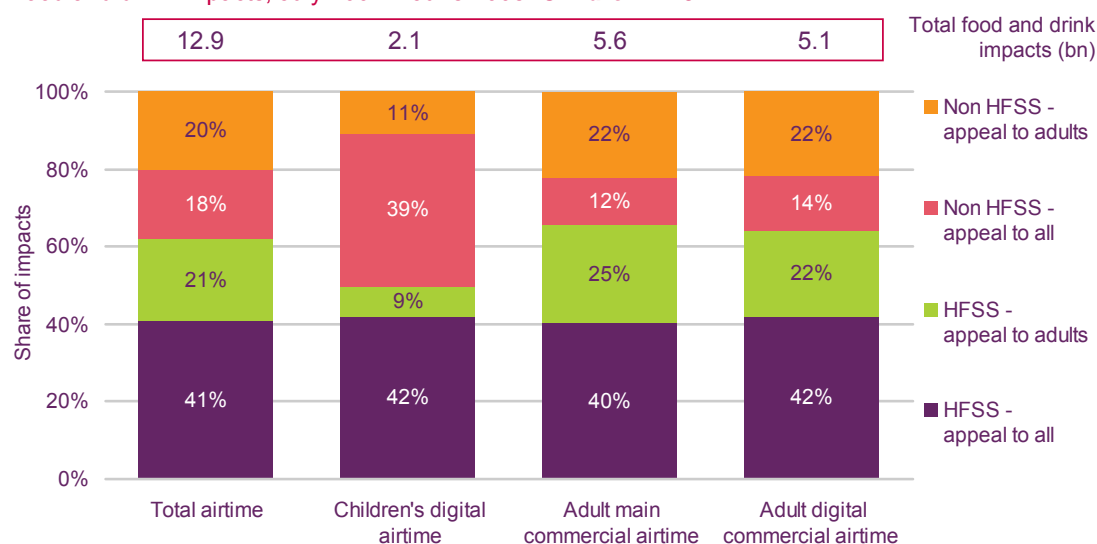
5.23 Not all food and drink advertising, whether for HFSS or non-HFSS products, is likely to be of appeal to children – examples include advertisements for cooking oils, spreads, and meal ingredients such as meat or fish, or beverages such as tea and coffee. Given that such advertising is unlikely to have a significant effect on children's food preferences, it is important to understand how much food and drink advertising falls into this category.

5.24 For this purpose, Ofcom has made an assessment of the HFSS / non-HFSS status of all the food and drink products featured in adverts seen by children during 2007/8. We explain in section 3 how we have carried out this assessment; Annex 4 lists the product categories we have deemed unlikely to appeal to children. In addition to providing a snapshot of the position in 2007/8, this work will also provide the basis for a comparison with data from future years, and contribute to a picture of changes in the nature of food and drink advertising over time. Using this list of product categories:

- a) just under 60% of all food and drink adverts seen by children were for products judged likely to appeal to both children and adults; the remainder of impacts were for items judged to only appeal to adults;
- b) around 41% of all children’s food and drink impacts were for HFSS products likely to appeal to children (and, in many cases, adults);
- c) this figure is broadly consistent for advertising during children’s airtime on digital channels, as well as adult airtime on both the main commercial and digital commercial channels. Figure 5.8 summarises the position; more detail is given in Annex 4; and
- d) the effect of restrictions on the volume of HFSS advertising on children’s channels is evident from the much higher proportion (40%) of non HFSS products of appeal to both children and adults appearing on these channels than on other services. The remaining HFSS advertising will be removed from these services from January 2009.

**Figure 5.8: Breakdown of food and drink impacts by nature of product, and appeal to children**

Food and drink impacts, July 2007 – June 2008: **Children 4-15**



Source: Nielsen Media/Ofcom (exclusion of children’s airtime on the main commercial channels = 0.1bn)

### Compliance with the scheduling restrictions

5.25 In section 2, we summarise the scheduling restrictions that have been phased in from April 2007; the detailed rules are set out in Annex 1. Responsibility for complying with these rules rests with licensees. Most licensees require advertisers to clear advertisements with Clearcast if they wish them to appear in parts of the schedule to which restrictions apply. Advertisers who wish to categorise an advertisement as non-HFSS must submit a certificate showing how they have established that the product concerned is non-HFSS<sup>31</sup>.

5.26 Although there was concern amongst both advertisers and broadcasters that the system would prove rather complex, the feedback Ofcom has received suggests that (after some initial confusion) the system is working well. Clearcast itself notes that

<sup>31</sup> Nutrition profile certificate (<http://www.clearcast.co.uk/NR/ronlyres/F6EE2257-8438-4EA6-B78A-686BAE0E9B52/0/ClearcastHFSSCertificate.doc>).

'despite much concern in advance of the introduction of the rules, we have not experienced too many hiccups in applying them. Agencies submit Nutritional Profiling Certificates on behalf of their clients and know that without supplying a certificate ads will automatically be assigned the status of HFSS and have the relevant scheduling restrictions applied by broadcasters'<sup>32</sup>.

- 5.27 It is clear from the statistical evidence on HFSS impacts for children aged 4-15, that there has been a substantial reduction in these impacts during children's airtime. While Ofcom is aware of one inadvertent scheduling of an HFSS advert in children's airtime shortly after the restrictions came into force, we are not aware of any systematic breaches of the rules. As in the case of other rules applying to the content of broadcasts, we do not routinely monitor the large number of channels that we regulate. The complaints about food and drink advertisements considered by the ASA were not found to have breached the scheduling rules<sup>33</sup>.
- 5.28 Ofcom has required broadcasters to report on the transitional arrangements that have allowed children's channels a declining amount of HFSS advertising until the concession is phased out from 1 January 2009. Under these arrangements, children's channels were allowed 75% of their 2005 HFSS minutage from April to December 2007 (pro-rated by the number of months left in 2007), and 50% of 2005 levels in 2008. The reports from children's broadcasters show that HFSS advertising minutage on their children's channels is well within these limits.
- 5.29 In the context of a gradual reduction in food and drink advertising in children's airtime since 2003, these findings indicate that the scheduling restrictions Ofcom put in place are contributing to a significant reduction in HFSS impacts on 4-15 year olds across channels and day parts. In 2007/8 51% of food and drink impacts on children's channels were for HFSS products. Further changes are therefore likely with the implementation of the final phase of advertising restrictions in January 2009, when HFSS advertising will be removed entirely from children's channels, providing scope for further impact reductions.

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<sup>32</sup> *Digesting the Food Rules*, Clearcast, 2008 (<http://www.clearcast.co.uk/NR/rdonlyres/D7A0852C-55AB-4486-8B3D-E73FF0750C6C/0/Digestingthefoodrules1.doc>)

<sup>33</sup> ASA adjudications (<http://www.asa.org.uk/asa/adjudications/public/>)

## Section 6

# Changes in food and drink advertising techniques seen by children

## Introduction

- 6.1 As part of the review, Ofcom is seeking 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;
  - b) what changes there have been to techniques used in food and drink advertising that may be seen by children; and
  - c) whether advertisers are evading the spirit of the restrictions through brand advertising.
- 6.2 We set out below the key findings on each of these issues, before discussing them in more detail.
- 6.3 The analysis was based on all food and drink advertising, as it proved impracticable to derive data on whether individual advertisements broadcast before the HFSS advertising restrictions came into force were for HFSS products or not. Accordingly, this analysis of children's viewing of food and drink advertisements featuring techniques considered to be of appeal to children includes advertisements for both HFSS and non-HFSS products.

## Key findings

- 6.4 Surveys carried out by Ofcom's co-regulator the Advertising Standards Authority (ASA) show that broadcasters are complying with the HFSS content rules.
- 6.5 As regards techniques in food and drink advertising considered to be of appeal to children:
- a) children saw fewer advertisements using these techniques in 2007/8 than they did in 2005<sup>34</sup>;
  - b) children saw less advertising featuring licensed characters (-69%), brand equity characters (- 36%), other characters (- 4%), promotions (- 36%) and health claims (- 18%). Children saw more advertising featuring celebrities (22%), this growth was confined to adult airtime, and included advertisements featuring celebrities mainly of appeal to adults (e.g. Ian Botham and William Shatner);
  - c) in children's airtime, child impacts for all these techniques declined and, with the exception of 'other characters' and 'celebrities', also declined in adult airtime;

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<sup>34</sup> Our analysis mirrors the findings of the Department of Health report which used a different measure (advertising spend) to establish the reductions in children's exposure. Both pieces of analysis show a fall in impacts for all techniques considered to appeal to children.

- d) further changes are likely when HFSS advertising is removed from children's channels.

6.6 As regards brand advertising and sponsorship, there is no evidence to support the view that advertisers are using these techniques to circumvent the restrictions on HFSS advertising, though the paucity of data makes definitive conclusions impossible.

## Content rules

6.7 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 or primary school children on the use of licensed characters and celebrities, health claims, and promotional offers.

6.8 Compliance with these rules in relation to spot advertising is monitored by the ASA<sup>35</sup>. It has conducted two surveys of food and drink advertising to assess whether or not broadcasters are complying with the rules:

- a) the first survey was carried out in December 2007, a few months after the rules came into force. The results were published in January 2008<sup>36</sup>. The survey found that two of the 292 unique food or soft drink 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; and
- b) the results of the second survey were published in December 2008<sup>37</sup>. The report covered food and drink advertising across all media. For TV advertising the ASA examined 209 television food and drink ads in July 2008. Of these adverts the ASA found that none breached the HFSS advertising restrictions, resulting in 100% compliance with the HFSS rules. One television advertisement breached a general food and drink rule (7.2.1), for suggesting that water should be rejected in favour of a soft drink product, thus encouraging poor dietary practice. However this rule applies to advertisements for all food and soft drink products, not just HFSS products. The overall compliance rate with the entire BCAP code was 99.5%..

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

## Advertising techniques

6.10 In considering whether there has been a change in food and drink advertising techniques between 2005 and 2007/8, Ofcom has looked at those techniques that

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<sup>35</sup> Application of these rules to sponsorship is the responsibility of Ofcom

<sup>36</sup> *Compliance Survey on HFSS Food and Drink Advertising*, ASA, January 2008 (<http://www.asa.org.uk/NR/rdonlyres/120B91FD-FB23-4551-A554-776822DEE333/0/FoodandSoftDrinkAdvertisingSurvey2007.pdf> )

<sup>37</sup> *Compliance Survey on HFSS Food and Drink Advertising*, ASA, December 2008 (<http://www.asa.org.uk/NR/rdonlyres/B59496A8-5750-466B-BE6E0C51D7EDE399/0/FoodandSoftDrinkSurvey2008.pdf>)



are regulated by BCAP's code<sup>38</sup> on the grounds that they are calculated to appeal to children aged 4-15. These are:

- 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.

6.11 In addition, we have looked at the use of:

- a) brand equity characters (that is, characters originally devised for marketing purposes, such as those associated with particular breakfast cereals); and
- b) 'other characters' (whether live or animated e.g. animated talking trees, puppets etc).

6.12 The analysis of changes in creative techniques included in this section is based on data for advertising for all products within the Billets Media food and drink categories, as defined in section 3. However, it should be noted that the Billets definition of food and drink categories differ slightly from the all food and drink definition used throughout the rest of the document, and therefore caution should be taken when comparing findings in this chapter with those elsewhere. These categories are listed in Annex 4.

6.13 In this analysis adverts are subject to multiple coding, to take account of adverts where 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 brand equity character (Tony the Tiger) and once for the use of promotions.

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

### **Licensed characters**

6.15 Spots featuring licensed characters fell by 56% (from 110,000 to 48,000) between 2005 and 2007/8. They accounted for 1.1% of all food and drink advertisements in 2007/8 down from 4.1% in 2005. The decline was 62% in children's airtime and 45% in adult airtime. In 2007/8, the majority (59.2%) of all spots containing licensed characters continued to be broadcast in children's airtime, although this was a lower proportion than in 2005 (67.9%).

6.16 There was a 69% (0.8bn) fall in child impacts for food and drink adverts containing licensed characters overall. The reduction was slightly greater in children's airtime (70% or 0.7bn) than in adult airtime (66% or 0.2bn).

6.17 Of the remaining total, 77.2% (0.3bn) of impacts for food and drink adverts using this treatment were delivered in children's airtime in 2007/8, down from 79.6% in 2005. However the BCAP content restrictions make it likely that the remaining 0.3bn impacts are for non HFSS products. Examples of certified non- HFSS ads featuring

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<sup>38</sup> See Annex 2

licensed characters include: Ella's Kitchen Smoothie, featuring Horton hears a Who; and Frubes, using Spiderman and The Simpsons.

### **Celebrities**

- 6.18 Spots featuring celebrities more than doubled (109%) from 228,000 spots to 476,000 spots between 2005 and 2007/8. They accounted for 11.5% of all food and drink advertisements in 2007/8, up from 7.8% in 2005. In 2007/8, 97.9% of all such celebrity-based ads were in adult airtime, in which all the growth took place; spots in adult airtime more than doubled (121%) between 2005 and 2007/8.
- 6.19 Overall, child impacts increased by 22% (0.24bn); they fell in children's airtime by 62% (0.1bn), but increased in adult airtime by 37% (0.34bn). As a result, there were relatively few impacts in children's airtime (4.2%, 0.06bn) in 2007/8. As previously discussed, due to the BCAP code, these are unlikely to be for HFSS products. It should also be noted that many of the celebrities used in food and drink advertising in adult airtime are likely to appeal mainly or exclusively to adults. Examples include Shredded Wheat, using Ian Botham, and All Bran, featuring William Shatner.

### **Promotions**

- 6.20 Spots featuring promotions rose by 79% (up from 206,000 to 368,000) between 2005 and 2007/8. The growth all occurred in adult airtime where there was a 163% increase in spots, compared with a 55% drop in spots in children's airtime. The percentage of adverts including promotions increased slightly from 7.6% of all food and drink advertising spots in 2005 to 8.8% in 2007/8.
- 6.21 Overall, child impacts fell by 36% (0.6bn), with a 63% (0.64bn) fall during children's airtime, and a 5% (0.04) increase in adult airtime. 65% of all child impacts occurred in adult airtime in 2007/8, up from 39% in 2005. Some advertisements, like the Frubes advert featuring Dr Who are likely to appeal to children. Some, like the invitations to 'buy one, get one free' at Subway, 'Buy One Get One Half Price' at Papa John's, are more likely to appeal to adults.

### **Health claims**

- 6.22 Between 2005 and 2007/8, the number of spots featuring health claims increased by 57% (from 594,000 to 934,000). This growth occurred entirely in adult airtime (71%), while spots fell 38% in children's airtime. The percentage of all adverts using health claims remained fairly constant, at 22% in 2005 and 22.3% in 2007/8.
- 6.23 Overall child impacts dropped by 18% (0.6bn), as a result of the 59% reduction in impacts during children's airtime. There was also a 2% fall in child impacts in adult airtime. Some of the health claims appeared to be aimed at adults rather than children – examples include Danone Actimel and Flora Pro-Activ margarine. Some were aimed at children; examples included the non-HFSS product Muller Little Stars and Yoplait Yop.

### **Brand equity characters**

- 6.24 Advertising spots containing brand equity characters increased by 31% (from 313,000 to 419,000) between 2005 and 2007/8. All the additional adverts appeared in adult airtime, representing a 94% increase in spots. Spots in children's airtime fell by 34%. In 2007/8, 13.8% of all food and drink advertisements featured brand equity characters, down from 17.9% in 2005.

- 6.25 Child impacts fell by 36%. There has been a 49% (0.8bn) fall in impacts in children's airtime, and a 10% drop (0.08bn) in adult airtime. Just over half (53%) of all food and drink adverts containing brand equity character child impacts appeared in children's airtime. This proportion may change when HFSS advertising is removed from children's channels. Unlike other techniques, brand equity characters are not restricted by the BCAP code.

### **Other characters**

- 6.26 'Other characters' covers characterisation not encompassed by licensed or brand equity characters, such as the animation of inanimate objects, use of puppets, people in costume etc.
- 6.27 Spots featuring 'other characters' have increased by 53% since 2005. The growth was in adult airtime where spots increased 117%. Spots in children's airtime fell by 29%. The proportion of adverts including 'other characters' remained steady at 5.7% of all food and drink advertising spots in 2007/8.
- 6.28 In terms of child impacts, there has been a small reduction overall, down 4% between 2005 and 2007/8. This has been driven by an 18% (0.1bn) reduction in children's airtime, but this reduction has been eroded by the 16% (0.08%) increase in HFSS child impacts during adult airtime.
- 6.29 In terms of share, 51% of all child impacts for food and drink ads including other characters occurred in children's airtime, down from 60% in 2005. As with brand equity characters, the use of 'other characters' sits outside of the BCAP code.

### **Brand advertising and sponsorship**

- 6.30 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**

#### Background

- 6.31 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 products<sup>39</sup>. 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 is not 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 would keep the issue under review.
- 6.32 In guidance produced for advertisers, Ofcom's co-regulator, the Advertising Standards Authority, makes clear that brand advertising which features products that

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<sup>39</sup> Paragraph 5.148 of the November 2006 document.

are identifiable as HFSS products, or uses brand names that are synonymous with HFSS products are likely to be regarded as advertisements for HFSS products<sup>40</sup>.

## Review

- 6.33 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 review<sup>41</sup>. However, as industry data does not separately distinguish commercial messaging that is brand advertising from product advertising, this has not proved possible.
- 6.34 As industry data does not distinguish between brand advertising and product advertising, 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 had increased, it has not offset the overall decline in the amount of HFSS advertising seen by children.
- 6.35 Anecdotal indications suggest that there has not been an increase in the incidence of brand advertising. One broadcaster noted that very few advertisers actually chose to promote brands without the product. Several broadcasters drew attention to advertising campaigns in the name of two brands used for both HFSS and non-HFSS products, but most broadcasters did not report any significant activity. Ofcom is also aware of advertising campaigns by one fast food chain that show selected non-HFSS products from its product range. For its part, Clearcast told us that it did not hold specific data on brand advertising, but had not observed any increase in brand advertising since the advertising restrictions had come into force, and if anything, brand advertising activity appeared to have decreased somewhat.
- 6.36 Although we do not have enough data 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**

- 6.37 In announcing the HFSS advertising restrictions, Ofcom said that they would apply equally to programme sponsorship by HFSS food and drink products<sup>42</sup>.
- 6.38 Both the content and scheduling rules that apply to HFSS product advertising apply equally to sponsorship closely associated with HFSS products. 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. Since the rules came into force, Ofcom has received one complaint that the rules on sponsorship

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<sup>40</sup> 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](http://www.asa.org.uk/asa/codes/tv_code/Guidance_Notes/Differentiating+HFSS+product+TV+Advertisements+from+Brand+TV+Advertisements.htm))

<sup>41</sup> Paragraph A1.59, February 2007 statement

<sup>42</sup> Paragraph 1.12, February 2007 statement

may have been breached. This is being dealt with under the standard complaints procedures<sup>43</sup>, and we expect to publish the outcome in due course.

- 6.39 We are also aware of 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. Since media analysts do not categorise sponsorship separately from advertising, it has not been possible to obtain statistical data on the amount of sponsorship in the name of food and drink products. As in the case of brand advertising, therefore, it has been necessary to seek information on this issue from broadcasters. Accordingly, we asked broadcasters if they could provide data on the value of all sponsorship, as well as revenues from food and drink sponsorship.
- 6.40 Not all broadcasters hold separate information on food and drink sponsorship revenues. Those that were able to provide it (seven broadcasters operating 39 channels) indicated that while, collectively, overall sponsorship revenues had risen by 42% between 2005 and 2007/8, income from food and drink sponsorship had fallen by 24%. Another large multichannel broadcaster also reported a fall in food and drink sponsorship.
- 6.41 Several reasons were advanced by these broadcasters for the reduction in food and drink-related sponsorship. One of the main commercial channels said that major brand owners were concerned that family programmes might attract disproportionately large child audiences, and that was dissuading them from sponsoring such programmes. A multichannel broadcaster noted that a steep decline in food and drink sponsorship revenue actually started before 2005 in anticipation of the regulatory restrictions. One broadcaster of a children's channel said that it had decided not to take any HFSS food or drink sponsorship activity since child obesity attracted public concern in 2003.
- 6.42 However, broadcasters operating 15 channels (including some of the main commercial channels, some spin-off channels and a multichannel broadcaster) reported an increase in food and drink sponsorship revenues. However, none of these channels were children's channels, and only four carried any children's programming.
- 6.43 Given that a relatively small sample of broadcasters actually provided data, there is not enough data on food and drink sponsorship to draw definitive conclusions. We shall have better evidence when full year data is available for 2008 and 2009. Even so, sponsorship revenues can only be indicative, since they can be affected by the changing price of sponsoring programmes, the number of channels operated by a broadcaster, and other changes in the market.
- 6.44 However, there is little evidence to support the view that advertisers are making significant use of sponsorship in the name of HFSS products as a means of getting around the advertising restrictions.

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<sup>43</sup> *Guidelines for the handling of standards complaints and cases (in programmes and sponsorship)*. <http://www.ofcom.org.uk/tv/ifi/guidance/standards/>

## Section 7

# Impact on broadcasters

### Introduction

- 7.1 In this section we:
- a) describe trends in advertising revenue, both at the industry level and by type of channel;
  - b) summarise the anticipated impact on broadcasters of the advertising restrictions;
  - c) review the actual impact the restrictions have had to date on broadcasting revenues and other more qualitative effects;

### Key findings

- 7.2 The review found that restrictions on food and drink advertising have not been the most significant factor affecting broadcasters in the period under review. In particular, on the basis of data supplied by broadcasters:
- a) children's channels saw a significant decline in food and drink advertising revenue. However data provided by broadcasters indicates that total advertising revenue on children's channels has nevertheless increased overall;
  - b) main commercial channels (ITV1, GMTV, Channel 4 and Five) have seen a 6% decline in food and drink advertising revenue. They have also experienced a reduction in overall advertising revenues;
  - c) most other digital commercial channels have been able to increase their revenue from food and drink advertising, so mitigating the effects of restrictions to a greater degree than we expected.
- 7.3 Inevitably, the current assessment only represents a snapshot, based largely on data up to the end of 2007. It is not a guide to the future. For instance it is possible that shifts in advertising revenue away from television or between channels stemming from the advertising restrictions could be swamped by changes stemming from the economic downturn. We should have a clearer picture of this once full year revenue data is available for 2008 and 2009.

### Trends in advertising revenue

- 7.4 Section 4 (Figure 4.8 – 4.9) sets out figures which indicate that although there had been a real (i.e. adjusted for inflation) increase in expenditure by advertisers on food and drink advertising between 2003 and 2005, this was followed by a real fall in such expenditure between 2005 and 2007.
- 7.5 Figure 7.1 below sets out the change in net advertising revenue in nominal terms (i.e. not adjusted for inflation) between 2003-2007 for the TV industry as a whole, as well as for the main commercial channels, their digital spin-off channels and other digital commercial channels. The figures fluctuate from year to year. Some of the loss in revenue of the main commercial channels has been offset by a growth in revenue for their spin-off channels. However, taking into account inflation (as measured by the

GDP deflator), overall industry revenue has fallen between 2003-2007 in real terms - down some 1.5% over this period - and the revenue of the main commercial channels has fallen by around 16% in real terms.

**Figure 7.1: Change in net advertising revenue by channel type**

Channels	2003/4	2004/05	2005/06	2006/07
All channels	7%	2%	-2%	2%
Main commercial channels	5%	0%	-10%	-2%
Digital Spin-off channels (e.g. ITV2)	n/a	70%	61%	29%
Other digital commercial channels	3%	0%	11%	5%

Source: Communications Market Report 2008. <http://www.ofcom.org.uk/research/cm/cmr08/>

7.6 The data in Figure 7.2 below indicates that digital commercial channels have increased their share of industry revenues by around 3 percentage points over the period 2005 to 2007.

**Figure 7.2: Share of total industry net advertising revenue**

Channels	2004	2005	2006	2007
Main commercial channels	77%	76%	70%	67%
Spin-off channels (e.g. ITV2)	3%	5%	8%	10%
Other digital commercial channels	20%	20%	22%	23%

Source: Communications Market Report 2008. <http://www.ofcom.org.uk/research/cm/cmr08/>

7.7 Taken together, this indicates that the implementation of the restrictions on food and drink advertising to children has taken place against a backdrop of a real decline in the level of both food and drink advertising and TV advertising overall, and a shift in revenues from the main commercial channels to the other digital channels.

### Estimated impact on broadcasting revenues

7.8 In the impact assessments that accompanied Ofcom's publications in March 2006, November 2006 and February 2007, we estimated the effect the potential restrictions would have on broadcasting revenues<sup>44</sup>. As part of that process we estimated the maximum potential revenue at risk. We also then also made a number of assumptions about the relative ability of different types of broadcasters to mitigate the effect of the proposed restrictions.

7.9 It should be noted that the model assumed a "steady state", and did not take account of possible changes to the television market, such as changes in the number of channels available to viewers on different platforms, or shifts in viewing patterns. Nor did it take account of fluctuations in demand for advertising for different products and services.

<sup>44</sup> A detailed explanation of the modelling processes used to estimate the potential revenue effect on broadcasters is set out in the impact assessment published with the November 2006 and February 2007 documents November 2006 statement and February 2007 statement: [http://www.ofcom.org.uk/consult/condocs/foodads\\_new/statement/statement.pdf](http://www.ofcom.org.uk/consult/condocs/foodads_new/statement/statement.pdf)

- 7.10 In the first instance the advertising restrictions were expected to have a detrimental impact on the revenues of broadcasters. We then considered that the negative impact of the restrictions might be mitigated to a certain degree by:
- advertisers shifting HFSS advertising to times of the day not subject to restrictions;
  - advertisers shifting some, if not all of their advertising budgets to non-HFSS food and drink products (including reformulated products) within their portfolios rather than simply cutting expenditure;
  - attracting food and drink advertisers “new-to-TV”; and
  - broadcasters attracting revenue for advertising of non-food and drink products (including attracting advertisers that were “new-to-TV”).
- 7.11 Figure 7.3 summarises the estimated impact of the restrictions. In brief, it was estimated that the restrictions – after mitigation - would reduce overall industry revenue between £17m and £27m pa with a central estimate of £23m. A little less than half of this cost (£7m - £12m pa) would fall on the main commercial channels, representing about 0.3% of their revenues. The estimated cost to children’s channels was not as high in absolute terms but represented just under 5% of their total revenues - one children’s channel was estimated to lose over 15% of its total revenue. The estimated cost to music channels was about 1.9% of their revenue - one music channel was estimated to lose almost 9% of its revenue. It was estimated that nine channels would lose more than 5% of their revenue.

**Figure 7.3: Estimated revenue impact of the advertising restrictions**

Channels	Expected revenue loss (£million)			Average revenue loss as % of total revenue	Highest % loss for a channel in each category
	Low	Central	High		
All Channels	17.4	22.6	26.5	0.4%	15.3%
Main commercial channels	7.3	10.4	12.4	0.3%	0.7%
Children’s channels	4.6	5.2	5.9	4.7%	15.3%
Music channels	2.1	2.4	2.7	1.9%	8.8%
Other channels	3.4	4.6	5.4	0.2%	6.3%

Source: February 2007 statement

### Actual impact on broadcasters

- 7.12 For the purposes of the review, we asked broadcasters to provide us with evidence of the actual impact of the restrictions to date, both in terms of changes in advertising and sponsorship revenues and also any other aspects of their operations.



- 7.13 Broadcasters pointed out that HFSS advertising restrictions were just one of a number of factors that had affected advertising revenues in recent years. A number argued that it was difficult to identify the HFSS effects specifically.

### **Changes in the composition of advertising**

- 7.14 In our consideration of mitigating factors in our modelling work we indicated four possible methods for limiting the effects of the restrictions (outlined in 7.10). Responses from broadcasters touched specifically on three of these.

### **Non-HFSS food and drink advertising (including new to TV)**

- 7.15 We suggested that the removal of some HFSS advertising could make way for an increase in non-HFSS food advertising. The experience of different broadcasters was mixed. Some of the main commercial channels had noticed growth in the health drink and yoghurt markets, such as Aptimal and Innocent. Another broadcaster reported some new advertisers promoting non-HFSS food and drink products on TV for first time (e.g. branded fruit snacks such as Kids Snax and Ella's Kitchen). It said that resulted from direct targeting of new-to-TV 'healthy' brands.
- 7.16 Other broadcasters had struggled to benefit from growth in non-HFSS food advertising. One children's channel had actively targeted the "health" sector but with little success on the basis that this sector did not tend to target children.
- 7.17 One broadcaster reported that existing advertisers had changed the mix of products that they advertise. One children's channel reported that a large multi-national company had maintained overall levels of advertising expenditure but had spent more on advertising non-HFSS food products. It reported that partly as a result, there had been reduced demand for advertising seasonal products (such as ice cream and soft drinks) at times of the year when advertising demand was less strong. Demand for advertising space in the autumn (when demand is traditionally strong) had increased.
- 7.18 Two other multi-channel broadcasters that had not been directly affected by the restrictions noted a shift in demand for different demographics, with more revenue going to the 'Housewives with Children' demographic..
- 7.19 Two multi-channel broadcasters and one of the main commercial channels also noted that advertisers had become cautious with where and how much they advertise HFSS products. An example provided was for two multi-national food groups that had reduced TV advertising expenditure across their portfolios but with the HFSS brands experiencing a greater decline than the non-HFSS.
- 7.20 In our original modelling work, we suggested that there would be scope for manufacturers to reformulate products high in fat or salt or sugar so that they would qualify as non-HFSS products. We recognised that reformulation is not a quick process - and it is not possible for all types of food and drink – but we suggested that the use of the FSA's NP scheme in the scheduling restrictions could lend impetus to this process.
- 7.21 Several broadcasters reported that advertisers appeared to have been reformulating products so that they would no longer be designated as HFSS (for example Crusha, and Yoplait). The effects so far had been limited by the relatively long lead-time required to reformulate products.

### Advertising for other products

- 7.22 One of the main commercial channels reported that an increase in non-food advertising had helped to offset the reduction in food advertising.

### Brand advertising and sponsorship

- 7.23 One area of concern that had been expressed during the original consultation process was whether these restrictions might lead to more brand advertising and sponsorship in the name of brands commonly associated with HFSS products.
- 7.24 The extent to which advertisers sought to use brand advertising and sponsorship in place of spot advertising is discussed in Section 6. Here we note that two multi-channel broadcasters and one of the main commercial channels drew attention to advertising campaigns for two brands that had offered both HFSS and non-HFSS products, but most broadcasters did not report any significant activity. One children's channel noted that very few advertisers actually chose to promote brands without the product, though some included health claims alongside their products where these could be justified.
- 7.25 One of the main commercial channels has also reported an impact on programme sponsorship as a result of the rule restricting HFSS advertising around adult programmes of particular appeal to children (i.e. indexing at 120 or more for child audiences). It said that major brands were taking a cautious approach towards sponsorship of programmes as 'event TV' such as light entertainment, as there was a risk that these family-oriented programmes might index at 120 or higher. Nonetheless, the same broadcaster said that the 120 index remained an effective mechanism and should remain the basis for determining whether a programme is of particular appeal to children.

### **Impact on broadcasting revenues**

- 7.26 The figures provided by broadcasters were all in nominal terms, i.e. not adjusted to take account of inflation.

### Changes in food and drink advertising revenue

- 7.27 The broadcasters that responded together represent around 86% of total industry revenue. They reported a reduction in the amount of food and drink advertising during children's programmes. However, in terms of overall food and drink advertising revenue, the experience was more mixed. Although collectively, they reported an increase in overall food and drink advertising revenue between 2005 and 2007/8, the main commercial channels and children's channels lost revenue from this source during the same period. The changes are set out in Figure 7.4 below.

**Figure 7.4: Change in food and drink advertising revenue reported in broadcasters responses by channel category (2005-07)**

Channels	Change in food advertising revenue 2005-2007
Main commercial channels	-6%
Children's channels	-26%
Music channels	12%
Other channels	93%

Source: Broadcasters (not all)

- 7.28 In order to put in context the impact the restrictions have had on broadcasters, it is useful to consider changes in food and drink advertising revenue against changes in advertising revenue for these broadcasters more generally. Of those broadcasters who provided information, some whose advertising revenue had grown, attributed this to larger audience share or sales campaigns, rather than advertisers taking advantage of advertising space vacated by HFSS advertising.
- 7.29 Figure 7.5 below sets out the overall changes in advertising revenue between 2005 and 2007 using the groups of broadcasters / channels adopted for the purposes of our original modelling work.

**Figure 7.5: Change in net advertising revenue reported in broadcaster responses by channel category 2005-7**

Channels	Change in NAR 2005-07
Main commercial channels	-11%
Children's channels	35%
Music channels	-31%
Other channels	72%

Source: Broadcasters (not all)

- 7.30 Comparing this table with Figure 7.4 suggests that restrictions on food and drink advertising have not been the most significant factor affecting broadcasters over the period 2005 to 2007. For instance, from the responses we received, the main commercial channels experienced a decrease of 6% in food and drink advertising between 2005 and 2007 and a reduction in overall advertising revenue of 11% over the same period. Equally, children's channels saw a reduction of 26% in food and drink advertising revenue between 2005 and 2007 but a 35% increase in overall advertising revenue on other channels over the same period. The substantial increase in advertising revenue reflects in part the number of PSB spin-off channels that were launched during this period (see Figure 4.2).

### Other effects

- 7.31 Two multi-channel broadcasters indicated that, as they did not target children, the restrictions had minimal impact on their advertising revenues. However, they and others said that the restrictions had affected them at the operational level. For example, some broadcasters had been obliged to divert capital and human resources towards investment in systems and controls that enable proactive and reactive monitoring of their programme and advertising inventory.
- 7.32 Some channels reported taking a precautionary approach to advertising around programmes that might appeal to children - one excluded HFSS advertising from programmes where the child component of the audience was likely to index at 100 or above. Smaller channels, for which audience sizes could fluctuate unpredictably, also adopted a cautious approach. As a result, some two of the main commercial channels and one multi-channel broadcaster say that they forgo opportunities to sell advertising space for HFSS advertisements, where there is a risk that a programme may attract a larger proportion of child viewers than expected.

- 7.33 One broadcaster reported that some media buying agencies had taken the removal of HFSS-advertising as an opportunity to force price reductions for advertising across the board on the grounds that some broadcasters had unsold inventory.
- 7.34 As indicated in Figure 7.4 above, food and drink advertising revenue for children's channels has declined significantly. While this fall may not entirely be due to restrictions on HFSS advertising, this has played a large part. Despite the transitional arrangements that allowed children's channels to continue to broadcast a significant level of HFSS advertising until 1 January 2009, it is possible that advertisers may have anticipated the restrictions by switching their advertising to other channels (and possibly other media). As indicated above, one broadcaster noted that demand for advertising aimed at the children's demographic had moved to the 'housewives and children' demographic, which is sold by many channels besides children's channels.

### Children's programming

- 7.35 Ofcom noted in its impact assessments that the reduced advertising opportunities around children's programmes could have an adverse effect on investment in new content for children. We understand that one multi-channel broadcaster with several children's channels concluded that, given the HFSS advertising restrictions, the business case for expanding investment in original content no longer existed, and it decided to continue relying on mostly imported library material. However we note that it is possible that the current economic climate may also have influenced this decision.
- 7.36 Some broadcasters that do not currently target children said the restrictions would be a barrier to them considering the development of their own child-targeted services in the future – i.e. they would focus on their adult audiences. Nonetheless, despite the fall in food and drink advertising revenues for children's channels, they have been able to increase advertising revenue overall.
- 7.37 Another broadcaster expressed some concerns about the viability of children's programming as a result of the HFSS restrictions. They have noticed revenue in the children's market decrease substantially, and whilst they have not yet cut their children's programming budget, programming costs as a percentage of income have increased dramatically. As a result they argued that their long term deals with companies supplying programming looked increasingly expensive. Other broadcasters that do not currently target children have said that the impact of these restrictions would discourage them from introducing their own child-focused service.

## Section 8

# Further review

### Current position

- 8.1 The current indications are that the scheduling restrictions Ofcom put in place are contributing to a significant reduction in the number of HFSS impacts for 4-15 year olds, and that the content restrictions implemented by BCAP have helped to markedly reduce the use of advertising of a number of the techniques calculated to appeal to children.
- 8.2 However it is not yet clear what will be the effects of the scheduling restrictions once they are fully implemented. Though we can estimate what the effects might be, it will not be possible to assess them effectively until we have full year data for 2009.

### Factors likely to affect the outcome

- 8.3 The actual outcome is likely to be influenced by a number of factors, including the requirements of the advertising restrictions, the evolution of scheduling and viewing patterns, the changing emphasis of advertising campaigns, and the extent to which HFSS advertising displaced from children's channels re-appears in adult airtime on other channels.
- 8.4 Other factors that may influence the outcome include the extent to which product reformulation (a long term process) contributes to changes in the balance of HFSS and non-HFSS products advertised on television, and possible changes to the nutrient profiling scheme stemming from the FSA's review. The economic downturn may also have an impact on the amount of food and drink advertising, though at this point, it is not possible to predict what this might be.

### Further review

- 8.5 For these reasons, we intend to carry out a further review in early 2010, once we have full-year data from both 2008 and 2009.
- 8.6 As with the current review, the focus will be on whether the advertising restrictions are having the anticipated effects, rather than attempting to identify the direct impact of the restrictions on child obesity levels. The reasons for this are that the causes of child obesity are multi-factoral, and the effects of interventions will only become apparent over a protracted period. The research reviewed by Ofcom<sup>45</sup> does suggest that television advertising is one (modest) factor affecting children's food preferences, and this conclusion was strongly reinforced by the Foresight<sup>46</sup> study published last year.

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*New research on advertising foods to children – an updated review of the literature*, Sonia Livingstone, 22 January 2006 (See Annex 9 - <http://www.ofcom.org.uk/consult/condocs/foodads/foodadsprint/>)

<sup>46</sup> *Tackling Obesity: Future Choices*, October 2007 (<http://www.foresight.gov.uk/OurWork/ActiveProjects/Obesity/Obesity.asp>)

## Annex 1

# Scheduling rules

The following rules are included in BCAP's rules on the scheduling of television advertisements<sup>47</sup>.

## Rules on the Particular Separation of Advertisements and Programmes

### 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 channel's may not carry any advertising 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.
- (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*)
  - (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);

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<sup>47</sup> The complete rules may be found at the ASA's website at [http://www.asa.org.uk/cap/codes/broadcast\\_codes/scheduling/Contents.htm](http://www.asa.org.uk/cap/codes/broadcast_codes/scheduling/Contents.htm).

(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

# Content rules

The following rules are included in BCAP's TV Advertising Standards Code<sup>48</sup>.

## 7.2 Food and Soft Drink Advertising and Children

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.

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.

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<sup>48</sup> The complete Code may be found at the ASA's website at <http://www.asa.org.uk/cap/codes/>.

(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 [Revised numbering] (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. “full of the goodness of 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 nutritional 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 and relevant to groups likely to be strongly interested in the advertisement. 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.

(2) A wide range of guidelines that offers best-practice advice for nutritional claims and healthy eating is available. For example, DEFRA Guidelines for the Use of Certain Nutrition Claims in Food Labelling and Advertising include a recommendation to avoid “% fat free” claims (issued November 1999). Appropriate consideration and uniform application of such guidelines is needed from the relevant pre-clearance and adjudicatory bodies.

(3) Licensees may also find the Joint Health Claims Initiative Code of Practice useful.

### **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 or therapeutic for the average person to augment their diet or that dietary supplements can enhance normal good physical or mental condition

(b) Advertisements must clearly establish those groups of people 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

# Children's channels and airtime

A3.1 Figure A3.1 lists the children's channels available in the UK between 2005 and 2007/8. It should be noted that some of these channels do not carry advertising (e.g. the BBC and Disney channels).

**Figure A3.1: Children's channels**

Children's channels		
Baby First	Discovery Kids	Nicktoons
Baby TV	Disney Channel	Playhouse Disney
Boomerang	Disney Channel +1	Playhouse Disney Plus
Boomerang +1	Disney Cinemagic	POP
Cartoon Network	Disney Cinemagic +1	Pop Girl
Cartoon Network Plus	Jetix	Pop +1
Cartoon Network Too	Jetix + 1	Tiny POP
Cartoonito/Toonami	Nick Jr.	Tiny Pop +1
CBBC	Nick Jr. 2	Toon Disney
CBeebies	Nickelodeon	Trouble (excluded from 2006+)
CITV	Nickelodeon Replay	Trouble +1 (excluded from 2006+)

A3.2 Figure A3.2 shows those periods of the PSB schedules comprising children's airtime between 2003 and 2008.

**Figure A3.2: Children's airtime definitions**

2003		2004		2005	
BBC One	Mon-Fri 1525-1735	BBC One	Mon-Fri 1525-1735	BBC One	Mon-Fri 1525-1735
BBC One	Sat 0600-1200	BBC One	Sat 0600-1200	BBC One	Sat 0600-1200
BBC Two	Mon-Fri 0600-1030	BBC Two	Mon-Fri 0600-1030	BBC Two	Mon-Fri 0600-1030
BBC Two	Sun 0600-1030	BBC Two	Sun 0600-1030	BBC Two	Sun 0600-1030
ITV1	Mon-Fri 1515-1700	ITV1	Mon-Fri 1515-1700	ITV1	Mon-Fri 1515-1700
ITV1	Sat 0600-1300	ITV1	Sat 0600-1300	ITV1	Sat 0600-1300
ITV1	Sun 0600-0900	ITV1	Sun 0600-0900	ITV1	Sun 0600-0900
Channel 4	Mon-Fri 0600-0700	Channel 4	Mon-Sun 0600-0700	Channel 4	Mon-Sun 0600-0700
Channel 4	Sat 0600-0700				
Channel 4	Sun 0600-0900				
Five	Mon-Fri 0630-0930	Five	Mon-Fri 0630-0930	Five	Mon-Fri 0630-0930
Five	Sat 0700-1330	Five	Sat 0700-1330	Five	Sat 0700-1330
Five	Sun 0630-1230	Five	Sun 0630-1230	Five	Sun 0630-1230

Changes in the nature and balance of television food advertising to children

2006		2007		2008	
BBC One	Mon-Fri 1525-1735	BBC One	Mon-Fri 1525-1735	BBC One	Mon-Fri 1505-1710
BBC Two	Mon-Fri 0700-1030	BBC Two	Mon-Fri 0700-1030	BBC Two	Mon-Fri 0600-1030
BBC Two	Sat 0600-1200	BBC Two	Sat 0600-1200	BBC Two	Sat 0600-1145
BBC Two	Sun 0600-1000	BBC Two	Sun 0600-1000	BBC Two	Sun 0600-1000
ITV1	Mon-Fri 1500-1630				
ITV1	Sat 0600-1130	ITV1	Sat 0600-1200	ITV1	Sat 0600-1030
ITV1	Sun 0700-1030	ITV1	Sun 0600-1130	ITV1	Sun 0730-1000
Channel 4	Mon-Sun 0600-0700	Channel 4	Mon-Sun 0600-0700	Channel 4	Mon-Sun 0600-0700
Five	Mon-Fri 0600-0900	Five	Mon-Fri 0600-0900	Five	Mon-Fri 0600-0900
Five	Sat 0700-1130	Five	Sat 0700-1000	Five	Sat 0700-1000
Five	Sun 0630-1230	Five	Sun 0600-1000	Five	Sun 0600-1000



## Annex 4

# Food and drink categories used in the review

A4.1 In section 5 we explain why it has been necessary to update the way we measure HFSS impacts and show the different impact reductions that were indicated using alternative measures (Fig 5.2). 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.

### Food and drink advertising

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 particular product and retail categories defined by Nielsen Media that are listed in Figure A4.1. In broad terms, these comprise all food advertising, and almost all drink advertising (except alcohol and organic drinks). It also includes advertising for so-called 'chain restaurants' such as those operated by Burger King or MacDonalds. In previous Ofcom publications, these have been referred to as 'core categories'.

**Figure A4.1: Food and drink advertising – Nielsen product and retail 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
03 CookingProd & Seasoning	05 Cakes&Pastry Mix	10 Condiments	15 Cooking Fats	25 Meat &Veg Extract
	30 Sauce (Cook&Mix)	35 Sauces	45 Sugars	46 Artificial Sweetner
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 RicePasta (Dr&Fr)
	30 Veg & Pasta (Can)	35 Vegetable (Fresh)	40 Vegetable(Frozen)	
07 Meat, Fish & Poultry	05 Bacon	10 Fish (Canned)	15 Fish (FreshFrozn)	20 SI Meat,Sprd,Pate
	25 Meat Poultry (Can)	30 Meat(FreshFrozn)	35 MeatPiesSausage	40 Poult (FreshFrozn)
08 Prepared & Convenience Foods	05 Baby Foods	10 Cereal(ReadyEat)	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			

<b>04 DRINK</b>				
<b>02 Soft Drinks</b>	05 Soft Drink Mixer	07 Mineral Water	10 Cordials	15 Fr Juice/St FrDrink
	20 Other Carbonated	25 Athlete/Hlth/Energ	95 Soft Drinks Gen	
<b>04 Beverages</b>	05 Coffee (Fresh)	10 Coffee (Instant)	15 Health Drinks	20 Tea
	25 Other Beverages			
<b>30 RETAIL</b>				
<b>01 Ent &amp; Leisure</b>	15 Chain Restaurant			

## Billets Media

A4.4 In this review, we have also used data from Billets Media (formerly known as Thomson Intermedia) for the purposes of analysing the use of techniques calculated to appeal to children (section 6 and annex 6). Billets' food and drink categories differ in some details from the definition of food and drink advertising used elsewhere in the review.

A4.5 The full list of Billets food and drink product and retail categories is set out in Figure A4.2. 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 A4.2: Food and drink advertising – Billets product and retail categories**

<b>FMCG</b>			
	Confectionery	Cereal Bars	Chewing Gum
		Chocolate	Potato Crisps & Snacks
		Sugar Confectionery	
	Drinks – Beverages	Chocolate	
	Drinks – Non Alcoholic	Carbonated Soft Drinks	Cordial & Squash
		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 - 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	
<b>Retail</b>			
	Stores - Department	Drink	Food
		Restaurant	
	Stores - Other	Fast Food	Restaurants & Bars
		Confectionary	
	Stores - Supermarket	Drink	Food
		Supermarket - Range	

### 2005 HFSS proxy

- A4.6 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.
- A4.7 As 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 and retail categories were likely to consist predominantly of HFSS products on the basis of the FSA's nutrient profiling model. As a result, the Nielsen food and drink categories listed in Figure A4.3 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. It is this proxy on which the estimated impact reductions were based.

**Figure A4.3: Exceptions from Nielsen product and retail categories in Figure A4.1 for the purpose of the 2005 HFSS proxy**

Products excluded	
02.03.10 Condiments	02.03.25 Meat & Vegetable Extracts
02.05.10 Coffee (instant)	02.05.15 Health Drinks
02.05.20 Tea	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
04.02.15 Fruit Juice/Still Fruit Drink	

A4.8 This proxy was necessarily approximate – some of the minor categories excluded by the IPA (such as meat and vegetable extracts) may have included HFSS products, while some of those included (such as cereals) may have included non-HFSS products. However, in the absence of definitive data, it does represent the best available basis for estimating how much advertising in 2005 was for HFSS or non-HFSS products.

### 2007/8 HFSS proxy

- A4.9 By 2007/8, better data was available on food and drink advertising. Using data on actual adverts for food and drink products shown on television in the 12 months from June 2007 to July 2008, we sought to determine how much had been for HFSS and non-HFSS products respectively.
- A4.10 We were able to obtain from Nielsen this lists of all food and drink advertisements seen by children in 2007/8. We then matched these against the advertisements approved by Clearcast for transmission during that period<sup>49</sup>. As a result, it was possible to determine how many of advertisements had been certified as non HFSS. Those certified non-HFSS included products that some may find surprising, such as:
- a) certain oven chips have a much lower fat content than, for example, microwaveable chips, and hence are non-HFSS;
  - b) hot cross buns, that are available in both HFSS and non-HFSS forms; and
  - c) chewing gum.
- A4.11 The majority of advertisements are not certified – if an advertiser has products that are not targeted at children (e.g. cooking sauces or sparkling water), it is not necessary for those products to be certified and the advertisements will be scheduled outside children’s airtime. In these cases, it was necessary to assess whether the products advertised were likely to be HFSS or non-HFSS.
- A4.12 We therefore looked at the product descriptors for all uncertified food and drink advertisements, 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 product descriptor. 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.
- A4.13 In some cases, product descriptors are specific to a product (e.g. Heinz Weightwatchers – Tuna). We have then categorised the product as either HFSS or non-HFSS on the basis of certification (where available) or assessment of the product descriptor. Where there was doubt, we classified products as HFSS.

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<sup>49</sup> Since the HFSS advertising restrictions were introduced in March 2007, advertisers wishing to advertise their products in children’s airtime have been obliged to certify in accordance with the FSA’s NP scheme whether their products are HFSS or not. The body entrusted by many broadcasters with checking that advertisements comply with these restrictions (Clearcast) will only advise broadcasters that an advertisement may be shown in children’s airtime if the relevant product has been certified as non-HFSS, it is for broadcasters to ensure they comply. In the case of children’s channels which remain able to transmit some HFSS advertising until Jan 2009, certification enables broadcasters to track the volumes of non HFSS (certified) and HFSS (non certified) adverts they are scheduling.

- A4.14 In other cases, product descriptors have been used to describe a range of products, some of which are HFSS, others of which are non-HFSS (e.g. McDonalds). In these cases, we have had to decide whether products described by that descriptor should be regarded as HFSS or non-HFSS. We did so by considering how many adverts with the relevant product descriptor were certified or assessed as being for non-HFSS products, and how many were not. As a result, adverts with the product descriptor 'McDonalds' are all classified as HFSS, despite a number of certified non HFSS, because the majority of adverts were for uncertified adverts assumed to be HFSS. Any product descriptor that included a mix of HFSS / non HFSS adverts is further explained by a footnote to the tables below.
- A4.15 However, data on an advert by advert basis is too granular to be used in the model developed for our HFSS impact analysis. For modelling purposes, therefore, we have had to make some simplifying assumptions, and to aggregate the individual advert data by product descriptor.
- A4.16 It is likely that the net effect of this approach is to slightly overstate the proportion of advertising in 2007/8 that was for HFSS products.

**Figure A4.4: Certified non HFSS by product descriptor**

Certified non HFSS products by product descriptor		
AlliedBakeries-SunblestVedaBre	BuxtonSpringWater	Dennylre-Ham
Alpro-SoyaRge §	CalonWenWhitland-OrgFruit/Veg	DietCoke §
Asda-Bakery	CocaCola-CocaColaZero §	DolmioBolognese §
Asda-BreadRge	CocaCola-DietCokePlusRge	Dolmio-BologneseSauce
Asda-Fish	CocaCola-MinuteMaid	Dolmio-ExtraRge
Asda-HotCrossBuns	Colmans-DrySauces	Dolmio-MyDolmioMeatballBologne
BallyfreeChickeenK	Colmans-RecipeMixes *	DonegalCatch-Chunky
BarrsIrnbu†	CoOp-FreshMeat	DouweEgberts-PureGoldInstant
Batchelors-SoupfullsRge	CoOp-FruitRge	EllasKitchen-OrganicPastaSauce §
BatchelorsSqueez §	Cow&Gate-BabyBalance §	EllasKitchen-SmoothieFruits §
Beefeater-SteakHouseRestr	Cow&Gate-FollowOnMilk §	ErinFoods-Soup §
Ben&Jerrys-FrozenYoghurtRge	Cravendale-Milk §	FeelGoodDrinksCo-Rge §
Benecol-DairyFreeDrink	Crusha-Milkshake	FloraProActivDrink §
BertolliPastaSauces	CrystalSprings-MineralWater	Freshways-SandwichRge *
Bertolli-PastaSaucesMcCann	DaleFarm-MegaMilk	Goldenlay-Omega3Eggs
BirdsEye-ChickenGrills	DanoneActimel §	GoodNatured-Juice
BirdsEye-CodFishFingers	Danone-ActiviaFatFreeRge §	GreenGiantCorn §
BirdsEye-EatPositiveRge	Danone-ActiviaFibreYoghurtRge §	GreggsBakers-Wraps
BirdsEye-Omega3FishFingers	DanoneBioActiviaYoghurt * §	Heinz/WWatchers-Tuna
BirdsEye-ProdRge	DanoneDanacolYoghurt §	Heinz-BeanzSnapPots
BrandPower-PetitsFilous	Danone-Essensis §	Heinz-FarmersMktSoupRge
Britvic-DrenchWater	Dennylre-FoodRge*	Heinz-MumsOwnBabyFoodRge

\* a mix of HFSSs and non HFSS. Attribution reflects majority  
† adverts classified as HFSS in 2007 and non HFSS in 2008  
± ads classified as non HFSS in 2007 and HFSS in 2008  
§ a mix of estimated and certified non HFSS

<b>Figure A4.4 continued</b>		
<b>Certified non HFSS products by product descriptor</b>		
HighlandSprngWater §	Morrisons-KingPrawns	Rooster-IrishPotatoes
Holland&Barrett-BrazilNuts	Morrisons-KnorrRagu	RubiconDrinks
Horlicks	Morrisons-RobinsonsDrinksRge	RubiconExotic-MangoJuiceDrink
Horlicks-ExtraLightMaltDrink	Muller-FruitCornerYoghurt *	Rubicon-PapayaFruitDrink
HovisBestOfBoth §	Muller-LittleStarsRge	Sainsburys-FreshFruit §
Hovis-InvisibleCrustWhiteBread	Muller-MullericeLowFat	SeedsOfChange *
Iceland-FrozenRoastJoint	Muller-MullerLightYoghurt	SevenUpFree §
InnocentSmoothies §	Muller-OneADayYogurt †	ShreddedWheatAndBiteSize §
IrishPrideBakeries	Muller-RiceDessert	SmaProgressMilk §
Isklar-MineralWater §	MullerVitality §	SoGood-FatFree
JohnWest-RedSalmon	Muller-YoghurtRange †	Somerfield-Pork
Kelloggs-Optivita	MunchBunch-Squashums §	Somerfield-Turkey
Kelloggs-WheatsCerealRge	Nescafe-CoffeeRge	SpriteZero
Kenco-InstantCoffee	NescafeDecafe	StrathmoreMinrIWtr §
Kingsmill-5050Bread §	NescafeGoldBlend	Tarantella-OrganicFoods
Kingsmill-GoldSeeds&Oats	Nescafe-Original §	Taylors-YorkshireTea §
Kingsmill-GreatEverydayBread	Nestle-MunchBunchYoghurt	Tesco-Beef *
Knorr-RaguBologneseSauce	Nestle-ShreddedWheatCereal	Tesco-Crackers §
KnorrSoups	Nestle-ShreddiesCereal	Tesco-HealthyLivingRge
Knorr-VieSoupsRge §	OnkenBioPot †	Tetley-Redbush
Lactofree-SemiSkimmedMilk	OptionsChocDrinksRge §	TildaBasmatiRice
Lavazza-EspressoCoffee	Oxo-ConcentratedLiquidStock	TridentSoft-ChewingGumRge §
LoydGrossman-SauceRge *	Pepsi-7upH2oh	TridentSplash-ChewingGumRge §
McCainHomeFries §	PepsiMax §	Tropicana §
McCainOvenChips §	PgTips §	Tropicana-SmoothiesRge
McCain-RusticOvenChips	PotNoodles *	Twinings-CoffeeRge
McCambridgesBread	Powerade §	TyphooTea
Milupa-AptamilFollowOn	PrincesTinnedTuna	VimtoCordial †
MinuteMaid-NutriTopUp	QuakerOats	VolvicPremierWater
Morrisons-BabyNewPotatoes	Quorn-Mince	VolvicTouchOfFruit
Morrisons-BritNewPotatoes	Quorn-ProdRge	WarburtonsBread
Morrisons-BritSpringLamb *	RedBull-Sugarfree	Weetabix ± §
MorrisonsFreshFishRge *	Ribena-PureJuiceRge	WeetabixAlpen
Morrisons-FreshScotSalmon *	RiverRock §	Weetabix-OatibixCerealRge * §
Morrisons-Fruit&Veg	RiverRockMineralWater §	WeetabixWeet-Os
Morrisons-HeinzBakedBeans	Robinsons-FruitShoot100%	Welchs-PurpleGrapeJuice
Morrisons-HovisBread	Robinsons-FruitShootH2o §	Wrigley-AirwavesChewingGum §
Morrisons-JerseyRoyals	Robinsons-SquashDrinkRge	Wrigley-ExtraChewingGum

\* a mix of HFSSs and non HFSS. Attribution reflects majority

† advert classified as HFSS in 2007 and non HFSS in 2008

± ads classified as non HFSS in 2007 and HFSS in 2008

§ a mix of estimated and certified non HFSS

<b>Figure A4.4 continued</b>		
<b>Certified non HFSS products by product descriptor</b>		
Wrigley-ExtraFusion	Yoplait-FrubesLtdEdition	Yoplait-YopYoghurtDrink §
Wrigley-OrbitChewingGum §	Yoplait-PetitsFilous ± §	Youngs-ChipShopFishFillet
Wrigley-OrbitComplete §	Yoplait-PetitsFilousFrubes §	Youngs-GreatGrimsbyRge
YoplaitFrubes §	Yoplait-ProdRge	

\* a mix of HFSSs and non HFSS. Attribution reflects majority

† adverts classified as HFSS in 2007 and non HFSS in 2008

± ads classified as non HFSS in 2007 and HFSS in 2008

§ a mix of estimated and certified non HFSS

**Figure A4.5: Assessed as non HFSS by product descriptor**

<b>Assessed as non HFSS products by product descriptor</b>		
AlproSoya-LightMilk	Danone-Essensis §	Morrisons-Strawberries
Alpro-SoyaRge §	DietCoke §	MullerVitality §
Asda-MilkRge	DolmioBolognese §	MunchBunch-Squashums §
Ballygowan	EllasKitchen-OrganicPastaSauce §	Murroughs-WelshBrewTea
Ballygowan-FlavouredSpringWater	EllasKitchen-SmoothieFruits §	NdcMilk
BarrysGoldBlendTea	ErinFoods-Soup §	Nescafe-Original §
BarrysTea/GoldBlen	FeelGoodDrinksCo-Rge §	Nestle-ShreddedWheatBitesize
BarryTeas	FlahavensPorridge	Nimble-WholemealBread
BatchelorsSqueez §	FloraProActivDrink §	Nutricia-AptamilMilk
Benecol-FoodRge	Florette-CrispySalad	OptionsChocDrinksRge §
BenecolYoghurtDrink	FoodMasters-GiaGarlicPuree	Pepsi-7upFree
BirdsEye-SimplyCod	FyffesBananas	PepsiMax §
BrennansBread	GreenGiantCorn §	PgTips §
CocaCola-CocaColaZero §	GreengiantSweetcorn	Powerade §
Cow&Gate-BabyBalance §	HighlandSprngWater §	RiverRock §
Cow&Gate-FollowOnMilk §	HovisBestOfBoth §	RiverRockMineralWater §
Cow&GateGrowingUpMilk	InnocentSmoothies §	RobertWisemanDairies-TheOne
Cow&GateNutricia	Isklar-MineralWater §	Robinsons-FruitShootH2o §
Cravendale-Milk §	Kenco-PureRge	Robinsons-SmoothJuice
Dairygold-LightPlus	Kingsmill-5050Bread §	Sainsburys-FairtradeBananas
DaleFarm-OnePercentMilk	Knorr-VieSoupsRge §	Sainsburys-FreshFruit §
DanoneActimel §	LyonsIreland-Tea	Sainsburys-JerseyRoyalPotatoes
Danone-ActiviaFatFreeRge §	LyonsQuickBrewTea	Sainsburys-Strawberries
Danone-ActiviaFibreYoghurtRge §	McCainHomeFries §	SainsburysTomatoes
DanoneBioActiviaYoghurt §	McCainOvenChips §	ScottishDairyMrktg-Milk
DanoneDanacolYoghurt §	Morrisons-Nectarines	SevenUpFree §

\* a mix of HFSSs and non HFSS. Attribution reflects majority

† adverts classified as HFSS in 2007 and non HFSS in 2008

± ads classified as non HFSS in 2007 and HFSS in 2008

§ a mix of estimated and certified non HFSS

<b>Figure A4.5 continued</b>		
<b>Assessed as non HFSS products by product descriptor</b>		
ShreddedWheatAndBiteSize §	Tesco-Potatoes	Weetabix §
SmaProgressMilk §	TetleyExtraStrongTea	Weetabix-OatibixCerealRge §
Somerfield-PgTips	TridentSoft-ChewingGumRge §	WhiteStuff-SemiSkimmedMilk
SplendaSweetener	TridentSplash-ChewingGumRge §	Wrigley-AirwavesChewingGum §
StrathmoreMinrIWtr §	Tropicana §	Wrigley-ExtralceLiquidBurst
TaylorsTea	TropicanaPurePrmum	Wrigley-OrbitChewingGum §
Taylors-YorkshireTea §	Twinnings-EarlGreyTea	Wrigley-OrbitComplete §
Tesco-Crackers §	Twinnings-LadyGreyTea	YoplaitFrubes §
Tesco-FreshFruit	UncleBens-BoilnABagRice	Yoplait-PetitsFilous §
Tesco-FreshSalmon	UnileverVieShots	Yoplait-PetitsFilousFrubes §
Tesco-LocalchoiceMilk	Volvic-ReviveWater	Yoplait-YopYoghurtDrink §
Tesco-Mushrooms		

\* a mix of HFSSs and non HFSS. Attribution reflects majority

† adverts classified as HFSS in 2007 and non HFSS in 2008

± ads classified as non HFSS in 2007 and HFSS in 2008

§ a mix of estimated and certified non HFSS

**Figure A4.6: Assessed as HFSS products by product descriptor**

<b>Assessed as HFSS products by product descriptor</b>		
Adez-DrinksRge	Baxters-CannedSoupRge	C&B-BranstonRelishRge
Aero-Bubbles	BaxtersHealthyChce	CadburyChocolateRge
Aldi-DeliContinentalMeats	BeReadyMeals	CadburyCremeEggs
AnBordBiaeggs-BiaLamb	BernardMatthewsSlicedTurkey *	Cadbury-CremeEggTwisted
AnBordBiaeggs-Chicken	BertolliSpread	CadburyCrunchie
AnchorButter	BettyCrockerCakeMix	CadburyDairyMilk
Anchor-LighterSpreadable	BettyCrocker-ShakeToMakePanca	Cadbury-DairyMilkWithCremeEgg
ArlaFoods-ApetinaFeta	BigAls-ChickenFillets	Cadbury-Digestives
Asda-CocaColaRge	BigAls-RoastedMiniFillets	CadburyMilkFlake
Asda-EasterEggs	BirdsEye-SimplyChicken	Cadbury-Moro
AsdaEasterPromo	Bisto	CadburysSnack
Asda-HotCrossBuns *	BistoGravyGranules	Campbells-Gateaux
AuntBessies-ApplePie	BlueDragon-SweetChilliDipping	CampbellsSoup
AuntBessies-BakeMuffins	BlueDragon-ThaiSauceRge	Cantrell&Cochrane-ClubOrange
AuntBessies-DessertRge	Bounty	CantrellClubEnergiseDrink
AuntBessies-DoubleChocChipMu	BoyneValley-OliveOil	Capri-SunFrtDrink
AuntBessies-Scones	BrandPower-Frubes	CathedralCity-CheddarCheese
AvonmoreSupermilk	BrandPower-JusRolPastry	CathedralCity-LighterCheese
Ballyfree-CarvedTurkeySlices	BrandPower-NestleCereal	Caxton-PinkNWhitesMallowWafer
BarrsImBru †	BuitoniPasta	CharvilleCheese
BatchelorsBeans	BurgerKing-RestrChain	CheeseStrings

\* a mix of HFSSs and non HFSS. Attribution reflects majority

† adverts classified as HFSS in 2007 and non HFSS in 2008

± ads classified as non HFSS in 2007 and HFSS in 2008



<b>Figure A4.6 continued</b>		
<b>Assessed as HFSS products by product descriptor</b>		
CocaCola-CokeRge	Feasters-MicrowaveBurgers	HalfPounders-ConfRge
CocaColaFanta	FerreroKinderBueno	HardRockCafe
CocaCola-OriginalCoke	FerreroNutella	Haribo
Colmans-SqueezeableMustard	FerreroRocherChoc	Haribo-SmallPacketSweetRge
CookstownMeats	FerreroTicTac	HazelbrookFmIcecrm
CoOp-ChocolateRge	FilippoBerio	HccWelshLamb&Beef
CountryLife-LighterSpreadable	Findus-JeanChristopheNovelliRg	Heinz-DeliMayo
CountryLife-SpreadableButter	Flora-Margarine	HeinzSaladCream
DairyCouncilNiDoo	Flora-Omega3PlusMiniDrink	HeinzTomatoKetchup
DairyCounNlre	Flora-Omega3Spread	Heinz-TomatoKetchupChilli
DairyCrestClover	FloraProActivRge	HeinzWWatchers-WedgeMelt
DairyCrest-WexfordMildCreamy	Flora-ProActivSpread *	Hellmanns-DressingsRge
DairyGold	Foxs-MeltsBiscuits	Hellmanns-LightMayonnaise
Dairygold-Bacon	FruiceFruitJuice	Hellmanns-RealMayonnaise
DairygoldFoodNlre-Spread	FruitfieldChefKetchup	Hellmanns-Squeezeable
Dairygold-GalteeMeats	FruitfieldChefMayonnaise	Hellmanns-SqueezyMayonnaise
DairygoldSpread	Fruitfield-Mallows	Hellmanns-WarmChickSaladDress
DanoneDanonino	Fruitfield-ProdRge	HomeFarmFoods-ProdRge
DanoneVitalinea	Frusi-YoghurtIceCream	HoneyMonster-SugarPuffs
Dawn-OrangeJuice	Galaxy-Chocolate	Iceland-BumperBbqSelectionPack
DcniDairy	GalaxyMinstrels	Iceland-CookFromFrozenRge
Dennylre-Bacon	Galaxy-MinstrelsChocolates	Iceland-Desserts
DolmioHeat&Serve	Galaxy-Ripple	Iceland-FrozenFishRange
DolmioStirlns	GalbaniCheese	IcelandKingPrawnR
Dolmio-TasteOfItalySauces	Galtee-Bacon	Iceland-PartyFoods
DominosPizza-RestrChain	GiovanniRana-PastaRge	Iceland-PicnicSelectionPack
DouweEgberts-CafeSwitch	GlanbiaPetitFilous	Iceland-Sausages
DrOetker-BistroPizza	Glanbia-Smoothze *	Iceland-SummerFruitPannaCotta
DrOetker-PaulaDessertRge	GoldenCowButter	Iceland-SummerFruitPudding
DrOetker-TarteCakeMixes	Goodfellas-SignatorePizzaRge	IntersnackPombearCrisps
Dromona-SpelgaFruitYoghurt	GoodfellasSolosPizzaRge	IrishBiscuitsCreamCrackers
DrPepper	GourmetGarden	JacobsCreamCracker
Eatwell-FeastersFoodRge	GreggsBakers-Baguettes	JacobsTucCrackers
Emap-M&Ms	GreggsBakers-ChickenWrap	JohnWest-ProdRge
Emap-VEnergy	GreggsBakers-ProdRge	KavliPrimulaCheese
Fanta-Drink	GreggsBakers-SteakBake	Kelloggs
Fanta-Orange	GreggsTheBakers	KelloggsAllBran
Fanta-StillDrink	GuylianChocolates	Kelloggs-AllBranCrunchOatbakes
FarmfoodsFrozenFoods	HaagenDazs	KelloggsBranFlakes

\* a mix of HFSSs and non HFSS. Attribution reflects majority

† adverts classified as HFSS in 2007 and non HFSS in 2008

± ads classified as non HFSS in 2007 and HFSS in 2008

<b>Figure A4.6 continued</b>		
<b>Assessed as HFSS products by product descriptor</b>		
KelloggsCerealBars	KerryFoods-DennysSlicedMeats	LurpakButterDish
Kelloggs-CerealRange	KerryFoods-GoldMedalMeat	LurpakLighterSpreadable
KelloggsCocoPops	KerryFoods-KerrymaidSpread	LurpakSpreadable
Kelloggs-CocoPopsCreations	KerryFoods-LowLowCheese	M&S-BritBurgers
Kelloggs-CocoPopsMegaMunchers	KerryFoods-MattesonsRge	M&S-Chicken
Kelloggs-CocoPopsMoons&Stars	KerryFoods-ProdRge	M&S-EasterChocolateRge
Kelloggs-CocoPopsStraws	KerrygoldButter	M&SFoodRge
KelloggsCornFlakes	Kerrygold-SofterButter	M&S-FreeRgeEggs
KelloggsCorporate	KettleFoods-KettleChips	M&S-MincePies
KelloggsCrunchyNut	KfcKentuckyFriedChicken-Restr	M&S-Salmon
Kelloggs-CrunchyNutBars	Kilmeaden-Cheese	Maltesers
KelloggsCrunchyNutClusters	KinderBueno	MaltesersBox
KelloggsCrunchyNutFeast	Kitkat-Senses	MaltesersIceCream
KelloggsFrosties	Knorr-ChickenCubes	Maltesers-Sweets
Kelloggs-FruitNFibre	Knorr-OxtailSoup	Maoam
KelloggsFruitWindersDoubles	Knorr-PourOverSauces	Marmite
Kelloggs-MultigrainCornflakes	KnorrRecipeKits	Marmite-ChampagneMarmite
Kelloggs-NutriGrainBar	Knorr-VegetableStockCubes	Marmite-SqueezeMeSpread
Kelloggs-NutriGrainElevenses	KpHulaHoops	Mars
KelloggsNutriGrainIreland	KpRealMcCoys	MarsCelebrations
Kelloggs-NutriGrainOatBakeBar	Kraft-DairyIleaDunkersNachos	MarsGalaxy
Kelloggs-NutriGrainSoftOaties	Kraft-DairyIleaLunchables	Mars-GalaxyMistletoeKissesBar
KelloggsR/Recipes	KraftLightPhili	MarsIceCreamBar
Kelloggs-RiceKrispies	KraftPhiladelphiaGarlic&Herb	Mars-M&Ms
KelloggsRKrispies	Kraft-PhiladelphiaThaiSweetChi	Mars-MarsBar
KelloggsSnacking	Lactalis-PresidentEmmentalChees	Mars-Planets
KelloggsSpecialK	Lactalis-PresidentFrenchButter	Mars-ProdRge
Kelloggs-SpecialKBlissCereal	LaughingCow-ProdRge	MarsRevels
KelloggsSpecialKCerealBar	LeerdammerCheese	MarsSkittles
KelloggsSpecialKRedBerries	LeRouleCheese	MarsSnickers
Kelloggs-SpecKBlissCerealBar	Lindt-ExcellenceChocolateRge	MarsSnickersIceCm
Kelloggs-SpecKMiniBreaks	Lindt-GoldBunny	MarsStarburst
Kelloggs-SpecKOats&Honey	LindtLindorChocolates	Mars-StarburstChoozers
Kelloggs-SpecKSustain	LionsEggs	MarsTwix
KelloggsToronto/Bar	Lucozade	Maryland-ChocChipCookies
KelloggsVarietyPck	Lucozade-Drink	Mattesons-FridgeRaidersChicken
Kelloggs-WakeUpToBreakfastCam	LucozadeEnergy	Mattesons-SmokedPorkSausage
Kelloggs-RiceKrispies/Cornflakes	Lucozade-Sport	MaynardsWineGums
KerryFdsLowLow/Sp	LucozadeSportHydroActiveDrink	McCain-PotatoGourmet *

\* a mix of HFSSs and non HFSS. Attribution reflects majority

† adverts classified as HFSS in 2007 and non HFSS in 2008

± ads classified as non HFSS in 2007 and HFSS in 2008

<b>Figure A4.6 continued</b>		
<b>Assessed as HFSS products by product descriptor</b>		
McDonalds-RestrChain *	NatlDairyCouncilCheese	PeperamiMini
McVities-ChocolateDigestive	NatureValley-CrunchyGranola	PerfettiVanMelleFruitella
McVities-DigestiveRge	Nestle/Buitoni	PetersSavouryProducts
McVities-GoAheadYoghurtBreaks	NestleAeroDrink	PilgrimsCheese
McVitiesJaffaCakes	Nestle-AeroHotChocolateDrink	PilgrimsChoiceExtraMature
McVities-YogFruitDigestives	Nestle-AlmondOats&MoreCereal	PizzaHut-Restr
Meat&LivestockCommBeef&Lamb	NestleCereals	PizzaRistorante
Meat&LivestockComm-Mince	NestleCheerios	PringlesCrisps
MentosChewyMints	Nestle-CookieCrispCereal	Pringles-RiceInfusions
Mentos-PureFreshGum	NestleFinesseCereal	QuakerSnackAJacks
MilkyWay	Nestle-HeavenChocBar	Quaker-SnackAJacksPopcorn
Millions	Nestle-HoneyOats&MoreCereal	RedBull *
MiniBabyBell	Nestle-NesquikMagicStraws	RedBullFlugtag
MissionDeli-DeliWrapsRge	Nestle-OatCheerios	RhmFoodsGateaux
MissionFoods-FoodRge	Nestle-Oats&MoreRge	Ribena *
MitchelstownCheese	Nestle-RaisinOats&MoreCereal	RibenaOriginal
MiWadi	Nestle-ShreddedWheatBigBiscuit *	RiceKrispiesSquare
Morrisons-BreadRge *	Nestle-ShreddiesCereal *	RichmondSausages
Morrisons-BritLambChops	Nestle-SkiActiv8Yoghurt	RocksOrganic-OrganicJuices
Morrisons-BritPork	Nestle-Smarties	RosemaryConleyBelgianChocMous
Morrisons-CadburyRoses	NestlesMilkyBar	Rown/QualityStreet
Morrisons-CadburySelectionBox	NestleWholegrain	RowntreeAero
Morrisons-CadburyTreatSizePack	Nestle-WholeGrainCereal	Rowntree-FruitPastilles
Morrisons-Chocolates	NewYorkBagels	RowntreeKitkat
Morrisons-CocaCola	NutellaChocolateSp	Rustlers-MicrowaveFoodRge
Morrisons-EasterEggs	NutrigrainEleveses	Rustlers-MicrowaveQuarterPound
Morrisons-GoodfellasPizza	OakhouseFoods-FrozenMeal	Ryvita-MinisRge
Morrisons-IceCreamRge	OceanSprayCranbry	SaclaClassicPesto
Morrisons-KelloggsCornflakes	OceanSpray-Light	SainsburyReadyMeal
Morrisons-KelloggsSpecKCereal	OldEIPaso-CrispyChickenFajita	Sainsburys-Biscuits
Morrisons-MullerRge	OldEIPasoEnchiladas	Sainsburys-BritFoodRge
Morrisons-SandwichRge	OldEIPaso-StandNStuffTacoKi	Sainsburys-ButchersChoiceSausag
Morrisons-WalkersCrisps	OldEIPassoFajitaDinnerKit	Sainsburys-CarbonatedDrinksRge
MullerCorners	OldJamaica-GingerBeer	Sainsburys-CarteDorRge
Muller-CornerYogurtRge	OnkenBioPot †	SainsburysCheese
Muller-OneADayYogurt †	OpChocolate-Pink&WhitesMallow	Sainsburys-CocaCola
Muller-YoghurtRange †	OrvilleRedenbachers-PopcornRge	Sainsburys-Crisps
NabiscoOreoCookies	PapaJohnsRestr	SainsburysGammon
NationalDairyCounc	PennState-Pretzels	Sainsburys-HotCrossBuns

\* a mix of HFSSs and non HFSS. Attribution reflects majority

† adverts classified as HFSS in 2007 and non HFSS in 2008

± ads classified as non HFSS in 2007 and HFSS in 2008

<b>Figure A4.6 continued</b>		
<b>Assessed as HFSS products by product descriptor</b>		
Sainsburys-Lamb	SubwaySandwichShop *	UnileverMagnumIce
Sainsburys-MullerYoghurtRge	SussexFarmhouseMeals-Delivery	UtterlyButterly
Sainsburys-PorkSteaks	Tayto-AdvantageCrisps	VimtoCordial †
Sainsburys-RobinsonsSquash*	TaytoCrisps	Waitrose-DeliRge
Sainsburys-SalmonFishcakes	TerrysChocOrange	WalkersCrisps
SainsburysSmokedSalmon	Tesco-Bacon	WalkersDoritos
Sainsburys-TasteDiffBurgers	Tesco-Biscuits	Walkers-MonsterMunchSnack
Sainsburys-TasteDiffMinceTarts	Tesco-CakesRange	Walkers-Quavers
Sainsburys-TtdBeefSteaks	TescoEasterEggs	Walkers-SunBitesRge
Schwartz-PacketMixRge	Tesco-Lamb	WallsCarteD'Or
SchweppesMixers	Tesco-Turkey	Walls-CarteDorChocolateInspira
SchweppesTonic	TgiFridays	Walls-CarteDorLemonSorbet
SeabrookCrisps-CrispRge	ThomasTunnockCaramelWafers	Walls-CarteDorStrawberryYoghur
SharwoodSauces	ThorntonsChocolateRge	WallsCornetto
ShawsNire-CookedMeatRge	Toblerone	Walls-FrusiFrozenSnacks
ShippamsOldEIPaso	Toblerone-Fruit&Nut	Walls-MagnumEcuadorDark
ShloerFruitJuice	ToppsJuicyDrop	Walls-MagnumJava
ShreddedWheatBigBiscuit *	Topps-LotsaLicks	Walls-MagnumMayanMystica
SkinnyCow-LowFatIceCream	ToppsMegaMouth	Walls-MagnumMini
Skittles-Sweets	ToppsPushPops	Walls-MilkTimeStrawberryPot
Smarties	Topps-SliderzCandy	WallsRecipeSausages
Snickers-Bar	Topps-VertigoCandy	Weetabix-Cereal ±
Somerfield-CarteDorIceCream	Tunnocks-CaramelWafer	Weetabix-OatibixBitesizeCereal
Somerfield-EasterEggRge	TunnocksTeaCake	Weetabix-OatibixCerealRge *
Somerfield-GoodfellasPizzeria	Twix-Bar	Weetabix-OatiflakesCerealRge
Somerfield-HoneyRoastHam	UncleBens-ChilliConCarne	Weetabix-Weetaflakes
Somerfield-LambChops	UncleBens-CookingSauces	WeightWatchers-FoodRge
Somerfield-LeanSteakMince	UncleBens-ExpressEggFriedRice	WelshLamb&Beef
Somerfield-MeatRge *	UncleBensExpressR	WerthersOriginal
Somerfield-Salmon	UncleBens-ExpressRice	Wimpy-Restr
Spam-Fritters	UncleBens-OrientalSauces	Woolworths-TerrysChocOrange
Spar-BbqEssentials	UncleBens-Risotto	WykeFarms-JustDeliciousXmChdr
Sprite	UncleBensSauce	YakultYoghurt
Sprite-SpriteDrinkRge	UncleBensStFrySc	YoplaitFruitYghrt
Squares	UncleBens-StirFryRge	Yoplait-PetitsFilous ±
St.AgurCheese	UncleBens-Wraps	YorkshireTea-Cakes&Biscuits
Starburst-Sweets	Unilever-HellmannsRge	

\* a mix of HFSSs and non HFSS. Attribution reflects majority

† adverts classified as HFSS in 2007 and non HFSS in 2008

± ads classified as non HFSS in 2007 and HFSS in 2008

## Products of appeal to children

- A4.17 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 products likely to appeal to them. 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 children, and those unlikely to do so.
- A4.18 Although we had to aggregate the advertising data by product descriptor for the HFSS impact modelling, we were able to use the data based on individual adverts to assess the volume of impacts for adverts considered to be of appeal to children, and those considered only likely to appeal to adults.
- A4.19 In the interests of transparency, the tables below show which products have been counted as HFSS and which as non-HFSS, and whether the basis for the attribution was certification, or an assessment based on either the product descriptor or by looking at how other adverts for the same product may have been certified. As a result a number of product descriptors appear in more than one category. These products are flagged in each of the categories they appear in e.g. Green Giant Corn appears in both the certified and estimated non HFSS lists. This duplication arises from the fact that the same descriptor has sometimes been applied by the advertiser or broadcaster to a range of adverts, some of which were for HFSS products, some of which were for non-HFSS products. This includes any products whose NP status may have changed over the period examined because of reformulation.

## Products of appeal to both children and adults by advert

**Figure A4.7: Certified non HFSS products considered likely to appeal to children and adults (by advert)**

Certified non HFSS products considered likely to appeal to children and adults		
Asda-Bakery	EllasKitchen-SmoothieFruits †	Morrisons-HovisBread
Asda-HotCrossBuns †	Glanbia-Smoothieze †	Morrisons-RobinsonsDrinksRge
BarrsInBru †	GreenGiantCorn †	Muller-FruitCornerYoghurt †
BatchelorsSqueez †	GreggsBakers-Wraps	Muller-LittleStarsRge
Ben&Jerrys-FrozenYoghurtRge	HovisBestOfBoth †	Muller-MullericeLowFat
BirdsEye-CodFishFingers	Hovis-InvisibleCrustWhiteBread	Muller-RiceDessert
BirdsEye-Omega3FishFingers	InnocentSmoothies †	Muller-YoghurtRange †
BirdsEye-ProdRge	IrishPrideBakeries	MunchBunch-Squashums †
BrandPower-PetitsFilous	Kelloggs-WheatsCerealRge	Nestle-MunchBunchYoghurt
CocaCola-CocaColaZero †	McCainHomeFries †	Nestle-ShreddiesCereal †
CocaCola-DietCokePlusRge	McCainOvenChips †	OptionsChocDrinksRge †
CocaCola-MinuteMaid	McCain-RusticOvenChips	Pepsi-7upH2oh
Crusha-Milkshake	McDonalds-RestrChain †	PepsiMax †
Dennylre-foodrange	MinuteMaid-NutriTopUp	PotNoodles †
DietCoke †	Morrisons-HeinzBakedBeans	Ribena †

† adverts for these products are included in both HFSS and non-HFSS categories

**Figure A4.7 continued**

**Certified non HFSS products considered likely to appeal to children and adults**

Ribena-PureJuiceRge	TridentSoft-ChewingGumRge †	Wrigley-OrbitComplete †
Robinsons-FruitShoot100%	TridentSplash-ChewingGumRge †	YoplaitFrubes †
Robinsons-FruitShootH2o †	VimtoCordial †	Yoplait-FrubesLtdEdition
Robinsons-SquashDrinkRge †	Welchs-PurpleGrapeJuice	Yoplait-PetitsFilous †
RubiconDrinks	Wrigley-AirwavesChewingGum †	Yoplait-PetitsFilousFrubes †
RubiconExotic-MangoJuiceDrink	Wrigley-ExtraChewingGum	Yoplait-ProdRge
Rubicon-PapayaFruitDrink	Wrigley-ExtraFusion	Yoplait-YopYoghurtDrink †
SevenUpFree †	Wrigley-OrbitChewingGum †	Youngs-ChipShopFishFillet
SpriteZero		

† adverts for these products are included in both HFSS and non-HFSS categories

**Figure A4.8: Assessed as non HFSS products considered likely to appeal to children and adults (by advert)**

**Assessed as non HFSS products considered likely to appeal to children and adults**

Ballygowan-FlavouredSpringWater	McCainOvenChips †	TridentSplash-ChewingGumRge †
BatchelorsSqueez †	MunchBunch-Squashums †	Wrigley-AirwavesChewingGum †
CocaCola-CocaColaZero †	OptionsChocDrinksRge †	Wrigley-ExtralceLiquidBurst
DietCoke †	Pepsi-7upFree	Wrigley-OrbitChewingGum †
EllasKitchen-SmoothieFruits †	PepsiMax †	Wrigley-OrbitComplete †
GreenGiantCorn †	Robinsons-FruitShootH2o †	YoplaitFrubes †
GreengiantSweetcorn	Robinsons-SmoothJuice	Yoplait-PetitsFilous †
HovisBestOfBoth †	SevenUpFree †	Yoplait-PetitsFilousFrubes †
InnocentSmoothies †	TridentSoft-ChewingGumRge †	Yoplait-YopYoghurtDrink †
McCainHomeFries †		

† adverts for these products are included in both HFSS and non-HFSS categories

**Figure A4.9: Assessed as HFSS products likely to appeal to children and adults (by advert)**

**Assessed as HFSS products considered likely to appeal to children and adults**

Aero-Bubbles	BatchelorsBeans	Cadbury-DairyMilkWithCremeEgg
Asda-CocaColaRge	BettyCrockerCakeMix	Cadbury-Digestives
Asda-EasterEggs	BettyCrocker-ShakeToMakePanca	CadburyMilkFlake
AsdaEasterPromo	Bounty	Cadbury-Moro
Asda-HotCrossBuns †	BrandPower-Frubes	CadburysSnack
AuntBessies-ApplePie	BurgerKing-RestrChain	Campbells-Gateaux
AuntBessies-BakeMuffins	CadburyChocolateRge	Cantrell&Cochrane-ClubOrange
AuntBessies-DessertRge	CadburyCremeEggs	CantrellClubEnergiseDrink
AuntBessies-DoubleChocChipMu	Cadbury-CremeEggTwisted	Capri-SunFrtDrink
AuntBessies-Scones	CadburyCrunchie	Caxton-PinkNWhitesMallowWafer
BarrslnBru †	CadburyDairyMilk	CheeseStrings

† adverts for these products are included in both HFSS and non-HFSS categories

<b>Figure A4.9 continued</b>		
<b>Assessed as HFSS products considered likely to appeal to children and adults</b>		
CocaCola-CokeRge	HaagenDazs	KelloggsRKrispies
CocaColaFanta	HalfPounders-ConfRge	KelloggsSnacking
CocaCola-OriginalCoke	HardRockCafe	KelloggsToronto/Bar
CoOp-ChocolateRge	Haribo	KelloggsVarietyPck
Dennylre-FoodRge	Haribo-SmallPacketSweetRge	Kelloggs-WakeUpToBreakfastCam
DominosPizza-RestrChain	HazelbrookFmicecrm	Kellogss-RiceKrispies/Cornflakes
DrOetker-BistroPizza	HeinzTomatoKetchup	KettleFoods-KettleChips
DrOetker-PaulaDessertRge	Heinz-TomatoKetchupChilli	KfckKentuckyFriedChicken-Restr
DrOetker-TarteCakeMixes	HoneyMonster-SugarPuffs	KinderBueno
Dromona-SpelgaFruitYoghurt	Iceland-Desserts	Kitkat-Senses
DrPepper	Iceland-PartyFoods	KpHulaHoops
Eatwell-FeastersFoodRge	Iceland-PicnicSelectionPack	KpRealMcCoys
Emap-M&Ms	Iceland-Sausages	Kraft-DairyleaDunkersNachos
Fanta-Drink	Iceland-SummerFruitPannaCotta	Kraft-DairyleaLunchables
Fanta-Orange	Iceland-SummerFruitPudding	LaughingCow-ProdRge
Fanta-StillDrink	IntersnackPombearCrisps	Lindt-ExcellenceChocolateRge
Feasters-MicrowaveBurgers	JacobsTucCrackers	Lindt-GoldBunny
FerreroKinderBueno	KavliPrimulaCheese	LindtLindorChocolates
FerreroNutella	Kelloggs	Lucozade
FerreroRocherChoc	KelloggsBranFlakes	Lucozade-Drink
FerreroTicTac	KelloggsCerealBars	M&S-BritBurgers
Foxs-MeltsBiscuits	Kelloggs-CerealRange	M&S-EasterChocolateRge
FruiceFruitJuice	KelloggsCocoPops	M&S-MincePies
FruitfieldChefKetchup	Kelloggs-CocoPopsCreations	Maltesers
Fruitfield-Mallows	Kelloggs-CocoPopsMegaMunchers	MaltesersBox
Fruitfield-ProdRge	Kelloggs-CocoPopsMoons&Stars	MaltesersIceCream
Frusi-YoghurtIceCream	Kelloggs-CocoPopsStraws	Maltesers-Sweets
Galaxy-Chocolate	KelloggsCornFlakes	Maoam
GalaxyMinstrels	KelloggsCrunchyNut	Marmite
Galaxy-MinstrelsChocolates	Kelloggs-CrunchyNutBars	Marmite-SqueezeMeSpread
Galaxy-Ripple	KelloggsCrunchyNutClusters	Mars
GlanbiaPetitFilous	KelloggsCrunchyNutFeast	MarsCelebrations
Glanbia-Smoothieze †	KelloggsFrosties	MarsGalaxy
Goodfellas-SignatorePizzaRge	KelloggsFruitWindersDoubles	Mars-GalaxyMistletoeKissesBar
GoodfellasSolosPizzaRge	Kelloggs-NutriGrainBar	MarsIceCreamBar
GreggsBakers-Baguettes	Kelloggs-NutriGrainEleveses	Mars-M&Ms
GreggsBakers-ChickenWrap	KelloggsNutriGrainIreland	Mars-MarsBar
GreggsBakers-ProdRge	Kelloggs-NutriGrainOatBakeBar	Mars-Planets
GreggsBakers-SteakBake	Kelloggs-NutriGrainSoftOaties	Mars-ProdRge
GreggsTheBakers	KelloggsR/Recipes	MarsRevels
GuylianChocolates	Kelloggs-RiceKrispies	MarsSkittles

† adverts for these products are included in both HFSS and non-HFSS categories

<b>Figure A4.9 continued</b>		
<b>Assessed as HFSS products considered likely to appeal to children and adults</b>		
MarsSnickers	Nestle-NesquikMagicStraws	Sainsburys-HotCrossBuns
MarsSnickersIceCm	Nestle-OatCheerios	Sainsburys-MullerYoghurtRge
MarsStarburst	Nestle-ShreddiesCereal †	Sainsburys-RobinsonsSquash †
Mars-StarburstChoozers	Nestle-SkiActiv8Yoghurt	Sainsburys-ButchersChoiceSausag
MarsTwix	Nestle-Smarties	Sainsburys-TasteDiffBurgers
Maryland-ChocChipCookies	NestlesMilkyBar	Sainsburys-TasteDiffMinceTarts
MaynardsWineGums	NestleWholegrain	SeabrookCrisps-CrispRge
McDonalds-RestrChain †	Nestle-WholeGrainCereal	SkinnyCow-LowFatIceCream
McVities-ChocolateDigestive	NutellaChocolateSp	Skittles-Sweets
McVities-DigestiveRge	NutrigrainEleveses	Smarties
McVitiesJaffaCakes	OldJamaica-GingerBeer	Snickers-Bar
McVities-YogFruitDigestives	OpChocolate-Pink&WhitesMallow	Somerfield-CarteDorIceCream
MentosChewyMints	OrvilleRedenbachers-PopcornRge	Somerfield-EasterEggRge
Mentos-PureFreshGum	PapaJohnsRestr	Somerfield-GoodfellasPizzeria
MilkyWay	PennState-Pretzels	Sprite
Millions	PeperamiMini	Sprite-SpriteDrinkRge
MiniBabyBell	PerfettiVanMelleFruitella	Squares
Morrisons-CadburyRoses	PizzaHut-Restr	Starburst-Sweets
Morrisons-CadburySelectionBox	PizzaRistorante	Tayto-AdvantageCrisps
Morrisons-CadburyTreatSizePack	PotNoodles †	TaytoCrisps
Morrisons-Chocolates	PringlesCrisps	TerrysChocOrange
Morrisons-CocaCola	Pringles-RiceInfusions	Tesco-Biscuits
Morrisons-EasterEggs	QuakerSnackAJacks	Tesco-CakesRange
Morrisons-GoodfellasPizza	Quaker-SnackAJacksPopcorn	Tesco – Easter Eggs
Morrisons-IceCreamRge	RhmFoodsGateaux	TgiFridays
Morrisons-KelloggsCornflakes	Ribena †	ThomasTunnockCaramelWafers
Morrisons-MullerRge	RibenaOriginal	ThorntonsChocolateRge
Morrisons-WalkersCrisps	RiceKrispiesSquare	Toblerone
MullerCorners	RichmondSausages	Toblerone-Fruit&Nut
Muller-CornerYogurtRge	RosemaryConleyBelgianChocMous	ToppsJuicyDrop
Muller-FruitCornerYoghurt †	Rown/QualityStreet	Topps-LotsaLicks
Muller-YoghurtRange †	RowntreeAero	ToppsMegaMouth
NabiscoOreoCookies	Rowntree-FruitPastilles	ToppsPushPops
NationalDairyCounc	RowntreeKitkat	Topps-SliderzCandy
NatureValley-CrunchyGranola	Rustlers-MicrowaveFoodRge	Topps-VertigoCandy
NestleAeroDrink	Rustlers-MicrowaveQuarterPound	Tunnocks-CaramelWafer
Nestle-AeroHotChocolateDrink	Sainsburys-Biscuits	TunnocksTeaCake
NestleCereals	Sainsburys-CarbonatedDrinksRge	Twix-Bar
NestleCheerios	Sainsburys-CarteDorRge	UnileverMagnumIce
Nestle-CookieCrispCereal	Sainsburys-CocaCola	VimtoCordial †
Nestle-HeavenChocBar	Sainsburys-Crisps	WalkersCrisps

† adverts for these products are included in both HFSS and non-HFSS categories



<b>Figure A4.9 continued</b>		
<b>Assessed as HFSS products considered likely to appeal to children and adults</b>		
WalkersDoritos	Walls-CarteDorStrawberryYoghur	Walls-MilkTimeStrawberryPot
Walkers-MonsterMunchSnack	WallsCornetto	WallsRecipeSausages
Walkers-Quavers	Walls-FrusiFrozenSnacks	WerthersOriginal
Walkers-SunBitesRge	Walls-MagnumEcuadorDark	Wimpy-Restr
WallsCarteD'Or	Walls-MagnumJava	Woolworths-TerrysChocOrange
Walls-CarteDorChocolateInspira	Walls-MagnumMayanMystica	YoplaitFruitYghrt
Walls-CarteDorLemonSorbet	Walls-MagnumMini	YorkshireTea-Cakes&Biscuits

† adverts for these products will be included in more than one category

## Products of appeal to adults by advert

**Figure A4.10: Certified non HFSS products considered likely only to appeal to adults (by advert)**

<b>Certified non HFSS products considered likely only to appeal to adults</b>		
AlliedBakeries-SunblestVedaBre	CrystalSprings-MineralWater	Heinz-FarmersMktSoupRge
Alpro-SoyaRge †	DaleFarm-MegaMilk	Heinz-MumsOwnBabyFoodRge
Asda-BreadRge	DanoneActimel †	HighlandSprngWater †
Asda-Fish	Danone-ActiviaFatFreeRge †	Holland&Barrett-BrazilNuts
BallyfreeChickeenK	Danone-ActiviaFibreYoghurtRge †	Horlicks
Batchelors-SoupfullsRge	DanoneBioActiviaYoghurt †	Horlicks-ExtraLightMaltDrink
Beefeater-SteakHouseRestr	DanoneDanacolYoghurt †	Iceland-FrozenRoastJoint
Benecol-DairyFreeDrink	Danone-Essensis †	Isklar-MineralWater †
BernardMatthewsSlicedTurkey †	Dennylre-Ham	JohnWest-RedSalmon
BertolliPastaSauces	DolmioBolognese †	Kelloggs-Optivita
Bertolli-PastaSaucesMcCann	Dolmio-BologneseSauce	Kenco-InstantCoffee
BirdsEye-ChickenGrills	Dolmio-ExtraRge	Kingsmill-5050Bread †
BirdsEye-EatPositiveRge	Dolmio-MyDolmioMeatballBologne	Kingsmill-GoldSeeds&Oats
Britvic-DrenchWater	DonegalCatch-Chunky	Kingsmill-GreatEverydayBread
BuxtonSpringWater	DouweEgberts-PureGoldInstant	Knorr-RaguBologneseSauce
CalonWenWhitland-OrgFruit/Veg	EllasKitchen-OrganicPastaSauce †	KnorrSoups
Colmans-DrySauces	ErinFoods-Soup †	Knorr-VieSoupsRge †
Colmans-RecipeMixes †	FeelGoodDrinksCo-Rge †	Lactofree-SemiSkimmedMilk
CoOp-FreshMeat	FloraProActivDrink †	Lavazza-EspressoCoffee
CoOp-FruitRge	Flora-ProActivSpread †	LoydGrossman-SauceRge †
Cow&Gate-BabyBalance †	Freshways-SandwichRge †	McCain-PotatoGourmet †
Cow&Gate-BabyBalancePorridge	Goldenlay-Omega3Eggs	McCambidgesBread
Cow&Gate-BabyBalanceRge	GoodNatured-Juice	Milupa-AptamilFollowOn
Cow&Gate-FollowOnMilk †	Heinz/WWatchers-Tuna	Morrisons-BabyNewPotatoes
Cravendale-Milk †	Heinz-BeanzSnapPots	Morrisons-BreadRge †

† adverts for these products will be included in more than one category

**Figure A4.10 continued**

**Certified non HFSS products considered likely only to appeal to adult**

Morrisons-BritNewPotatoes	Powerade †	Tarantella-OrganicFoods
Morrisons-BritSpringLamb †	PrincesTinnedTuna	Taylor's-YorkshireTea †
MorrisonsFreshFishRge †	QuakerOats	Tesco-Beef †
Morrisons-FreshScotSalmon †	Quorn-Mince	Tesco-Crackers †
Morrisons-Fruit&Veg	Quorn-ProdRge	Tesco-HealthyLivingRge
Morrisons-JerseyRoyals	RedBull †	Tetley-Redbush
Morrisons-KingPrawns	RedBull-Sugarfree	TildaBasmatiRice
Morrisons-KnorrRagu	RiverRock †	Tropicana †
Muller-MullerLightYoghurt	RiverRockMineralWater †	Tropicana-SmoothiesRge
Muller-OneADayYogurt †	Rooster-IrishPotatoes	Twinings-CoffeeRge
MullerVitality †	Sainsburys-FreshFruit	TyphooTea
Nescafe-CoffeeRge	SeedsOfChange †	VolvicPremierWater
NescafeDecafe	ShreddedWheatAndBiteSize †	VolvicTouchOfFruit
NescafeGoldBlend	SmaProgressMilk †	WarburtonsBread
Nescafe-Original †	SoGood-FatFree	Weetabix †
Nestle-ShreddedWheatBigBiscuit †	Somerfield-MeatRge †	WeetabixAlpen
Nestle-ShreddedWheatCereal	Somerfield-Pork	Weetabix-OatibixCerealRge †
OnkenBioPot †	Somerfield-Turkey	WeetabixWeet-Os
Oxo-ConcentratedLiquidStock	StrathmoreMinrWtr †	Youngs-GreatGrimsbyRge
PgTips †	SubwaySandwichShop †	

† adverts for these products will be included in more than one category

**Figure A4.11: Assessed as non HFSS products considered likely only to appeal to adults (by advert)**

**Assessed as non HFSS products considered likely only to appeal to adults**

AlproSoya-LightMilk	Cravendale-Milk †	Florette-CrispySalad
Alpro-SoyaRge †	Dairygold-LightPlus	FoodMasters-GiaGarlicPuree
Asda-MilkRge	DaleFarm-OnePercentMilk	FyffesBananas
Ballygowan	DanoneActimel †	HighlandSprngWater †
BarrysGoldBlendTea	Danone-ActiviaFatFreeRge †	Isklar-MineralWater †
BarrysTea/GoldBlen	Danone-ActiviaFibreYoghurtRge †	Kenco-PureRge
BarryTeas	DanoneBioActiviaYoghurt †	Kingsmill-5050Bread †
Benecol-FoodRge	DanoneDanacolYoghurt †	Knorr-VieSoupsRge †
BenecolYoghurtDrink	Danone-Essensis †	LyonsIreland-Tea
BirdsEye-SimplyCod	DolmioBolognese †	LyonsQuickBrewTea
BrennansBread	EllasKitchen-OrganicPastaSauce †	Morrisons-Nectarines
Cow&Gate-BabyBalance †	ErinFoods-Soup †	Morrisons-Strawberries
Cow&Gate-FollowOnMilk †	FeelGoodDrinksCo-Rge †	MullerVitality †
Cow&GateGrowingUpMilk	FlahavensPorridge	Murroughs-WelshBrewTea
Cow&GateNutricia	FloraProActivDrink †	NdcMilk

† adverts for these products will be included in more than one category

**Figure A4.11 continued**  
**Assessed as non HFSS products considered likely only to appeal to adults**

Nescafe-Original †	SainsburysTomatoes	Tesco-Mushrooms
Nestle-ShreddedWheatBitesize	ScottishDairyMrktg-Milk	Tesco-Potatoes
Nimble-WholemealBread	ShreddedWheatAndBiteSize †	TetleyExtraStrongTea
Nutricia-AptamilMilk	SmaProgressMilk †	Tropicana †
PgTips †	Somerfield-PgTips	TropicanaPurePrmum
Powerade †	SplendaSweetener	Twinings-EarlGreyTea
RiverRock †	StrathmoreMinrlWtr †	Twinings-LadyGreyTea
RiverRockMineralWater †	TaylorsTea	UncleBens-BoillnABagRice
RobertWisemanDairies-TheOne	Taylors-YorkshireTea †	UnileverVieShots
Sainsburys-FairtradeBananas	Tesco-Crackers †	Volvic-ReviveWater
Sainsburys-FreshFruit	Tesco-FreshFruit	Weetabix †
Sainsburys-JerseyRoyalPotatoes	Tesco-FreshSalmon	Weetabix-OatibixCerealRge†
Sainsburys-Strawberries	Tesco-LocalchoiceMilk	WhiteStuff-SemiSkimmedMilk

† adverts for these products will be included in more than one category

**Figure A4.12: Assessed as HFSS products likely only to appeal to adults (by advert)**

**Assessed as HFSS products considered likely only to appeal to adults**

Adez-DrinksRge	BrandPower-JusRoIPastry	DanoneBioActiviaYoghurt †
Aldi-DeliContinentalMeats	BrandPower-NestleCereal	DanoneDanonino
AnBordBiaeggs-BiaLamb	BuitoniPasta	DanoneVitalinea
AnBordBiaeggs-Chicken	C&B-BranstonRelishRge	Dawn-OrangeJuice
AnchorButter	CampbellsSoup	DcniDairy
Anchor-LighterSpreadable	CathedralCity-CheddarCheese	Dennylre-Bacon
ArlaFoods-ApetinaFeta	CathedralCity-LighterCheese	DolmioHeat&Serve
AvonmoreSupermilk	CharlevilleCheese	DolmioStirlns
Ballyfree-CarvedTurkeySlices	Colmans-RecipeMixes †	Dolmio-TasteOfItalySauces
Baxters-CannedSoupRge	Colmans-SqueezeableMustard	DouweEgberts-CafeSwitch
BaxtersHealthyChce	CookstownMeats	Emap-VEnergy
BeReadyMeals	CountryLife-LighterSpreadable	FarmfoodsFrozenFoo
BernardMatthewsSlicedTurkey †	CountryLife-SpreadableButter	FilippoBerio
BertolliSpread	DairyCouncilNiDoo	Findus-JeanChristopheNovelliRg
BigAls-ChickenFillets	DairyCounNlre	Flora-Margarine
BigAls-RoastedMiniFillets	DairyCrestClover	Flora-Omega3PlusMiniDrink
BirdsEye-SimplyChicken	DairyCrest-WexfordMildCreamy	Flora-Omega3Spread †
Bisto	DairyGold	FloraProActivRge
BistoGravyGranules	Dairygold-Bacon	Flora-ProActivSpread †
BlueDragon-SweetChilliDipping	DairygoldFoodNlre-Spread	Freshways-SandwichRge †
BlueDragon-ThaiSauceRge	Dairygold-GalteeMeats	FruitfieldChefMayonnaise
BoyneValley-OliveOil	DairygoldSpread	GalbaniCheese

† adverts for these products will be included in more than one category

<b>Figure A4.12 continued</b>		
<b>Assessed as HFSS products considered likely only to appeal to adults</b>		
Galtee-Bacon	KerryFoods-ProdRge	Morrisons-BritSpringLamb †
GiovanniRana-PastaRge	KerrygoldButter	MorrisonsFreshFishRge †
GoldenCowButter	Kerrygold-SofterButter	Morrisons-FreshScotSalmon †
GourmetGarden	Kilmeaden-Cheese	Morrisons-KelloggsSpeckCereal
HccWelshLamb&Beef	Knorr-ChickenCubes	Morrisons-SandwichRge
Heinz-DeliMayo	Knorr-OxtailSoup	MullerOneADayYoghurt †
HeinzSaladCream	Knorr-PourOverSauces	NatIDairyCouncilCheese
HeinzWWatchers-WedgeMelt	KnorrRecipeKits	Nestle/Buitoni
Hellmanns-DressingsRge	Knorr-VegetableStockCubes	Nestle-AlmondOats&MoreCereal
Hellmanns-LightMayonnaise	KraftLightPhili	NestleFitnessCereal
Hellmanns-RealMayonnaise	KraftPhiladelphiaGarlic&Herb	Nestle-HoneyOats&MoreCereal
Hellmanns-Squeezeable	Kraft-PhiladelphiaThaiSweetChi	Nestle-Oats&MoreRge
Hellmanns-SqueezyMayonnaise	Lactalis-PresidentEmmentalChees	Nestle-RaisinOats&MoreCereal
Hellmanns-WarmChickSaladDress	Lactalis-PresidentFrenchButter	NestleShreddeWheatBigBiscuit †
HomeFarmFoods-ProdRge	LeerdammerCheese	NewYorkBagels
Iceland-BumperBbqSelectionPack	LeRouleCheese	OakhouseFoods-FrozenMeal
Iceland-CookFromFrozenRge	LionsEggs	OceanSprayCranbrry
Iceland-FrozenFishRange	LoydGrossman-SauceRge †	OceanSpray-Light
IcelandKingPrawnR	LucozadeEnergy	OldEIPaso-CrispyChickenFajita
IrishBiscuitsCreamCrackers	Lucozade-Sport	OldEIPasoEnchiladas
JacobsCreamCracker	LurpakButterDish	OldEIPaso-StandNStuffTacoKi
JohnWest-ProdRge	LurpakLighterSpreadable	OldEIPassoFajitaDinnerKit
KelloggsAllBran	LurpakSpreadable	OnkenBioPot †
Kelloggs-AllBranCrunchOatbakes	M&S-Chicken	PetersSavouryProducts
KelloggsCorporate	M&SFoodRge	PilgrimsCheese
Kelloggs-FruitNFibre	M&S-FreeRgeEggs	PilgrimsChoiceExtraMature
Kelloggs-MultigrainCornflakes	M&S-Salmon	RedBull †
KelloggsSpecialK	Marmite-ChampagneMarmite	RedBullFlugtag
Kelloggs-SpecialKBlissCereal	Mattessons-FridgeRaidersChicken	RocksOrganic-OrganicJuices
KelloggsSpecialKCerealBar	Mattessons-SmokedPorkSausage	Ryvita-MinisRge
KelloggsSpecialKRedBerries	McCain-PotatoGourmet †	SaclaClassicPesto
Kelloggs-SpeckBlissCerealBar	McVities-GoAheadYoghurtBreaks	SainsburyReadyMeal
Kelloggs-SpeckMiniBreaks	Meat&LivestockCommBeef&Lamb	Sainsburys-BritFoodRge
Kelloggs-SpeckOats&Honey	Meat&LivestockComm-Mince	SainsburysCheese
Kelloggs-SpeckSustain	MissionDeli-DeliWrapsRge	SainsburysGammon
KerryFdsLowLow/Sp	MissionFoods-FoodRge	Sainsburys-Lamb
KerryFoods-DennysSlicedMeats	MitchelstownCheese	Sainsburys-PorkSteaks
KerryFoods-GoldMedalMeat	MiWadi	Sainsburys-SalmonFishcakes
KerryFoods-KerrymaidSpread	Morrisons-BreadRge †	SainsburysSmokedSalmon
KerryFoods-LowLowCheese	Morrisons-BritLambChops	Sainsburys-TtdBeefSteaks
KerryFoods-MattesonsRge	Morrisons-BritPork	Schwartz-PacketMixRge

† adverts for these products will be included in more than one category

<b>Figure A4.12 continued</b>		
<b>Assessed as HFSS products considered likely only to appeal to adults</b>		
SchweppesMixers	SubwaySandwichShop †	UncleBens-StirFryRge
SchweppesTonic	SussexFarmhouseMeals-Delivery	UncleBens-Wraps
SeedsOfChange †	Tesco-Bacon	Unilever-HellmannsRge
SharwoodSauces	Tesco-Beef †	UtterlyButterly
ShawsNire-CookedMeatRge	Tesco-Lamb	Waitrose-DeliRge
ShippamsOldElPaso	Tesco-Turkey	Weetabix-Cereal †
ShloerFruitJuice	UncleBens-ChilliConCarne	WeetabixCerealRge †
ShreddedWheatBigBiscuit †	UncleBens-CookingSauces	Weetabix-OatibixBitesizeCereal
Somerfield-HoneyRoastHam	UncleBens-ExpressEggFriedRice	Weetabix-OatibixCerealRge †
Somerfield-LambChops	UncleBensExpressR	Weetabix-OatiflakesCerealRge
Somerfield-LeanSteakMince	UncleBens-ExpressRice	Weetaflakes
Somerfield-MeatRge †	UncleBens-OrientalSauces	WeightWatchers-FoodRge
Somerfield-Salmon	UncleBens-Risotto	WelshLamb&Beef
Spam-Fritters	UncleBensSauce	WykeFarm-JustDeliciousXmChdr
Spar-BbqEssentials	UncleBensStFrySc	YakultYoghurt
St.AgurCheese		

## Annex 5

# Changes in the balance of food and drink advertising seen by children

## 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 2007/8 ('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.

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 The annex covers 'all food and drink advertising'<sup>50</sup> and is based on the Nielsen product and retail categories listed in Annex 4. In brief, these comprise all food and drink products, including chain (fast food) restaurants, but excluding alcoholic and organic drinks. The amount of food and drink advertising seen by children is measured in 'impacts'<sup>51</sup>.

A5.4 It should also be noted that by definition 'all food and drink advertising' includes both HFSS and non-HFSS products. This means 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 'all 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 The table below summarises all of the key percentage changes in advertising viewed by children (impacts) between 2005 and 2007/8 for all children aged 4-15. It

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<sup>50</sup> 'All food and drink advertising' has been referred to as core category advertising in previous reports.

<sup>51</sup> See definition in section 3.

also details separate columns for children aged 4-9 and 10-15. The trends visible between 2005 and 2007/8 are themselves a continuation of trends that have been clear since 2003. For this reason the charts from A5.2 onwards include this historic data.

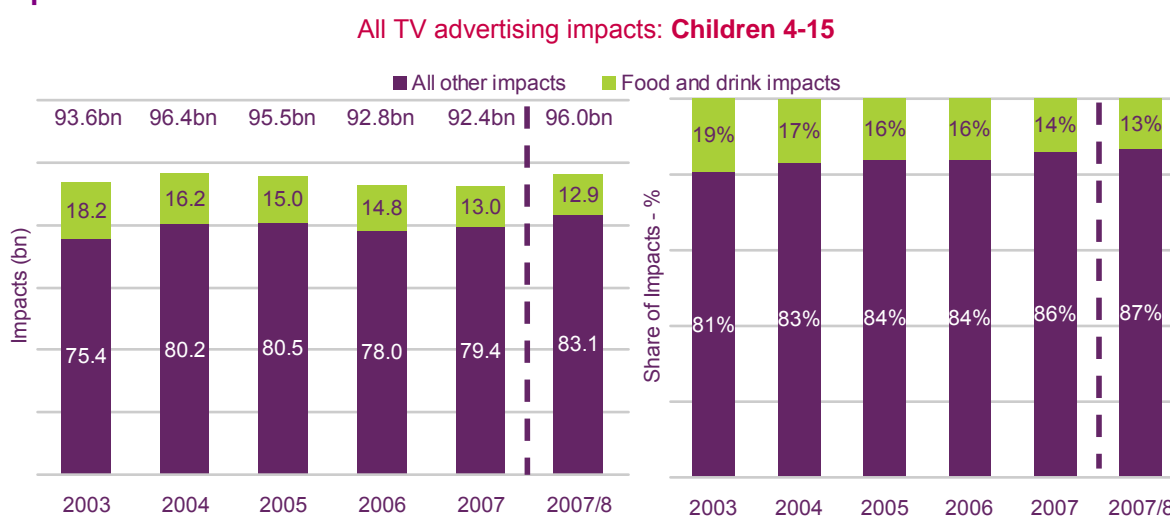
**Figure A5.1: Summary of changes in food and drink impacts**

	Children aged 4-15	Children aged 4-9	Children aged 10-15
Changes in food and drink impacts between 2005 and 2007/8			
All airtime	-14%	-21%	-8%
Children's airtime	-56%	-55%	-61%
Adult airtime	+7%	+8%	+7%
Main commercial channels	-25%	-27%	-24%
Digital commercial channels	-3%	-15%	+8%
Children's airtime – main commercial channels	-92%	-88%	-100%
Children's airtime – digital channels	-45%	-44%	-50%
Adult airtime – main commercial channels	-13%	-8%	-16%
Adult airtime – digital commercial channels	+42%	+36%	+45%

### Amount of food and drink advertising seen by children

A5.7 Food and drink child impacts fell from 15.0bn in 2005 to 12.9bn in 2007/8, representing a 14% reduction. This reduction is also reflected in a reduced share of all food and drink impacts as a proportion of all television advertising. The share of food and drink impacts have fallen from 16% of all television advertising in 2005 to 13% of all television advertising in 2007/8.

**Figure A5.2: Food and drink impacts to children as a proportion of all television impacts to children**



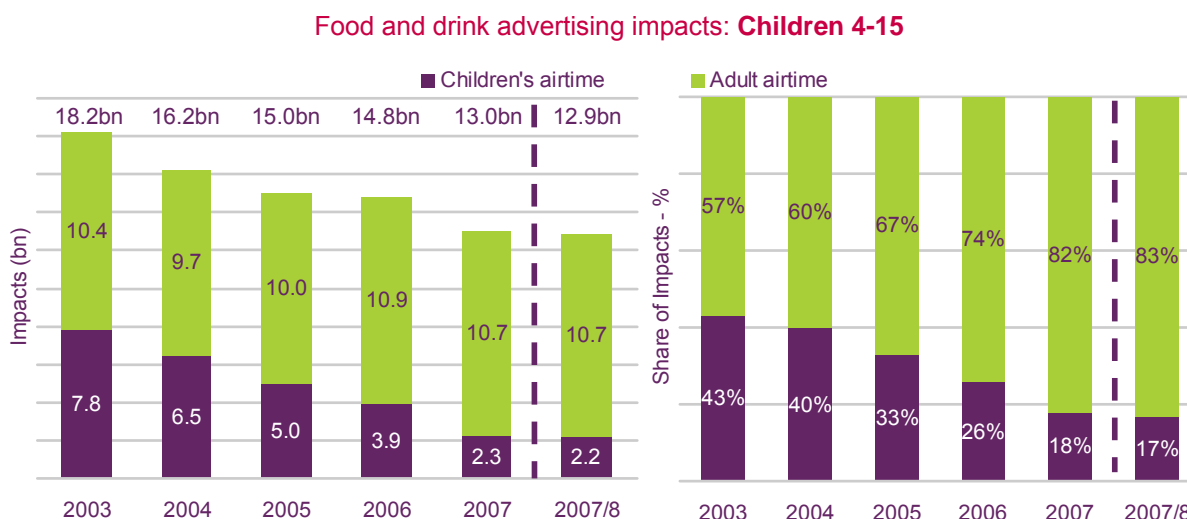
Source: Nielsen Media

A5.8 There has been a larger fall in food and drink impacts among 4-9 year olds than 10-15 year olds. Food and drink impacts to 4-9 year olds have fallen 21%, from 7.2bn in 2005 to 5.7bn between 2005 and 2007/8. Impacts to 10-15 year olds fell 8% in the same period, from 7.8bn to 7.2bn. The difference between the two age groups can partly be attributed to the higher proportion of viewing time younger children aged 4-9 spend in children’s airtime, where the total number of food and drink spots has fallen sharply. Whereas 10 – 15 year olds view more adult airtime where food and drink advertising has increased.

### Food and drink advertising seen by children by channels / type of channel

A5.9 Further analysis shows the overall decline in impacts has been driven by a reduction in impacts during children’s airtime. Food and drink impacts in children’s airtime have fallen by from 5.0bn in 2005 to 2.2bn in 2007/8, representing a 56% reduction. This reduction is also reflected in a reduced share of food and drink impacts during children’s airtime. Share of food and drink impacts delivered during children’s airtime has fallen from 33% in 2005 to 17% in 2007/8.

Figure A5.3: Food and drink impacts: children’s vs adults airtime



Source: Nielsen Media

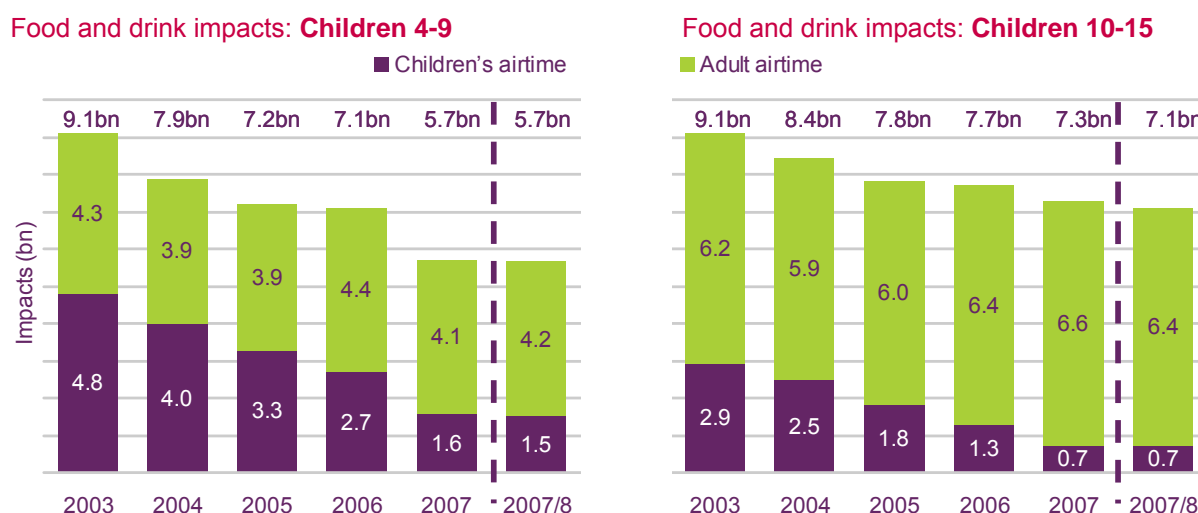
A5.10 Food and drink child impacts for 4-9 year olds in children’s airtime fell from 3.3bn in 2005 to 1.5bn in 2007/8, representing a 55% reduction. Food and drink impacts in children’s airtime for children aged 10-15 year olds fell from 1.8bn in 2005 to 0.7bn in 2007/8 representing a 61% fall in the same time period. Note: this started from a lower baseline as 10 -15 year olds watch significantly less programming in children’s airtime.

A5.11 The food and drink impact reductions achieved in children’s airtime have been partially off-set by a growth in child impacts during adult airtime. Food and drink child impacts in adult’s airtime have risen from 10.0bn in 2005 to 10.7bn in 2007/8, representing a 7% increase. The growth can partly be attributed to both the rise in food and drink advertising spots on more readily accessible digital channels, and an increase in the amount of time children are spending watching these services.

A5.12 Food and drink child impacts in adult’s airtime for 4-9 year olds increased from 3.9bn in 2005 to 4.2bn in 2007/8, representing an 8% increase. Food and drink impacts in adult’s airtime for children aged 10-15 year olds increased from 6.0bn to 6.4bn over the same time period representing a 7% increase.



**Figure A5.4: Food and drink impacts: Children vs adult airtime: age splits**

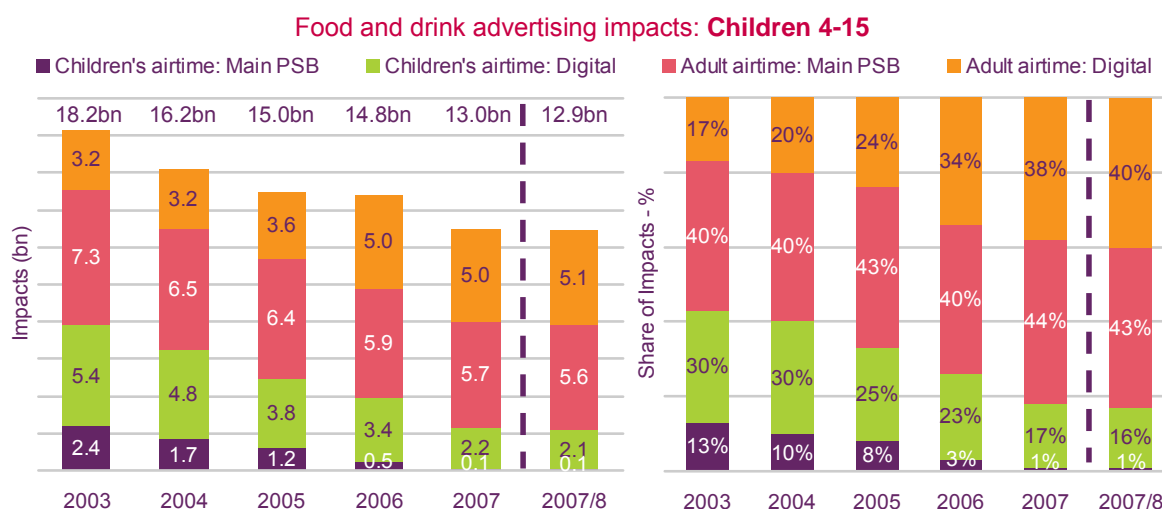


Source: Nielsen Media

### Impacts during children's airtime vs adults' airtime by type of channel

- A5.13 The 56% reduction in impacts during children's airtime is driven by a reduction in impacts delivered on both the main commercial channels and digital channels. Children's impacts in children's airtime on the main commercial channels fell from 1.2bn to 0.1bn impacts, representing a 92% reduction between 2005 and 2007/8. Looking at child age splits, food and drink impacts for children aged 4-9 fell from 0.8bn to 0.1bn between 2005 and 2007/8 and amongst children aged 10-15 impacts fell from 0.4bn to under 0.05bn across the same period.
- A5.14 The corresponding reduction on children's channels measured 45%, with impacts reducing from 3.8bn to 2.1bn amongst all children aged 4-15 and by 44% from 2.5bn to 1.4bn amongst children aged 4-9 and by 50% from 1.4bn to 0.7bn amongst children aged 10-15.
- A5.15 Conversely, the increase in impacts delivered during adult airtime was largely driven by an increase on digital commercial channels. Impacts delivered during adult airtime on these channels increased from 3.6bn to 5.1bn impacts, representing a 42% increase amongst all children between 2005 and 2007/8. This represents a share increase of 15 percentage points, up from 24% to 40%. Amongst children aged 4-9 impacts increased from 1.4bn to 1.9bn representing a 36% increase. There has been a bigger increase of 45% (from 2.2bn to 3.2bn) among children aged 10-15, who spend more of their time viewing in adult airtime than the younger age group.
- A5.16 Impacts delivered during adult airtime on main commercial channels fell slightly from 6.4bn to 5.6bn, representing a 13% reduction amongst all children. Amongst children aged 4-9 impacts have decreased by 8% from 2.5bn to 2.3bn, and amongst children aged 10-15 there has been a greater impact fall of 16% (from 3.8bn to 3.2bn). This shift in impacts during adult airtime from the main commercial channels to digital commercial channels reflects a general shift of viewing to digital channels away from traditional services. However the share of impacts delivered on the main commercial channels is still fairly significant at 43% of all food and drink impacts in 2007/8. This level of the share of impacts in adult airtime is due in large part to the declining share of impacts found in children's airtime.

**Figure A5.5: Food and drink impacts: adult's v children's airtime by main commercial and digital commercial channels**



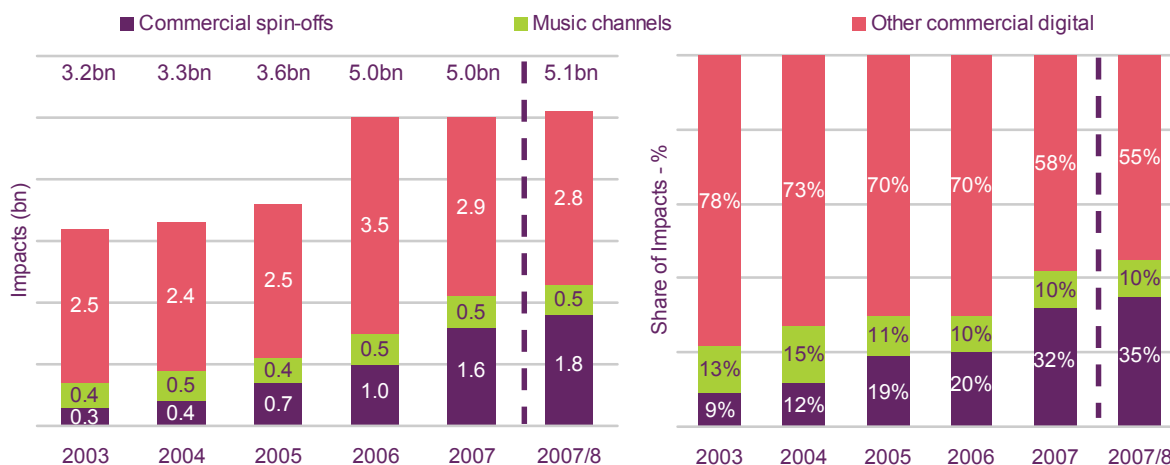
Source: Nielsen Media

### Impacts by type of channel

- A5.17 Of the digital channels, the greatest number of food and drink impacts are accounted for by digital commercial channels, including the spin-off channels of the main commercial channels. Music channels contribute a small proportion of overall impacts.
- A5.18 Food and drink impacts amongst all children on spin-off channels have increased from 0.7bn to 1.8bn between 2005 and 2007/8, representing a 157% increase. As a proportion of total food and drink impacts on digital commercial channels (other than children's channels), the spin-off channels accounted for 35.2% in 2007/8, up from 19.4% in 2005. Impacts delivered on these channels in 2007/8 represent 14% (1.8bn of 12.9bn) of all food and drinks impacts delivered to children. This growth can be attributed to a number of factors including; the rise in the numbers of homes with multichannel television (up by 6.5million since 2005), improved availability of spin-off channels via Freeview and for some channels, extended transmission hours. These changes have enabled all viewers to gain greater access to the channels, and children have been viewing more of this output as a result.
- A5.19 Food and drink impacts delivered by the other digital commercial channels increased from 2.5bn to 2.8bn between 2005 and 2007/8, amongst all children, representing a 12% increase. It is worth noting that when analysing the digital commercial channels data the relatively small size of the market means fairly minor changes in advertising distribution can have significant effects on child impacts.
- A5.20 Impacts viewed by children on the music channels have remained fairly constant over the same period in terms both of the number of impacts and the share of impacts.

**Figure A5.6: Food and drink impacts for children on digital commercial channels during adult airtime**

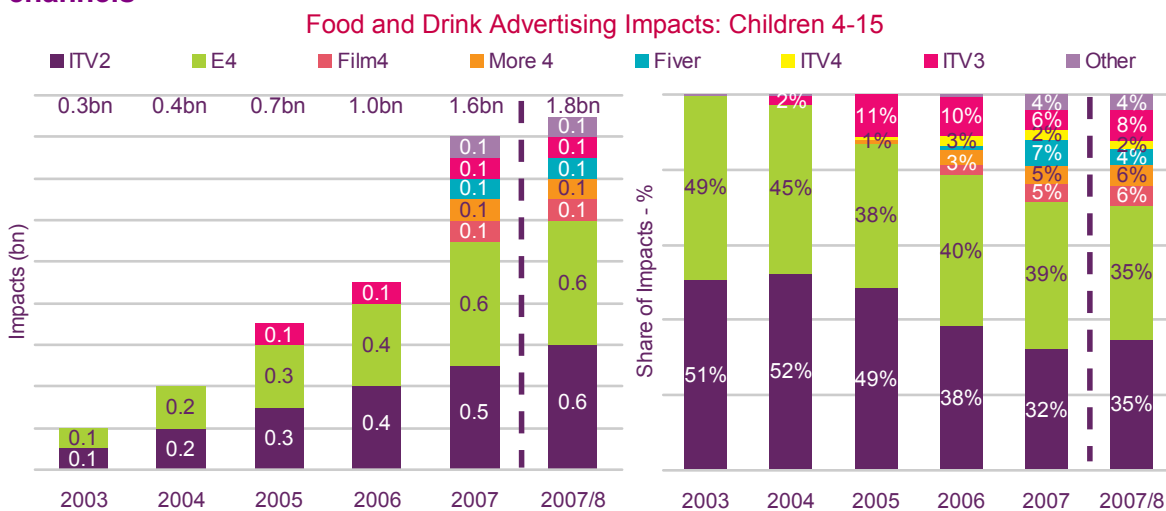
Food and drink impacts on commercial digital channels (excl. dedicated children's channels): **Children 4-15**



Source: Nielsen Media

A5.21 Of the commercial spin-off channels, ITV2 and E4 accounted for the greatest number of child impacts in this channel group both in 2005 and 2007/8. E4 accounted for 0.6bn impacts in 2007/8 having increased from 0.3bn impacts in 2005. ITV2 also accounted for 0.6bn impacts in 2007/8, double the 0.3bn impacts in 2005. Other spin-off channels (Film 4, More 4, Fiver, ITV3, ITV4) are also increasing their share of impacts, as advertising spots are redistributed in line with the growth in audiences.

**Figure A5.7: The growth of food and drink impacts to children on digital commercial channels**



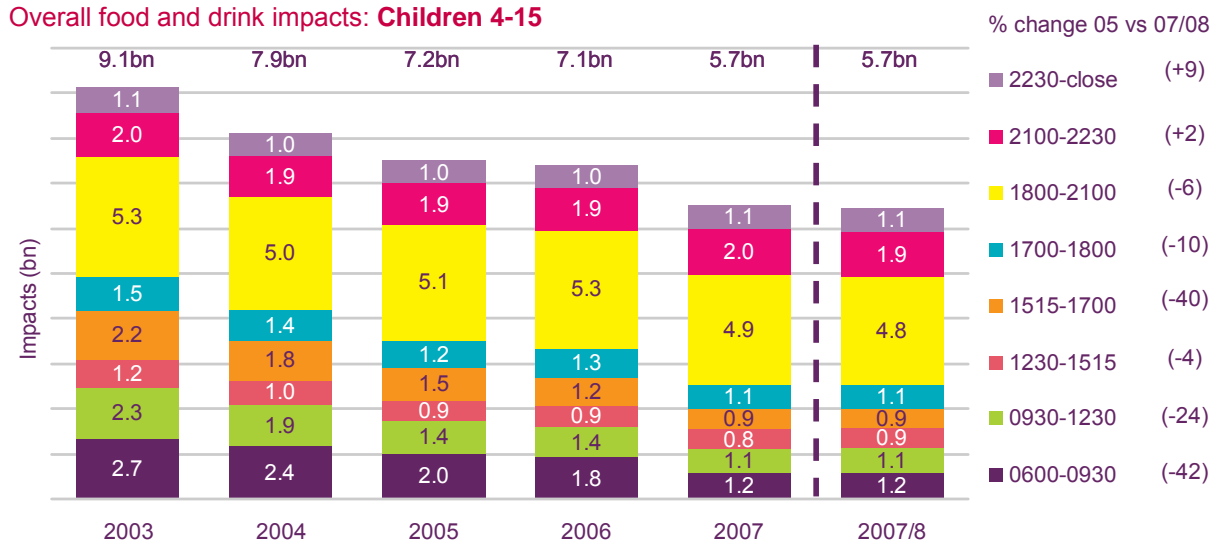
Source: Nielsen Media

**Impacts by time of day**

A5.22 Overall, food and drink child impacts fell 14% between 2005 and 2007/8. The biggest reductions by daypart were seen 06:00-09:30 (-42%) and 15:15-17:00 (-40%). These daypart reductions match the location of children's airtime during the day. Some of the reduction is due to scheduling changes as well as impact reductions effected by the regulation. Since 2003 there has been a decrease in the amount of children's airtime broadcast on the main commercial channels. Children's

airtime has declined on ITV1 and Five (and BBC One, from which children’s programming has moved to BBC Two). There were other impact reductions in other dayparts (e.g. pre 21:00) – but the children’s airtime slots (breakfast and teatime) saw the most significant changes.

**Figure A5.8: Food and drink impacts viewed by children by daypart**

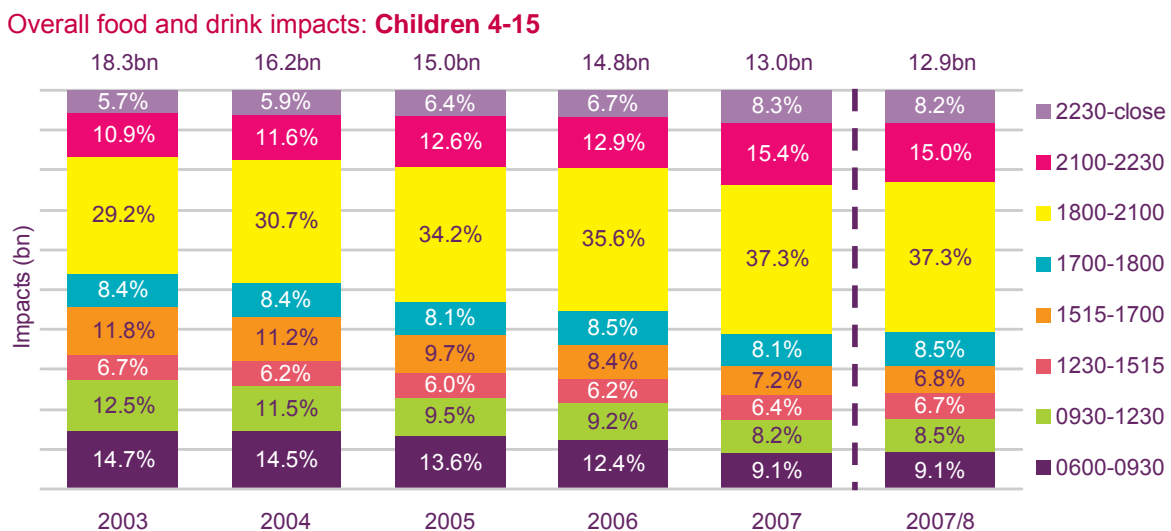


Source: Nielsen Media

Note: Minor variations due to rounding

A5.23 The share of food and drink impacts viewed by children by time band has increased most between 18:00 and 21:00 from 30.7% to 37.3% since 2005. Post 21:00 share has also increased, but not to the same extent. Pre 18:00 food and drink share has reduced over this time period.

**Figure A5.9: Share of food and drink impacts viewed by children by daypart**



Source: Nielsen Media

Note: Minor variations due to rounding

A5.24 The share summary table below shows actual impacts for 2005 and 2007/8, along with the corresponding percentage increase / decrease over this time period for children’s airtime on digital commercial channels, adult airtime on main commercial channels and adult airtime on digital commercial channels. Main commercial

channels' children's airtime is not shown as impacts have reduced to minimal amounts on these channels.

A5.25 Impacts have reduced across all dayparts in children's airtime on digital commercial channels. There has been a corresponding increase in impacts on digital commercial adult channels across all dayparts, although there are less dramatic movements observed in the 06:00-09:30 and 18:00-21:00 slots. Impacts in adults' airtime on the main commercial channels have fallen across the day, except during 09:30-12:30 and 15:15-17:00 which correspond to the slots where there has been a decrease in the amount of children's airtime broadcast on the main commercial channels.

**Figure A5.10: Food and drink impacts by daypart: channel type**

Impacts (bn)	Children's airtime: digital channels			Adult airtime: digital channels			Adult airtime: main commercial channels		
	2005	2007/8	Change 07/8 vs 05	2005	2007/8	Change 07/8 vs 05	2005	2007/8	Change 07/8 vs 05
0600-0930	0.93	0.47	-49%	0.26	0.28	+9%	0.43	0.34	-20%
0930-1230	0.55	0.37	-32%	0.22	0.32	+47%	0.33	0.37	+14%
1230-1515	0.37	0.20	-46%	0.24	0.40	+64%	0.26	0.25	-5%
1515-1700	0.61	0.31	-49%	0.22	0.34	+54%	0.17	0.21	+21%
1700-1800	0.46	0.24	-49%	0.25	0.37	+50%	0.50	0.48	-5%
1800-2100	0.76	0.41	-47%	1.46	1.78	+23%	2.91	2.60	-11%
2100-2230	0.10	0.06	-44%	0.51	0.88	+71%	1.28	0.99	-22%
2230-close	0.02	0.02	-37%	0.47	0.70	+50%	0.47	0.32	-30%

Source: Nielsen Media

### Case Study – commercial Spin Off Channels

A5.26 One of the most interesting findings has been that food and drink impacts to children have increased most quickly on commercial spin-off channels between 2005 and 2007/8. However it is still important to remember that they represent a very small proportion of overall child food and drink impacts. In order to understand the causes of this growth, we have analysed the two largest spin-off channels, E4 and ITV2, in greater depth.

A5.27 For simplicity, we have restricted the analysis to the primary channels, ITV2 and E4. We have not included any analysis of their "timeshifted" channels, ITV2+1 and E4+1.

#### ITV2

#### How have the channels changed over time?

##### Changes in supply

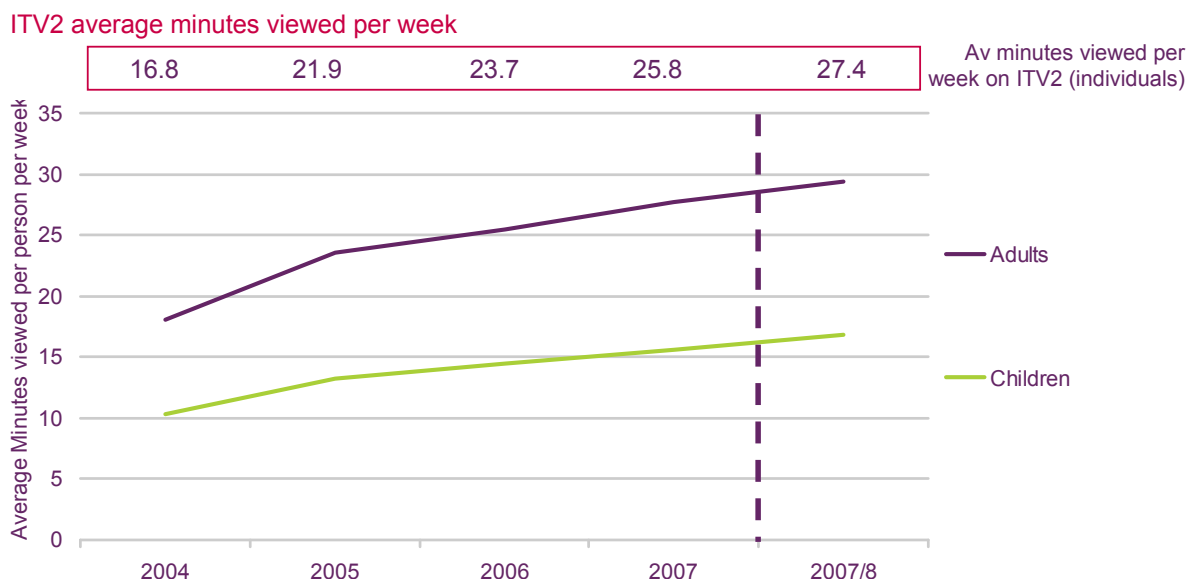
A5.28 ITV2 was launched in December 1998 as a free-to-air channel across most digital platforms and as a free-to-view channel on Sky Digital. It became free-to-air on this platform (i.e. non-encrypted) in November 2005. ITV2 launched a 24 hour schedule in March 2008 whilst ITV2+1 was launched in October 2006.

A5.29 Since 2005, ITV2, which is targeted at 16-34 year olds, has become available in 6.5 million more homes due to the increased take-up of multi-channel television.

**Changes in Viewing**

A5.30 Viewing of ITV2 has increased for both adults and children at a similar rate since 2005. Adults watch more ITV2 than children. In 2007/8 adults watched, on average, 29.4 minutes per week (an increase of 5.8 minutes on 2005), whilst children watched an average of 16.9 minutes per week (an increase of 2.4 minutes).

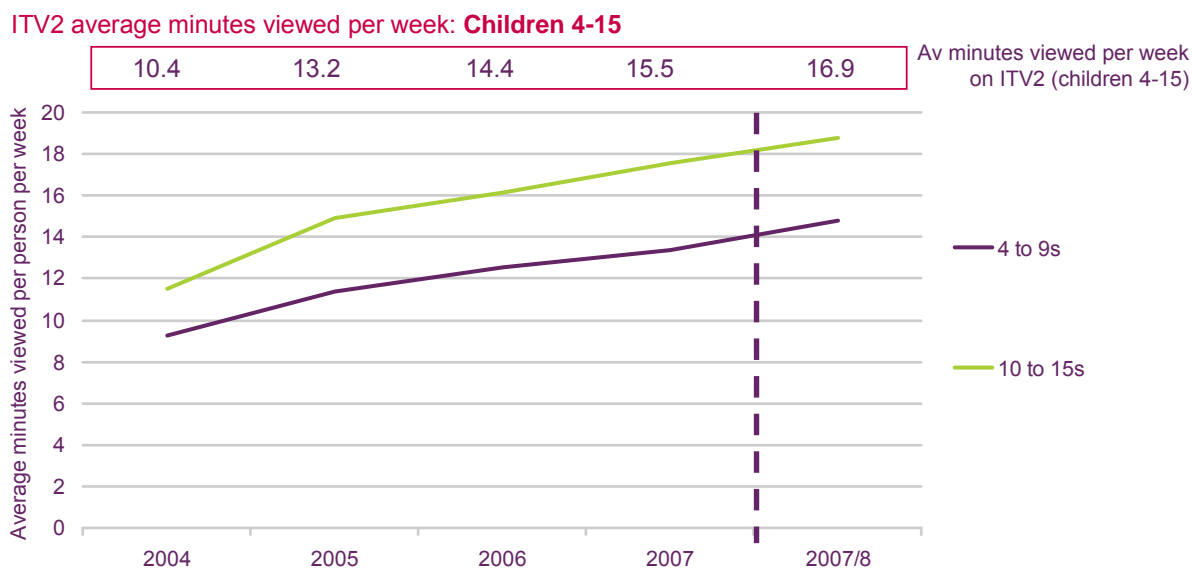
**Figure A5.11: Average minutes viewed per week, ITV2, 2004 – 2007/8**



Source: BARB. \*2008 includes January – June only

A5.31 Older children, aged 10 to 15, watch more ITV2 (18.8 minutes per week, on average) than younger children (14.8 minutes per week). Since 2005, viewing has grown steadily for both age groups.

**Figure A5.12: Average minutes viewed per week, ITV2, children 4-15, 2004 – 2007/8**



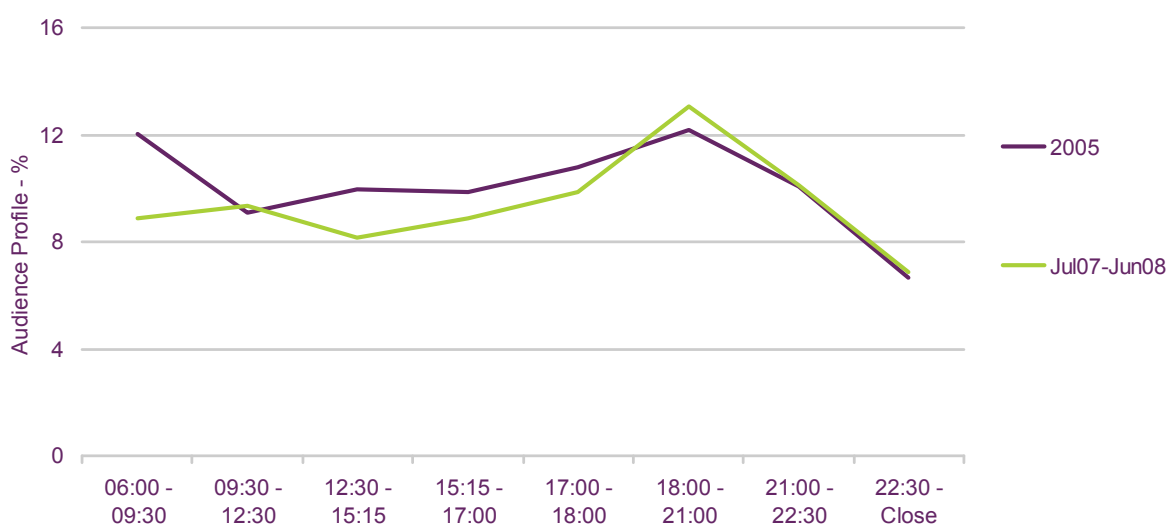
Source: BARB. \*2008 includes January – June only

A5.32 The audience profile graph shown below (Figure A5.13) shows the audience breakdown demographic (children aged 4-15), as a share of the base audience (all individuals). The audience profile of ITV2 has not changed substantially since 2005. Children still comprise less than 10% of the total audience (9.8% in 2005 to 9.5% in 2007/8).

A5.33 However there has been a substantial increase in the profile of children between the hours of 18:00 and 21:00 where it has grown from 12.2% in 2005 to 13.1% in 2007/8. Across most dayparts, the audience profile of children has fallen for ITV2 between 2005 and 2007/8. The greatest skew away from children has occurred between 06:00 and 09:30, as ITV2 stopped broadcasting children's programmes in 2007/8.

**Figure A5.13: ITV2 audience profile, children 4-15, 2005 & 2007/8**

ITV2 audience profile by daypart: **Children 4-15**



Source: BARB

## How have changes in HFSS restrictions affected ITV2?

### Changes in Supply

A5.34 The total number of advertising spots broadcast on ITV remained fairly stable between 2005 and 2007, however there was greater growth in 2007/8 to 170,000 spots per year, which is due to the greater number of hours broadcast since March 2008, when ITV2 became a 24-hour channel.

A5.35 Growth in food and drink spots has been greater than for all other spots. The food and drink share of spots broadcast has increased from 12.9% in 2006 to 17.3% in 2007/8.

**Figure A5.14: All advertising spots broadcast, ITV2, 2004 – 2007/8**

All ITV2 advertising spots



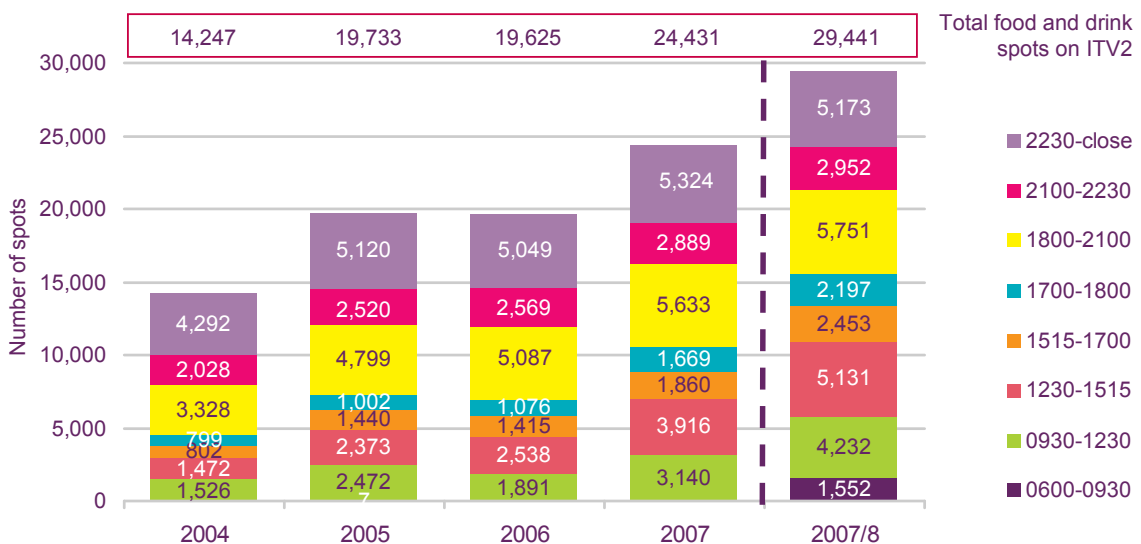
Source: Nielsen Media

A5.36 The greatest growth in food and drink spots on ITV2 has occurred during daytime hours (Figure A5.15). The introduction of spots between 06:00 and 09:30 in 2007/8 was caused by the change in broadcasting hours. This displays by far the highest levels of growth between 2005 & 2007/8 but Figure A5.13 shows that this is the daypart that has seen the greatest fall in children’s profile over the same time period.

A5.37 Elsewhere, food and drink spot growth has been highest from 12:30-5:15 and from 17:00-18:00, where food and drink spots have more than doubled between 2005 and 2007/8. Again, these are dayparts where the profile of children has fallen since 2005.

**Figure A5.15: Food and drink spots broadcast by daypart, ITV2, 2004 – 2007/8**

Food and drink spots on ITV2 by daypart



Source: Nielsen Media

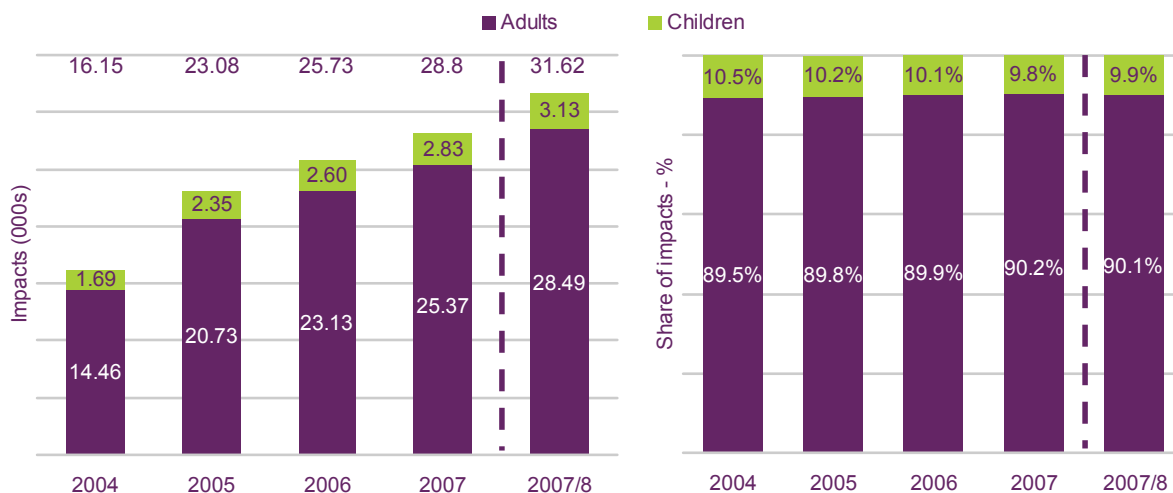


### Changes in viewing impacts

A5.38 The total number of impacts viewed on ITV2 has increased for both adults and children at a similar rate since 2005. Children’s share of all impacts has remained fairly stable from 10.2% in 2005 to 9.9% in 2007/8.

**Figure A5.16: Total advertising impacts, ITV2, 2004 – 2007/8**

All ITV2 advertising impacts

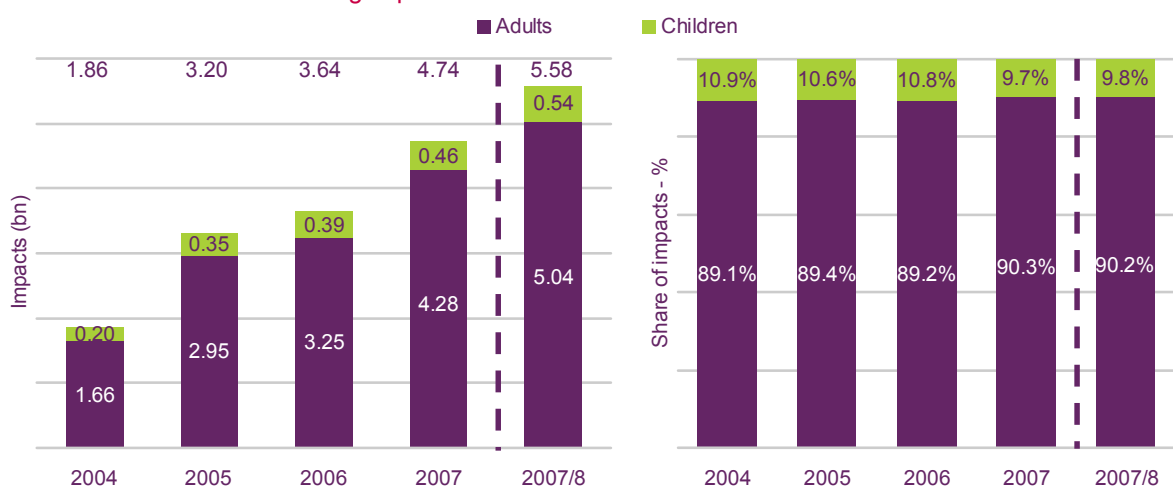


Source: Nielsen Media

A5.39 Food and drink advertising impacts have grown at a faster rate than overall impacts on ITV2 since 2005. Whilst overall impacts have increased by 37%, food and drink impacts have increased by 74%. Over the same period, the proportion of impacts delivered to children has decreased from 10.8% to 9.8%. This implies that food and drink impacts to adults have increased more quickly than food and drink impacts to children.

**Figure A5.17: Food and drink advertising impacts, ITV2, 2004 – 2007/8**

ITV2 food and drink advertising impacts



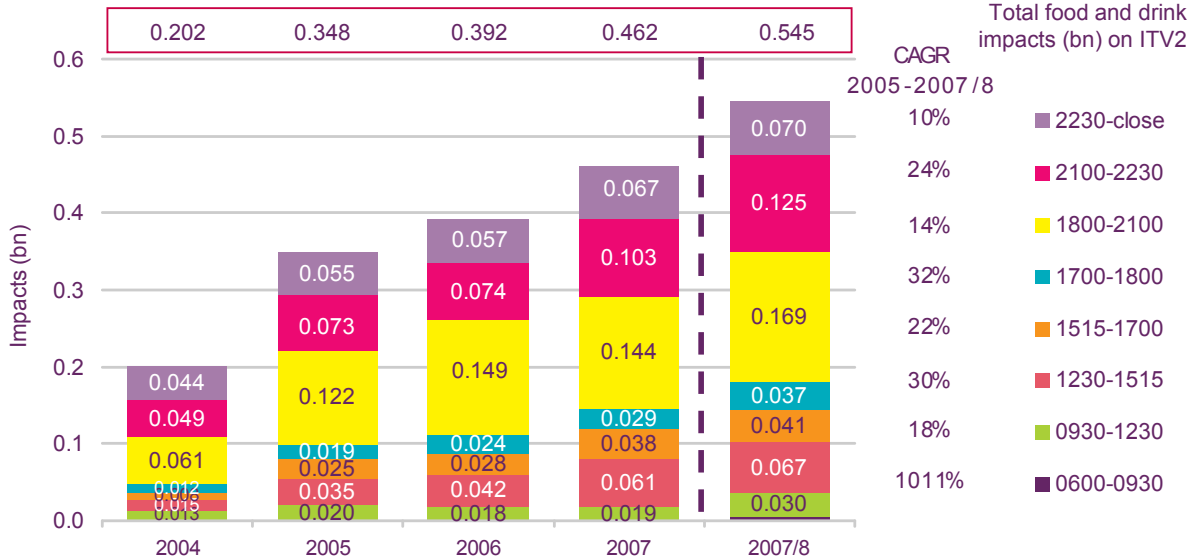
Source: Nielsen Media

A5.40 In absolute terms, food and drink impacts to children have grown across all dayparts. The pre-watershed increase in food and drink impacts on ITV2 since 2005 has been smallest during the dayparts 18:00-21:00 and 09:30-12:30. Figure A5.13

shows that unlike all other dayparts, these are the two when the profile of children has increased on ITV2.

**Figure A5.18: Food and drink impacts to children on ITV2**

Food and drink impacts on ITV2 by daypart: **Children 4-15**



Source: Nielsen Media. Numbers may vary due to rounding

## E4

### Changes in Supply

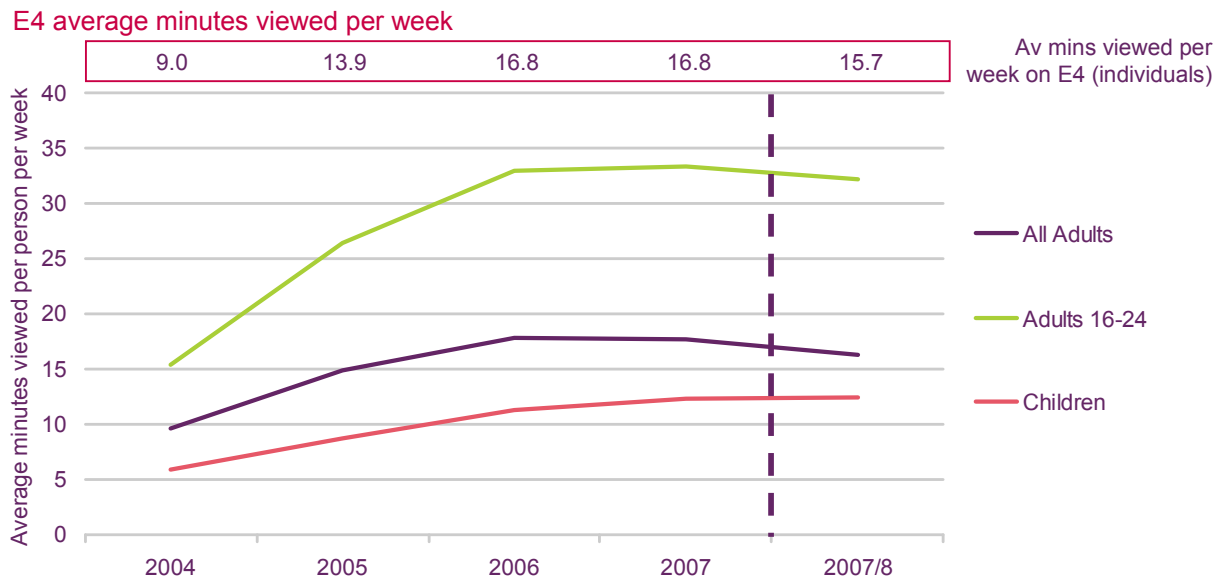
A5.41 E4 launched in January 2001 on BSkyB and Cable (only accessible through subscription), became available through Top Up TV in March 2004, and finally appeared as a free-to air channel via Freeview in May 2005 and via Freesat in May 2008. The timeshifted channel, E4+1 was launched on Sky Digital in July 2003 and on Freeview in May 2005. E4 (and E4+1) launched a 24 hour schedule in August 2005.

A5.42 This means that since 2005, E4 is now available to 6.5 million more homes (through free-to-air television and the increase in subscribers to other digital platforms).

### Changes in Viewing

A5.43 Viewing of E4 has grown quickest for children between 2005 and 2007/8 (41% growth), increasing by 3.6 minutes per week. The growth rate for adults aged 16-24 has been slower (22% growth) but has increased by a greater amount (5.8 minutes per week, on average).

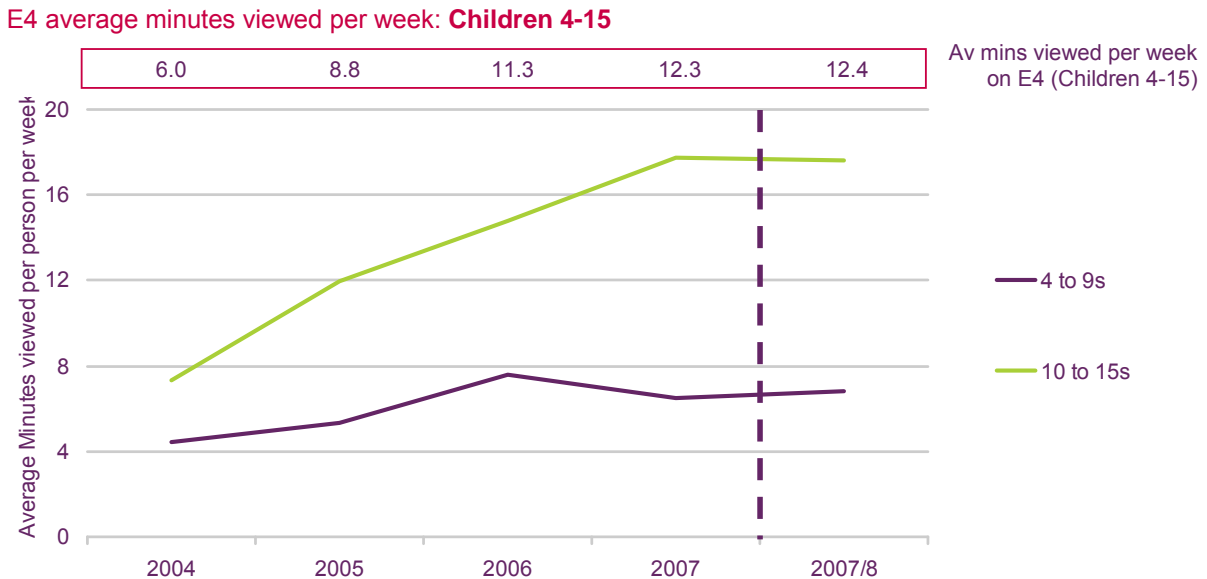
**Figure A5.19: Average minutes watched on E4, 2004 – 2007/8**



Source: BARB

A5.44 E4 is more popular among older children. Between 2005 and 2007/8, the average minutes viewed by 10-15 year olds increased by 47% from 12 minutes to 17.6 minutes per week. Over the same period, viewing by 4 to 9 year olds grew at a substantially slower rate and peaked in 2006 at 7.6 minutes per week.

**Figure A5.20: Average minutes watched on E4, children aged 4-15**



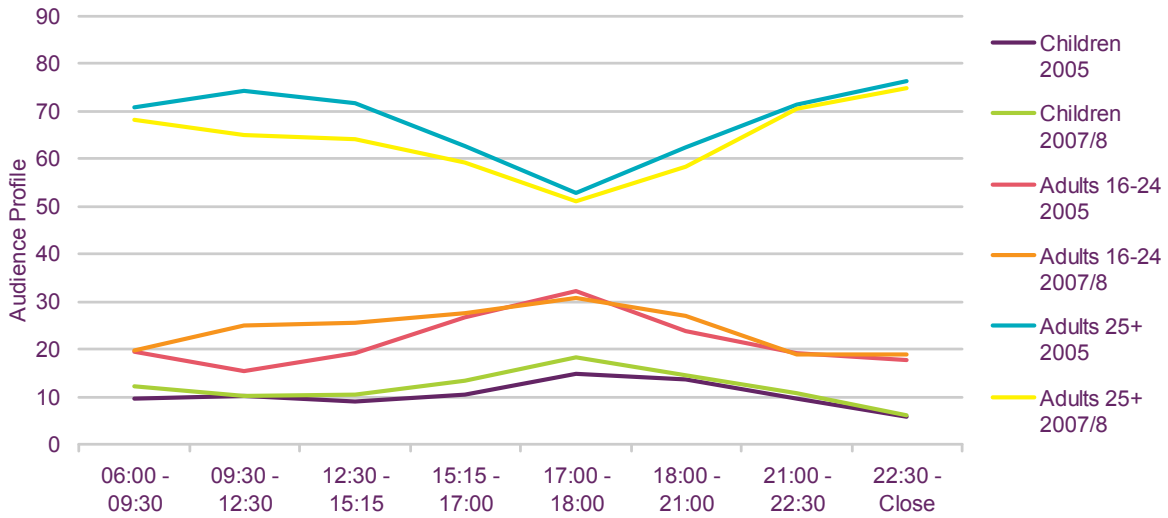
Source: BARB

A5.45 The profile of the E4 audience has become younger since 2005. The profile of all children has increased from 10.2% to 12.2% in 2007/8. This has predominantly been driven by those aged 10-15. The audience profile has increased most strongly for adults aged 16-24 (an increase of 2.5%), whilst it has also increased for 25-34 year olds. Contrastingly, there has also been a sharp drop in profile for adults aged 35-54, down from 35.7% to 29.1% over the same period.

A5.46 E4's audience profile skews youngest between 17:00 and 18:00.. It is also the daypart which has the highest profile for adults aged 16-24. E4 normally broadcast Friends or other US sitcoms at this time of day.

**Figure A5.21: Profile of E4 audience by daypart**

E4 audience profile by daypart



Source: BARB

## How have restrictions on HFSS advertising affected E4?

### Changes in Supply

A5.47 The total number of spots broadcast on E4 grew strongly between 2005 and 2006 from 159,000 to 184,000. This can be attributed to the increase in broadcasting hours that occurred during 2005. Since 2006, there has only been a small increase in the number of spots to 190,000 in 2007/8. Overall, advertising spots have grown by 20% since 2005 on E4.

A5.48 Food and drink spots have grown significantly quicker (68% since 2005). This is reflected by the increased food and drink share of total spots broadcast over the same period.

**Figure A5.22: Total advertising spots broadcast, E4, 2004 – 2007/8**

All E4 advertising spots

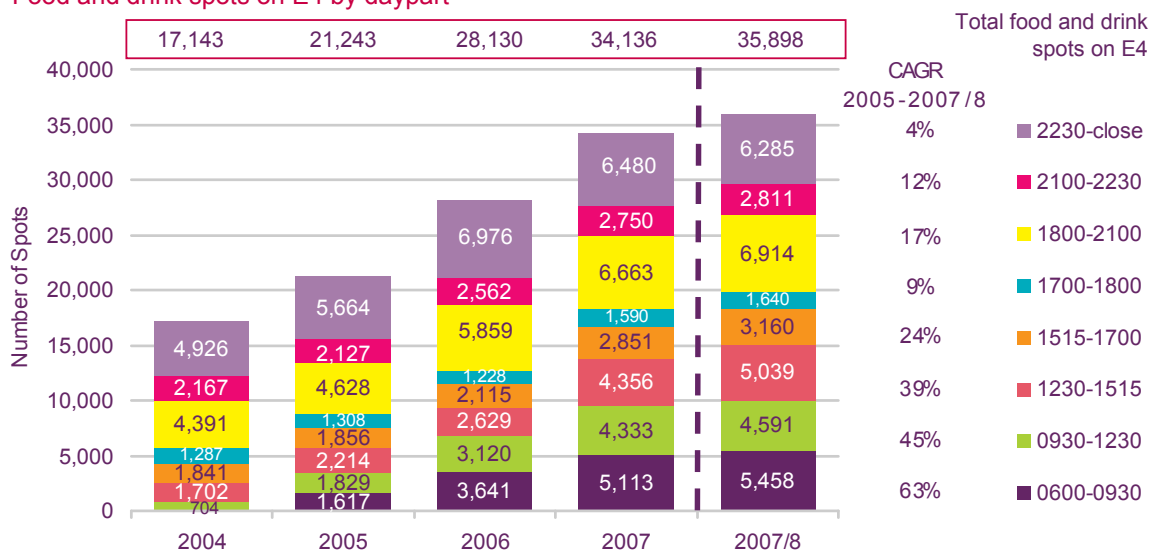


Source: Nielsen Media

**A5.49** The number of food and drink spots broadcast on E4 has increased across every daypart since 2005. Growth has been greatest during daytime hours, particularly between 06:00-09:30. This is partially attributable to the increase in hours of broadcast on E4 during 2005. Pre-watershed growth in food and drink spots is lowest between 17:00 and 18:00. As Figure 5.21 shows, this is the time of day that skews most heavily towards children on E4. In general, pre-watershed growth in food and drink spots has been higher when the profile of children is lower.

**Figure A5.23: Food and drink spots broadcast on E4 by daypart, 2004 – 2007/8**

Food and drink spots on E4 by daypart



Source: Nielsen Media

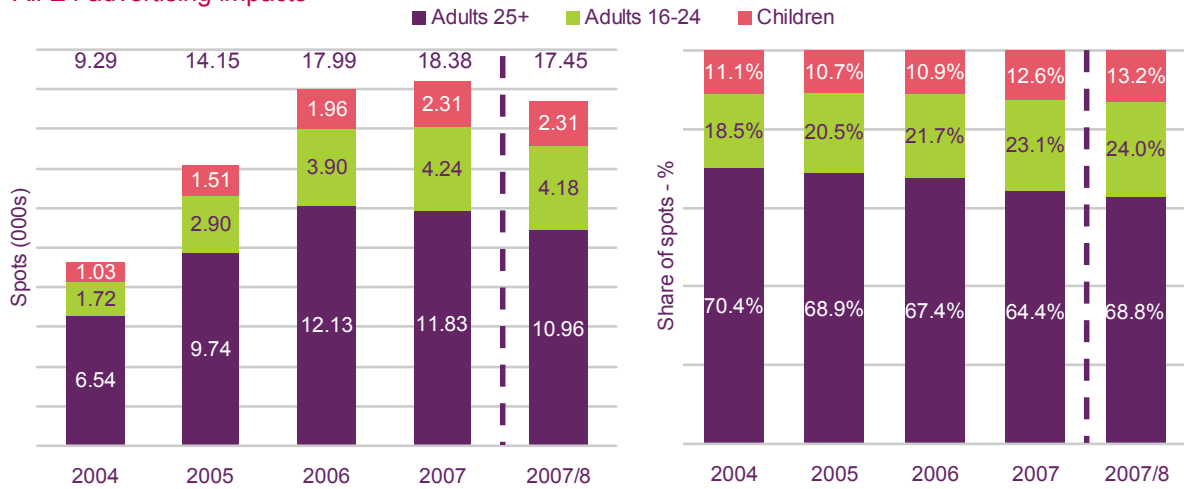
Changes in viewing impacts

**A5.50** The total number of impacts viewed on E4 grew by 30% between 2005 and the peak level in 2007 and has since fallen by 5%, leading to overall growth of 23%. Impacts to children have grown more quickly (by 52% since 2005) and have remained constant between 2007 and 2007/8, whilst the growth has been nearly as strong for adults aged 16-24 (44% growth since 2005).

A5.51 The share of all impacts viewed by children has increased by 2.5% to 13.2% between 2005 and 2007/8.

**Figure A5.24: Total E4 advertising impacts, 2004 – 2007/8**

All E4 advertising impacts



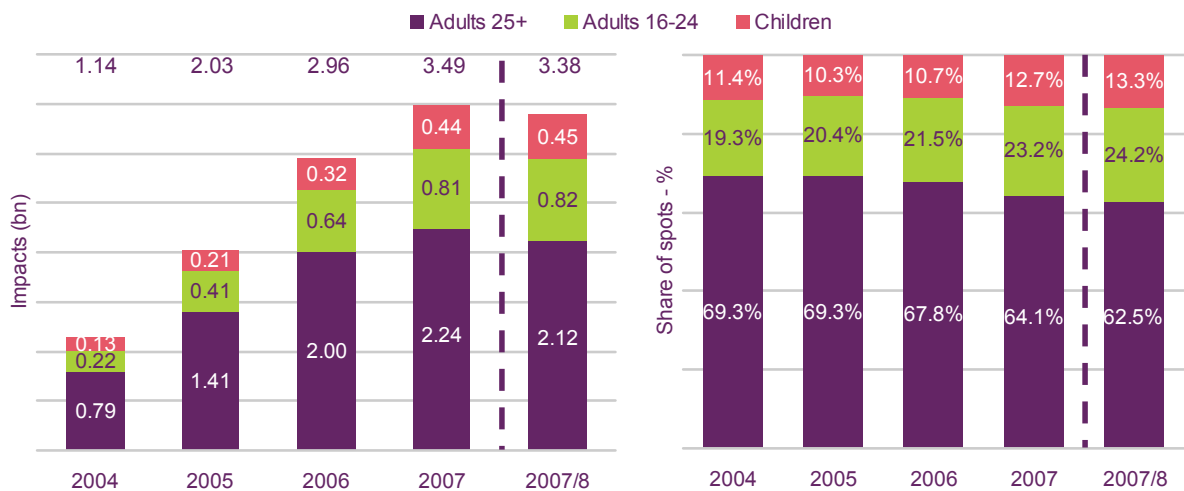
Source: Nielsen Media

A5.52 The growth patterns of food and drink advertising impacts on E4 are very similar to those for all advertising. Overall, food and drink advertising impacts peaked in 2007 after strong growth (72%) since 2005, whilst food and drink impacts to children increased more quickly (111%) over the same period. Impacts to children also maintained a similar level between 2007 & 2007/8.

A5.53 The share of total food and drink child impacts has increased by 3% to 13.3% between 2005 and 2007/8, whilst the share for adults aged 16-24 grew faster (3.8% since 2005) to 24.2%. If Figure A5.24 and Figure A5.25 are compared, it is apparent that the proportion of food and drink impacts delivered to children is very similar to the proportion of all advertising impacts consumed delivered to children for each time period between 2005 and 2007/8.

**Figure A5.25: E4 food and drink advertising impacts, 2004 – 2007/8**

E4 food and drink advertising impacts

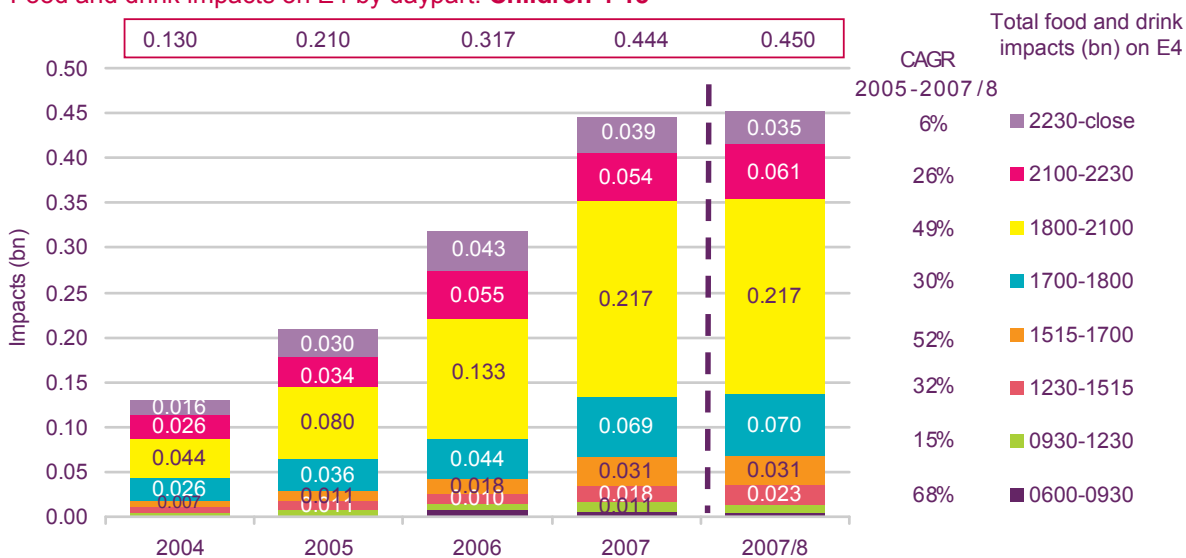


Source: Nielsen Media

A5.54 The lowest levels of growth in food and drink impacts for children have occurred when the audience profile is lowest for children, i.e. post-watershed and between 09:30-12:30. As illustrated in Figure A5.21, E4's audience profile skews most towards children between 17:00 and 18:00. Growth in food and drink impacts to children during this daypart has grown at a slower rate than the average for all dayparts (CAGR of 30% for 17:00-18:00 compared to 36% across the whole day). This can be attributed to the small growth in food and drink spots broadcast during this daypart (Figure A5.23).

**Figure A5.26: Food and drink impacts, E4, 2004 – 2007/8, children 4 - 15**

Food and drink impacts on E4 by daypart: **Children 4-15**



Source: Nielsen Media. Numbers may vary due to rounding

### Case study conclusions

- A5.55 The case studies suggest that the introduction of restrictions on HFSS advertising has not led to deliberate targeting of children on E4 or ITV2.
- A5.56 With ITV2, the analysis shows that viewing has increased for both adults and children at a similar rate, whilst the audience profile has become slightly older. Food and drink spots have increased over time on ITV2 but the increase has been slowest during the dayparts when the audience skews most highly towards children.
- A5.57 Food and drink impacts have also grown for both children and adults. However, food and drink impacts to adults have grown more quickly than to children. The share of food and drink impacts on ITV2 viewed by children has fallen over time.
- A5.58 The evidence is more nuanced for E4 but still suggests that children are not being targeted directly. The share of child food and drink impacts as a proportion of all food and drink impacts viewed has grown from 10.3% to 13.3% between 2005 and 2007/8. The share of impacts for children as a proportion of all impacts viewed has grown at a similar rate, which suggests that much of the increase in child food and drink impacts has been driven by increased viewing rather than by the greater placement of spots.
- A5.59 In addition, whilst food and drink spots have grown across every daypart, the slowest pre-watershed growth has occurred between 17:00-18:00, which is the daypart which skews most heavily towards children. This suggests that food and

drink advertisers are not so interested in targeting a younger demographic. Food and drink impacts to children have also grown at a lower than average rate during this daypart.



## Annex 6

## Changes in advertising impacts by different measures

A6.1 The grid below sets out the key HFSS child impact reductions by age group for each of the two measures discussed in section 5 (and explained in detail in section 3 and annex 3), that is:

- a) the 2007/8 HFSS proxy, which is a less granular version of the HFSS best estimate, used on grounds of practicality for more detailed modelling purposes; and
- b) the 2005 HFSS proxy, which assumed that certain food and drink categories were wholly comprised of HFSS products, while others were wholly comprised of non-HFSS products.

A6.2 The table also summarises changes in the amount of advertising seen by children for all food and drink products. These form the basis of Annex 4 and enable the reader to both view the HFSS reductions in the context of all food and drink.

**Figure A6.1: Summary of changes in advertising impacts by different measures**

% Change in impacts	Methodology	4-15	4-9	10-15
All airtime	2007/8 HFSS proxy	-34%	-39%	-28%
	2005 HFSS proxy	-18%	-24%	-12%
	All food and drink	-14%	-20%	-9%
Main Commercial Airtime	2007/8 HFSS proxy	-41%	-43%	-39%
	2005 HFSS proxy	-28%	-30%	-26%
	All food and drink	-24%	-27%	-24%
Digital Airtime	2007/8 HFSS proxy	-27%	-36%	-16%
	2005 HFSS proxy	-8%	-19%	+5%
	All food and drink	-3%	-15%	+8%
Children's airtime	2007/8 HFSS proxy	-63%	-63%	-63%
	2005 HFSS proxy	-52%	-52%	-51%
	All food and drink	-56%	-55%	-61%
Adult airtime	2007/8 HFSS proxy	-20%	-21%	-20%
	2005 HFSS proxy	-2%	-3%	-2%
	All food and drink	+7%	+8%	+7%
Children's airtime – main commercial channels	2007/8 HFSS proxy	-94%	-93%	-95%
	2005 HFSS proxy	-92%	-90%	-95%
	All food and drink	-92%	-88%	-100%

Changes in the nature and balance of television food advertising to children

Children's airtime – digital children's channels	2007/8 HFSS proxy	-57%	-58%	-56%
	2005 HFSS proxy	-44%	-45%	-41%
	All food and drink	-45%	-44%	-50%
Adult airtime- main commercial channels	2007/8 HFSS proxy	-35%	-35%	-35%
	2005 HFSS proxy	-21%	-20%	-21%
	All food and drink	-13%	-8%	-16%
Adult airtime - digital channels	2007/8 HFSS proxy	+7%	+10%	+5%
	2005 HFSS proxy	+32%	+36%	+30%
	All food and drink	+42%	+36%	+45%
Adult airtime – Digital spin off channels (E4 ITV2 etc)	2007/8 HFSS proxy	+133%	+151%	+123%
	2005 HFSS proxy	+185%	+208%	+172%
	All food and drink	+103%		
Adult airtime – digital music channels	2007/8 HFSS proxy	-3%	-1%	-4%
	2005 HFSS proxy	+20%	+23%	+19%
	All food and drink	+25%		
Adult airtime – other digital channels	2007/8 HFSS proxy	-24%	-25%	-24%
	2005 HFSS proxy	-6%	-6%	-6%
	All food and drink	+12%		

## 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 our research into changes in the use of advertising techniques calculated to appeal to children in food and drink advertising. This annex details the analysis behind these findings and deals in turn with:

- a) changes in the volume of advertising spots;
- b) changes in the volume of advertising impacts; 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 assert the NP status of products;
- b) advertisers make use of the techniques discussed in this annex to promote both HFSS and non-HFSS products<sup>52</sup>;
- c) some advertisements make use of more than one of the advertising techniques calculated to appeal to children within each advert, and would therefore be counted more than once (i.e. in the case of a popular cereal including an offer for children's books, the advert would be coded twice; once for brand equity character and once for promotions); and
- d) all data relates to children aged 4-15.

## Changes in the volume of advertising spots

A7.3 Overall (Billets) food and drink spots grew by 55% between 2005 and 2007/8. As discussed in section 4, this mainly reflects an increase in the number of channels, rather than growth in food and drink advertising on individual channels. Most of this growth has taken place in adult airtime (72%) and has been balanced by a reduction in children's airtime (43%), where the amount of food and drink advertising has almost halved<sup>53</sup>.

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<sup>52</sup> 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.

<sup>53</sup> These changes compare well to Nielsen core category spot movements, which show a 56% increase in all food and drink advertising, driven by a 75% increase in adult airtime and a 49% reduction in children's airtime.

- A7.4 In line with the general trends in food and drink advertising the number of advertising spots including five out of six of these techniques have increased overall. However in children's airtime spots for all six techniques have fallen but spots have increased in adult airtime (with the notable exception of licensed characters).

**Figure A7.1: Summary of changes in food and drink spots**

Spots	Total airtime	Adult airtime	Children's airtime
<b>Changes in food and drink spots 2005 – 2007/8</b>			
Total Billetts Core Category Spots	55%	72%	-43%
Total Nielsen Media Core Category Spots	56%	75%	-49%
Celebrity Advertising	109%	121%	-40%
Licensed Character Advertising	-56%	-45%	-62%
Promotions Based Advertising	79%	163%	-55%
Health Claim Advertising	57%	71%	-38%
Brand Equity Advertising	31%	94%	-34%
Other Character Advertising	53%	117%	-29%

### Changes in the volume of impacts

- A7.5 Food and drink advertising impacts seen by children aged 4-15 have fallen overall by 17%, by 55% in children's airtime, and by 2% in adult airtime<sup>54</sup>.
- A7.6 Child impacts have fallen in children's airtime for all these six techniques. In adult airtime, there have been increases in impacts for advertisements using celebrities, promotions and other characters, but reductions in impacts for advertisements using licensed characters, brand equity characters and health claims.

**Figure A7.2: Summary of changes in impacts**

Impacts, Children 4-15	Total airtime	Adult airtime	Children's airtime
<b>Change in Impacts 2005 – 2007/8</b>			
Total Billetts Core Category Spots	-17%	-2%	-55%
Total Nielsen Media Core Category Spots	-14%	+7%	-56%
Celebrity Advertising	22%	37%	-62%
Licensed Character Advertising	-69%	-66%	-70%
Promotions Based Advertising	-36%	5%	-63%
Health Claim Advertising	-18%	-2%	-59%
Brand Equity Advertising	-36%	-10%	-49%
Other Character Advertising	-4%	16%	-18%

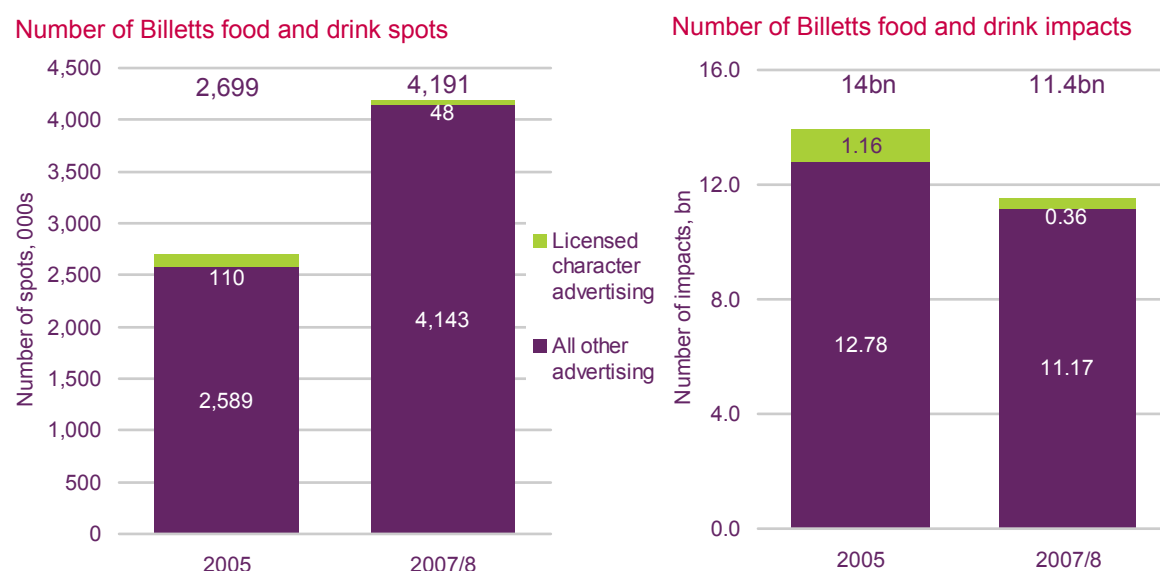
<sup>54</sup> These changes to food and drink advertising impacts as measured by Billetts Media are similar to those measured by Nielsen Media using its own definition of food and drink (see section 3). Nielsen's figures show a 14% reduction in all food and drink advertising, driven by a 56% reduction in children's airtime.

## Use of advertising techniques by type of content, daypart and by type of product

### Licensed characters

- A7.7 Of all the advertising techniques discussed in this section, licensed character advertising is the only technique that sees reductions in both spots and impacts, indicating that the rules have affected the use of this technique and advertisers have not moved this type of advertisement into adult airtime in a bid to target children.
- A7.8 Between 2005 and 2007/8 the number of food and drink advertising spots featuring licensed characters fell by 56% (from 110,000 spots to 48,000 spots). In terms of share, licensed character spots represented 4.1% of all food and drink advertising spots in 2005. In 2007/8 they accounted for just 1.1% of all food and drink spots.
- A7.9 There was a 69% fall (from 1.16bn to 0.36bn) in child impacts for food and drink advertisements containing licensed characters. In terms of share of total food and drink impacts, impacts dropped from 8.3% to 3.1%.

**Figure A7.3: Licensed characters: changes in spots and impacts**

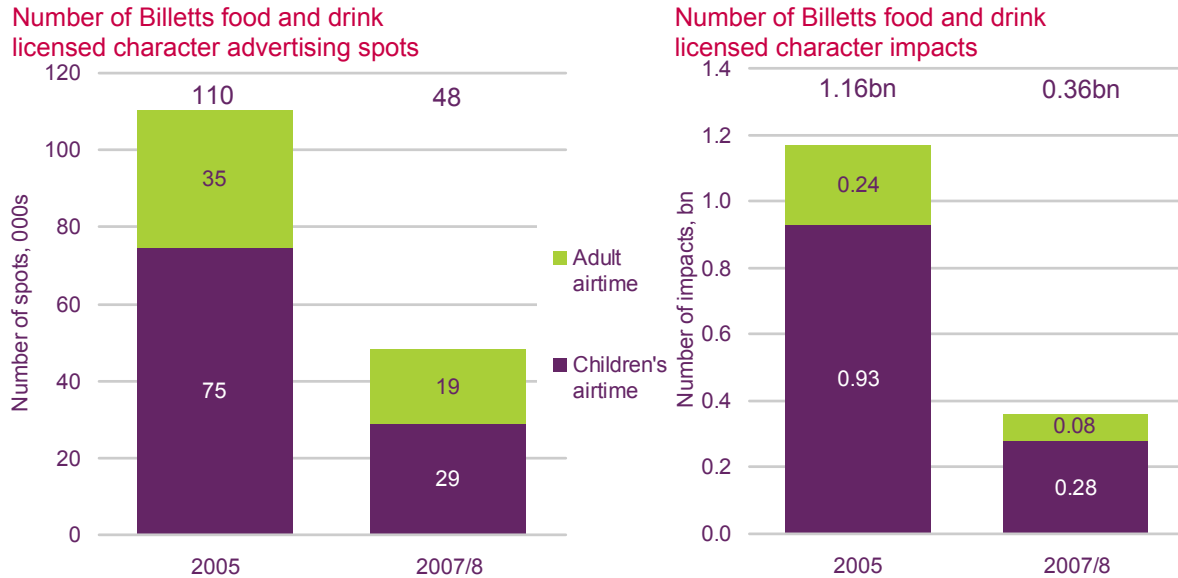


Source: Billetts

- A7.10 The number of spots featuring licensed characters across children's airtime fell by 62% (from 75,000 to 29,000). Spots in adults' airtime fell by 45% over the same period (from 35,000 to 19,000). However, it should be noted that in terms of share, the majority of spots featuring licensed characters were still broadcast during children's airtime (59.5%) in 2007/8 although this figure has fallen from 67.9% in 2005.
- A7.11 The same is true for licensed character based child impacts. 77.2% of impacts are delivered in children's airtime, compared to 22.8% in adult's airtime. This indicates that whilst reductions have occurred, this is still a technique used to target at children. However it should also be noted that the BCAP prohibition on the use of this technique to promote HFSS products to primary aged children, should mean that the remaining 0.3bn impacts in children's airtime must be for non HFSS products

A7.12 Impacts show similar trends. There has been a 70% fall, from 0.93bn to 0.28bn impacts in children's airtime. While impacts in adult airtime have fallen by 66% from 0.24bn to 0.08bn. The share of impacts in children's airtime as a proportion of all children's and adult airtime fell slightly to 77.2% compared with 79.6% in 2005.

**Figure A7.4: Licensed characters: spots and impacts by children's vs adults airtime**



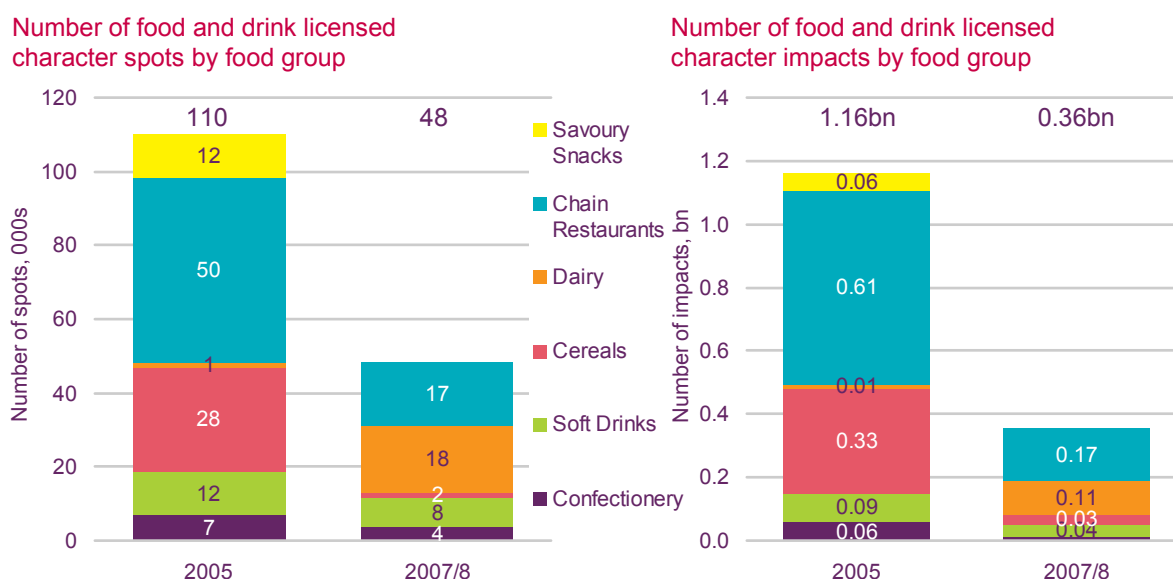
Source: Billetts

A7.13 Reductions in spots and impacts have occurred in both adult and children's airtime, and across every day part, but in particular 06.00-09.30 during adult airtime.

A7.14 When looking at food and drink spots containing licensed characters by product type, all product categories have seen declines since 2005 except dairy, which has seen large increases. In terms of share of all product categories, spots containing licensed characters for dairy products have increased from 1.4% to 37% between 2005 and 2007/8.

A7.15 Similar trends are apparent in child impacts. Child impacts across all product categories have decreased, except dairy, which have seen substantial increases. In terms of share of all product types, impacts containing licensed characters in dairy have increased from 1.1% to 30.1% between 2005 and 2007/8.

**Figure A7.5: Licensed characters: spots and impacts by product type**

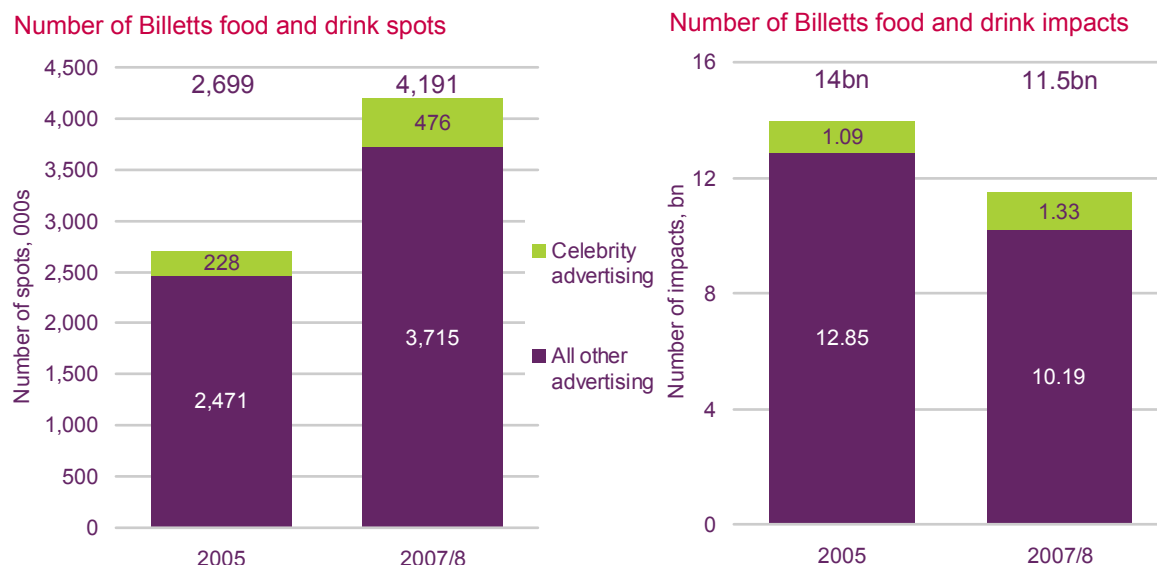


Source: Billetts

## Celebrities

- A7.16 Food and drink adverts containing celebrities saw an overall increase in both spots and child impacts – meaning more of this type of advertising is being broadcast and more of it is being seen by children. However, the increase in spots takes place entirely in adult airtime, which has led to an increase in child impacts in adult airtime. The limited scale of the increase in impacts compared with the large increase in spots suggests that while children are seeing more of these adverts it is likely that adults are seeing even more.
- A7.17 Between 2005 and 2007/8 the number of food and drink advertising spots featuring celebrity advertising more than doubled rising by 109% (from 228,000 spots to 476,000 spots). In terms of share of all food and drink advertising, celebrity advertising spots represented 8.4% of all food and drink advertising spots in 2005. This increased to 11.4% of all food and drink spots in 2007/8.
- A7.18 Child impacts for food and drink adverts containing celebrities also increased, but not by the same extent as spots, suggesting that whilst children are seeing more of these types of advertisements, other audiences i.e. adults are seeing more still. This in turn may indicate that children are not the main target of these adverts. The number of celebrity advertising child impacts increased 22% from 1.09bn to 1.33bn between 2005 and 2007/8. In terms of share of total food and drink impacts, they increased from 7.8% to 11.5%.

**Figure A7.6: Celebrity advertising: changes in spots and impacts**



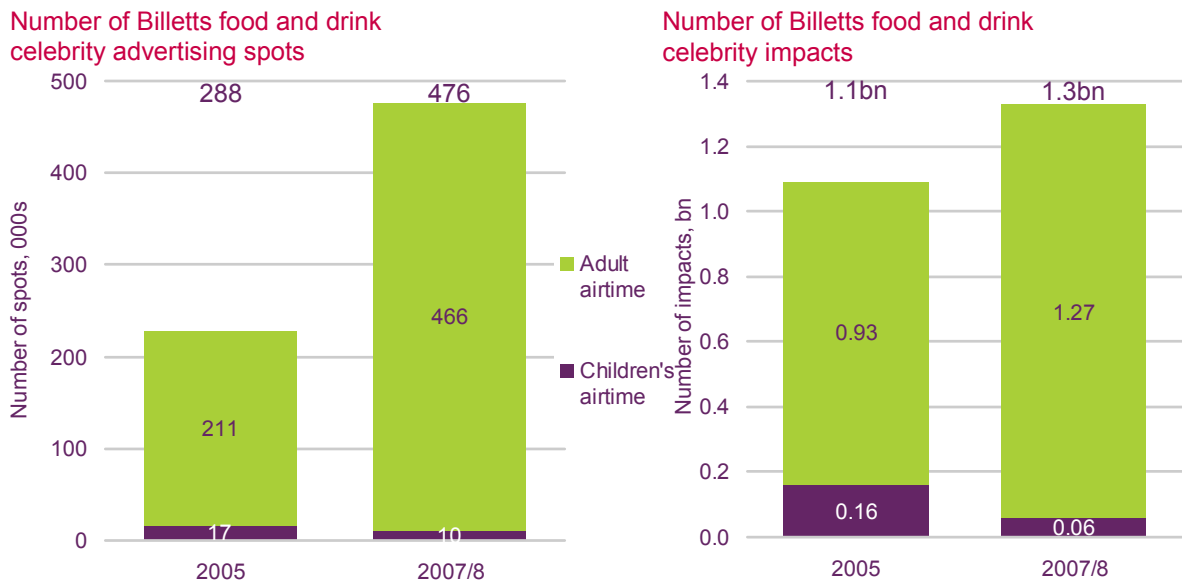
Source: Billetts

A7.19 The number of spots featuring celebrities broadcast in children’s airtime fell by 40% (from 17,000 to 10,000). Spots in adult airtime more than doubled in this same time period with a 121% increase (from 211,000 to 466,000). In terms of share, spots featuring celebrities in adult’s airtime now represent 97.9% of all spots, up from 92.6% in 2005. There has been a corresponding reduction in the proportion of celebrity spots appearing in children’s airtime.

A7.20 The movements in spots are mirrored in child impacts. Impacts for advertisements containing celebrities in children’s airtime have fallen by 62% from 0.16bn to 0.06bn. The BCAP prohibition on this technique for HFSS products aimed at young children means the remaining impacts in children’s airtime are likely to be for non-HFSS products. Impacts during adult airtime have increased by 37% from 0.93bn to 1.27bn. The share of impacts in children’s airtime as a proportion of all child impacts accounted for by advertisements containing celebrities fell from 14.8% in 2005 to 4.2% in 2007/8.



**Figure A7.7: Celebrity advertising: spots and impacts by children's vs adults' airtime**

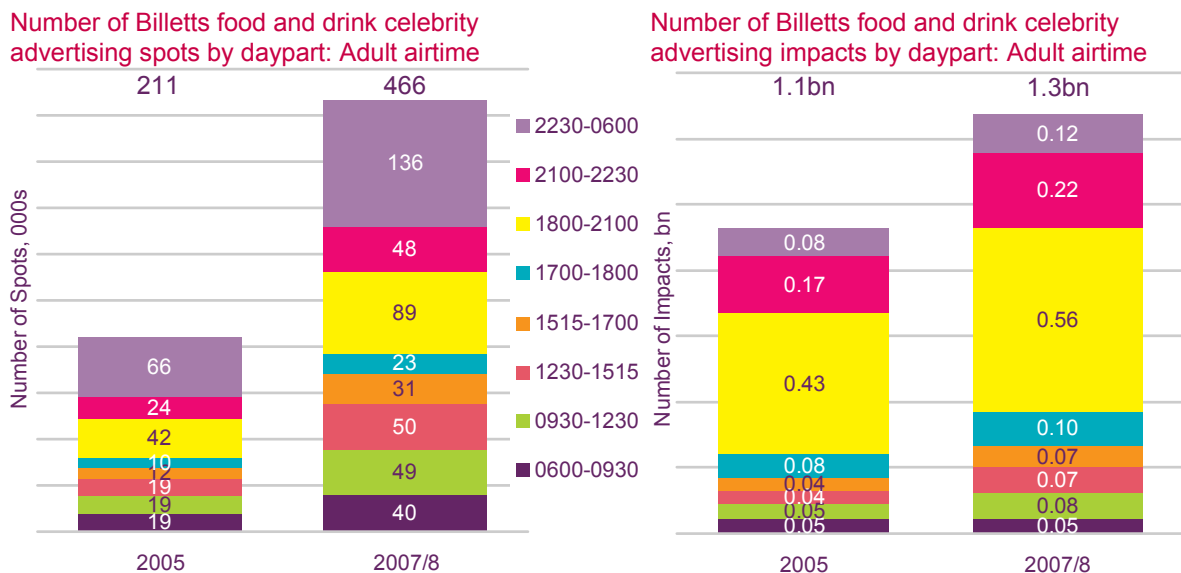


Source: Billetts

A7.21 Since 2005 the total number of celebrity advertising food and drink spots has increased in every daypart in adult airtime. The largest increases occurred in the daytime slots (09:30-17:00). However the largest proportion of celebrity based spots occurred after 18:00. This remains virtually unchanged since 2005.

A7.22 Movements in impacts mirror movements in spots with all adult airtime dayparts seeing increases. Again, the biggest increases have taken place during the day. But the largest proportion of child impacts continue to take place post 18:00.

**Figure A7.8: Celebrity advertising: spots and impacts by daypart in adults' airtime**



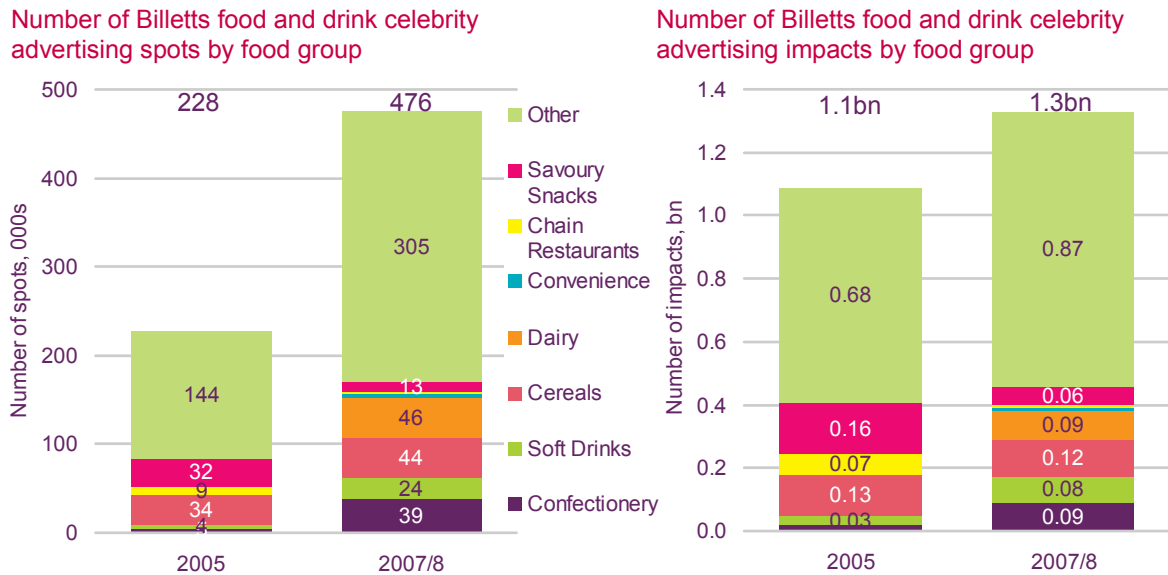
Source: Billetts

A7.23 When looking at spots containing celebrities by product type, all product categories except chain restaurants and savoury snacks have seen increases. Confectionery, soft drinks, dairy and 'other' categories in particular, have seen big increases in

spots since 2005. In terms of share, 'other products' remains the largest category (64.1%).

A7.24 The trend is in the same direction for child impacts across all product categories except cereals, which has seen no real change (0.13bn impacts in 2005 cf 0.12bn impacts in 2007/8).

**Figure A7.9: Celebrity advertising: spots and impacts by product type**



Source: Billetts

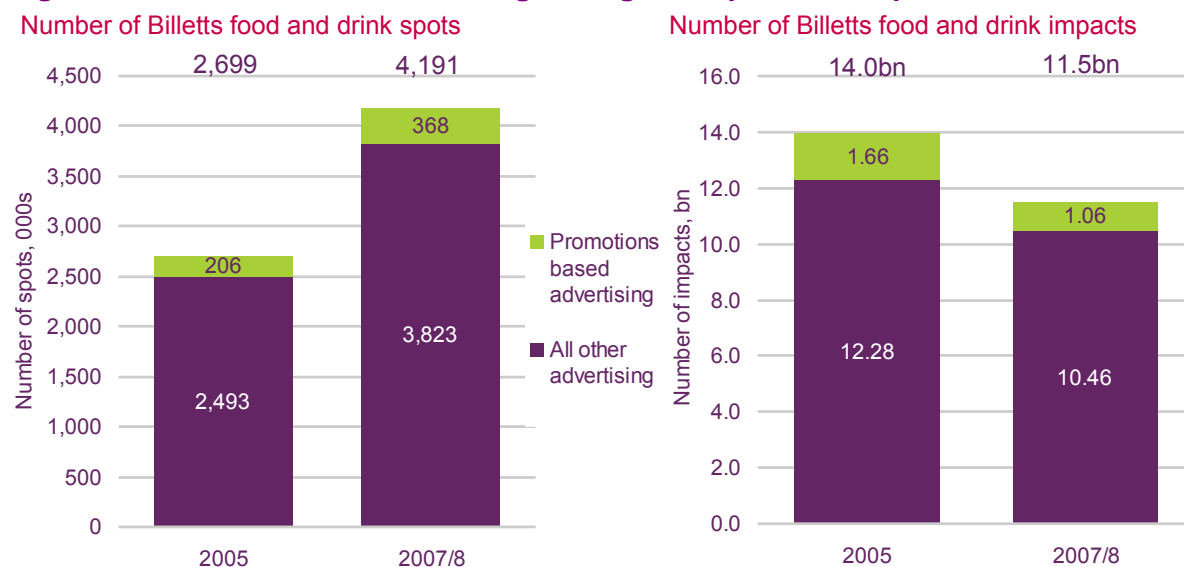
## Promotions

A7.25 Food and drink advertising containing promotions has seen an increase in spots and a decrease in child impacts. So whilst there is more advertising being aired that contains this type of creative technique, children are seeing less of it. In particular, they are seeing less in children's airtime. The increase in usage of this advertising technique is mainly post 18:00 in adult airtime.

A7.26 Between 2005 and 2007/8 the number of food and drink advertising spots featuring promotions increased by 79% (from 206,000 to 368,000). In terms of share, promotions spots increased slightly representing 7.6% of all food and drink advertising spots in 2005 and 8.8% in 2007/8, so whilst spots increased in absolute numbers, they remained relatively constant as a proportion of all food and drink spots.

A7.27 Child impacts for advertisements containing promotions dropped 36% (from 1.66bn to 1.06bn). In terms of share of total food and drink impacts, they reduced slightly from 11.9% to 9.2%.

**Figure A7.10: Promotions advertising: changes in spots and impacts**



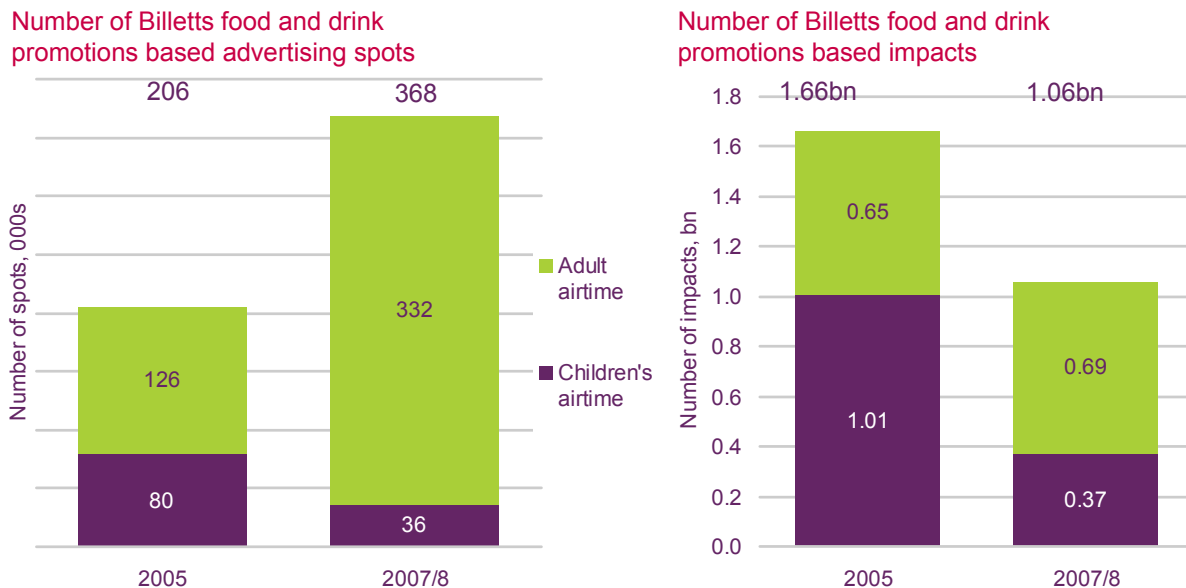
Source: Billetts

A7.28 The number of spots featuring promotions broadcast in children’s airtime fell by 55% (from 80,000 to 36,000). Spots in adults airtime increased by 163% over the same period (from 126,000 to 332,000). In terms of share of spots broadcast during children’s vs adult’s airtime, spots featuring promotions in children’s airtime fell from 38.6% to 9.8%. There as been a corresponding increase in the proportion of promotions spots appearing in adult airtime (90.2% in 2007/8).

A7.29 Impacts in children’s airtime have fallen by 63% from 1bn to 0.4bn. As with other techniques the BCAP prohibitions make it unlikely that the remaining 0.4bn impacts in children’s airtime are for HFSS products. Impacts in adult airtime have increased by 5% from 0.65bn to 0.69bn. The proportion of child impacts accounted for by advertisements containing promotions during children’s airtime fell from 60.8% in 2005 to 35.0% in 2007/8.

A7.30 The growth in child impacts in adult airtime is comparatively small when compared with the large increase in spots in adult airtime. One reason for this may be that the bulk of adverts featuring this technique may be targeted at older audiences.

**Figure A7.11: Promotions: spots and impacts by children's vs adult's airtime**

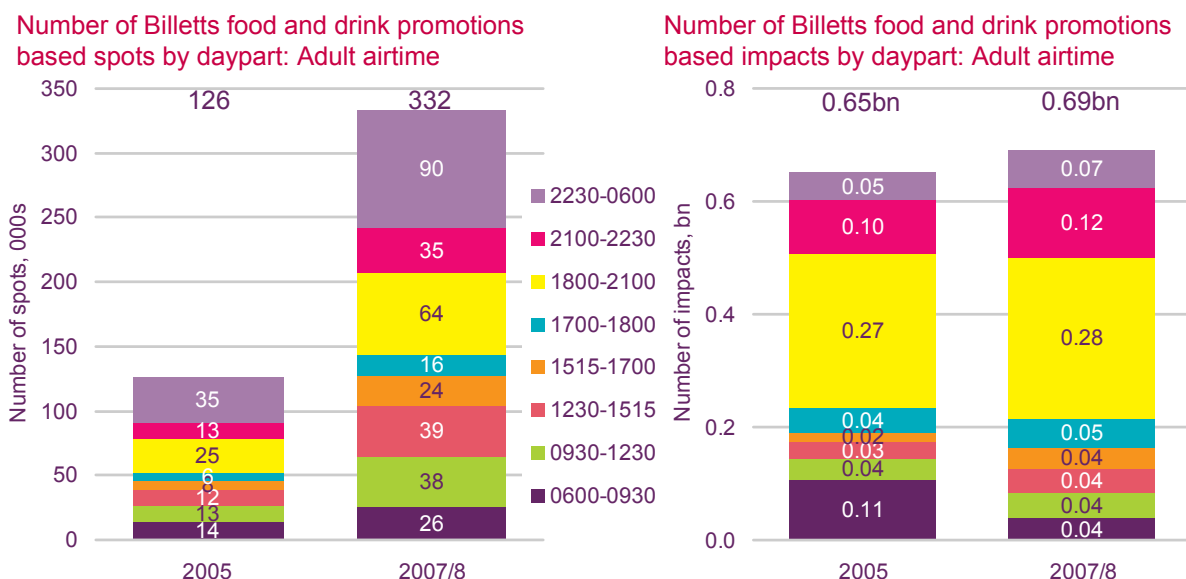


Source: Billetts

A7.31 Since 2005 the total number of promotional spots has increased in every day part in adult airtime. The largest increases have occurred during the day (12:30-17:00). However the largest proportion of promotional spots occurred after 18.00. This remains virtually unchanged since 2005.

A7.32 In terms of impacts, all adult airtime dayparts except 06:00-09:30 have seen increases. As with spots, the largest proportion of impacts for ads featuring promotions occurred after 18.00. This remains virtually unchanged since 2005.

**Figure A7.12: Promotions: spots and impacts by daypart in adult's airtime**



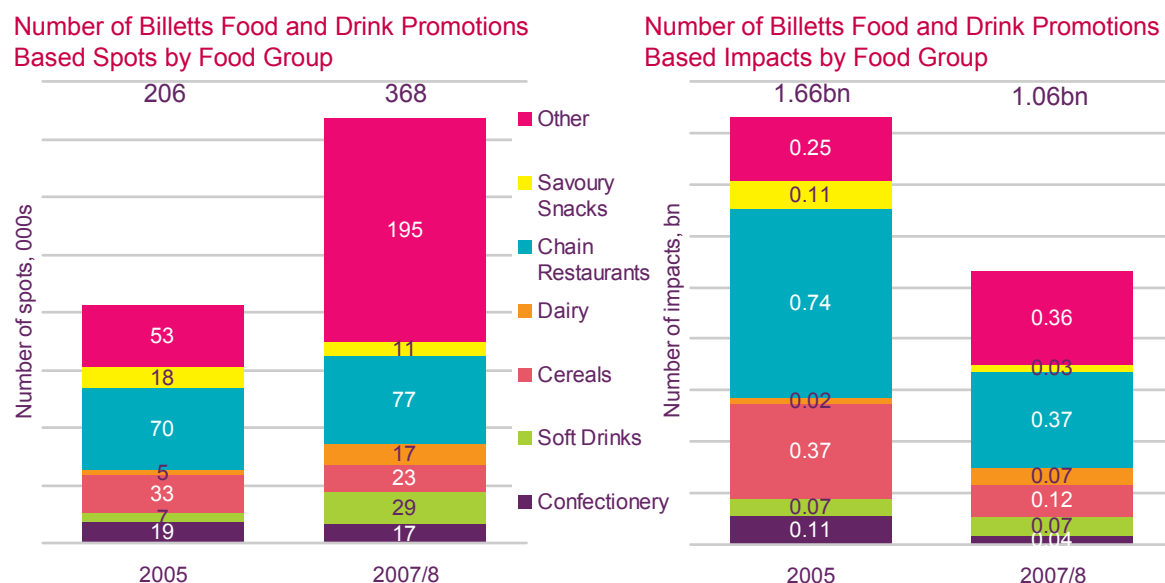
Source: Billetts

A7.33 When looking at spots containing promotions by product type, soft drinks, dairy, chain restaurants and 'other' have seen increases. 'Other' (52.8%) took the greatest share of spots across all the categories in 2007/8 with chain restaurants (20.9%) in

second position. This represents a share shift from 2005 when chain restaurants had the largest share (34.2%) followed by 'other' (25.7%).

A7.34 Somewhat similar movements are apparent for child impacts. Soft drinks, dairy, and 'other' have seen increases. However chain restaurants have seen reductions. In terms of share, chain restaurants (34.7%) and 'other' (34.4%) dominate promotions based child impacts. However in terms of movements over time, 'other' has seen increases (up from 14.8% in 2005) whilst chain restaurants have seen reductions (down from 44.4% in 2005).

**Figure A7.13: Promotions: spots and impacts by product type**



Source: Billetts

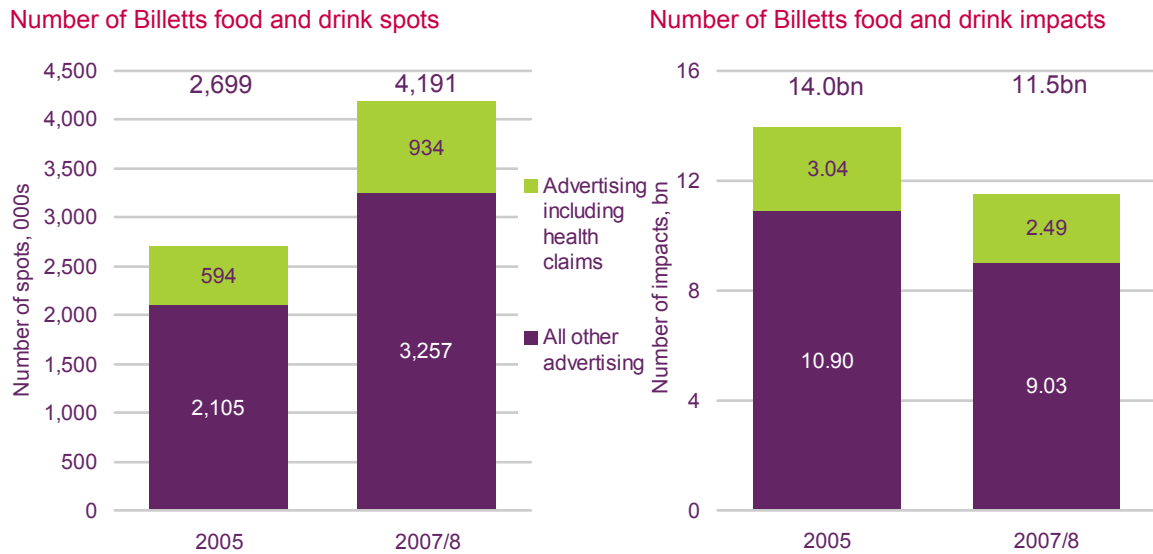
## Health claims

A7.35 Food and drink advertising containing health claims has seen an increase in spots in adult airtime but a decrease in child impacts in both children's and adult's airtime. So whilst there is more advertising being aired that contains this type of creative technique, children are seeing less of it. In particular, they are seeing less in children's airtime. This suggests that advertisers using this technique have reduced their targeting of children. Increases in spots during adult airtime have taken place in all dayparts, with the biggest increases taking place during the day (12:30-17:00). However the largest proportion of health claim spots continue to occur after 18:00. In terms of impacts, there has been a mix of movements across all adult airtime dayparts. Early morning (06:00-09:30) has seen a fall in impacts and there have been small decreases during the evening slots (18:00-21:00, 21:00-22:30). All other dayparts have seen increases. However the largest proportion of child impacts occurred after 18:00.

A7.36 Between 2005 and 2007/8 the number of food and drink advertising spots featuring health claims increased by 57% (from 594,000 to 934,000). In terms of share, health claims spots remained fairly constant representing 22.0% of all food and drink advertising spots in 2005 and 22.3% in 2007/8, so whilst spots increased in absolute numbers, they remained relatively constant as a proportion of all food and drink spots.

A7.37 Child impacts for food and drink advertisements containing health claims dropped 18% (from 3.04bn to 2.49bn). In terms of share of total food and drink impacts, they remained fairly constant at 21.8% in 2005 to 21.6% in 2007/8.

**Figure A7.14: Health claims: changes in spots and impacts**

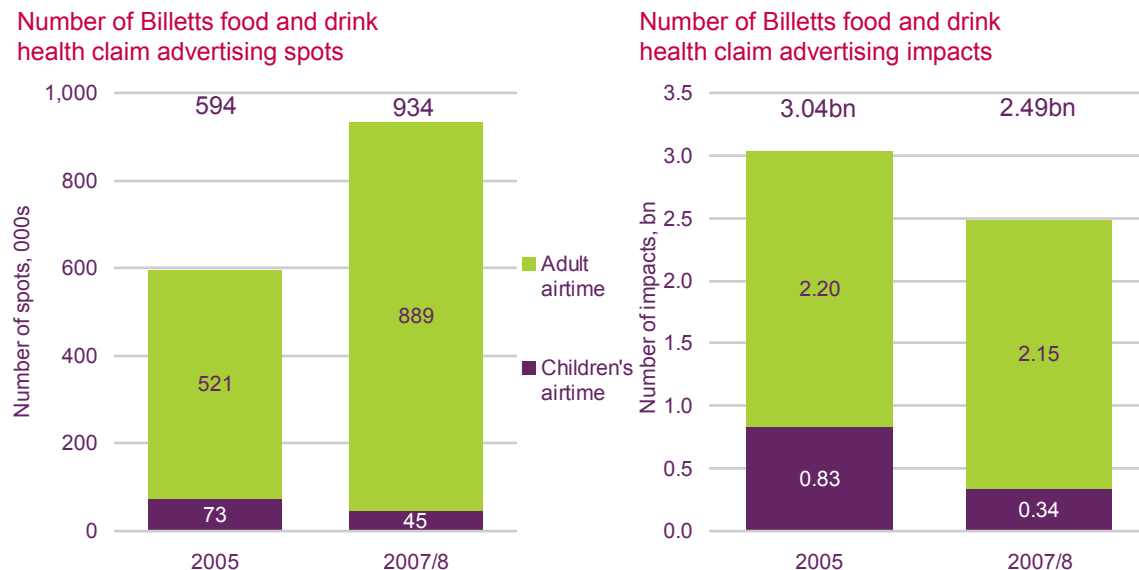


Source: Billetts

A7.38 The number of spots featuring health claims broadcast in children’s airtime fell by 38% (from 73,000 to 45,000). Spots in adults airtime increased by 71% over the same period (from 521,000 to 889,000). In terms of the proportion of health claims spots appearing in children’s vs adult’s airtime, spots featuring health claims in children’s airtime fell from 12.2% to 4.8%. There has been a corresponding increase in the proportion of health claims spots appearing in adult airtime (95.2% in 2007/8).

A7.39 Impacts for adverts containing health claims children’s airtime have fallen by 59% from 0.83bn to 0.34bn, while impacts in adult airtime have fallen by 2% from 2.20bn to 2.15bn. The share of impacts in children’s airtime as a proportion of all child impacts accounted for by advertisements containing health claims dropped from 27.4% in 2005 to 13.7% in 2007/8. The BCAP code restrictions on health claims to young children for HFSS products indicate the remaining 0.3bn impacts in children’s airtime will be for non HFSS products.

**Figure A7.15: Health claims: spots and impacts by children's vs adult's airtime**

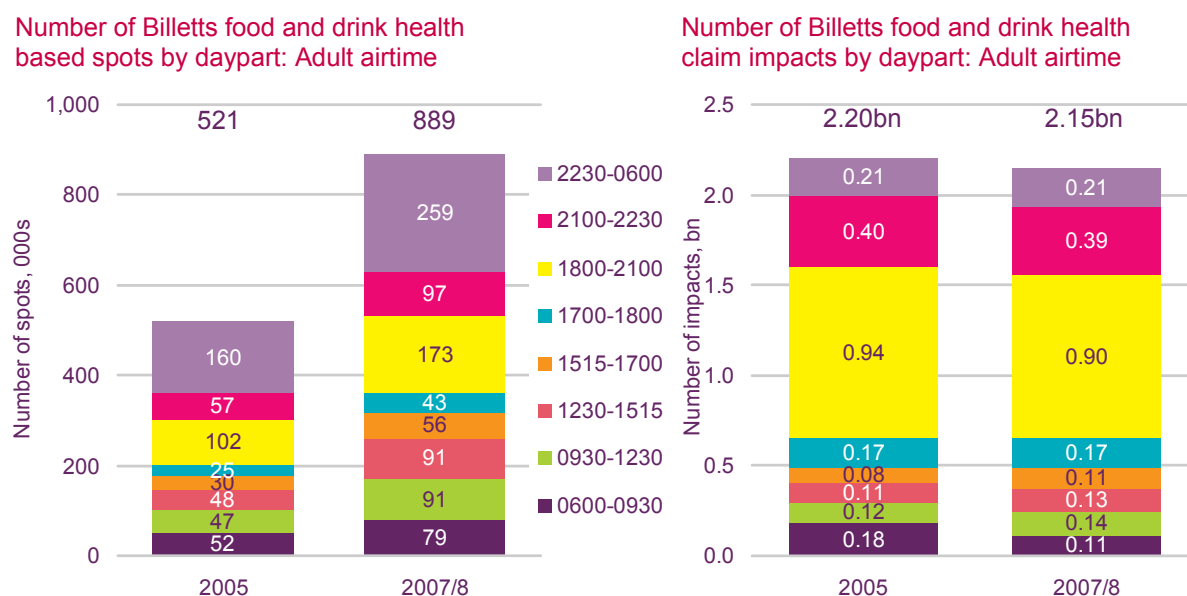


Source: Billetts

A7.40 Since 2005 the total number of spots containing health claims have increased in every day part in adult airtime. The largest increases have occurred during the day. However the largest proportion of health claim spots occurred after 18:00. This has remained virtually unchanged since 2005.

A7.41 In terms of impacts, there has been a mix of movements across all adult airtime dayparts. Early morning (06:00-09:30) has seen a reduction and there have been small decreases during the evening slots (18:00-21:00, 21:00-22:30). All other dayparts have seen increases. However the largest proportion of child impacts for this technique occurred after 18:00. This remains virtually unchanged since 2005.

**Figure A7.16: Health claims: spots and impacts by daypart in adult's airtime**



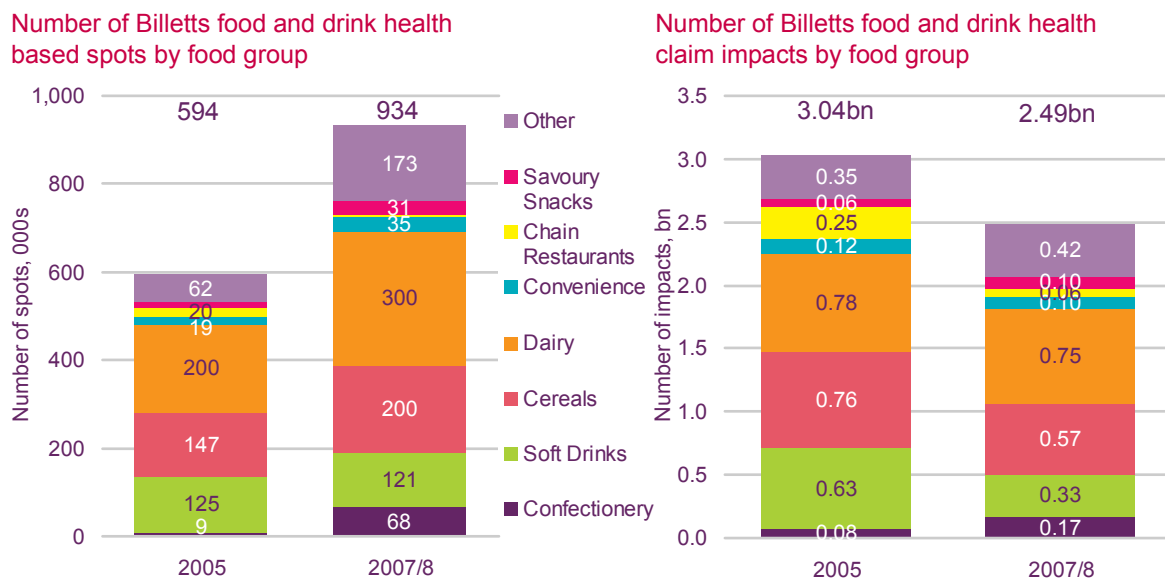
Source: Billetts

A7.42 When looking at spots containing health claims by product type, all product categories except soft drinks and chain restaurants have seen growth. Confectionery, savoury snacks and 'other' in particular have seen large increases,

although the share for confectionery and savoury snacks remains small. In terms of share of spots measured in 2007/8 for health claims advertising, dairy takes the biggest proportion (32.2%), followed by cereals (21.4%) and other (18.5%).

A7.43 In terms of health claims child impacts, confectionery, savoury snacks and ‘other’ have seen increases. In terms of share dairy (30%) and cereals (22%) dominate health claims based child impacts.

**Figure A7.17: Health claims: spots and impacts by product type**



Source: Billetts

### Brand equity characters

A7.44 The use of brand equity characters in HFSS advertising targeting children outside children’s programming is not restricted by the BCAP code.

A7.45 In contrast to licensed character advertising, which has seen reductions in both spots and impacts, brand equity character advertising has seen a reduction in child impacts but an overall increase in spots. So whilst there is more advertising being aired that contains this type of creative technique, children are seeing less of it. In particular, they are seeing less brand equity food and drink advertising in children’s airtime. Impacts in adult’s airtime have also fallen, which could imply that these spots are being scheduled around programmes which are not of particular appeal to children. This hypothesis is supported by the fact that despite most of the increase in spots is post 18:00 in adult airtime and almost 70% of children’s viewing takes place in adult airtime, (with over 50% of viewing taking place post 18:00) overall child impacts in adult airtime have still fallen.

A7.46 However, advertising containing brand equity characters still accounts for nearly 14% of child food and drink impacts. The majority (53.6%) still sit in children’s airtime. It therefore appears that brand equity advertising is still a relatively popular creative technique that is being seen by children, in children’s airtime as well as in adult airtime. The relative importance of children’s airtime may decrease from January 2009 when all HFSS advertising is removed from children’s channels.

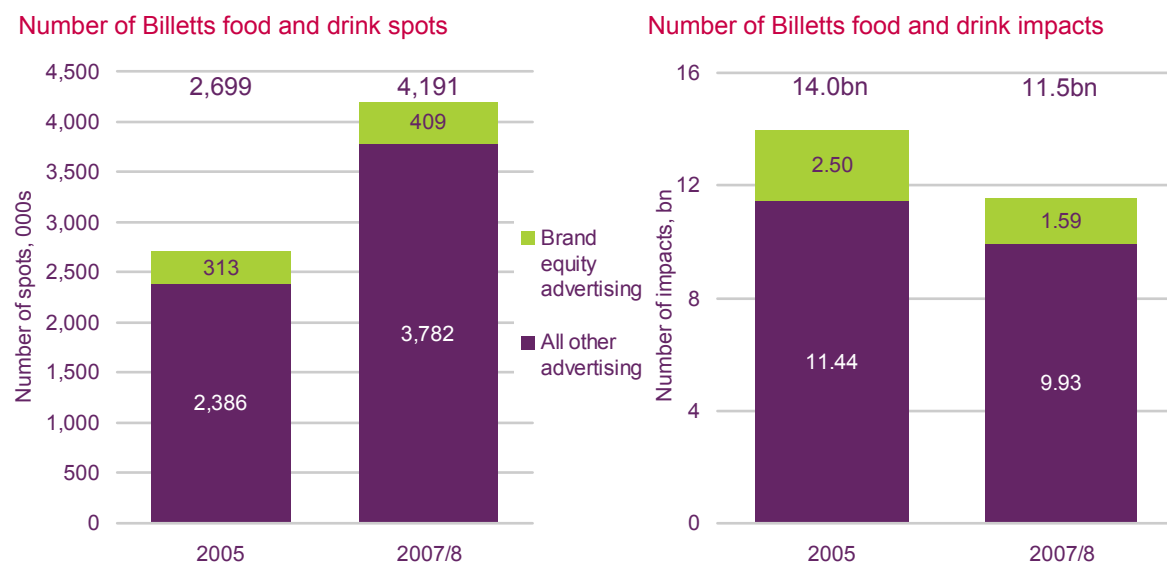
A7.47 Between 2005 and 2007/8 the number of food and drink advertising spots featuring brand equity characters increased by 31% (from 313,000 spots to 409,000 spots).



In terms of share, brand equity character spots represented 11.6% of all food and drink advertising spots in 2005. This fell to 9.8% of all food and drink spots in 2007/8.

A7.48 Child impacts for advertisements containing brand equity characters dropped 36% (from 2.5bn to 1.59bn). In terms of share of total food and drink impacts, they fell from 17.9% to 13.8%.

**Figure A7.18: Brand equity characters: changes in spots and impacts**



Source: Billetts

A7.49 The number of spots featuring brand equity characters broadcast in children's airtime fell by 34% (from 154,000 to 102,000). Spots in adults airtime increased by 94% over the same period (from 159,000 to 307,000). In terms of share of children's vs adult's airtime, spots featuring brand equity characters in children's airtime have reduced from around half (49.3%) to one quarter (25.0%). There has been a corresponding increase in the proportion of brand equity spots appearing in adult airtime.

A7.50 Impacts in children's airtime have fallen by 49% from 1.67bn to 0.85bn, while impacts in adult airtime have fallen by 10% from 0.82bn to 0.74bn despite the significant increase in spots. This suggests it is possible that this technique is being used to target older viewers as well as children.

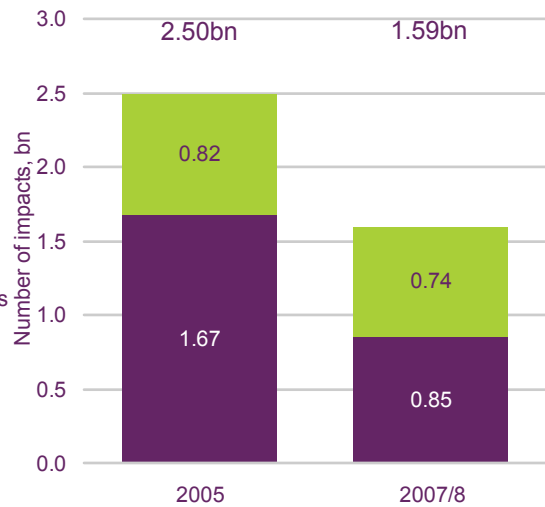
A7.51 The share of impacts in children's airtime as a proportion of all child impacts accounted for by advertisements containing brand equity characters reduced from 67% in 2005 to 53.6% in 2007/8, however the majority of impacts (0.85bn) were still accounted for by children's airtime. This balance may change when HFSS advertising is removed from children's channels. Unlike the previous techniques, brand equity characters are not restricted by the BCAP code, therefore some of the 2007/8 impacts are likely to be for HFSS products, which it will no longer be possible to promote during children's airtime from January 2009.

**Figure A7.19: Brand equity characters: spots and impacts by children's vs adults airtime**

Number of Billetts food and drink brand equity advertising spots



Number of Billetts food and drink brand equity impacts



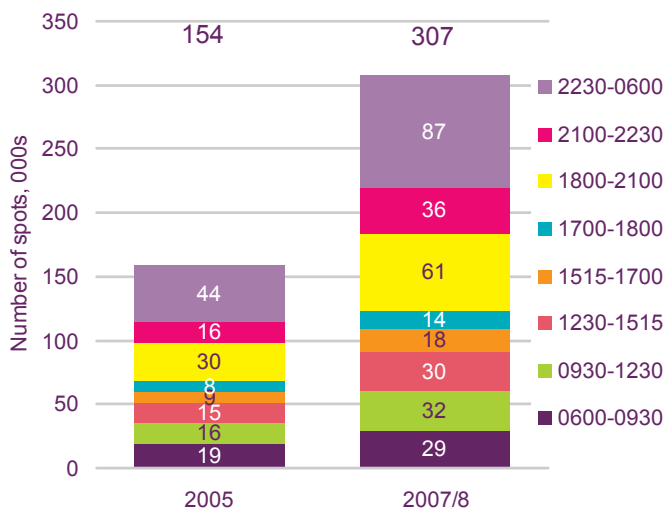
Source: Billetts

A7.52 Since 2005 the total number of food and drink brand equity character spots has increased in every day part in adult airtime. The largest increases have occurred in the 18:00-21:00 and 21:00-21:30 slots. The largest proportion of brand equity character spots occurred after 18:00. This remains virtually unchanged since 2005.

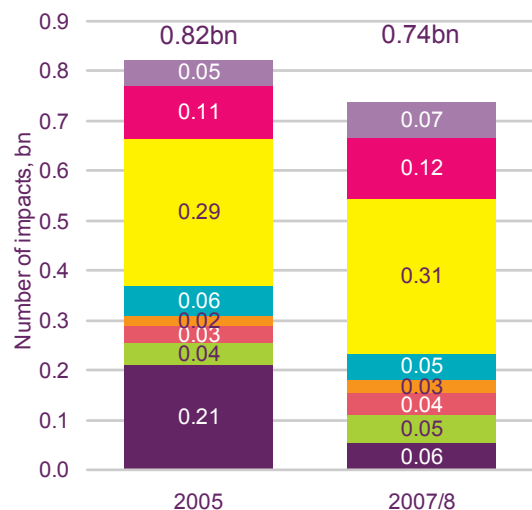
A7.53 In terms of child impacts, some adult airtime dayparts have seen reductions and some have seen increases. There have been reductions in the number of child impacts delivered during the 06:00-09:30 slot and the 17:00-18:00 slot. Conversely, all other dayparts have seen increases. In terms of share of adult airtime, the post 18:00 slot has seen the biggest increase in food and drink brand equity character impacts with 68.4% of all brand equity impacts delivered after this time (compared to 55.1% in 2005).

**Figure A7.20: Brand equity characters: spots and impacts by daypart in adults airtime**

Number of Billetts food and drink brand equity spots by daypart: Adult airtime



Number of Billetts food and drink brand equity impacts by daypart: Adult airtime

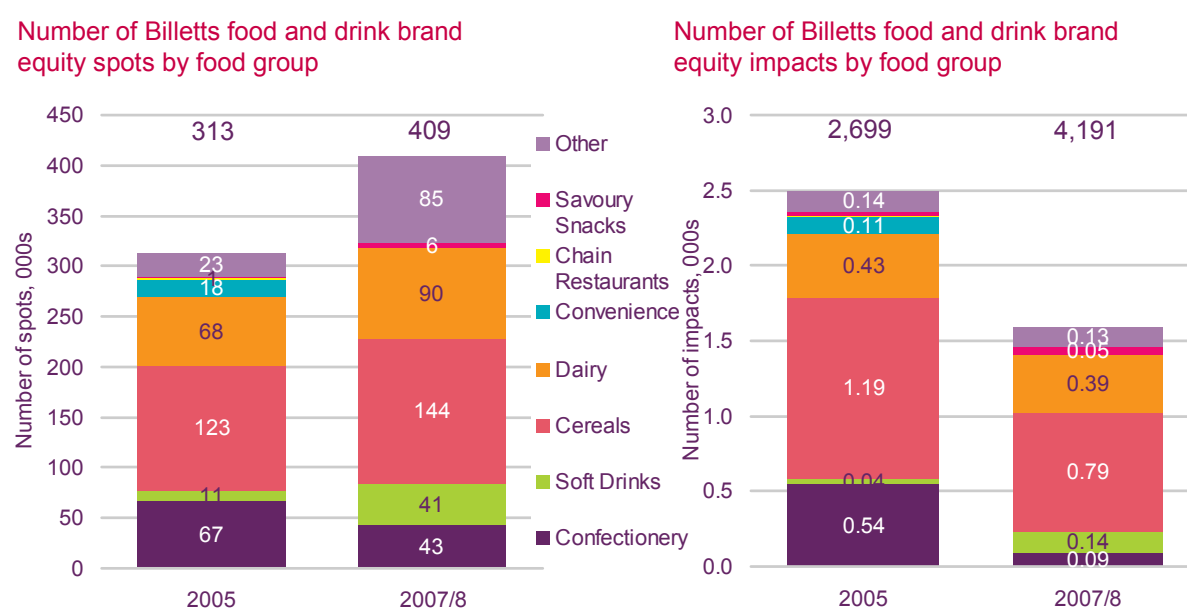


Source: Billetts

A7.54 When looking at spots containing brand equity characters by product type, both convenience foods and chain restaurants have seen spots fall to zero, there have also been falls for confectionery. But dairy, cereals, soft drinks, savoury snacks and 'other' have seen increases. In terms of share, cereals and dairy continue to maintain the largest share of spots (35.2% and 22.0% respectively). The 'other' product category represents 20.7% of share of spots in 2007/8 up from 7.5% in 2005. This category has shown the largest increase.

A7.55 In terms of child impacts, soft drinks and savoury snacks are the only food and drink product categories using brand equity characters to see increases. In terms of share of child impacts, cereals and dairy dominate.

**Figure A7.21: Brand equity characters: spots and impacts by product type**



Source: Billetts

### Other characters

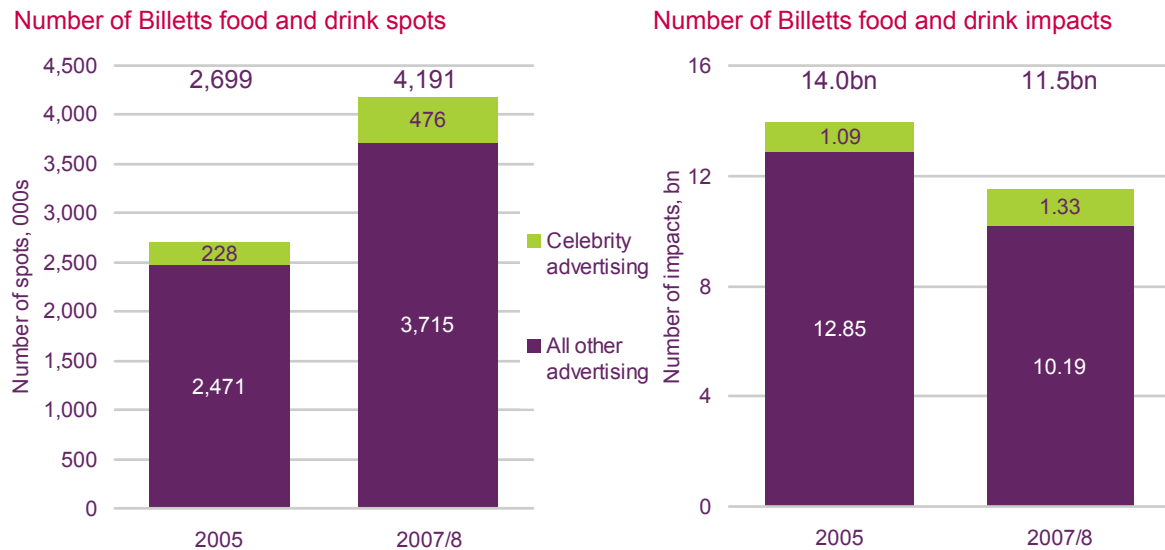
A7.56 The use of 'other characters' in HFSS advertisements targeting children outside children's airtime is not restricted by the BCAP code.

A7.57 Spots for 'other characters' have increased, up 53% since 2005, but all of this increase occurred in adult airtime (up by 117%). The number of 'other characters' spots have fallen in children's airtime (down 29%). In terms of child impacts, there has been a small reduction overall (down 4% between 2005 and 2007/8) with all of this reduction occurring in children's airtime (18%). Child impacts in adult airtime have increased (16%). So overall, whilst there is more advertising being aired that contains this type of creative technique, children are seeing less of it, despite there being no BCAP restrictions limiting the placement of 'other characters' adverts. Whilst these adverts are still reaching children, it is possible they may not be the primary target for this technique.

A7.58 Between 2005 and 2007/8 the number of food and drink advertising spots featuring other characters increased by 53% (from 157,000 spots to 240,000 spots). In terms of share, 'other character' spots remained fairly constant representing 5.8% of all food and drink advertising spots in 2005 and 5.7% in 2007/8.

A7.59 Child impacts for advertisements containing ‘other characters’ dropped 4% (from 1.23bn to 1.17bn). In terms of share of total food and drink impacts, they increased slightly from 8.8% to 10.2%.

**Figure A7.22: Other character advertising: changes in spots and impacts**



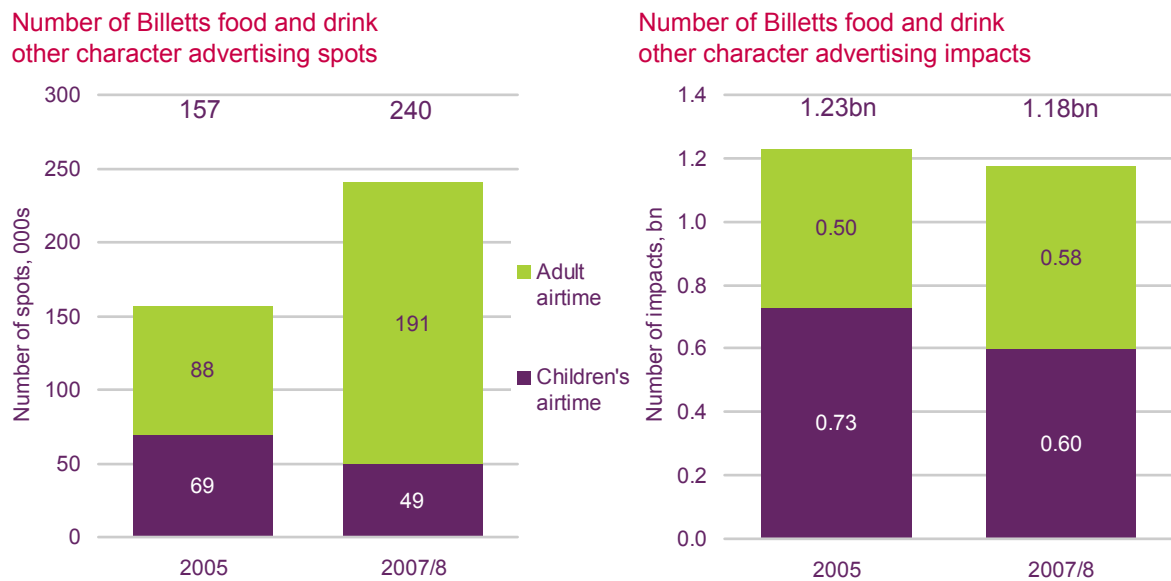
Source: Billetts

A7.60 The number of spots featuring ‘other characters’ broadcast in children’s airtime fell by 29% (from 69,000 to 49,000). Spots in adult airtime increased by 117% over the same period (from 88,000 to 191,000). In terms of share of children’s vs adult’s airtime, spots featuring ‘other characters’ in children’s airtime fell from 44.2% to 20.6%. There has been a corresponding increase in the proportion of ‘other characters’ spots appearing in adult airtime (79.4% in 2007/8).

A7.61 Child impacts in children’s airtime have fallen by 18% from 0.73bn to 0.60bn, while impacts in adult airtime have increased by 16% from 0.50bn to 0.58bn. The share of impacts in children’s airtime as a proportion of all child impacts accounted for by adverts containing ‘other characters’ fell from 59.6% in 2005 to 50.9% in 2007/8.

A7.62 The rise in impacts in adult airtime is comparatively small when compared with the large increase in spots suggesting many advertisements using the technique are targeted at audiences other than children.

**Figure A7.23: Other characters: spots and impacts by children's vs adults airtime**

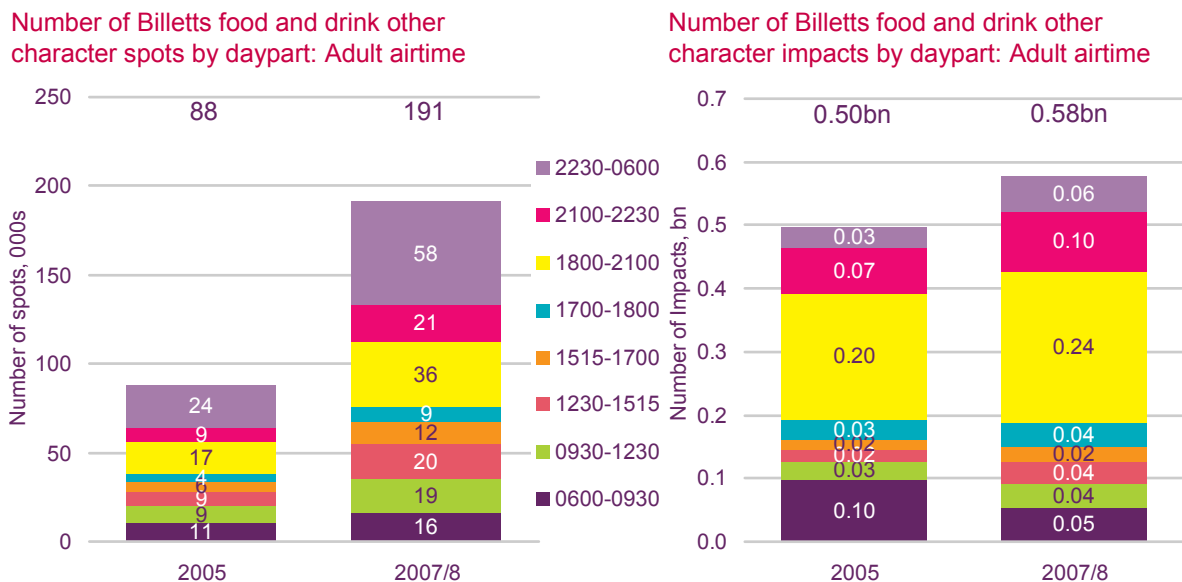


Source: Billetts

A7.63 Since 2005 the total number of 'other character' spots has increased in every day part in adult airtime. The largest increases have occurred post 18:00 (in particular 22:30-06:00) and 12:30-15:15. However the largest proportion of promotions spots occurred after 18:00. This remains virtually unchanged since 2005.

A7.64 In terms of child impacts, all adult airtime dayparts except 06:00-09:30 have seen increases. The largest increases have taken place post 18:00. As seen with spots, the largest proportion of impacts continued to occur after 18:00.

**Figure A7.24: Other characters: spots and impacts by daypart in adults airtime**

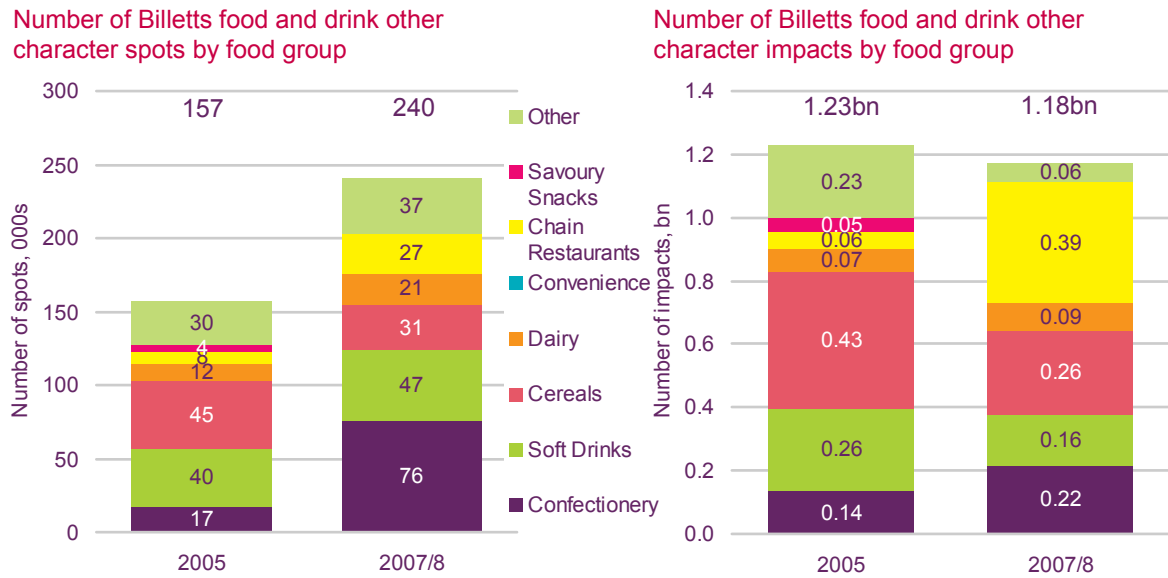


Source: Billetts

A7.65 When looking at spots containing other characters by product type, all product categories except cereals and savoury snacks have seen increases in the use of this technique. Confectionery and chain restaurants in particular, have seen big increases in 'other characters' spots since 2005. Confectionery (31.8%) took the greatest share of these spots across all the categories in 2007/8 with soft drinks

(19.6%) in second position. This represents a large share shift from 2005 when cereals (28.8%) and soft drinks (25.5%) took the greatest share between them.

**Figure A7.25: Other characters advertising: spots and impacts by product type**



Source: Billetts

A7.66 There has been growth in 'other characters' child impacts for confectionery, dairy, and in particular chain restaurants. Increases in child impacts for chain restaurants have seen a disproportionately high increase when compared to the increase in spots for this product category and now represent a 32.9% share of impacts (up from 4.5% in 2005).