

## Restricting advertising of high fat, sugar and salt (HFSS) products – Policy Position

### Policy Position

Obesity Action Scotland **supports the introduction of restrictions on all forms of advertising of high fat, sugar and salt (HFSS) products**. Such restrictions should be focused on protecting children from harmful influences and improving the diet and health of the wider population.

A significant proportion of food and drink adverts are used to promote HFSS products in the UK and Scotland. Conversely, very few adverts promote healthy options, like fruit and vegetables. Adverts have an especially big impact on the food preferences and choices of children, ultimately affecting their diet and health outcomes.

There are **high levels of public support** for policies to restrict advertising of unhealthy foods. The large majority of adults in the UK (80%) favour banning advertising of unhealthy food aimed at children on TV and online<sup>1</sup>. In Scotland, 56% of people support interventions to ban adverts for unhealthy foods in outdoor spaces such as billboards, bus stops and train stations, while 59% support such a ban at sports events<sup>2</sup>.

#### ***What should be restricted?***

In order to be effective, we need **extensive restrictions of as many types** of HFSS product advertising as possible, including:

- TV and online (with adaptable policy capable of reacting to new forms of digital marketing)
- Outdoor spaces (e.g. public transport adverts, billboards)
- Product packaging (children's cartoon characters and nutritional claims)
- Sport and event sponsorship
- All other media children are exposed to (including radio and print)

For a wider consideration of the evidence related to advertising, please see our full [Food and Drink Advertising Briefing – 2023](#)<sup>3</sup> which is available on our website.

### **Why restrictions on HFSS product advertising are needed**

- Advertised food and drinks are generally less healthy than those recommended as part of a healthy diet<sup>4</sup>.
- 32% of total food and drink marketing spend in the UK is channelled towards unhealthy products compared to just 1% used to advertise fruit and vegetables<sup>1</sup>.
- Children and adults from more deprived backgrounds are up to 50% more likely to be exposed to unhealthy food advertising than less deprived groups<sup>5</sup>.
- For every four minutes of TV food and drink advertising exposure, children consume approximately 60 calories more than children exposed to non-food adverts. The effect of TV adverts on dietary intake is also shown to be greater for children already living with overweight or obesity<sup>6</sup>.

- Exposure to unhealthy food advertising causes increased overall calorie intake in children and results in a higher chance of them preferring the advertised product when making food choices<sup>7</sup>.
- A 2023 UK survey showed that young people report seeing adverts for unhealthy products at least twice per day, which is likely to be an underestimation due to it being increasingly difficult to identify what qualifies as an advert<sup>8</sup>.

### **Restrictions must apply to all types of HFSS product advertising aimed at children**

Regulation of advertising in the UK is split between the UK Government and the Scottish Government. The UK Government retains powers over TV and digital advertising and the Scottish Government has devolved powers on outdoor advertising and sports sponsorship.

**Comprehensive restrictions on all forms and locations of HFSS advertising is required.** Without such an approach it is likely there would be a displacement effect with adverts flooding to unregulated spaces, undermining the potential effectiveness of any interventions.

We strongly urge the Scottish and UK Governments to work together to deliver the necessary action required to protect children from harmful HFSS advertising.

### **Devolved advertising powers**

The Scottish Government has the legislative powers to act on a range of areas where children are exposed to harmful advertising and should take action urgently to protect children's health.

#### ***Outdoor Advertising***

Outdoor advertising is a unique form of marketing as it is largely unavoidable for people and is highly visible in everyday life<sup>9</sup>. Examples include billboards, public transport spaces (bus stops, train platforms), and posters<sup>8</sup>. Studies exploring outdoor advertising of HFSS products have mostly focused on types of outdoor adverts and levels of exposure<sup>10</sup>.

- A recent Scottish study surveyed bus stop adverts in Edinburgh and showed that, of the 298 adverts recorded, 66% were for fast-food outlets and fruit juices high in sugar<sup>11</sup>.
- Another Scottish study explored children's exposure to unhealthy food advertising on transport networks across the central belt of Scotland. It revealed that children from more deprived backgrounds were at greater risk of exposure given their higher usage of public transport networks, such as bus routes, compared to their less deprived peers<sup>12</sup>.
- There is also some evidence which suggests that such adverts concentrate around schools and other popular routes for young people<sup>8</sup>.

Another important aspect of outdoor adverts is their frequent appearance on publicly owned or controlled assets. This places responsibility for such adverts and their impacts with local authorities and public authorities who own the advertising space<sup>8</sup>.

#### ***Sport Sponsorship***

Sport events are an extremely effective way for companies to advertise. As sport sponsorship is an area that largely focuses on promoting brands, it is an even stronger advertising channel for large HFSS food and drink companies to promote their brand. To date, policy proposals to restrict food marketing have solely focused on *product*-specific advertising as opposed to brand advertising, which increases the attractiveness of sport sponsorship and sport-related advertising opportunities<sup>13</sup>.

- A 2021 survey showed **78% of UK parents** believe unhealthy product advertising in sport causes children to prefer the food brands associated with their favourite team or player<sup>12</sup>. Evidence supports this, with studies finding associations between children's exposure to sport sponsorship products and subsequent consumption<sup>14</sup>. Polling shows that 86% of UK parents support measures to stop partnerships between junk food brands and sport<sup>11</sup>.
- HFSS food and drink advertising is highly present and visible across sport in Scotland. Examples include soft drinks company A.G. BARR and takeaway pizza brand Papa John's having sponsorship deals with Scottish Rugby<sup>15</sup>, while McDonalds is a large sponsor of grass roots football across Scotland and the rest of the UK<sup>16</sup>.

### Reserved advertising powers

The UK Health and Care Act (2022) outlines policy to further restrict TV advertising and paid adverts online, however implementation has been delayed until October 2025<sup>17</sup>.

### There are high levels of public support for legislative action

We recently commissioned polling<sup>a</sup> to gain an understanding of levels of public support for various public health policy interventions<sup>2</sup>. The results largely showed support for a number of policy measures which would allow people in Scotland to eat a healthier diet.

- The majority of respondents supported interventions to ban adverts for unhealthy foods in outdoor spaces such as billboards, bus stops and train stations— **56% in favour**, compared to 19% opposed
- Many people also support banning sponsorship by unhealthy food and drinks at sports events – **59% in favour**, compared to 18% opposed

### References

---

<sup>1</sup> Sustain (2023). Public wants more action to curb junk food industry. <https://www.sustainweb.org/news/may23-public-wants-action-health/>

<sup>2</sup> Obesity Action Scotland (2022) Public support for healthy weight policies <https://www.obesityactionsotland.org/publications/reports/public-support-for-healthy-weight-policies/>

<sup>3</sup> Obesity Action Scotland (2023) Food Advertising and Marketing Briefing <https://www.obesityactionsotland.org/media/as3leiwg/food-and-drink-advertising-briefing-2023.pdf>

<sup>4</sup> The Food Foundation (2022). The Broken Plate 2022: The State of the Nation's Food System <https://foodfoundation.org.uk/publication/broken-plate-2022>

<sup>5</sup> Yau A, Adams J, Boyland EJ, Burgoine T, Cornelsen L, De Vocht F, et al (2021) Sociodemographic differences in self-reported exposure to high fat, salt and sugar food and drink advertising: a cross-sectional analysis of 2019 UK panel data. *BMJ Open*;11:48139 <http://bmjopen.bmj.com/>

<sup>6</sup> Russell SJ, Croker H, Viner RM (2019) The effect of screen advertising on children's dietary intake: A systematic review and meta-analysis. *Obesity Review*;20(4):554–68 <https://onlinelibrary.wiley.com/doi/full/10.1111/obr.12812>

<sup>7</sup> Boyland EJ, Nolan S, Kelly B, Tudur-Smith C, Jones A, Halford JCG, et al (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. *American Journal of Clinical Nutrition*;103(2):519–33. <https://academic.oup.com/ajcn/article/103/2/519/4662876>

<sup>8</sup> Bite Back 2030 Enticing, Effective and Everywhere: How Brands are Keeping Unhealthy Food and Drink in the Spotlight with Digital Marketing to Young People [https://www.biteback2030.com/enticing-effective-and-everywhere?utm\\_source=twitter&utm\\_medium=organic\\_social&utm\\_campaign=jfm](https://www.biteback2030.com/enticing-effective-and-everywhere?utm_source=twitter&utm_medium=organic_social&utm_campaign=jfm)

---

<sup>a</sup> We commissioned Diffley Partnership to carry out public polling on various policy interventions. Over 1,000 people in Scotland responded which was conducted between the 24th and 26th of August 2022.

- 
- <sup>9</sup> Chung A, Zorbas C, Riesenber D, Sartori A, Kennington K, Ananthapavan J, et al (2022) Policies to restrict unhealthy food and beverage advertising in outdoor spaces and on publicly owned assets: A scoping review of the literature. *Obesity Review*;23(2):e13386 <https://onlinelibrary.wiley.com/doi/full/10.1111/obr.13386>
- <sup>10</sup> Finlay A, Robinson E, Jones A, Maden M, Cerny C, Muc M, et al (2022) A scoping review of outdoor food marketing: exposure, power and impacts on eating behaviour and health. *BMC Public Health*;22(1):1–48. <https://link.springer.com/articles/10.1186/s12889-022-13784-8>
- <sup>11</sup> Robertson T, Jepson R, Lambe K, Olsen JR, Thornton LE (2022) Socio-economic patterning of food and drink advertising at public transport stops in Edinburgh, UK. *Public Health Nutrition*;25(5):1131–9. <https://www.cambridge.org/core/journals/public-health-nutrition/article/socioeconomic-patterning-of-food-and-drink-advertising-at-public-transport-stops-in-edinburgh-uk/2093D478C07EB7B1150FCE1E0F66A5DF>
- <sup>12</sup> Olsen JR, Patterson C, Caryl FM, Robertson T, Mooney SJ, Rundle AG, et al (2021) Exposure to unhealthy product advertising: Spatial proximity analysis to schools and socio-economic inequalities in daily exposure measured using Scottish Children’s individual-level GPS data. *Health Place*; 68:102535.
- <sup>13</sup> Sustain (2022) Kicking Out Junk Food: sports sponsorship and a better deal for children’s health 2022 Oct 19]. <https://www.sustainweb.org/publications/nov21-kicking-out-junk-food/>
- <sup>14</sup> Chambers T, Sassi F (2019) Unhealthy sponsorship of sport. *BMJ* Dec 4 [cited 2022 Oct 19];367. <https://www.bmj.com/content/367/bmj.l6718>
- <sup>15</sup> SPONSORS AND PARTNERS - Scottish Rugby 2022 <https://scottishrugby.org/about/sponsors-and-partners/>
- <sup>16</sup> McDonald’s (2022) Grassroots Football UK | McDonald’s UK <https://www.mcdonalds.com/gb/en-gb/football.html>
- <sup>17</sup> UK Government - Department of Health and Social Care. Health Update - Statement made on 9 December 2022 <https://questions-statements.parliament.uk/written-statements/detail/2022-12-09/hcws433>