February 2006

TV ADVERTISING OF FOOD TO CHILDREN: THE FSA'S NUTRIENT PROFILING MODEL

Key points

- **Ofcom has been asked by the Government to consult on tightening the rules on broadcast advertising of food and drink to protect children from encouragement to eat foods high in fat, salt and sugar**
- **The FSA has developed a nutrient profiling model for Ofcom to use as a tool to differentiate foods high in fat, salt and sugar in order to restrict their promotion to children on TV**
- **The FSA's nutrient profiling model is based on a simple "scoring" system which compares levels of a food product's energy, fat, sugar and salt with levels of protein, fibre and fruit and vegetables in the food.**
- **The food is assessed according to "per 100g", rather than portion size (which is often hard to define), as this is the approach legally required for nutritional labelling and for nutrition claims such as "low fat" and it allows foods to be compared on a like-for-like basis**
- **The model has undergone a rigorous development process with extensive consultation and it has strong backing from a wide range of nutritional experts**
- **The nutrient profiling model is specifically intended for use by Ofcom – it is not suitable to be used to support on-pack nutritional labelling or to advise consumers on how to construct a balanced diet**
- **Ofcom is due to consult shortly on its proposals**

Background

Independent research, commissioned by the Food Standards Agency, has shown that food promotion to children has an effect on children's food preferences, purchase behaviour and consumption[1]. Similarly, research on behalf of Ofcom has indicated that the majority of parents favour some changes to the way advertising of food to children is regulated[2].

In the public health White Paper, *Choosing Health*, the Department of Health asked Ofcom to:

> "consult on proposals on tightening the rules on broadcast advertising, sponsorship and promotion of food and drink and securing their effective implementation by broadcasters in order to ensure that children are protected from encouragement to eat too many foods high in fat, salt and sugar[3]."

The Government will assess in early 2007 whether the nature and balance of food promotion to children has changed, or whether further action or new legislation is necessary to regulate the promotion of food to children.

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[1] Hastings, G et al, 2003, *Does Food Promotion Influence Children? A Systematic Review of the Evidence*
[2] Ofcom, 2004, *Child obesity – food advertising in context*
[3] Department of Health, October 2004, *Choosing health*

Why we need a nutrient profiling model

1) **The Government wants to promote a balanced, healthy diet and not all foods have an equal role in achieving this.** Children eat too much food high in fat, saturated fat, sugar and salt and not enough fruit and vegetables. Foods that are high in fat, sugar and salt, such as confectionery, soft drinks, crisps and savoury snacks, fast food and pre-sugared breakfast cereals (the 'Big Five') figure prominently in foods promoted to children in the UK (77% of food advertising spend within children's airtime[4]).

2) **Without a system for categorising foods, restrictions on advertising to children could only be achieved with a blanket ban on food advertising to children.** The FSA's nutrient profiling model has been developed to help target any restrictions on those foods which are high in fat, saturated fat, salt or sugars. An alternative approach would be to ban advertisements of all foods to children. The Government and Ofcom considers such an approach to be disproportionate.

3) **Using a nutrient profiling model encourages companies to advertise healthier foods, and allows the Government to promote fruit and vegetables.**

4) **Nutrient profiling provides an incentive to the food industry to reformulate foods.** This approach provides an incentive to produce products that, because of lower levels of fat, salt or sugar, pass the thresholds set out in the model (see below). Some cereals aimed at children would be permitted under the FSA's nutrient profiling model (such as Ready Brek original, Weetabix, Nestle shredded wheat, Nestle bite size shredded wheat and Kellogg's Tiger power as well as porridge oats and mueslis produced by a range of manufacturers). Other cereals that are high in fats, sugar or salt (eg sugar coated cereals) would not. A total ban or a food category-based approach offers no such incentive.

5) **A variety of nutrient profiling models are used by other governments and some food companies to distinguish between foods.** The food industry uses nutrient profiling to help categorise their own product ranges for marketing purposes, for example to distinguish healthy living ranges from their standard product. The Governments in France and Australia use nutrient profiling schemes to assess foods in schools.

Developing the FSA's nutrient profile model

A team from the British Heart Foundation Health Promotion Research Group at Oxford University developed the FSA's nutrient profiling model. The work was overseen by an expert working group, including independent nutritionists and dietitians, members of the Scientific Advisory Committee on Nutrition (SACN), and representatives from the food industry and consumer groups. The FSA has consulted with stakeholders at each stage of the model's development. All comments were reviewed by the FSA and new scientific comments were referred to the expert group for its consideration and advice.

[4] Child Obesity – Food Advertising in Context, Ofcom, July 2004

FOOD STANDARDS AGENCY PARLIAMENTARY BRIEFING

How the FSA's nutrient profiling model works

- The nutrient profiling model developed by the FSA's Expert Group for Ofcom takes into account the key elements of concern in children's diets. It recognises the contribution made by beneficial nutrients (protein – as a marker for the important contribution of meat and dairy products to iron and calcium levels - fibre, fruits, vegetables and nuts) and penalises food with components that children should eat less of (energy, saturated fats, salt and sugars). The contributions made by dairy products, breakfast cereals, meat and fruit and vegetables are taken into account by the model.
- Points are allocated depending on the amount of each nutrient in 100g of the food, allowing foods to be categorised on the basis of their overall points score.
- Foods with four points or more, and drinks with one point or more, are considered "high" in saturated fat, sugar or salt and could be subject to broadcast advertising restrictions. The thresholds were set by the Expert Working Group following extensive testing and scrutiny.
- The model was tested on 300 foods to check that it classified food appropriately in the context of possible new restrictions relating to the broadcast advertising of food and drink to children.
- The model is not used to rank foods, but to assess whether they are over or below the threshold whereby broadcast advertising restrictions could be applied.

An example of how the model works is attached (appendix 1) for information.

Q&A

1) Surely there is no such thing as "good" or "bad" foods, only "good or bad diets"?
Clearly it is the overall balance of the diet that matters and this balance is determined by the amount and frequency of consumption of individual foods. The basis for the FSA model is that children's diets have too much food that is high in fats, sugar and salt and not enough fruit and vegetables. People are relying increasingly on convenience food which make it more difficult to maintain a healthy balance between fat, sugar and salt and other nutrients than in the past. For competitive marketing reasons, the food industry already uses forms of nutrient profiling to promote their own healthy eating ranges and in so doing accepts that some foods are healthier than others.

2) Isn't the FSA model flawed because it is based on 100g measures and not on portion sizes? No-one uses 100g of marmite or mustard!
The model has been developed as a tool to assess the types of foods that might be advertised on TV to children. Per 100g is the approach legally required for nutritional labelling and for nutrition claims such as "low fat". The 100g/per portion issues was discussed in detail by the Expert Group during the development process and by the Academic Workshop on Nutrient Profiling (Feb 2005) and the Scientific Advisory Committee on Nutrition (SACN, in February and September 2005). Each concluded that using a "per portion" approach would bring no significant advantages, but would introduce several difficulties, not least of which the fact that serving sizes and consumption patterns are an individual matter and cannot be standardised. The eating behaviours of children at different age groups adds an extra layer of complexity to defining commonly agreed "per portion" criteria.

3) What is your response to the accusation that the FSA model is unscientific?
The FSA's nutrient profiling model has been developed in a systematic way, and has been externally scrutinised by academic and practising nutrition and dietician professionals as well as SACN at various stages during its development. The model has been thoroughly tested to ensure that it classifies foods appropriately for the purposes of advertising controls; that it accords with the views of nutrition and dietetic experts, and; that it is consistent with healthy eating advice.

4) What is your response to the accusation that the model throws up some surprising findings?
The model has been tested by practising nutrition and dietetic professionals and there was high level of agreement that each food tested was appropriately rated. We are satisfied that the model classifies foods appropriately in the context of possible new restrictions relating to the broadcast advertising of food and drink to children. The model is not intended to rank foods for advice to consumers.

- **Milk** - Both full-fat and semi-skimmed milk score 0 points and would not be subject to any new advertising restrictions
- **Chips** - Classification of chips depends on the recipe, eg whether animal or vegetable fat is used and how much, and method of preparation – some would be subject to the possible new advertising rules, others would not.
- **Chicken curry** – Classification of chicken curry would depend on recipe. No takeaway curries were examined, but the range of chicken curry ready meals that were examined scored fewer than 4 points and would not be subject to new advertising rules.
- **Carbonated diet drinks** – all sugar free drinks would score 0 points and would not be subject to possible new advertising restrictions.
- **Ketchup** – would score 14 points because it is high in salt and sugar and could not be advertised.
- **Fruit juice** - fruit juice sold as a drink is recognised as contributing to the overall fruit and vegetable intake and the scores awarded by the nutrient profiling model reflect this. Unsweetened orange juice would score –4 points, and a selection of other ready to drink fruit juices would score –3 points. These drinks would therefore be classified by the model as suitable for being advertised to children.
- **Crisps** - Crisps, which score 17 or more depending on the recipe, would be subject to new rules.

Why are raisins classified as less healthy options?
Because of their high sugar content raisins score on average 5 points and would be subject to possible new advertising rules. Other dried fruit, such as apricots and figs, which have a lower sugar content, would not. Therefore, although raisins may be a better lunch box or snack option for children than confectionery or crisps, as with all high sugar products caution should be exercised over the amount and frequency with which they are consumed.

How else could the model be used?
The model has been specifically developed to help Ofcom with its review of the regulations governing the broadcast advertising of food to children between the ages of 5 and 16. It is not intended to be used in relation to health claims, vending, school meals, to support consumer advice on how to construct a balanced diet or to underpin work relating to a simplified labelling scheme.

For further information, see the FSA's website: http://www.food.gov.uk/healthiereating/nutlab/nutprofmod
Or contact Veronica Martell, Public Affairs Manager, on 020 7276 8823, email:
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APPENDIX: How the FSA's Nutrient Profiling Model works in practice: Trifle

100g of Trifle contains:

KJ	Sat Fat (g)	Sugar (g)	Sodium (mg)	NSP Fibre (g)	Protein (g)	Fruit & Veg (%)
696	2.4	16.7	70	0.4	2.6	30

Step 1 - work out the scores for the 'A' nutrients [see table 1]

- Trifle contains 696 kJ per 100g so it scores 2 points.
- Trifle contains 2.4g of saturated fat per 100g, so it scores 2 points.
- Trifle contains 16.7g of sugar per 100g so it scores 3 points.
- Trifle contains 70 mg of sodium per 100g so it scores 0 points.

So the total score for A points is: **2 + 2 + 3 + 0 = 7**

Step 2 - do the same for the 'C' nutrients [see table 2]

- Trifle contains 2.6g of protein per 100g, so it scores 1 point.
- Trifle contains 0.4g of fibre per 100g, so it scores 0 points.
- Trifle contains 30% fruit and vegetables – so it scores 0 points.

Total 'C' nutrients is therefore: **1 + 0 + 0 = 1**.

Step 3 - Work out overall score - Total 'A' points minus Total 'C' points, **7 - 1 = 6**

Trifle scores 6 points and is therefore a food high in saturated fat, salt or sugar and would therefore be subject to possible new advertising restrictions

Table 1: "A" NUTRIENTS

Points ⇒	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**
Energy (kJ)	≤ 335	>335	>670	>1005	>1340	>1675	>2010	>2345	>2680	>3015	>3350
Sat Fat (g)	≤ 1	>1	>2	>3	>4	>5	>6	>7	>8	>9	>10
Total Sugar (g)	≤ 4.5	>4.5	>9	>13.5	>18	>22.5	>27	>31	>36	>40	>45
Sodium (mg)	≤ 90	>90	>180	>270	>360	>450	>540	>630	>720	>810	>900

Table 2: "C" NUTRIENTS

Points ⇒	**0**	**1**	**2**	**3**	**4**	**5**
Protein (g)	≤ 1.6	>1.6	>3.2	>4.8	>6.4	>8.0
NSP Fibre (g)	≤ 0.7	>0.7	>1.4	>2.1	>2.8	>3.5
Fruit & Veg (%)	≤ 40	>40	>60	-	-	>80