

# **Healthier Advertising Policy**

**Adopted January 2024**

**Refreshed 2025**

## Healthier Advertising Policy guidance

### 1. Background

- 1.1. Evidence shows that advertisements directly and indirectly impact what we eat and drink and influence our behaviours.<sup>1</sup> Knowsley Council has high rates of ill health and widening health inequalities.
- 1.2. There are significant inequalities in health outcomes across the borough linked to levels of deprivation. Knowsley also falls below the national average for most health outcomes and in 2019 was classed as the second most deprived borough nationally. Both children and adults from lower socio-economic groups are 50% more likely to be exposed to such advertisements for high fat, salt, or sugar (HFSS) foods.<sup>2</sup>
- 1.3 Numerous 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), with a smaller number extending to other health harming commodities. This restriction applies to spaces owned by the local authority.

### 2. General Principles

- 2.1. Consistent with similar advertising policies implemented by several councils across Cheshire and Merseyside and further afield such as Bristol City Council, Barnsley Council, as well as the London Boroughs of Haringey, Hounslow, 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>3</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. Unhealthy foods and drinks will include commercial baby foods as defined by the World Health Organization's (WHO) Nutrient and Promotion Profile Model (NPPM). The World Health Organization created its baby foods Nutrient and Promotion Profile Model (NPPM) to set out nutrient and promotional requirements to address gaps in existing regulation. The WHO NPPM is aligned with internationally recognised diet and health goals for babies and children aged 6–36 months and has been tested in Denmark, Spain and the UK.

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<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: <https://pubmed.ncbi.nlm.nih.gov/32434618/>

<sup>2</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: <https://bmjopen.bmj.com/content/11/4/e048139>

<sup>3</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](http://www.unicef.org/child-rights-convention/convention-text)

**2.4.** Guidance on how to identify whether a product is considered HFSS under the NPM is available [here](#). Guidance on identifying restricted commercial baby foods under NPPM is available [here](#). All potential advertisers should familiarise themselves with the technical guidance for both models. In any case of doubt, it is for the advertiser to show that the featured product meets both models.

**2.5.** Any revisions to the NPM and NPPM will be reflected in the advertisement decisions made by the council.

**2.6.** It is the responsibility of advertisers and their agents to verify the status of the products featured using the NPM and the NPPM.

**2.7.** 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 the 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**

**10.1** The 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. The International Code of Marketing of Breastmilk Substitutes (World Health Organization)**

- 11.1** Services for babies and young children in Knowsley are already UNICEF Baby Friendly accredited, or working towards. As per the WHO Code and resolutions, the following is prohibited; advertising of all formula milk (infant formula, follow on formula, growing up and toddler milks, and infant milks marketing as a food for special purposes), bottles, teats, related equipment or solid food for babies under six months of age.

- 11.2** These products apply to all aspects of the advertising policy alongside HFSS food and drinks.

## **12. Commercial baby foods**

**12.1** The Nutrient and Promotion Profile Model (NPPM), created by the World Health Organization and the University of Leeds, has been adopted by Knowsley to assess the appropriateness of commercial baby foods.

**12.2** Guidance on how to identify whether a commercial baby food product is considered inappropriate under the NPPM is available [here](#).

## **13. Other Restrictions**

This advertising policy also applies to other products and services that are considered to be health harming or present messages that undermine good health habits. This includes:-

- Weapons,
- gambling,
- alcohol,
- pay day and high-interest loans,
- tobacco,
- e-cigarettes.

## **14. 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 advertising when looking at planning applications which include advertising sites. Marketing of products considered to be unhealthy is an important consideration upon healthy town centres and is therefore considered in planning applications.

