

## An End to Junk Food Marketing Online: Briefing Paper

The Obesity Health Alliance (OHA) is a coalition of over 40 health charities, medical royal colleges and campaign groups. We fully support the Government's ambitious plans to end unhealthy food advertising online.

### Summary

- There is strong evidence linking junk food marketing to child overweight and obesity. This link is accepted by the Government and the aim of policy is to protect children most effectively across the channels where they are exposed to advertising.
- Food companies spend millions every year on a range of different digital marketing techniques to keep junk food in the spotlight. Research shows children are exposed to over 15 billion adverts for products high in fat, sugar and salt (HFSS) online every year.<sup>1</sup>
- The Government has committed to introducing a 9pm watershed on adverts for unhealthy food and drinks on TV and is proposing a total restriction online. **This would mean children only see adverts for healthier food and drinks.**
- Due to the multiple formats, complexity, and fast changing nature of the digital marketing environment along with the issues in regulating this environment, ending all online junk food marketing would be the most effective way to protect children and would also benefit adults' health.
- Taking steps to end all junk food marketing online would go further than any other country in protecting children and show the Government's commitment to addressing obesity.

### Why we need to end junk food marketing online

#### Junk food marketing and the link to obesity

There is a pressing need for effective regulation to restrict junk food advertising online as part of a comprehensive approach to reduce obesity.

- A wealth of evidence shows that there is a clear link between food advertising and the food children prefer.<sup>2</sup> Advertising influences how much children eat,<sup>3</sup> and leads to them 'pestering' parents to buy unhealthy products.<sup>45</sup> Advertising also influences dietary norms, leading to population level shifts in preferences for certain food categories and also affects cultural values that under-pin eating behaviours.<sup>6</sup>
- According to a Cancer Research UK study<sup>7</sup>, children who use the internet for more than 3 hours per day:
  - Are almost three times more likely to pester their parents for junk food,
  - Are almost four times more likely to buy junk food,
  - Will eat around three times less fruit and vegetables.
- The Department of Health has estimated that restricting junk food adverts online would lead to NHS cost savings of around £62 million and social care savings of £49m.<sup>8</sup> This is an underestimate as it does not include the benefits to adults who are also likely to benefit from the policy.

#### Junk food marketing online domination

Food and drinks companies invest millions in online marketing to ensure their products remain centre stage in our minds, and they would not do so if advertising did not work.

- There has been a 450% increase in food and drink online advertising spend between 2010 and 2017. Around 59% of this advertising is for products that are high in fat, sugar and salt (HFSS).<sup>9</sup>

- Young people report feeling targeted by junk food marketing, which they perceive as being everywhere. They feel that it is targeting them by using spaces associated with younger audiences such as social media, and through appealing content.<sup>9</sup>

#### The current rules are weak and don't protect children from seeing junk food adverts

The existing system is one of self-regulation, enforced by the Advertising Standards Authority (ASA). The rules ban HFSS advertising in media of obvious appeal to children or where more than 25% of the audience is under 16 years old. In reality this is extremely hard to enforce in the online environment and creates significant loopholes and room for errors.

- A YouTube channel or social media influencer popular with both adults and children can lead to large nominal numbers of young people being exposed without breaching the current threshold; for example, if a promotional video is watched by 10 million people, a breach does not occur until more than 2.5 million children have seen it.
- Research from the ASA found 78 adverts for HFSS products appeared on children's websites and YouTube channels aimed at children in just three months.<sup>10</sup> This is despite the existing rules that ban HFSS advertising on children's content and brand owners claiming to not target children.
- Children often access content and channels such as YouTube (which has an age restriction of 13) via parents' accounts or watch without being signed in or use a false age to create an account. This makes the 'official' demographic of the viewing audience meaningless.

#### The digital feedback loop traps users in a cycle of constant advertising

- Social media platforms like Facebook use algorithms to determine what organic and advertising content to serve to their users, based on what they think the user will engage with. This means media users can experience a 'feedback loop' effect, where they signal affinity for a particular topic or content type (e.g. by liking or engaging with the content in some way), are exposed to more of the same through both organic and paid, which in turn generates further engagement signals to again create more similar recommendations.
- This mechanism traps children and adults into a cycle of bombardment of unhealthy food adverts, undermining efforts they may be making to improve their health.

### **An end to all digital junk food marketing is the best way to protect children now, and in the future**

#### A total ban would provide comprehensive protection to children

Online marketing is a complex eco-system comprising many different types of advertising formats.

- As well as traditional paid advertising, brands post organically on their own social media pages and channels as part of their marketing mix. Brands with large followings can get significant reach. For example on Facebook brands can expect their posts to be seen by 5.5% of their followers.<sup>11</sup> A major fried chicken retailer's UK Facebook page has over 55 million followers, so each post could be reaching over 2 million people.
- The majority of content created by brands is designed to prompt higher levels of audience engagement and social sharing. Once advertising content is shared by a user, there is no ability to control who views the content. Studies show that junk food brands frequently ask users to share or invite others to participate to extend its reach.<sup>18</sup>

#### Young people are spending increasingly more time online – with older children using digital devices post 9pm

- Children are increasingly spending more time online. Children aged 11-15 spend just over 20 hours a week online<sup>12</sup>. Anecdotal evidence suggests children's screen-time has increased significantly in 2020 due to lockdown measures.

- 71% of children aged 12-15 who own a mobile phone (equivalent to 62% of all children that age) and 61% of children aged 12-15 who own a tablet (equivalent to 31% of children of that age) are allowed to take it to bed with them, meaning they are exposed to advertising throughout the day and night.

#### The digital advertising world is ever-evolving and protection to children must be future-proof

- A total ban on digital HFSS advertising would be a future-proof policy as it would apply to all emerging formats of advertising in a world where innovation is rapid.
- Restricting junk food adverts online would strengthen other policy measures, preventing displacement of unhealthy food adverts from TV and providing food manufacturers with an incentive to make their products healthier.

#### **Children would only see adverts for healthier food**

- The restriction would only apply to adverts for food and drinks included in the reformulation programme, that are also classed as high in fat, sugar and salt. This would include sweets, chocolate, ice cream, biscuits along with products like pizza, burgers and crisps.
- Staple products like butter, cheese, and olive oil would be excluded along with condiments and products like hummus. Avocados would not be included.

Due to the multiple formats, complexity, and fast changing nature of the digital marketing environment along with the issues in regulating this environment, we believe that ending all digital junk food marketing with a total restriction is the most effective way to protect children and would also benefit adults' health.

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<sup>1</sup> Department of Health and Social Care/Department of Culture Media and Sport (2020). Evidence Note.

<sup>2</sup> Public Health England (2015). Sugar Reduction: the evidence for action.

<sup>3</sup> Boyland E, Nolan S, Kelly B (2016). Advertising as a cue to consume: a systematic review and meta-analysis of the effects of acute exposure to unhealthy food and non-alcoholic beverage advertising on intake in children and adults. *Am J Clin Nutr.* 103(2):519-33.

<sup>4</sup> Hastings, G. (2006). The extent, nature and effects of food promotion to children: a review of the evidence. WHO 16.

<sup>5</sup> McDermott L et al. (2006). International food advertising, pester power and its effects. *International Journal of Advertising.* 25(4):513-539

<sup>6</sup> Cairns, G. (2019). A critical review of evidence on the sociocultural impacts of food marketing and policy implications. *Appetite*, 136:193-207.

<sup>7</sup> Boyland E et al (2018). "See it, want it, buy it, eat it: How food advertising is associated with unhealthy eating behaviours in 7 – 11 year old children

<sup>8</sup> DHSC, DCMS (2020). Evidence Note. <https://www.gov.uk/government/consultations/total-restriction-of-online-advertising-for-products-high-in-fat-sugar-and-salt-hfss/evidence-note>

<sup>9</sup> Thomas C et al (2018). Under Pressure: New evidence on young people's broadcast marketing exposure in the UK.

<sup>10</sup> <https://www.asa.org.uk/news/protecting-children-online.html>

<sup>11</sup> Hootsuite blog post (2020). <https://blog.hootsuite.com/facebook-algorithm/>

<sup>12</sup> Ofcom (2019). Children and parents: media use and attitudes report 2018