

Dear Mr Gandry,

I write to request that the DCMS uphold the current prohibition of product placement on UK-produced TV programming.

You are asking for responses on:

- \* The genres of programmes that could be allowed to carry product placement;
- \* The measures needed to ensure viewer transparency;
- \* Whether the concept of undue prominence can be retained if product placement is permitted; and
- \* To what degree there needs to be consistency with the Broadcast Advertising Code in product placement scenarios.

I note that further to the EU directive a clear description of 'cinematographic works, films and series made for audiovisual media services' (Article 3g.2) is needed. Does this mean factual programmes or not? It is far too loose a description in light of my comments below.

My response would be

- 1) Drama, factual and children's programmes should be excluded, including family light entertainment. Effectively this restricts product placement to young adult and adult light entertainment, excluding for example quiz shows with any factual content or early evening viewing.
- 2) Viewer transparency should be maintained in the same way as now, where sponsorship is separately identified at the beginning and end of programmes and between advertisement breaks.
- 3) I do not believe the concept of undue prominence can be retained, principally because the less prominence, the more sub-conscious the message; there is a mutually conflicting act. I concede I may have misunderstood the subtleties of the concept.
- 4) There needs to be full consistency, and may well need to be additional safeguards.

Finally, I do not believe that product placement is a well-founded or right way forward for British broadcasting. My response to this consultation is that the prohibition on product placement be retained or more restrictive than the EU Directive. I've given my reasons below.

I would further point out that this demonstrates the importance of the BBC as a non-commercially funded independent broadcaster, something that is considerably underestimated. The fact that the BBC would be excluded from such a proposal demonstrates first its value as a credible and trustworthy broadcaster, and demonstrates the innate untrustworthy nature of product placement. This is a point I would like reiterating to the Department for Culture, Media and Sport.

Product placement erodes trust between viewers and producers. It represents an unwelcome extension of advertising into cultural, artistic and everyday life.

It could easily be used to increase the negative effects of the advertising of alcohol, gambling and unhealthy food, especially among children and young people. It is clear in recent reports and actions that curtailment of advertising, especially of unhealthy food, could improve the health of the nation. This flies in the face of many recent actions on advertising.

Even with safeguards in place the subconscious effect may well be to desensitise people to public information, and, consciously to increase scepticism about much TV output, to the detriment of many public services.

It appears that all that it will do will benefit the commercial interests involved, which have a great deal of lobbying power already.

You will know of the concerns expressed by the BMA, NUT, Church of England, British Heart Foundation and Children's Food Campaign, and I will not repeat them. However, I support their opposition to the proposals.

Yours,