

Introducing further advertising restrictions on TV and online for products high in fat, salt or sugar: consultation on secondary legislation

Introduction

The Alcohol Health Alliance UK (AHA) is an alliance of more than 60 non-governmental organisations working together to promote evidence-based policies to reduce the harm caused by alcohol. Members of the AHA include medical royal colleges, charities, treatment providers, and alcohol health campaigners.

We welcome the chance to respond to this consultation, which will help ensure that children are protected from exposure to food advertising for products which are high in fat, sugar, and salt (HFSS). However, it is striking that alcohol, another heavily promoted unhealthy commodity, is exempted from these policy considerations.

We strongly believe that alcohol needs to be included in the HFSS marketing restrictions, outlined in our response to the final consultation question.

Do you have any additional comments on the draft regulation?

We strongly disagree with the omission of alcoholic drinks from the consultation remit, and urge the regulations to include these products due to a) high exposure of alcohol advertising to children and young people, and b) the extensive mental and physical harms associated with alcohol, including links between alcohol and obesity.

Alcohol is currently outside the scope of the consultation because it is not classified as a HFSS food according to the Nutrient Profiling Model (NPM) 2004/5, due to an exemption. Under the NPM, drinks scoring 1 or more points (awarded for energy, saturated fat, total sugar and sodium, and subtracted for fruit, vegetable and nut content, fibre and protein) are classified as “less healthy.”¹ As alcoholic drinks typically contain high energy, with very little fibre, protein or fruit, vegetables and nuts, many alcoholic drinks would be classified as less healthy products under this measure. Some alcohol products, including those popular with younger drinkers such as alcopops and liquors, also have high sugar content.²

Alcohol should be included in the HFSS marketing restrictions for several reasons:

- Children and young people are exposed to high levels of alcohol marketing. A recent study found that alcohol, in addition to HFSS foods, appear frequently in reality TV programmes, which are frequently watched by children and young people. Alcohol appeared in 98% of the episodes studied, compared with HFSS food features in 88% of episodes.³ Underage exposure is also prominent in digital marketing, with more than 1 in 10 of 11-19-year-olds having actively participated in user-created alcohol marketing online.⁴
- There is extensive evidence that, as with HFSS foods, exposure to alcohol advertising and marketing encourages consumption, both causing children and young people to drink at an earlier age and to drink more.⁵ The NHS Digital 2018 Smoking Drinking and Drug Use survey

¹ Department of Health (2011), [Nutrient Profiling Technical Guidance](#).

² Cancer Research UK (2017), [Youth engagement with alcohol brands in the UK](#).

³ Alcohol Health Alliance UK (2022). [New research finds reality TV ‘bombards’ young people with alcohol and its marketing](#).

⁴ Critchlow, N. et al. (2019). [Participation with alcohol marketing and user-created promotion on social media, and the association with higher-risk alcohol consumption and brand identification among adolescents in the UK](#).

⁵ PHE (2016). [The public health burden of alcohol and the effectiveness and cost-effectiveness of alcohol control policies](#).

found that almost 1 in 10 of 11-15-year-olds reported being drunk in the previous four weeks,⁶ and UK adolescents experience drunkenness more than the European average.⁷ Early exposure to alcohol (and heavy or regular drinking in particular) can lead to a range of physical and mental health problems, as well as being associated with missing or falling behind at school, violent and antisocial behaviour, and unsafe sexual behaviour.⁸ Youth drinking is also associated with an increased likelihood of higher risk drinking or alcohol dependence in adolescence and adulthood, and with dependence at a younger age.⁹

- We could soon be in a position where children are shielded from advertising promoting HFSS foods and gambling but exposed to advertising of an age-restricted product with toxic properties which can lead to health harms and other immediate risks. The harms associated with drinking early in life are not unlike HFSS foods in that they are linked with harm to physical and mental health, both in the short and long term. Alcohol remains the biggest risk factor for death, illness and disability between the ages of 15-49 in the UK,¹⁰ and plays a causal factor in over 200 diseases and injuries,¹¹ including seven cancers.¹²
- Alcoholic drinks can have a high calorie and sugar content: a unit of pure alcohol alone is 56 calories.¹³ Additional ingredients can further increase calorie content: a unit of an alcopop, for example, can be 144 calories.¹⁴ To put this into context, a glass of wine can have the equivalent calories as a Cadbury's mini roll and a pint of beer can have the equivalent calories as a packet of crisps.¹⁵ Research by the AHA found that it was possible to reach the recommended daily sugar intake (30g) in just two medium-sized glasses of some of the most popular wine on the market.¹⁶ In fact, the 'Tackling obesity' policy paper indicated that of adults that drink, alcohol makes up nearly 10% of their daily calorie intake.¹⁷
- The wider impact on society, and on the NHS, is considerable in both cases. The annual NHS spend on obesity-related diseases is estimated to be £6.5 billion – recent OECD figures put the healthcare costs of alcohol at £8.3 billion.¹⁸
- If alcohol is not covered, this policy could lead to content promoting alcohol filling the gaps left by HFSS marketing, increasing children and young people's exposure to harmful alcohol ads. This has already proven the case in other areas: following restrictions of HFSS products from store entrances and checkouts, off-fixture displays containing alcoholic drinks surged by 57%.¹⁹

⁶ NHS Digital (2019) [Smoking, Drinking and Drug Use among Young People in England 2018 \[NS\]](#)

⁷ World Health Organization (2020) [Spotlight on adolescent health and well-being](#)

⁸ Viner, R. & Taylor, B. (2007). [Adult outcomes of binge drinking in adolescence: findings from a UK national birth cohort.](#)

⁹ Donaldson, L. (2009). [Guidance on the Consumption of Alcohol by Children and Young People.](#)

¹⁰ VizHub - GBD Results. (2019). [Global Health Data Exchange](#), Institute for Health Metrics and Evaluation, University of Washington.

¹¹ World Health Organisation (September 2018). [Fact sheets: alcohol.](#)

¹² Schütze M. et al. (2011). [Alcohol attributable burden of incidence of cancer in eight European countries based on results from prospective cohort study.](#) British Medical Journal.

¹³ Royal Society of Public Health (2014), [Increasing awareness of 'invisible' calories from alcohol.](#)

¹⁴ NHS, [Alcohol support, calories in alcohol.](#)

¹⁵ NHS, [Alcohol support, calories in alcohol.](#)

¹⁶ Alcohol Health Alliance UK (2022). [Sugar content in wine revealed: Health experts deem alcohol labelling 'woefully inadequate'](#)

¹⁷ Department of Health and Social Care. (2020). [Tackling obesity: empowering adults and children to live healthier lives](#)

¹⁸ £8.3bn is 3% of £277bn, the figure given for total current health expenditure in 2021 by the ONS. ONS (2022) [Healthcare expenditure, UK Health Accounts provisional estimates: 2021](#)

¹⁹ Grocery Gazette (2022). [HFSS restrictions boost alcoholic drink space across UK supermarkets.](#)

A human rights approach

Article 17 of the UN Convention on the Right of the Child states that '*State Parties shall ... encourage the development of appropriate guidelines for the protection of the child from information and material injurious to his or her wellbeing.*'²⁰ The government needs to consider the widespread risks associated with children consuming alcohol and the role alcohol marketing plays in encouraging that consumption.

Public Support

The public strongly support introducing more advertising restrictions on alcohol, with 77% of people backing controls to help protect children. Moreover, 67% of 11-18-year-olds support controls to limit their exposure to alcohol advertising.²¹

²⁰ UN Human Rights: Office of the High Commissioner. (Accessed 30/03/23). [Convention on the Rights of the Child](#)

²¹ Alcohol Health Alliance UK (2021). [No escape: How alcohol advertising preys on children and vulnerable people.](#)