A ‘Watershed’ Moment
Why it’s Prime Time to Protect Children from Junk Food Adverts
We have a childhood obesity epidemic with more than one in three children in England overweight or obese by the time they leave primary school.

Research already shows us that there is a clear link between the food and drink adverts children see and their food choices and how much they eat.

Existing rules do not protect children from seeing adverts for food and drink products high in fat, sugar and salt (HFSS) (see glossary on p10) during the TV programmes they watch most. The rules still allow HFSS adverts to be shown during family viewing time when the number of children watching TV is at its highest.

The Obesity Health Alliance commissioned the University of Liverpool to analyse the adverts shown during some of the TV shows popular with children in February 2017 to examine how many HFSS adverts children are exposed to during the programmes they watch most.

Key findings

1. The majority (59%) of food and drink adverts shown during family viewing time would be banned from children's TV, yet hundreds of thousands of children are exposed to these ads every week.

2. In the worst case example, children were bombarded with nine HFSS adverts in just a 30 minute period.

3. Adverts for fruit and vegetables made up just over 1% of food and drink adverts shown during family viewing time.

4. Adverts for fast food and takeaways appeared more than twice as often as any other type of food and drink adverts – largely due to their tactic of sponsoring popular family shows.

Solutions

- Loopholes in regulations mean the most popular programmes with children, even ones marketed as ‘family programmes’, do not have the same safeguards on HFSS advertising as programmes watched only by children. This is despite significantly more children watching these programmes than even the most popular children's TV programmes.

- To protect our children from adverts that we know can influence their food preferences, choices, and consumption, the Government should extend existing regulations to restrict HFSS advertising where children are exposed to the most HFSS advertising. The most effective way to do this would be with a 9pm watershed.

- Companies or brands that are ‘synonymous’ with (i.e. very closely associated with) HFSS products should not be allowed to sponsor prime time family TV shows.
Report methodology

We analysed the adverts shown before and during 16 hours of some of the TV programmes most popular with children on ITV, Channel 4 and E4 shown in family viewing time. The data were collected in February 2017.

Programme sponsorship slots were included in the analysis as Ofcom regulations include a ban on sponsorship in the name of HFSS products in programmes made for children or likely to be of particular appeal to them.

The following programmes were chosen based on their popularity with children in the weeks preceding the study period or due to their high level of popularity with children when previously shown. Only programmes that were shown on commercial channels during the study period were selected for inclusion.

- The Voice (ITV, Saturday night) — this was chosen due to the previous series (shown on BBC1 in 2015) being the sixth most watched programme among children aged 4-15 years in 2015.¹
- Ninja Warriors (ITV, Saturday night) — this was chosen due to the previous series being the third most watched programme shown on a commercial channel among children aged 4-9 years in 2015.¹
- Coronation Street (ITV, Friday night) — this was chosen due to the high volume of children watching the show in the weeks preceding the study period.²
- The Simpsons (Channel 4, Friday night) — this was chosen as it was the most popular show watched by children on this channel in the weeks preceding the study period.²
- Hollyoaks (E4, Friday night) — this was chosen as it was the most popular show watched by children on this channel in the weeks preceding the study period.²

We used the UK Government’s Nutrient Profile Model³ to make an assessment as to whether the advert was likely to be considered suitable to be shown during children’s programming. This model is currently used to identify HFSS adverts based on the overall nutritional content of the products shown. It is currently being updated by Public Health England to reflect the most current evidence based dietary advice.

Nutritional information was taken preferentially from the manufacturer’s own website or from the product packaging, but Tesco.com was used if other sources did not supply the required information. Where this information was not available from any of the stated sources, we contacted the manufacturer directly and asked them to provide the information.

*Please see the appendices for more information on methods used and the analysis including links to all nutrient information sources.*
Our childhood obesity crisis

Childhood obesity is at a devastating all-time high in England, with over one in three children overweight or obese by the time they leave primary school. Obese children are around five times more likely to become obese adults, and obese adults are more likely to develop serious health conditions such as Type 2 diabetes, cancer, liver and heart disease, stroke and associated mental health problems. The NHS spends at least £5.1 billion a year dealing with ill health caused by overweight and obesity. If rates of obesity continue to increase, these enormous costs will spiral, putting unsustainable pressure on our already stretched national health service.

The power of advertising

HFSS advertising is a concern for a number of reasons. First, research shows that there is a clear link between food promotion and children’s food preferences, what they buy and what they eat. Advertising also influences how much children eat, and can lead to them ‘pestering’ parents to buy unhealthy products. Second, children are a vulnerable audience who need protection from advertising due to their limited ability to critically understand what advertising is. Finally, the impact of brand recognition influences children’s behaviour from a very young age with research showing that children as young as 18 months can recognise brands, with preschool children demonstrating preferences for branded products.

The current rules

In recognition of the role advertising plays in encouraging unhealthy food habits in children, in 2007 the Government saw fit to ban HFSS adverts during or adjacent to children’s TV programming (i.e. TV shows made specifically for children including dedicated children’s TV channels) or those that are likely to be of ‘particular appeal’ to children under 16 years. This ‘particular appeal’ definition is based on the proportion of children aged 4-15 years watching compared to the proportion of children in the general UK population.
These rules are failing children

However, the rules did not go far enough and are not protecting children or reflecting how or when children watch TV the most. Crucially, only 27% of a typical child’s viewing time is currently falling within programming that is covered by the existing regulations.¹

Children do not only watch dedicated children’s programming on TV, and in fact watch substantially more family TV. The number of children watching TV climbs from 3pm but peaks between 7 and 8pm.¹ Between 6-9pm, referred to as family viewing time, does not typically feature children’s programming and therefore does not benefit from the advertising protections that children’s programming has.

The ‘particular appeal’ rule prevents HFSS adverts being shown unless children are over-represented in the audience, compared to the total viewing population, by 20%. The rule is based on the proportion of children watching, rather than the actual number. Based on our understanding of how this rule is applied, we estimate a TV programme watched live by 8 million people could allow up to 1.8 million children to be watching - and exposed to HFSS adverts - before the Ofcom advertising restrictions would apply.²

As popular programmes shown during adult commercial airtime typically have very large adult audiences (often tens of millions) the proportion of children watching is very unlikely to reach the 120 threshold for it to be classed as of ‘particular appeal.’ This means children can be bombarded with HFSS adverts.

In week 3 of the study (w/c 6th February 2017), ‘The Voice’ (the rules don’t apply to this programme) was the most popular show with children watched by 918,000 children.

In contrast, the most popular children’s show that week was ‘Ben and Holly’s Little Kingdom’ (the rules do apply to this programme). This was watched by just 195,000 children.²

¹ONS population data for 2015 estimates that 18.8 per cent of total UK population is under 16. Because the current index is 120, a show with junk food commercials could be watched with an audience of 22.6 per cent children (18.8*1.2) without restriction. This is equivalent to 1,818,000 children watching.
Key Findings

1. The majority of food and drink adverts shown would be banned from children’s TV programmes

59% of the food and drink adverts shown before and during the programmes monitored would be likely to be rated as HFSS by the nutrient profile model and therefore banned from being shown on children’s TV.

The figure was even higher among certain shows:

- During ITV’s flagship primetime show ‘The Voice’, watched by an average of 731,625 children per episode during the study period, 75% of all food and drink adverts shown would be likely to be banned from children’s TV.

- During E4’s popular soap ‘Hollyoaks,’ watched by an average of 140,200 children per episode during the study period, 65% of all food and drink adverts shown would be likely to be banned from children’s TV.

Adverts were coded as miscellaneous if they did not advertise a product suitable for nutrient profiling. This includes generic supermarket adverts, vitamins, alcohol etc. See Appendix 1 for a full breakdown of categories.
2. At worst, children were being exposed to nine HFSS adverts in just a 30 minute period.

An episode of Hollyoaks (17/02/17) on E4 watched by an average of 140,225 children showed a total of nine HFSS adverts in just 30 minutes. The adverts shown in the advert breaks before and during the episode were as follows:

- McDonalds – Bacon Double Clubhouse Burger
- Domino’s – Chicken Strippers
- Raffaello – Coconut Chocolates
- Ritz – Crisp and Thin Crackers
- Domino’s Pizza – Pepperoni Passion Pizza
- Lidl – advert showed a range of food products with a cheese and tomato pizza most prominent
- Haribo – Starmix Sweets
- Innocent – Super Smoothie
- Oreo – Thins biscuits

An episode of The Voice (18/02/17) on ITV was watched by an average of 708,400 children and showed 12 adverts for HFSS foods between 8-9pm. This included adverts for takeaway pizza at the start and end of every commercial break due to a sponsorship deal with a pizza manufacturer. The adverts shown in the advert breaks before and during the episode (before 9pm) were as follows:

- McDonalds – Bacon Double Clubhouse Burger
- McVities – Chocolate Digestive Nibbles
- Seven programme sponsorship adverts for Domino’s pizza showing a range of pizzas
- Lidl – advert showed a range of food products with a cheese and tomato pizza most prominent
- Rowse – Snap and squeeze honey sachets
- Anchor – Spreadable Butter

\(^b\)Average taken from number of children watching each episode across the four to five week study period. BARB data was captured on a weekly basis from Thinkbox (see appendix 1 for full viewing breakdown) - http://www.thinkbox.tv/Research/Barb-data/Top-programmes-report?tag=Kids
3. Adverts for fruit and vegetables made up just over 1% of the food and drinks adverts shown during family viewing time.

According to ‘The Eatwell Guide’, to achieve a healthy balanced diet we should eat five portions of fruit and vegetables daily — making up over a third of our diet.\textsuperscript{15}

Despite food and drink adverts being the most frequent type of advert shown in the study period, adverts for vegetables and fruits (or fruit products with no added sugar) accounted for just 1.2% of the total food and drinks adverts shown. This is a stark illustration of how the food advertising environment does not align with healthy eating guidelines.

The Government's own healthy living campaign ‘Change for Life’ advertising appeared just three times, showing how hard it is for health campaigns to compete with the sizeable budgets of the food industry.

4. Adverts for fast food and takeaways appeared more than twice as often as any other type of food and drinks adverts — largely due to their tactic of sponsoring popular prime time family shows.

Of all the food and drink adverts shown, the most common type was marketing for fast food restaurants and meals — accounting for 36% of all food and drink adverts shown in the 16 hour study period. This is well over double the number of supermarket adverts, which was the next most common type, accounting for 14% of the total food and drinks adverts shown.

This dominance was largely due to programme sponsorship with episodes of both The Voice and Hollyoaks sponsored by takeaway brands. As a result, adverts for these brands appeared at the beginning and end of every advert break during every show — a tactic used by brands to build brand loyalty.\textsuperscript{16}

Nearly one in six of the adverts in the fast food category were for takeaway ordering websites/apps. One of these brands, while encouraging the audience to order a takeaway meal, did not show any food within the advert itself, meaning it could not be profiled using the current nutrient profile model. However takeaway meals are not generally reflective of dietary recommendations, with a recent study finding takeaway meals profiled were excessive for portion size, energy, macronutrients and salt.\textsuperscript{17}

These types of adverts should be monitored closely as they are a growing type of business and are contributing to an emerging loophole in the existing regulation which currently only applies to adverts where food is clearly shown on screen.
Summary

While the causes of childhood obesity are multi-factorial, there is a wealth of evidence showing the detrimental impact HFSS advertising has on driving unhealthy food choices and, as a result, rules are in place that aim to prevent children from seeing these adverts.

However these rules do not reflect children’s viewing patterns and therefore fail to adequately protect children from exposure to HFSS advertising.

Our analysis shows that the majority of food and drink adverts shown during TV programmes popular with children could not be shown on children’s TV – this means hundreds of thousands of children are being bombarded by HFSS adverts every time they watch their favourite programmes.

Food and drink adverts dominate advertising during family viewing time, yet the type of food they promote does not reflect a healthy diet with adverts for takeaway meals appearing more than twice as often as any other type of food adverts and adverts for fruit and vegetables barely represented.

The Solution

Children should be protected from exposure to adverts for HFSS foods and drinks that we know can influence their preferences, choices, and intake.

- To do this, the Government must take action to ensure the strongest restrictions apply to programming where the greatest numbers of children are exposed to HFSS advertising. The solution to this problem is to extend existing regulations to restrict HFSS advertising on TV until after the 9pm watershed.

- The Government should take action to stop companies and brands that are ‘synonymous’ with (i.e. very closely associated with) HFSS products from sponsoring TV programmes during peak family viewing time.

Why a 9pm watershed

The 9pm watershed exists to protect children from unsuitable content on TV. According to Ofcom, the watershed is highly recognisable and over three quarters of parents agree that 9pm is an appropriate time for a cut-off point for unsuitable content. Children’s TV viewing peaks between 7-8pm and then begins to fall. Some children are still watching TV post 9pm, but this tends to be older children aged 10-15 years) and figures fall rapidly from 10pm.

Polling data show that 76% of people support the restriction of adverts for unhealthy food on TV before the 9pm watershed.
**Glossary**

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tr>
<td>HFSS adverts</td>
<td>Adverts for food and drink products that are high in fat, sugar and salt as identified by the Government’s Nutrient Profile Model.³</td>
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<tr>
<td>9pm watershed</td>
<td>The cut off time after which programmes and adverts unsuitable for children can be broadcast as defined by Ofcom. ¹⁸</td>
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<td>Family viewing time</td>
<td>The time period between 6-9pm when children’s TV viewing is at its most concentrated but not typically made up of programmes of particular appeal to children.</td>
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<tr>
<td>Children’s programming</td>
<td>This covers programmes made for children below the age of 16 and channels devoted to children’s TV programmes.</td>
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<tr>
<td>Audience Index</td>
<td>Ofcom use the process of Audience Indexing to determine the child audience of a TV programme relative to the audience as a whole. This is calculated as a percentage, not in absolute numbers.</td>
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<tr>
<td>Particular appeal to children</td>
<td>A programme which appeals disproportionately to children (as determined by the Audience Index rating). A programme would be classed as particularly appealing to children if there is a high percentage of children viewing in comparison to the percentage of adults viewing (see p5 for more detail).</td>
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**Contributors**

This report was written by Caroline Cerny at the Obesity Health Alliance.

The study was conducted by Dr Emma Boyland and Dr Rosa Whalen, University of Liverpool.

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The Obesity Health Alliance is a coalition of over 40 health charities, medical royal colleges and campaign groups working together to tackle obesity.

[obesityhealthalliance.org.uk](http://obesityhealthalliance.org.uk)

[@OHA_updates](http://twitter.com/OHA_updates)
References

19. You Gov (2016). Total sample size was 1,542 adults. Fieldwork was undertaken between 1st - 2nd December 2016. The survey was carried out online. The figures have been weighted and are representative of all GB adults.

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