

British Association for the Study of Community Dentistry

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Stewart Gandy
Product Placement Consultation
5th Floor
Department for Culture, Media and Sport
2-4 Cockspur Street
London
SW1Y 5DH

Dear Mr Gandy,

Re: Consultation on Product Placement on Television

On behalf of the British Association for the Study of Community Dentistry (BASCD) I am pleased to have the opportunity to comment on this consultation on Product Placement on Television by the Department for Culture, Media and Sport. I appreciate that the deadline passed 5 days ago nevertheless we feel that it is such an important issue that you will include our response.

BASCD is the main national organisation representing Dental Public Health and Community Dentistry across the UK. One of the key aims of the organisation is the promotion of oral health through effective public health policy.

Oral health and the prevention of oral disease is an issue for everyone in society. Tooth decay is perhaps the best known problem but gum disease, dental erosion, developmental anomalies and oral cancer are all becoming commoner despite being largely preventable. Dental decay although preventable, remains a significant public health problem in many parts of the UK, particularly amongst more disadvantaged groups. The promotion and advertising of, and the frequent and excessive consumption of non milk extrinsic sugars (NMES) is the main cause of decay. Currently a high proportion of the population consumes more than the recommended 10% of their energy from NMES. High levels of NMES consumption, particularly in soft drinks is also linked to the development of becoming overweight and obese. The main sources of NMES in the diet, for both adults and children are soft drinks, confectionery, biscuits and other snack foods.

The British Association for the Study of Community Dentistry is opposed to any relaxation on the ban on product placement in television. UK television broadcasters should not be allowed to include product placement in programmes which they have

made or which are made for them. The position pertaining since the start of commercial television broadcasting under the Television Act 1954 should remain.

Our concern is for the public health of the entire UK population, but we are particularly concerned about product placement in programmes watched by children. Although the Audiovisual Media Services Directive, 2007/65/EC (AVMS Directive) prohibits product placement in children's programmes we know that many other programmes are watched by children. Product placement of food and drink high in fat, salt and sugar (HFSS) in other programmes, popular with children, currently undermines Ofcom's rules restricting the advertising of HFSS food and drink products. It may be possible to define programmes with a disproportionately high child audience but a ban on product placement in all programmes would be preferred to benefit people of all ages. We reiterate that the only way to ensure that children are not exposed to alcohol and HFSS food promotion is a complete ban on product placement on television.

With the advent of digital technology, it is now relatively simple to disguise product placement made in television programmes from other countries and this process of digitally removing alcohol and HFSS food products should be applied to all programme genres, including films, shown in the UK.

The supposed commercial advantages of allowing product placement are outweighed by the risk of an increase in oral and general disease which would result. These diseases include dental decay, oral cancer, other cancers, diabetes, obesity, heart disease and stroke. We should not allow the manufacturers of these harmful products to feature on television and in so doing contribute to our epidemic of oral disease, obesity and alcohol misuse.

We agree that television placement of smoking accessories such as cigarette papers and pipes should be prohibited. Like tobacco, television placement of alcohol, HFSS foods and gambling should be subject to an outright prohibition.

The regulation of television product placement should include specific controls on the use of simulated products to avoid any possible brand identity.

We would be keen to discuss our contribution if necessary and invite you to contact us should you require further details or clarification.

We note that the Department will publish all responses in full and we have no concerns about disclosure of our response

Yours sincerely

Dr Colwyn Jones
Past President