

Welsh Government response to the Committee of Advertising Practice consultation on introducing restrictions on the non-broadcast advertising of food and soft drinks to children, 21 July 2016.

The Welsh Government considers that promotion can impact on High Fat, Salt and Sugar (HFSS) food preference, purchase and consumption by children.

The Welsh Government considers current UK broadcast regulations are not strong enough to reduce children's exposure to unhealthy food advertising. We support the banning of advertising of such foods before the 9pm watershed. We will continue to pursue this.

The Welsh Government welcomes the Committee of Advertising Practice's intention to introduce restrictions on the non-broadcast advertising of food and soft drinks to children. It is recognised that there is a shift in children's screen time away from television. Digital marketing strategies are rapidly growing and are a potentially influential area, given the highly immersive and interactive nature of these approaches.

We recognise there is a paucity of evidence regarding the behavioural and health impacts of new digital marketing strategies, which differ in approach to most traditional marketing strategies. However, we are aware that research on averaging found it significantly influenced the intake of, or preference for, high sugar foods in school age children.

A review, published by Public Health England in October 2015, examined the most recent research evidence on the health and behavioural impacts of marketing strategies that target high sugar food and non-alcoholic drink. It considered that the evidence suggests:

- marketing strategies (including promotion) are likely to impact on purchases and consumption, with the evidence predominantly focused on children
- promotion activities such as averaging and sponsorship can influence purchase and intake of unhealthy or high sugar products

Findings from this review support evidence from previous systematic reviews to suggest that marketing is effective in influencing the purchase and consumption of unhealthy or high sugar foods. And most of the evidence focuses on children who are considered more vulnerable to the impact of marketing.

Although we accept that evidence could be stronger, we consider that the stakes are high enough to justify strong regulation across all forms of promotion of High Fat, Salt and Sugar foods to children.

Over a quarter of reception age children in Wales are overweight or obese.

Children and young people in Wales have sugar intakes around three times over the recommended maximum. From the National Diet and Nutrition Survey (December 2015), the main sources of added sugar (non-milk extrinsic sugars, NMES) was soft drinks contributing 29% to NMES intake for children aged 11 to 18 years and 13-14% for children aged 10 years and under 'Cereals and cereal products' contributing 24-29% and 'sugar, preserves and confectionery' contributing 20-23% to NMES intake in children.

In addition to the immediate health consequences of obesity and an unhealthy diet, early-life behaviours may track into adulthood and influence weight later in life, with estimates that around 70% of obese children or adolescents become obese adults.

It is therefore crucial that everyone with influence over these alarming statistics acts now. We therefore call on CAP to introduce the legislation to eliminate advertising of HFSS foods and drinks in all forms of non-broadcast advertising that may be viewed by our children and young people.