

# Healthier Advertising Policy (food and non-alcoholic drink)

Adopted January 2024

# Healthier Advertising Policy (food and non-alcoholic drink) guidance

#### 1. Background

- 1.1. Evidence shows that advertisements for unhealthy food and drink products directly and indirectly impact what we eat.<sup>1</sup> Young people who recall seeing junk food adverts every day are more likely to be obese.<sup>2</sup> Knowsley Council has high rates of child and adult excess weight and widening health inequalities. In 2022/23 rates of childhood overweight and obesity at ages 5 and 11 were the highest in the country.
- **1.2.** There are significant inequalities in child excess weight levels with higher rates reported for children living in disadvantaged households, children with disabilities and children from specific ethnic backgrounds. Both children and adults from lower socioeconomic groups are 50% more likely to be exposed to such advertisements for high fat, salt, or sugar (HFSS) foods.<sup>3</sup>
- **1.3** Transport for London (TfL) and nine other Local Authorities have introduced an advertising restriction on all food and non-alcoholic drink products that are high in fat, salt and/or sugar (HFSS). This restriction is across all advertising opportunities on the TfL estate and Local Authority owned sites (including bus stops, taxi wraps and stations).

### 2. General Principles

- **2.1.** Consistent with similar advertising policies implemented by Bristol City Council, Barnsley Council, as well as the London Boroughs of Haringey, Southwark, Merton Greenwich and Tower Hamlets, the UK Nutrient Profiling Model (NPM) has been adopted by Knowsley Council to identify HFSS products.
- **2.2.** The UK Nutrient Profiling Model (NPM) is widely used and has been subject to rigorous scientific scrutiny, extensive stakeholder consultation, and review. Furthermore, the scoring system it uses balances the contribution made by beneficial nutrients that are particularly important in children's<sup>4</sup> diets with components in the food that children should eat less of. It has therefore been concluded that the NPM model is the best way of identifying food that contributes to child obesity. Such food and drink is not only purchased directly by children but is bought for them by others.
- **2.3.** Guidance on how to identify whether a product is considered HFSS under the NPM is available <u>here</u>. All potential advertisers should familiarise themselves with the NPM's technical guidance on how to identify whether a product is considered HFSS under

doublesfor-teens-bombarded-with-junk-food-adverts

<sup>&</sup>lt;sup>1</sup> Critchlow, N. et al. (2020) 'Awareness of marketing for high fat, salt or sugar foods, and the association with higher weekly consumption among adolescents: a rejoinder to the UK government's consultations on marketing regulation'. Accessed via: <u>https://pubmed.ncbi.nlm.nih.gov/32434618/</u> <sup>2</sup> <u>https://www.cancerresearchuk.org/about-us/cancer-news/press-release/2018-03-15-obesity-risk-</u>

<sup>&</sup>lt;sup>3</sup> Yau, A. 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', Accessed via: <u>https://bmjopen.bmj.com/content/11/4/e048139</u>

<sup>&</sup>lt;sup>4</sup> Child/Children means a person/s below the age of 18. This is in line with the Convention on the Rights of the Child's definition: www.unicef.org/ child-rights-convention/ convention-text

the NPM. In any case of doubt, it is for the advertiser to show that the featured product is not HFSS.

- **2.4.** Any revisions to the NPM will be reflected in the advertisement decisions made by the council.
- **2.5.** It is the responsibility of advertisers and their agents to verify the status of the products featured using the NPM.
- **2.6.** Knowsley Council or its representatives may request evidence of nutrition information of food and drink products advertised, and in line with the Food Standards Agency recommendations, Knowsley Council expects any laboratory used for nutrition analysis to have ISO 17025 accreditation and this should be by the United Kingdom Accreditation Service (UKAS).

### 3. Content featuring only non-HFSS products

**3.1.** These would normally be approved but would still need to comply with existing principles and procedures relating to any advertising carried by Knowsley Council.

### 4. Content featuring only HFSS products

- **4.1.** Where proposed content features only food and/or drink which is rated HFSS, such copy would be rejected.
- **4.2.** It is therefore recommended that, before committing to advertising production agreements, advertisers should discuss their eligibility with the council or its agents.

#### 5. Content where there is a range of food/drink featured, some of which is HFSS

- **5.1.** The advertising or promotion of HFSS products is unacceptable under the policy, so a range or meal could not feature them (e.g. fish, chips and peas could only be advertised if all products were non-HFSS). This would also apply to any meal settings being shown, including those for restaurants, aggregator platforms and delivery services.
- **5.2.** It is the responsibility of advertisers and their agents to verify the status of the products featured using the NPM.

# 6. Content where no food or drink is featured directly but the advertisement is from or features a food and/or non-alcoholic drink brand

- 6.1. This may include:
- advertisements where the brand's logo is included but no products, such as a brand values campaign,
- directional signage to a store, app or website,
- promotional advertising which is price-led but features no products such as '50% off everything' or similar,

- advertising about a business or its performance
- **6.2.** Food and drink brands (including food and drink service companies or ordering services) will only be able to place such advertisements if the advertisement promotes healthier options (i.e. non-HFSS products) as the basis of the copy.
- **6.3.** Where advertisers are uncertain about the classification of proposed copy under these guidelines, they should discuss this with the council or its agents.

# 7. Advertisements where food and drink is shown 'incidentally' i.e. it is not the subject of the advertisement but is included (or implied) by visual or copy

- **7.1.** HFSS products should not be promoted by being featured in advertisements for other products. It is the responsibility of advertisers and their agents to verify the HFSS status of the products featured using the NPM.
- **7.2.** Where a food or drink item is featured incidentally and does not relate to a specific identifiable product which can be assessed for its HFSS status, advertising copy may be rejected by the council or its agents on the basis that the advertisement promotes the consumption of HFSS products.

# 8. Advertisements where food and drink is referenced in text, through graphical representations or other visual representation

**8.1.** HFSS products should not be promoted through references in text, graphical images or other visual representations of food and drink. Where a food or drink item is featured in this way and does not relate to a specific identifiable product which can be assessed for its HFSS status, copy may be rejected by the council or its agents on the basis that it promotes the consumption of HFSS products.

# 9. Indirect promotion of HFSS food and/or drink

- **9.1.** Where a product is non-HFSS but falls within a category covered by the Office for Health Improvement and Disparities recommendations for sugar or calorie reduction, the product should always carry a prominent product descriptor to help differentiate it from noncompliant products (e.g. where an advertisement features a non-HFSS pizza or burger, the image should be accompanied by prominent text that names the specific product and retailer).
- **9.2.** Children should not usually be shown in advertisements for products which are compliant in a category which is covered by the Office for Health Improvement and Disparities recommendations for sugar or calorie reduction.

#### 10. Portion sizes

10.1The NPM model is based on nutrients per 100g of a product, rather than recommended portion size. Advertisers should always ensure that they promote products in portion sizes which encourage healthy eating. For products that are non-HFSS but fall within a category covered by PHE's recommendations for sugar or calorie reduction, the product should be displayed as a single portion.

**10.2**If advertisers and/or agencies are unsure about how to interpret this, or any other aspect of these guidelines, they are encouraged to get in touch with the council or its agents and work together on a solution to avoid submitted copy requiring changes or being rejected.

# 11. Exceptions

There are no standard exceptions to the policy offered on council-owned advertising sites.

### 12. Alignment Council-wide

Knowsley Council will consider the potential impact of HFSS advertising when looking at planning applications which include advertising sites. Unhealthy food and drink marketing is an important consideration upon healthy town centres and is therefore considered in planning applications.

# Appendix: Guidance for decisions regarding advertising including high fat, salt, or sugar food and non-alcoholic drinks

#### 1. Example Decision Table

The table below, adapted from Barnsley Council's Advertising policy, outlines examples of a range of advertisements and what the policy outcome would likely be.

| Advertisement<br>Content  | Outcome  | Example(s)  | Notes   |
|---|--|---|---|
| Only non-HFFS<br>products featured  | Approved   | An advertisement for fresh fruit and vegetables   | Subject to<br>compliance with<br>our overall<br>Advertising<br>Policy.                                      |
| Only HFSS products featured   | Rejected   | An advertisement for sweet pastries   |   |
| A range of<br>products, some of<br>which are HFSS<br>and some of which<br>are non-HFSS                            | Rejected   | An advertisement for a meal deal that includes a chocolate bar (HFSS) as well as fruit (non-HFSS)                                 | All food/drink<br>items being<br>advertised must<br>be non-HFSS.  |
| No food or drink<br>directly displayed<br>but the<br>advertisement is<br>from (or features) a<br>food/drink brand | Possibly approved<br>– only if healthier<br>options (non-HFSS)<br>are being promoted | A fast-food business<br>advertising only non-<br>HFSS products<br>(approved)<br>A fast-food business<br>advertising a competition | Many brands and<br>their logos have<br>strong HFSS<br>product<br>association.<br>Some HFSS<br>products also |
|   |  | or an affiliation to an event (rejected).   | •   |

| Food and drink is<br>shown 'incidentally'<br>i.e., it is not the<br>advertisement but is<br>included (or<br>implied) by visual or<br>copyPossibly approved<br>- only if healthy<br>products (non-<br>displayedA travel firm advertising<br>images of oranges<br>(approved)If<br>advertisement<br>advertisement<br>images of oranges<br>(approved)A travel firm advertising<br>images of oranges<br>(approved)If<br>advertisement is<br>the images of oranges<br>(approved)Food and drink is<br>representations or<br>of ther visual<br>representation (ndtPossibly approved<br>- only if healthy<br>products (non-<br>HFSS) are being<br>images of ice creams<br>(rejected)An advertisement that<br>contains a cartoon image<br>of carrots (accepted)If<br>the advertisement<br>easonably<br>considered to<br>products (non-<br>HFSS) are being<br>promotedAn advertisement that<br>contains a cartoon image<br>of carrots (accepted)If<br>the advertisement that<br>advertisement that<br>contains a cartoon image<br>of chocolate (rejected)An advertisement that<br>advertisement that<br>contains a cartoon image<br>of chocolate (rejected)A prominent<br>featuring a non-HFSS ice<br>product.Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>the image naming<br>the product and<br>retailerAn advertisement that<br>accompanies the image<br>accompanies the image<br>accompanies the image<br>accompaning<br>the accompaning the specific<br>product and<br>retailerAn advertisement for a<br>non-HFSS 16-inch pizza<br>should always<br>ensure that they<br>product and<br>retails<br>inco accessary where<br>the product falls<br>inco accessary where<br>the product falls<br>product and<br>retailsPortion sizesPossibly approved<br>- see Notes columnAn adv  |                        |                     |   | difficult to                          |
|--|------------------------|---------------------|---|---------------------------------------|
| Image: Solution of the store incidentally<br>i.e., its not the<br>subject of the<br>advertisement but is<br>included (or<br>implied) by visual or<br>copyPossibly approved<br>isplayedA travel firm advertising<br>happens to contain<br>(approved)If the<br>advertisement<br>considered to<br>products (non-<br>happens to contain<br>images of ice creams<br>(rejected)A travel firm advertising<br>module of the<br>products it will be<br>regarcless of<br>whether the food<br>is intended focus<br>of the<br>advertisement.Food and drink is<br>referenced in the<br>text, through<br>graphical<br>representation or<br>of thr visual<br>advertised)Possibly approved<br>- only if healthy<br>products (non-<br>HFSS) are being<br>products (non-<br>HFSS) are being<br>products (non-<br>HFSS) are being<br>products (non-<br>HFSS) are being<br>products (non-<br>HFSS) are being<br>advertised)An advertisement that<br>contains a cartoon image<br>of carrots (accepted)If the<br>the<br>can be<br>regarcless of<br>the<br>contains a cartoon image<br>of carrots (accepted)Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>the product and<br>retailerAn advertisement<br>facturing a non-HFSS fice<br>cream that includes<br>products and<br>retailerAn advertisement<br>for and advertisement<br>for an advertisement<br>for a category<br>typically<br>associated with<br>HFSS product and<br>retailerAn advertisement<br>for and/or drinkPortion sizesPossibly approved<br>- onsibly approved<br>and/or drinkAn advertisement for a<br>companies<br>the product and<br>retailerAn advertisement<br>for an advertisement<br>for an advertisement<br>for a category<br>typically<br>associated with<br>HFSS food<br>recem but with no<br>accompanying<br>explanatory<br>the prod   |                        |                     |   |                                       |
| Food and drink is<br>shown 'incidentally'<br>e, it is not the<br>subject of the<br>advertisement but is<br>included (or<br>implied) by visual or<br>copyPossibly approved<br>included (or<br>implied) by visual or<br>copyA travel firm advertising<br>images of oranges<br>(approved)If<br>advertisement<br>(approved)Food and drink is<br>referenced in the<br>text, through<br>graphical<br>nepresentations or<br>of ther Yssol<br>advertisemed)Possibly approved<br>oralization (not<br>a resentation (not<br>a real product being<br>advertisementAn advertisement that<br>contains a cartoon image<br>of carrots (accepted)If<br>advertisement that<br>contains a cartoon image<br>of carrots (accepted)Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>products (non-<br>HFSS) are being<br>products a cartoon image<br>of chocolate (rejected)An advertisement that<br>contains a cartoon image<br>of chocolate (rejected)Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>explanation<br>the product and<br>retailerAn advertisement<br>faturing a non-HFSS ice<br>cream that includes<br>product and retailerAn advertisement<br>for non-<br>reserved)An advertisement<br>for non-<br>reserved)Portion sizesPossibly approved<br>explanatory text<br>(rejected)An advertisement for a<br>non-<br>reserved)An advertisement<br>for non-<br>reserved)Portion sizesPossibly approved<br>explanatory text<br>is product fals<br>into a category<br>typically<br>asso   |                        |                     |   |                                       |
| i.e., it is not the<br>subject of the<br>advertisement but is<br>included (or<br>implied) by visual or<br>copyproducts (non-<br>HFSS) are being<br>displayedhappens to contain<br>images of ice creams<br>(rejected)can be<br>reasonably<br>considered to<br>products it will be<br>regardless of<br>whether the food<br>is intended focus<br>of arrots (accepted)can be<br>reasonably<br>considered to<br>products it will be<br>regardless of<br>is intended focus<br>of arrots (accepted)Food and drink is<br>referenced in the<br>text, through<br>graphical<br>representations or<br>of HFSS food<br>and/or drinkPossibly approved<br>products (non-<br>HFSS) are being<br>promotedAn advertisement that<br>contains a cartoon image<br>of carrots (accepted)If<br>the davertisement<br>regardless of<br>regardless of<br>vertised in the<br>contains a cartoon image<br>of chocolate (rejected)If<br>madvertisement that<br>regardless of<br>vertised in the<br>is intended focus<br>of arrots (accepted)Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn<br>advertisement<br>featuring a non-HFSS ice<br>prominent text that<br>accepted)A<br>prominent<br>product descriptor<br>helps to<br>differentiate it<br>product falls<br>into a category<br>typically<br>associated with<br>HFSS product<br>accepted)Portion sizesPossibly approved<br>- see Notes clum<br>also displays clear textAn advertisement<br>for an<br>advertisement for a<br>associated with<br>HFSS product<br>associated with<br>HFSS product<br>associated with<br>the product falls<br>into a category<br>typically<br>associated with<br>HFSS product<br>form inaming the specific<br>product falls<br>inon a category<br>typically<br>assoc  |                        |                     | <u> </u>  | If the                                |
| subject of the<br>advertisement but is<br>included (or<br>implied) by visual or<br>copyHFSS) are being<br>displayedimages of oranges<br>(approved)reasonably<br>considered to<br>promote HFSS<br>products it will be<br>rejected<br>regardless of<br>is intended focus<br>of the<br>advertisement that<br>erferenced in the<br>text, through<br>graphical<br>representation (not<br>a real product being<br>advertised)Possibly approved<br>- only if healthy<br>promotedAn advertisement that<br>contains a cartoon image<br>of carrots (accepted)If the<br>advertisement that<br>considered to<br>promote HFSS<br>products it will be<br>reasonably<br>considered to<br>promoteIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>promotedAn advertisement that<br>contains a cartoon image<br>of chocolate (rejected)A<br>promoteA<br>advertisement that<br>contains a cartoon image<br>of chocolate (rejected)A<br>promoteIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>the product and<br>retailerAn advertisement that<br>includes<br>of chocolate (rejected)A<br>promote<br>promoteA<br>promote<br>promotePortion sizesPossibly approved<br>- see Notes column<br>a so display approved<br>productAn advertisement for a<br>naming the specific<br>product and retailerA<br>prominent<br>featuring a non-HFSS is<br>companies the image<br>non-HFSS 16-inch pizza<br>should always<br>ensored to   |                        |                     |   |                                       |
| included (or<br>implied) by visual or<br>copyA travel firm advertising<br>holday offers which<br>happens to contain<br>images of ice creams<br>(rejected)promote HFSS<br>products ir will be<br>rejected<br>regardless of<br>whether the food<br>whether the food<br>is intended focus<br>of an advertisement.Food and drink is<br>referenced in the<br>graphical<br>representation (not<br>a real product being<br>advertised)Possibly approved<br>– only if healthy<br>promotedAn advertisement that<br>contains a cartoon image<br>of carrots (accepted)IfIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>– only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn advertisement that<br>contains a cartoon image<br>of chocolate (rejected)A prominent<br>productsIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>– only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn advertisement<br>featuring a non-HFSS ice<br>cream that includes<br>product failsA prominent<br>product and<br>retailerPortion sizesPossibly approved<br>– see Notes columnAn advertisement for<br>advertisement for<br>accompanying<br>explanatory<br>text (rejected)A prominent<br>product fails<br>ascoilated with<br>the specific<br>product failsPortion sizesPossibly approved<br>– see Notes columnAn advertisement for<br>anon-HFSS 16-inch pizza<br>tasis displays clear text<br>as odisplays clear text<br>in portion sizesAn advertisement for<br>a category<br>typically<br>associated with<br>enducts<br>associated with<br>associated with<br>enducts<br>associated with<br>enducts<br>associated with<br>enducts<br>associated with<br>enducts<br>associated wi  |                        |                     |   | -                                     |
| copyNoticeNoticeNoticeNoticePrejectedrejectedFood and drink is<br>referenced in the<br>text, through<br>representation (not<br>a real product being<br>advertised)Possibly approved<br>of carrots (non-<br>HFSS) are being<br>promotedAn advertisement that<br>contains a cartoon image<br>of carrots (accepted)Ifthe<br>advertisementIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>products (non-<br>HFSS) are being<br>promotedAn advertisement that<br>contains a cartoon image<br>of carrots (accepted)Ifthe<br>advertisement that<br>contains a cartoon image<br>of chocolate (rejected)rejected<br>reasonably<br>considered to<br>promote HFSS<br>products it will be<br>rejectedIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn advertisement<br>featuring a non-HFSS ice<br>cream that includes<br>prominent text that<br>accompanies the image<br>naming the specific<br>product and retailerA prominent<br>product and retailerA prominent<br>product fails<br>into a category<br>typically<br>accompanying<br>compliant<br>products (such as ice<br>cream but with respecific<br>product fails<br>into a category<br>typically<br>accompanying<br>cream but with respecific<br>product and retailerPortion sizesPossibly approved<br>- see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>that displays lag ontoin<br>(e.g., 3 slices) and that<br>also displays clear textAdvertisers<br>should always<br>ensure that they<br>promote products  | included (or           | uispiayeu           | · · · · · · · ·                                 | promote HFSS                          |
| Possibly approved<br>repersentation (not<br>a real reduct being<br>advertised)Possibly approved<br>representation (not<br>a real product being<br>advertised)An advertisement that<br>contains a cartoon image<br>of carrots (accepted)regardless<br>whether the food<br>is intended focus<br>of the<br>advertisement.Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>representation (not<br>a real product being<br>advertised)An advertisement that<br>contains a cartoon image<br>of carrots (accepted)representations or<br>promotedAn advertisement that<br>contains a cartoon image<br>of carrots (accepted)rejected<br>reasonably<br>considered to<br>promotedIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>retailerAn<br>advertisement<br>featuring a non-HFSS ice<br>product and<br>retailerAn<br>advertisement<br>featuring a non-HFSS ice<br>the image naming<br>the product and<br>retailerAn<br>advertisement<br>featuring a non-HFSS ice<br>into a category<br>typically<br>associated with<br>HFSS products<br>(rejected)An<br>advertisement that<br>includes<br>prominent text that<br>accompanies the image<br>naming the specific<br>product and retailerA<br>prominent<br>product and<br>retailerPortion sizesPossibly approved<br>- see Notes column<br>- see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>(e.g., 3 slices) and that<br>promote products<br>in portion sizesAn advertisement for a<br>non-HFSS 16-inch pizza<br>should always<br>ersure that they<br>promote products<br>in portion sizes  | . , .                  |                     |   |                                       |
| Food and drink is<br>referenced in the<br>graphical<br>representations or<br>other visual<br>representation (not<br>a real product being<br>advertised)Possibly approved<br>- only if healthy<br>products (non-<br>HFSS) are being<br>promotedAn advertisement that<br>contains a cartoon image<br>of carrots (accepted)If<br>the<br>advertisement<br>that<br>considered to<br>promotedIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>text accompanies<br>the product and<br>retailerAn advertisement that<br>contains a cartoon image<br>of chocolate (rejected)An advertisement<br>rejected<br>regardless of<br>whether the food<br>is an actual<br>product.Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>text accompanies<br>the image naming<br>the product and<br>retailerAn advertisement<br>featuring a non-HFSS ice<br>cream that includes<br>product and retailerAn advertisement<br>featuring a non-HFSS ice<br>cream that includes<br>product and retailerAn advertisement<br>featuring a non-HFSS ice<br>cream that includes<br>product and retailerAn advertisement<br>featuring a non-HFSS ice<br>cream but with no<br>accompanying<br>text in a category<br>typically<br>associated with<br>HFSS products<br>(such as ice<br>cream)An advertisement for a<br>non-HFSS 16-inch pizza<br>should always<br>ensure that they<br>promotes products<br>(also displays clear text<br>in portion sizesPossibly approved<br>- see Notes columnAn advertisement for a<br>a<br>dovertisers<br>should always<br>ensure that they<br>promotes products<br>in portion sizes   |                        |                     |   | regardless of                         |
| Food and drink is<br>referenced in the<br>text, through<br>graphical<br>representations or<br>advertised)Possibly approved<br>- only if healthy<br>products (non-<br>HFSS) are being<br>promotedAn advertisement that<br>contains a cartoon image<br>of carrots (accepted)If<br>the<br>advertisement<br>can be<br>reasonably<br>considered to<br>promote HFSS<br>products ti will be<br>rejected<br>regresentation (not<br>a real product being<br>advertised)Possibly approved<br>- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn<br>advertisement<br>featuring a non-HFSS ice<br>cream that includes<br>products and retailerAn<br>retailerIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn<br>advertisement<br>featuring a non-HFSS ice<br>cream that includes<br>product and retailer<br>(accepted)An<br>advertisement<br>featuring a non-HFSS ice<br>cream but with no<br>accompanying<br>explanatory text<br>(rejected)An<br>advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>sizesAn<br>advertisement for a<br>a dvertisement for a<br>in portion sizes  |                        |                     |   |                                       |
| Food and drink is<br>referenced in the<br>text, through<br>graphical<br>representations or<br>other visual<br>a real product being<br>advertised)Possibly approved<br>nemotedAn advertisement that<br>contains a cartoon image<br>of carrots (accepted)Ifthe<br>advertisement<br>can<br>be<br>reasonably<br>considered to<br>promotedIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>product being<br>advertised)An<br>advertisement that<br>contains a cartoon image<br>of chocolate (rejected)An<br>advertisement that<br>contains a cartoon image<br>of chocolate (rejected)Feiceted<br>regardlessIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>– only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn<br>advertisement<br>featuring a non-HFSS ice<br>prominent text that<br>accompanies the image<br>naming the specific<br>(regered)An<br>advertisement<br>from non-<br>compliant<br>product and<br>retailerAn<br>advertisement<br>featuring a non-HFSS ice<br>remem that includes<br>product and retailerAn<br>advertisement<br>the product and<br>retailerPortion sizesPossibly approved<br>– see Notes columnAn<br>advertisement for a<br>non-HFSS 16-inch pizza<br>that displays clear textAdvertisers<br>should always<br>ensure that they<br>promote that they<br>products in portion sizes  |                        |                     |   |                                       |
| text, through<br>graphical<br>representations or<br>other visual<br>advertised)products (non-<br>HFSS) are being<br>promotedof carrots (accepted)can be<br>reasonably<br>considered to<br>promote HFSS<br>products it will be<br>rejected<br>regardless of<br>whether the food<br>is an actual<br>product.Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn advertisement<br>featuring a non-HFSS ice<br>cream that includes<br>products the image naming<br>the product and<br>retailerAn advertisement<br>featuring a non-HFSS ice<br>cream that includes<br>prominent text that<br>accompanies the image<br>naming the specific<br>product and retailerAn advertisement<br>form non-<br>compliant<br>product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(succepted)An advertisement<br>featuring a non-HFSS ice<br>cream that includes<br>prominent text that<br>accompanies the image<br>recepted)An advertisement<br>form non-<br>compliant<br>product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(such as ice<br>cream).Portion sizesPossibly approved<br>- see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>should always<br>ensure that they<br>promote products<br>in no proton sizes  |                        | · · · ·             |   | If the                                |
| representations or<br>other visual<br>representation (not<br>a real product being<br>advertised)promotedconsidered to<br>promote HFSS<br>products it will be<br>regardless of<br>whether the food<br>is an actual<br>product.Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn advertisement<br>featuring a non-HFSS ice<br>product and retailerA prominent<br>product and retailerPortion sizesPossibly approved<br>- see Notes columnAn advertisement<br>featuring a non-HFSS ice<br>product and retailerA prominent<br>product and retailer<br>(accepted)Portion sizesPossibly approved<br>- see Notes columnAn advertisement<br>for a sociate (rejected)An advertisement<br>featuring a non-HFSS ice<br>product and retailerPortion sizesPossibly approved<br>- see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>(e.g., 3 slices) and that<br>also displays clear textAn advertisers<br>in portion sizes   | text, through          | products (non-      |   | can be                                |
| representation (not<br>a real product being<br>advertised)An<br>advertisement that<br>contains a cartoon image<br>of chocolate (rejected)products it will be<br>rejected<br>regardlessIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn<br>advertisement that<br>icacepted)An<br>advertisement<br>featuring a non-HFSS ice<br>product and retailerA<br>prominent<br>product descriptor<br>helpsIndirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>retailerAn<br>featuring a non-HFSS ice<br>product and retailerA<br>prominent<br>product and retailer<br>product and retailerPortion sizesPossibly approved<br>rese Notes columnAn<br>advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>(e.g., 3 slices) and that<br>also displays clear textA<br>advertisement for a<br>non-HFSS ice<br>should always<br>should always<br>ensure that they<br>promote products   | 0                      |                     |   | -                                     |
| a real product being<br>advertised)An advertisement that<br>contains a cartoon image<br>of chocolate (rejected)rejected<br>regardless of<br>whether the food<br>is an actual<br>product.Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn advertisement<br>featuring a non-HFSS ice<br>cream that includes<br>prominent text that<br>accompanies the image<br>naming the specific<br>(accepted)A prominent<br>product descriptor<br>helps to<br>differentiate it<br>from non-<br>compliant<br>product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(such as ice<br>cream).Portion sizesPossibly approved<br>- see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>that displays clear textAdvertisers<br>should always<br>ensure that they<br>promoter text  |                        |                     |   | 1                                     |
| Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn<br>advertisement<br>cream<br>that includes<br>prominent text that<br>accompanies the image<br>product and<br>retailerAn<br>advertisement<br>product and<br>retailerA<br>prominent<br>product and<br>product and<br>retailerPortion sizesPossibly approved<br>- see Notes columnAn<br>advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>sizes) and that<br>promote productsAn<br>advertisement for a<br>non-HFSS 16-inch pizza<br>should always<br>ensure that they<br>promote products<br>also displays clear textAn<br>advertises and that<br>accompany as portion<br>associated with<br>accompany as products<br>(e.g., 3 slices) and that<br>also displays clear textAn<br>prominent text that<br>accompany associated with<br>accompany associated with<br>acc | a real product being   |                     | An advertisement that                           | rejected                              |
| Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn<br>featuring a non-HFSS ice<br>prominent<br>text that<br>accompanies the image naming<br>the product and<br>retailerAn<br>featuring a non-HFSS ice<br>prominent<br>accompanies the image<br>prominent text that<br>accompanies the image<br>naming the specific<br>(accepted)A<br>prominent<br>of HFSS ice<br>product.A<br>prominent<br>product descriptor<br>helps<br>to<br>differentiate<br>it<br>product and<br>retailerPortion sizesPossibly approved<br>- see Notes columnAn<br>advertisement for a<br>non-HFSS 16-inch pizza<br>should always<br>ensure that they<br>promote productsAn<br>advertisement for a<br>non-HFSS 16-inch pizza<br>should always<br>ensure that they<br>promote products  | advertised)            |                     |   | whether the food                      |
| Indirect promotion<br>of HFSS food<br>and/or drinkPossibly approved<br>– only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerAn<br>featuring a non-HFSS ice<br>cream that includes<br>prominent text that<br>accompanies the image<br>naming the specific<br>product and retailerA<br>prominent<br>helps<br>to helps<br>to differentiate<br>it<br>from non-<br>compliant<br>product and retailerPortion sizesPossibly approved<br>– see Notes columnAn<br>explanatory<br>advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>sizes) and that<br>also displays clear textAn<br>explanatory clear textA<br>differentiate<br>from non-<br>compliant<br>products. This is<br>necessary where<br>the product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(such as ice<br>cream).Portion sizesPossibly approved<br>– see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>also displays clear textAdvertisers<br>should always<br>ensure that they<br>promote products<br>in portion sizes   |                        |                     |   |                                       |
| of HFSS food<br>and/or drink- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerfeaturing a non-HFSS ice<br>cream that includes<br>prominent text that<br>accompanies the image<br>naming the specific<br>product and retailerproduct descriptor<br>helpsAnadvertisement<br>featuring a non-HFSS ice<br>product and retailerfrom non-<br>compliant<br>products. This is<br>necessary where<br>the product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(such as ice<br>cream).Portion sizesPossibly approved<br>- see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>should always<br>ensure that they<br>promote products<br>in portion sizes  |                        |                     |   |                                       |
| of HFSS food<br>and/or drink- only if prominent<br>text accompanies<br>the image naming<br>the product and<br>retailerfeaturing a non-HFSS ice<br>cream that includes<br>prominent text that<br>accompanies the image<br>naming the specific<br>product and retailerproduct descriptor<br>helpsAnadvertisement<br>featuring a non-HFSS ice<br>product and<br>retailerfrom<br>non-<br>non-<br>naming the specific<br>product and retailerfrom<br>on-<br>non-<br>necessary where<br>the product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(such as ice<br>cream).Portion sizesPossibly approved<br>- see Notes columnAn<br>advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>(e.g., 3 slices) and that<br>also displays clear textAn output always<br>ensure that they<br>promote products  | Indianat managemention | Dessible serviced   |   | A prominent                           |
| the image naming<br>the product and<br>retailerprominent text that<br>accompanies the image<br>naming the specific<br>product and retailerdifferentiate it<br>from non-<br>compliant<br>products. This is<br>necessary whereAnadvertisement<br>featuring a non-HFSS ice<br>cream but with no<br>accompanying<br>explanatory<br>(rejected)the product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(such as ice<br>cream).Portion sizesPossibly approved<br>– see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>(e.g., 3 slices) and that<br>also displays clear textAdvertisers<br>should always<br>ensure that they<br>promote products  | of HFSS food           | - only if prominent | featuring a non-HFSS ice                        | product descriptor                    |
| the product and<br>retaileraccompanies the image<br>naming the specific<br>product and retailerfrom<br>non-<br>compliant<br>products. This is<br>necessary where<br>the product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(rejected)Portion sizesPossibly approved<br>- see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>(e.g., 3 slices) and that<br>also displays clear textAn advertisement for a<br>necessary where<br>the product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(such as ice<br>cream).   | and/or drink           |                     |   |                                       |
| Portion sizesPossibly approved<br>- see Notes columnAn advertisement<br>(accepted)products. This is<br>necessary where<br>the product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(rejected)Portion sizesPossibly approved<br>- see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>also displays clear textAdvertisers<br>should always<br>ensure that they<br>promote products  |                        | the product and     | accompanies the image                           | from non-                             |
| Anadvertisement<br>featuring a non-HFSS ice<br>cream but with no<br>accompanying<br>explanatory<br>rejected)the product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(such as ice<br>cream).Portion sizesPossibly approved<br>- see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>(e.g., 3 slices) and that<br>also displays clear textAn output<br>the product falls<br>into a category<br>typically<br>associated with<br>HFSS products<br>(such as ice<br>cream).  |                        |                     | product and retailer                            | products. This is                     |
| Portion sizesPossibly approved<br>- see Notes column<br>(e.g., 3 slices) and that<br>also displays clear textAn advertisement for a<br>non-HFSS 16-inch pizza<br>a should always<br>ensure that they<br>promote products<br>in portion sizesAn advertisement for a<br>non-HFSS 16-inch pizza<br>should always<br>ensure that they<br>promote products<br>in portion sizes  |                        |                     |   | 3                                     |
| Portion sizesPossibly approved<br>- see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>(e.g., 3 slices) and that<br>also displays clear textAssociated with<br>HFSS products<br>(such as ice<br>cream).  |                        |                     |   | •••                                   |
| Portion sizesPossibly approved<br>- see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>(e.g., 3 slices) and that<br>also displays clear textSuch as ice<br>(such as ice<br>cream).   |                        |                     | accompanying                                    | associated with                       |
| Portion sizesPossibly approved<br>– see Notes columnAn advertisement for a<br>non-HFSS 16-inch pizza<br>that displays a portion<br>(e.g., 3 slices) and that<br>also displays clear textAdvertisers<br>should always<br>ensure that they<br>promote products<br>in portion sizes   |                        |                     | -   | (such as ice                          |
| - see Notes column<br>that displays a portion<br>(e.g., 3 slices) and that<br>also displays clear text<br>in portion sizes   | Portion sizes          | Possibly approved   | An advertisement for a                          | · · · · · · · · · · · · · · · · · · · |
| (e.g., 3 slices) and that promote products also displays clear text in portion sizes   |                        |                     | non-HFSS 16-inch pizza                          | should always                         |
|  |                        |                     | (e.g., 3 slices) and that                       | promote products                      |
|  |                        |                     | also displays clear text naming the product and | -                                     |

| retailer as per the row   | healthy eating.    |
|---------------------------|--------------------|
| above (accepted)          | For products that  |
| An advertisement for a    | are non-HFSS but   |
| non-HFSS 16-inch pizza    | fall within a      |
| that displays an image of | category covered   |
| the full pizza (rejected) | by OHID's          |
|                           | recommendations    |
|                           | for sugar or       |
|                           | calorie reduction, |
|                           | the product        |
|                           | should be          |
|                           | displayed as a     |
|                           | single portion.    |