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14 October 2008

### **Public consultation on implementing the EU audiovisual media services directive – part 4 product placement**

The British Heart Foundation (BHF) is the nation's heart charity, dedicated to preventing early death from heart and circulatory disease which caused 53,000 premature deaths in 2006<sup>1</sup>.

Preventing heart disease by tackling the risk factors which cause it is central to our work. Diets which are high in fat, salt and sugar (HFSS) can contribute to a number of major risk factors in the onset of coronary heart disease (CHD), including obesity which is fast becoming the number one factor undermining the current and future health of the UK's children.

The BHF believes it is crucial that children establish healthy dietary patterns from an early age, so that they can enjoy the best health possible both as children and in later life. We believe that the external environment is key to influencing these patterns. Children are currently being bombarded with advertising and marketing messages promoting HFSS foods and we know that this advertising has an impact on children's food choices, as research by both Ofcom and the Food Standards Agency acknowledges<sup>2</sup>. Ofcom has imposed a ban on HFSS advertising during dedicated children's programming, but the BHF and other health campaigners would like a 9pm watershed ban to be established.

**The BHF considers that product placement of HFSS food and drink on television would be a form of advertising, therefore we strongly support option 3 – legislate to prohibit product placement in all types of programming.**

#### Consultation Questions:

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<sup>1</sup> [www.heartstats.org](http://www.heartstats.org)

<sup>2</sup> Ofcom, *Childhood Obesity – food advertising in context: children's food choices, parents' understanding and influence, and the role of food promotions*, 2004. And Hastings et al for the Food Standards Agency, *Review of research on the effects of food promotion to children*, 2003

We welcome the opportunity to respond to this consultation document, but will restrict our submission to those questions which directly impact on children and young people and their potential exposure to HFSS food and drink.

**Question 26. Should product placement be prohibited by law?**

The BHF strongly supports the Government's favoured option of legislation to prohibit product placement in all types of programming, without exception (option 3).

Ofcom's research has shown that 68.9% of children's television viewing is outside specific children's programming times<sup>3</sup>. We are concerned that allowing product placement in other programmes which high numbers of children have been shown to watch would potentially expose them to unacceptable levels of advertising of HFSS foods and drinks. Therefore whilst all the proposals in the consultation specifically prohibit product placement in children's programming, we do not think this alone would provide enough protection.

**Question 31. Should the same rules apply to both television broadcasting and on-demand audiovisual media services?**

Yes. We believe that on-demand video services are viewed in a similar way to television and that advertising on these services has an equivalent impact on viewers. There is therefore no good reason that different rules should apply to on-demand media services.

For further information please contact Alex Callaghan, Policy Officer, on 020 7725 0688 or [Callaghana@bhf.org.uk](mailto:Callaghana@bhf.org.uk)



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<sup>3</sup> Ofcom, *Childhood Obesity – food advertising in context: children's food choices, parents' understanding and influence, and the role of food promotions*, 2004