

Committee of Advertising Practice Non-broadcast food advertising rules: 12-month review

IAB UK is a member of the Committee of Advertising Practice (CAP) and we welcome this review. This submission responds to CAP's invitation for submissions on the regulatory effectiveness of the rules restricting the advertising of products high in fat, salt or sugar (HFSS) to children.

New rules were introduced to the CAP Code in July 2017 following a thorough process of evidence review and consultation, and careful consideration by the Committee of Advertising Practice of the nature and scope of the new rules.

CAP's review and subsequent introduction of new rules came in response to wider concerns in society about childhood obesity and the public health challenges it poses. While there are many factors that have an impact on childhood obesity, and available evidence shows that the effect of advertising on children's food preferences is relatively small, particularly when compared to other factors like parental influences, CAP took the view that even a very small positive impact from these new ad restrictions could play a meaningful role in reducing potential harms to children.

A year on, the IAB believes that CAP's evidence-based decision to introduce new rules remains the right one and demonstrates the advertising industry's commitment to responsible practice, and to ensuring that the protections provided by the CAP Code are effective and up-to-date. The rules also show that the self-regulatory system is effective at recognising and responding appropriately to issues when they arise.

CAP's review will gather evidence, including through media monitoring, so we await that with interest and this may identify issues that have not come to light thus far. Subject to that, we believe that the new rules have formalised some existing voluntary practice in the industry and have served to ensure that under-16s are not targeted with ads for HFSS products, thereby removing non-broadcast advertising from the childhood obesity equation. In the meantime, the IAB considers that the ASA's adjudications to date on the new rules demonstrate two things: firstly, that compliance is high (there have been few rulings), and secondly that the ASA is able to effectively enforce the non-broadcast rules in the same way as it has done in the past for broadcast media, with the ads in question being removed.

The IAB is concerned that misperceptions persist among the media, lobby groups and some Parliamentarians that non-broadcast HFSS ads are not regulated by the ASA, which unhelpfully confuses the debate about what **other** measures should be

taken to address childhood obesity, and we welcome the ASA's recent **briefing** on this issue. Any consideration by the Government of further measures should be evidence-based and proportionate, and be aimed at addressing the factors that have been demonstrated to contribute to childhood obesity.

IAB UK
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