Understanding Food Advertising
In politics and in advertising, perceptions matter.

The debate about food advertising – and especially the advertising of food that might appeal to children – has been raging for decades. Sadly, it is a debate that has often been based on the rhetoric of vocal campaigners rather than the evidence.

There is an assertion from parts of the medical profession that the obesity crisis can be solved by interfering in food branding, restricting food manufacturers or banning food advertising. The evidence does not support these claims.

It is our view that obesity is a serious and multifaceted social problem, which will not be reversed without a serious and multifaceted response. As the Department of Health’s own website acknowledges, “obesity does not just happen overnight, it develops gradually from poor diet and lifestyle choices.” We think food and drink companies can be part of the solution to the obesity crisis, and that supporting a competitive, innovative and successful industry is likely to lead to effective ways of encouraging healthier choices. The apparent obsession with further food marketing restrictions does nothing to drive the debate forward.

This report tackles some of the mythology that has built up around food advertising, explains how food companies are tackling obesity and explores the regulatory system which governs their advertising.

It is our hope that the ministerial teams charged with reducing obesity and growing the UK’s creative industries can do so with informed and accurate perceptions and evidence-based arguments at their disposal.

Cilla Snowball CBE
Chairman,
Advertising Association
The coalition government is now halfway through its five year term, and there are new ministerial teams at the Department of Health and the Department of Culture, Media and Sport. One of the debates relevant to both of these departments, as well as to some of the UK’s most high profile businesses, NGOs and media, is food advertising’s impact (or otherwise) on obesity.

The members of the Advertising Association’s Food Advertising Unit (FAU) – media companies, food and drink manufacturers and advertising agencies – have commissioned this report to ensure that there is balance in a debate sometimes dominated by campaigns that are not grounded in the best available science. FAU members believe that advertising in general is a good thing. It increases choice, encourages competition, promotes innovation and drives down the price of products. Commercial free speech, responsibly exercised, is a fundamental right in a free society. In the case of advertising, the process of producing commercial communications creates high value jobs, as well as providing some of the revenues which support our diverse and plural media. FAU members believe companies should have the right to market their products responsibly, in line with strict regulatory codes. They also believe in evidence-based policy making.

To assist with that process, this report provides an analysis of current trends in UK food advertising, considers the extensive regulatory regime which governs advertising and examines the strength of claims linking food advertisements to obesity. In addition, it explains how advertisements are made: exploring the creative process, revealing the centrality of the consumer to modern marketing and considering the codes of practice employed by food manufacturers.

The findings demonstrate that:

**Regulation is strict**

UK advertising regulations are strict, apply 24 hours a day, 7 days a week across all media – including the internet – and are comprehensively adhered to and enforced. In addition, these regulations make special provision for the advertising of food, and the advertising of food to children.

**The only constant is change**

The tastes and preferences of consumers do not stand still and therefore neither does the food industry. Consumers today want a wider range of low fat, salt and sugar foods alongside more traditional ‘treat’ products. The food industry is delivering what consumers are looking for and that process is on-going. The food industry is working to take billions of calories out of the nation’s diet, reduce salt levels and remove artificial trans fats.

**Advertising has changed too**

Consumers today prefer a more family-friendly style of advertising and again the industry has responded. Through a combination of government and industry initiatives, regulation has evolved and has become even more comprehensive.

**Advertising reflects and involves consumer attitudes at every step**

The process of creating an advertising campaign is complex, often lengthy, and can involve multiple pre-clearance with regulators and significant scrutiny by legal teams. Alongside compliance with external regulation, advertisements must also adhere to the stringent internal marketing guidelines of food manufacturers, and appeal to the tastes of diverse and health-conscious consumers. But the most important person to an advertiser is the person they are advertising to – which is why companies constantly test their products and communications concepts with consumers.

**Advertisers are committed to the Responsibility Deal**

The Responsibility Deal system is helping our industry to deliver healthier products, more customer information and a better diet for the whole UK, as well as encouraging wellness at work, physical exercise and responsible drinking – all important elements of a healthy lifestyle.

**Advertising does not cause obesity**

There is not an established scientific link between advertising and obesity. Leading UK academics call into question the validity of the studies used by NGOs to suggest a link between advertisements and eating behaviour.
According to Professor David Buckingham, who advised the UK government on the relationship between children and the commercial world, strong evidence linking obesity and food advertising does not exist.

He says that: “Expert opinion is divided on this issue. Most experts agree that advertising does have some impact, but the evidence is that the impact is very small. One frequently quoted figure is that exposure to television advertising accounts for some 2% of the variation in children’s food choice. Food choice is only one factor amongst many more important factors contributing to obesity – including parental influence, family income, educational background and physical activity levels.”

Many of the studies cited by campaigners focus on brand recognition and American TV advertising (and not on advertising and body weight) but are used by campaigners to try and justify marketing restrictions as a means to tackle obesity in the UK.

According to the government’s Foresight Report into the causes of obesity:

“There is an underlying complexity to obesity, which means that tackling it will be difficult and will require a multifaceted approach. Obesity is the consequence of interplay between a wide variety of variables and determinants related to individual biology, eating behaviours and physical activity, set within a social, cultural and environmental landscape.”

Campaign groups and NGOs dedicate significant communications and lobbying budgets to call for restrictions on food marketing, because restrictions are easier to achieve than tackling the long-term causes of obesity, such as poverty, poor food education or lack of exercise.
The advertising of food to children is strictly regulated. The compliance regime is tough and effective, and the advertising regulator has a strong track record of challenging brands and upholding these regulations when things go wrong.

Advertisements that contravene CAP or BCAP codes, or break the law under the Consumer Protection from Unfair Trading Regulations 2008, are banned. Commercial broadcasters are required by their Ofcom licences not to show any advertisements that are misleading. It takes just a single complaint about an advertisement to trigger an Advertising Standards Authority (ASA) investigation – but the ASA also has the power to instigate an investigation without receiving a complaint if it believes the BCAP or CAP codes have been broken.

Because of an industry-led initiative, the CAP codes that regulate non broadcast advertising in the UK now apply to online advertising, including marketing on companies’ own websites and in other non-paid spaces such as Facebook and Twitter. This new regulatory regime, combined with companies’ own responsiveness to consumer demand, has led to significant changes in the tone, style and content of company websites and online marketing.

Everything food companies produce, from their advertising and packaging, through to the range and formulation of their products, must satisfy customers with high expectations, who are willing to vote with their wallets.
A problem as complex as obesity does not have a single cause, and cannot be solved with a single measure. Major government studies, such as Tackling Obesity: Future Choices, point to a complex web of factors influencing obesity, an extract of which is shown below.

**ADVERTISING AND OBESITY**

MYTH 1: Food advertising causes obesity

Tackling Obesity: Future Choices

**Full generic map**

(Tackling Obesity: Future Choices diagram)

Tackling Obesity: Future Choices
The available research on food advertising and obesity was examined in depth in a report published by the government in 2009. The report was written by Professor David Buckingham, one of the leading international researchers in the field of media education and in research on children and young people’s interactions with electronic media.

His independent report is worth quoting at length:

**The Buckingham Report**

**Obesity: limits of the evidence.**

‘Obesity was the most hotly contested of the areas addressed in this assessment. Most of the research evidence in this area relates to television advertising rather than marketing more broadly; most of it is from the United States, where television advertising and other types of promotion have historically been at much higher levels than in the UK; and much of the evidence cited in the debate is several decades old.’

Even here, we found a surprisingly small amount of reliable evidence relating specifically to television advertising (as opposed to television viewing in general) and to obesity (as opposed to children’s brand awareness or preference or other aspects of food choice and diet).”

‘Much of this evidence comes from laboratory experiments, whose ability to predict real-life behaviour is limited; and from surveys, which have established correlations (or associations) but rarely provide convincing evidence about the causal role of advertising.’

**Obesity: the role of marketing.**

‘Expert opinion is divided on this issue. Most experts agree that advertising does have some impact, but the evidence is that the impact is very small. One frequently quoted figure is that exposure to television advertising accounts for some 2% of the variation in children’s food choice.’

‘However, food choice is only one factor in obesity; and other factors – such as the availability and price of food, the influence of parents, patterns of physical activity, and the lack of access to outdoor play areas – play a much greater role.

**Focusing attention on television advertising may lead to a neglect of these other, more important factors.’**

The NHS website is clear on the underlying cause of most cases of obesity:

“Most cases of obesity are caused by eating too much and moving too little. If you consume high amounts of energy from your diet but do not burn off the energy through exercise and physical activity, the surplus energy will be turned into fat.”

This relatively simple problem – too much energy in, not enough energy out – is nonetheless complex to resolve. It requires a significant effort to promote behavioural change as well as raise awareness and understanding of healthy lifestyle choices.

Food advertising has an important part to play in helping people get the balance right and the industry has an impressive record of using its marketing expertise to promote active lifestyles; for example, by encouraging young people to take up sport.

**McDonald’s case study**

McDonald’s aired two TV ads during its recent Olympics Mascotathon campaign – one specifically targeted at kids and the other at parents.

Over half the mums who watched wanted to get their children involved. They distributed over 9 million ‘Get Active’ counters and over half the children were playing with them 2-3 times a week.

Source: McDonald’s

**Change4Life**

In Government, the highly successful Change4Life social movement is another great example of the effective use of advertising and marketing to drive positive behaviour change – often through campaigns delivered in partnership with industry and NGOs, including manufacturers and retailers. The Change4Life brand has remained strongly associated with a healthy lifestyle and is regarded as a source of impartial and trusted consumer advice. DH figures show that awareness and recognition is high at 85% of families and 67% of all adults, with over a million mums saying they have changed their behaviour as a direct result of Change4Life.
The number of adults playing regular grassroots football in England has been declining due to a combination of factors including changing lifestyles, increased apathy, and a lack of flexible football options.

Designed to remove these barriers to playing and to inspire adults to play regular, accessible football in any form no matter what their level of experience and ability, FA Mars Just Play provides casual, play as you go ‘kickabouts’, supervised by an FA Level One coach, at sites across the UK. The programme is part of Mars’ wider commitment to ensure that consumers have a clear and easily accessible route into sport in order to maintain a healthy lifestyle.

The programme was launched over the summer of 2011 with a national media and PR campaign that included a TV advert and Peter Crouch, Theo Walcott and Robbie Savage as ambassadors. This national campaign was designed to highlight the barriers to playing football and showcase how FA Mars Just Play is designed to address them.

There are now over 200 FA Mars Just Play centres open across the country, with 90,000 adult places having been provided to date, helping contribute towards a 12% increase in adults playing football in England since 2008.

Source: Mars

Robinsons Fruit Shoot was launched in 2000 and is now the No.1 kids FMCG brand in the UK. Fruit Shoot full sugar is now available in Orange and Apple & Blackcurrant flavours in 200ml and 275ml servings, whilst low sugar is also available in Summer Fruits, Apple, and Tropical flavours. Over 85% of sales come from the low sugar range.

Fruit Shoot’s ethos is about inspiring kids to learn new skills and have fun. In 2005 a ‘Get Good’ campaign and magazine were launched, encouraging kids to get outdoors and learn new skills such as skateboarding techniques. This was followed by ‘Skillicious’, a wider campaign focussing on trying new, exciting activities such as beat boxing, skipping and speed stacking.

By 2005 Britvic had a specific ‘marketing to children’ policy (which was further updated in 2008), and which now promotes healthy lifestyle choices, including the consumption of a healthy, balanced diet. Fruit Shoot has always led with its ‘no added/low sugar’ variants, never advertising the full sugar range and has also launched healthy line extensions such as ‘My 5’ – comprising of real fruit juice and water and providing kids with one of their 5-a-day portions, and ‘Hydro’, a fruit flavoured water-based Fruit Shoot aimed at keeping kids hydrated.

Source: Britvic
The allegation that there is a dearth of regulation covering food advertising provokes many a raised eyebrow in advertising agencies and amongst their clients. In addition to the self-imposed codes that many companies have adopted, there are no fewer than ten external bodies and organisations involved in regulating food advertising in the UK, applying some of the most stringent rules in place anywhere in the world.

Entire books could be written on the nature and extent of advertising regulation in the UK. This chapter attempts to give a broad overview of that regulatory regime but more information can be found at www.check.uk.com or www.asa.org.uk

In essence, the approach to regulation depends on the media being used:

› Broadcast advertising is regulated through a co-regulatory arrangement: the responsibility for regulation in broadcast media is shared between Ofcom and the Advertising Standards Authority (ASA).
› Non-broadcast advertising (e.g. posters, newspaper ads, online ads, text-messaging etc.) is the responsibility of the ASA.

The ASA is funded by the advertising industry through a levy on advertising spend but operates independently of the industry and government. In its 50 years of operation, the ASA has established a reputation as an effective regulator, frequently cited by the government as one of the best examples of self-regulation.

The ASA monitors compliance with two codes of practice governing advertising drawn up by the Committee of Advertising Practice (CAP) and the Broadcasting Committee of Advertising Practice (BCAP).

The CAP and BCAP codes are designed to protect consumers, and to ensure a level playing field for advertisers. The codes are underpinned by consumer protection legislation and fully reflect UK and EU law. They are frequently reviewed to take account of new technology and changing public and policy concerns.

The ASA works to ensure that all advertisements are ‘legal, decent, honest and truthful’. It adjudicates on complaints that the codes have been broken and, if they have, it takes steps to ensure compliance. Compliance with the advertising codes and ASA adjudications is binding on all advertisers. It is not voluntary.

The ASA has a range of enforcement sanctions at its disposal. Naming and shaming by the ASA has serious reputational and financial implications for companies. Advertisers whose posters breach the code can find their posters being subject to mandatory pre-vetting, and the ASA may even ask media owners to refuse to accept the advertisements of persistent offenders. It also can refer cases of misleading advertising to a legal backstop, and it can refer breaches of the broadcast code to Ofcom, which can impose statutory sanctions on broadcasters including fines and the revocation of licences. Ultimately, advertisers who breach the codes could end up in court.

Within this overall regulatory structure, both the advertising of food and advertising to children are subject to particularly strict rules.
Advertising Regulation

Food and Children

There are stringent BCAP rules that restrict the advertising of food on TV and radio. Advertisers are required to avoid anything that could be construed as condoning or encouraging poor nutritional habits or an unhealthy lifestyle, and must not encourage excessive consumption of any food or drink product.

Where children are the potential target group there is an extra layer of regulation. These rules are underpinned by the firm principle that advertising should not do anything likely to cause physical, mental, or moral harm to children. The rules also protect parents by specifically banning the use of ‘pester power’ in advertising.

In addition to these rules, Ofcom has imposed an outright ban on any advertising of food or drink assessed as high in fat, salt and sugar (HFSS) on or around children’s programmes, including all dedicated children’s TV channels and any TV programmes likely to be of particular appeal to children below the age of 16. The ban applies equally to programme sponsorship.

There are also strict rules on the use of celebrity endorsements and on the use of third-party licensed characters; for example, cartoon characters familiar to children from non-advertising contexts such as hit animation movies.

In 2010 Ofcom reviewed its restrictions on HFSS TV advertising to decide whether or not they were effective. Having looked at the evidence of the effectiveness of the existing restrictions it decided that it was appropriate to maintain the restrictions but not to extend them.

Pre-Clearance

To ensure that TV ads comply with the Advertising Code, the main broadcasters have all advertisements examined by Clearcast, which provides pre-transmission clearance for TV ads, and advises on ads for video on demand. There are equivalent organisations providing pre-transmission clearance for radio and cinema advertisements.

The Clearcast Process

The client (usually the ad agency, sometimes the advertiser) submits a pre-production script – along with storyboards sketching out the visuals. Clearcast carries out a preliminary vetting, which might include asking an independent expert to comment on, for example, nutritional claims.

If Clearcast believes the script is non-compliant, the client will be asked to resubmit.

Once the script has been approved production begins. Clearcast next sees the ad at the post-production stage and, if rejected, the ad has to be resubmitted once the necessary changes have been made.

Clearcast sees 32,000 scripts each year and watches double that number of TV ads, at various stages of completion. It takes only a single complaint to trigger an ASA investigation and if the ASA feels that a non-compliant ad has slipped through the net, then regardless of the fact that it has been cleared by Clearcast, the ASA will insist on amendments or withdrawal.

For non-broadcast ads, a similar process is provided by Copy Advice, part of CAP. Copy Advice offers pre-launch advice on the content, tone and placement of any marketing communication covered by the CAP code.

But is all this regulation effective? An ASA survey in 2010 found that the rate of compliance with the content rules were at the very high level of 99.4% and in 2011, only 0.1% of the ads cleared by Clearcast were judged non-compliant by the ASA.

Moreover, if a manufacturer wishes to make a nutritional or health claim relating to their product – for example that it is ‘low fat’ or ‘high in fibre’ or that added calcium ‘helps build strong bones’ – then there is an additional layer of European and UK regulation that must be adhered to, regardless of the target audience or media used.
It used to be the case that the ASA could not respond to complaints about some kinds of online marketing, as they lay outside of its remit. In March 2011, after three years of work by the UK’s ad industry, that changed, as companies’ own websites joined the paid-for online space in the ASA’s remit.

These changes are a good example of the industry making sure that its self-regulation arrangements stay fit for purpose in the face of rapid change in the media landscape.

The ASA’s new online remit covers paid-for space (banner ads, pop-ups, paid search results and so on) and now covers non-paid-for space such as companies’ own websites and other non-paid-for space they control, for example, on social networks such as Facebook and Twitter. In March 2012, the ASA investigated and cleared Mars, following sponsored Tweets by Katie Price and Rio Ferdinand, after two complaints.

So, non-paid-for online marketing, far from being the ‘wild west’ of the advertising world, is now subject to exactly the same extensive controls as other non-broadcast advertising and to the same CAP code regulations. The remit extension was accompanied by new funding and by enhanced sanctions to help ensure compliance.

Examples of ASA Ads

_Somebody should be doing something about misleading ads. Somebody is. _If you think an ad is wrong, the Advertising Standards Authority is here to put it right. And now that includes marketing communications on websites. _Visit asa.org.uk

_If an advertiser steps out of line we’re here._ If you think an ad is wrong, the Advertising Standards Authority is here to put it right. And now that includes marketing communications on websites. _Visit asa.org.uk_
The Evolution of Food Websites

The internet is a powerful tool and one that enables food and drink companies to engage with their consumers in a more interactive and engaging way. Companies are well aware, however, that being seen to abuse this media can lead to major reputational damage and the alienation of consumers.

Over the past decade the websites of most major food companies have changed beyond all recognition. Many have signed up to the EU Pledge (overleaf) and all are required to comply with ASA regulations. But above all, companies are responding to consumer demand for a different approach.

Today, most big companies’ websites are aimed at parents, focus on healthy eating and concentrate on offering nutritional information and advice.

Kellogg’s Websites

The way that Kellogg’s websites have evolved over the last six years is an excellent example of food brands changing the way they communicate, in response to evolving consumer tastes:

› The Coco Pops and Frosties websites were closed in 2006. Visitors are redirected to the main Kelloggs.co.uk website.
› Under 16s have been removed from its database (and new users prevented from registering), to ensure children do not receive correspondence from Kellogg’s.
› There are no child-targeted ads for HFSS products on Kellogg’s websites.
› All Kellogg’s branded Facebook pages are locked to anyone under 16 years old using age-gating.
› The current Kellogg’s website is focused on the role Kellogg’s products can play in healthy diets and is primarily aimed at parents.

Before

After

Source: Kellogg’s
CONSUMERS AND INDUSTRY

Consumers buy the products they want to buy. Advertising informs, entertains and educates them. If they want to buy a cereal bar, advertising helps them to make choices between the plethora of different brands that are available to them. If they don’t like the product, they won’t buy it again and no amount of advertising will persuade them otherwise. If the advertising does not appeal to them, offends them or alienates them, consumers will vote with their wallets and buy something else.

The EU Pledge

The EU Pledge was launched in 2007. By the end of 2011 its signatories accounted for more than 80% of food and beverage advertising spend in the EU.

The criteria have been progressively tightened since they were first drawn up. The media covered have been extended. A rigorous and independent compliance audit is carried out annually. In 2011 the most recent audit 99.1% of TV commercials were compliant, as were 100% of print ads and virtually 100% of internet ads. In primary schools the compliance rate was 98%.


Companies are always talking to their consumers to ensure that their products and their advertising reflect expectations. Products are reformulated, new products created and old ones abandoned as tastes change. The tone and style of advertising is continually evolving as society evolves. In the fast moving world of consumer products, companies must adapt their products and their marketing or risk losing their customers. This is why food manufacturers have been quick to respond to public concerns about health and marketing – particularly to children.

The EU Pledge

The EU Pledge is a voluntary initiative by leading food and drink companies to change their advertising to children under the age of twelve in the EU, including the UK. Signatories promise to respect the following criteria:

- No advertising of products to children under 12 years, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines. (In effect this means that only advertising of ‘better-for-you’ food and drink products is permitted).
- Online, the above commitment will apply to marketing communications for food and beverage products on company-owned websites, in addition to third-party internet advertising.
- No communication related to products in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes.

MYTH 5: Food and drink companies aren’t interested in their consumers’ views
Another good example of advertisers responding rapidly to their consumers’ wishes can be seen in the recent restrictions that key brands voluntarily imposed on ‘peer-to-peer’ marketing. The move came just a few months after the publication of the government’s Bailey Review, which reflected concerns amongst parents over the use of children in this type of marketing. The industry was subsequently praised by ministers for its proactive approach to the issue.

The Bailey Review

The Bailey Review into the commercialisation and sexualisation of childhood was published in June 2011. Its author, Reg Bailey, is CEO of the Mother’s Union. One of his recommendations was to “prohibit the employment of children as brand ambassadors and in peer-to-peer marketing.”

Peer-to-peer marketing pays individuals (sometimes in kind) to promote products, brands or services by recommending them to friends and acquaintances. Although not a widespread practice, concerns had been raised that paying children to carry out this form of marketing risks commercialising their relationships.

The Review urged CAP to explore whether its codes should ban the employment of children under 16 in this way.

How the advertising industry responded

Following publication of the Bailey Review, the advertising industry reacted swiftly and positively. The Advertising Association convened a Children’s Panel including academics and NGOs to lead the industry response to the Bailey Review.

This Panel created a pledge to end the employment of children in this way.

The pledge states: “Young people under the age of 16 should not be employed and directly or indirectly paid or paid-in-kind to actively promote brands, products, goods, services, causes or ideas to their peers, associates or friends.”

40 companies signed the pledge directly – including giants like Tesco, Unilever and Vodafone – alongside 13 trade associations, bringing thousands of their member companies into the process.

In addition, in December 2012 CAP announced its intention to publish new guidance for marketers, following a year-long review into the use of children as brand ambassadors and in peer-to-peer marketing.
Similarly, in 2009 Coca-Cola Great Britain published its Responsible Marketing Charter. This responded to parental concerns by pledging not to target the marketing of any of Coca-Cola’s drinks, in any media, to children under 12. Coca-Cola responded to specific concerns about online and digital marketing with a pledge to assess the demographics of websites used for its marketing campaigns to avoid advertising to under-12s.

McDonald’s is committed to using its licensed characters and properties to make fruit and vegetables more attractive to parents and children alike. For example, with its Shrek 3 promotion, McDonald’s renamed some of its food items to fit in with the film, e.g. Donkey Carrot Sticks and Princess Fiona Fruit Bags, resulting in a 15% increase in sales for fruit bags in the UK during the promotion.

Source: British Retailing: A Commitment To Health

PepsiCo UK provides a good example. Since 2004, the company has responded to public concern over sugar by using its above the line advertising solely to support versions of Pepsi that contain no sugar (Pepsi Max and Diet Pepsi). It has pledged to continue this policy in the future: all Pepsi advertising will support growth in its no-sugar and natural colas.

A good example comes from Kellogg’s. Its advertising stance has changed significantly over the last decade. Kellogg’s used to advertise brands such as Coco Pops specifically at children, but now the only Coco Pops product advertised to children is a version of the cereal which is not high in fat, salt or sugar.

This change did not take place because Kellogg’s believes that the advertising of its products is linked to obesity, but because Kellogg’s customers wanted them to change their marketing approach. The company’s ads are now designed to appeal to families as a whole and emphasise positive health and nutrition messages.

In addition to industry-wide initiatives, it is commonplace for large food brands to have their own company-level policies on the kinds of advertising they will sanction. Here, too, there is plenty of evidence that these policies change over time to keep in touch with changing consumer concerns.

MYTH 5: Food and drink companies aren’t interested in their consumers’ views
Coca-Cola’s Policy on Responsible Marketing

At Coca-Cola we have a longstanding commitment to responsible marketing, and do not target the marketing of any of our drinks to children under the age of 12. Media buying data for Coca-Cola, diet Coke and Coke Zero (one HFSS and two non-HFSS drinks as defined by OFCOM) between 2002-2010 shows that there was a 15% reduction in exposure to under 16s, and that we have been operating ahead of the regulatory curve for a while.

Source: Coca-Cola Spokesman

Changing Products

In the last decade, food companies have invested millions of pounds in reformulating their products, removing fat, salt and sugar from our diets, and offering consumers a healthier range of options. This process was accelerated with the advent of the government’s Public Health Responsibility Deal.

The Department of Health says the Responsibility Deal “...aims to tap into the potential for businesses and other influential organisations to make a significant contribution to improving public health.”

Organisations signing up to the Responsibility Deal commit to taking action voluntarily to improve public health through their responsibilities as employers, as well as through their commercial actions and their community activities. It’s an example of the progress that can be made when government and businesses work in partnership to tackle serious and multifaceted social problems such as obesity. Many FAU members are Responsibility Deal signatories, committed to working with government and each other to tackle poor diets and lack of exercise.

Since 2010, the Responsibility Deal has seen different FAU members commit to pledges which will:

› Reduce salt by nearly 1g per person per day compared to 2007 levels in food;
› Support and enable consumers to eat and drink fewer calories through actions such as product or menu reformulation, reviewing portion sizes, education and information, and actions to shift the marketing mix towards lower calorie options;
› Ensure that they do not use ingredients that contain artificial trans fats or work to remove artificial trans fats from our products within the next 12 months (from November 15 2012);
› Create a positive environment that supports and enables people to increase their consumption of fruit and vegetables.

These are significant developments which will have a positive impact on the UK’s diet.

Mars Marketing Code

The Mars Marketing Code was launched in 2007 and sets strict guidelines for the way they advertise food, chocolate, confectionery and gum products in all markets. The main goal of the global marketing code is to reaffirm Mars’ sustained commitment to the responsible and creative use of advertising and to explain how Mars uses specific marketing techniques through new and emerging forms of media. Mars are committed to not advertising to under 12s by not buying advertising time or space if more than a quarter of the audience is likely to be under 12 years of age; nor do they advertise on websites aimed at those under 13.

Source: Mars
Changing our food

Mars has eliminated all artificial trans fats in its chocolate products. Since summer 2010, Mars, Snickers, Milky Way and Topic in the UK have been reformulated and now contain at least 15% less saturated fat per bar.

PepsiCo has cut salt levels in Walkers crisps by nearly 12% since 2008.

Kraft (now Mondelez) has reduced sodium in its Dairylea cheese by almost 30% since 2002.

and has reduced the sugar level in regular Pepsi by 4% since 2008. There are many other examples.

Many major food manufacturers have introduced lower-fat versions of key brands to offer additional choices to consumers seeking a healthier alternative. Hellman’s mayonnaise, for example, is available as Original (80% fat); Light (37% fat); and Extra Light (7% fat).
Redesigning packaging to include nutritional information

Packaging has also seen significant changes over the past decade. It is now commonplace for food packaging to show information on Guideline Daily Amounts (GDAs) including calories, sugars, fat, saturates and salt. Increasingly, the GDA information is placed prominently on the front of the pack.

### Coca-Cola Calorie Reduction Pledge

*In March 2012, Coca-Cola Great Britain (CCGB) announced we would cut the calories in some of our leading sparkling soft drinks by at least 30%. The move is part of a pledge we have made to reduce the average calories per litre of our range of sparkling soft drinks by 5% by the end of 2014. To achieve our pledge, we will take the following actions:

1. **Reduce calories:**
   - We will invest approximately £15m in reformulating several of our leading soft drinks brands by 2014. We will cut the calorie content of these drinks by at least 30%, whilst retaining the great taste consumers demand*.

2. **Increase promotion of our no calorie, zero sugar colas:**
   - We will increase the marketing budget for our no calorie, zero sugar colas by 25% by the end of 2014 (from 2011 level). We will work with customers to increase the availability of our no calorie, zero sugar cola brands (Diet Coke and Coca-Cola Zero). We offered our widest ever range of drinks and pack sizes at the Olympic and Paralympic Games. 73% of our drinks consumed at the Games were juice, water or low or no calorie options.

Over the three year period 2012 to 2014, we expect the actions contained in this pledge to cut the average calories per litre of many of our range of sparkling soft drinks by 5%. This more than doubles the rate at which we have reduced our average calories per litre in the past decade.”

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*Source: Coca-Cola*
CONCLUSION

The last ten years has seen a revolution in the way our foods are developed, formulated and advertised. Food companies offer healthier choices than ever before, and have changed the tone of their advertising to reflect what their customers want. Advertising's regulatory system has adapted to consumer demand, ensuring that all internet marketing is included in the ASA’s remit, and that HFSS food advertising does not appear around children’s TV programmes (including all children’s TV channels).

Evidence demonstrates that while food advertising is, at most, a marginal factor in determining children’s food choices, it is already subject to close scrutiny by both regulators, and companies themselves.

Elsewhere, programmes like Treatwise, Change4Life and Business4Life have all seen the industry work together and with government to help deliver large scale, educational and behaviour changing public information.

The Responsibility Deal recognises that governments achieve more when they work in partnership with business. The on-going pledge system is delivering healthier products, more customer information and a better diet for the whole of the UK, as well as encouraging wellness at work, physical exercise and responsible drinking – all important elements of a healthy lifestyle.

So as the Responsibility Deal enters its next phase it is important that the debate is based on sound evidence. This report has set out the FAU’s commitment to a collaborative approach to achieving better public health and evidence-based policy making.

It is our hope that the Government continues to share these principles.
The ASA’s Mission

The ASA’s mission is to ensure that advertising in all media is legal, decent, honest and truthful, to the benefit of consumers, business and society.

The infographic overleaf illustrates this complementary process, and is based on conversations with senior account handlers at some of London’s most famous advertising agencies. We used the creation of a TV ad to bring this to life, but a similar process is typically followed when designing marketing communications for media as diverse as the internet, radio, print or billboards.

Appendix: How advertisements are made

Making a food advertisement for any form of media (but perhaps especially for television) is a complex process, often taking over 12 months. During this time the finished advertisement we see on our TV screens, hear on the radio or read online will have gone through a large number of processes to ensure it is appealing to consumers. These processes include conforming to the strict CAP/BCAP codes (and Clearcast if the advertisement is for TV), satisfying the brand’s legal team, and obeying the internal marketing guidelines of the advertiser.

Alongside this, the creative idea at the heart of the advertisement is typically tested and refined throughout the process. The creatives, strategists and account managers within advertising agencies will consider the makeup of the target audience for any given product, aiming to produce a message which will chime with (and not annoy) potential consumers.

Focus groups of consumers will see early versions of the advertisement, offering insights on what appealed (and didn’t appeal) to their tastes and values – frequently leading to significant changes in the content and tone of advertising.

These processes are important because they illuminate how responsive food advertising is to its consumers, and the lengths which brands and agencies will go to in order to carry their customers with them. This desire to produce ads which inspire (rather than offend) complements and reinforces the formal regulatory system advertisements are subject to – but is poorly understood by those outside of the marketing community.

ASA codes

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

Advertisements must not condone or encourage excessive consumption of any food.

Advertisements that contain nutrition or health claims must be supported by documentary evidence.

Comparisons between foods must not discourage the selection of options such as fresh fruit and fresh vegetables.

Advertisements must not disparage good dietary practice.

Advertisements must not state or imply that a balanced and varied diet cannot provide appropriate quantities of nutrients in general. Individuals must not be encouraged to swap a healthy diet for supplementation.

Conclusion
CREATING THE PERFECT AD

**Research**
Defining the communications challenge
Have you:
- Analysed the client’s own brand and market research?
- Understood what the product tastes like, looks like, its target market, competitor products, price and other important information?

**Collaborative communications brief**
The agency and client work together creating a brief for the campaign, which meets the goals of the brand.
Are client and agency clear on the goals of this product? And do they agree a strategic approach to meet it?

**Create a comms strategy**
Many advertising agencies will then turn this agreed business plan into a communications strategy which will work with customers.
Have you turned the brand’s business objectives into a clear communications plan?

**Client review**
The idea is presented to the client. The agreed idea will often be shared with Clearcast in an early form - often at this stage.

**Creative review**
Creatives share their ideas with the account team, who understand the tone the brand wants to strike, the target market and the BICAP codes.
Is your creative idea approved by your colleagues?

**Creative brief**
Here, the creative team come up with an idea which will communicate the brand to consumers, and meet the business goals agreed earlier.
Do you have a great idea?

**Prototype advertisements**
Prototype advertisements are tested on consumers – qualitatively and quantitatively.
What does the feedback from consumers say?

**Production**
Scripts are tested with Clearcast before production begins. Have you:
- Sent scripts to Clearcast
- Agreed scripts with internal brand marketing rules, and client legal teams?
- Gone through a pre-production checklist with the client, agreeing every element of the ad?

**Present to client**
Present a “rough cut” to the client, typically seen by marketing, comms and legal teams, as well as MD / CEO.
Is the ad approved by all departments?

**Final Advert**
The final ad is now sent to Clearcast to be pre-cleared before it’s shown on TV.
About the Advertising Association

Advertising is a vital enabler in the economy, underpinning at least £100 billion of UK GDP.

The Advertising Association unites those businesses and industries which contribute to that effect - the agencies that create and buy campaigns, the commercial media that carry them and the vast array of brands that use advertising to communicate with consumers, drive their businesses and be successful.

The Association exists as the single voice for advertising in the UK – championing its role, defending its rights and delivering its responsibilities. It works to keep advertising high on the business agenda, develop support and understanding in government and ensure that responsible practice earns the continued confidence of the public, regulators and policy-makers alike.

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