

October 2008

## **Cancer Research UK's response to the Department for Culture, Media and Sport "Public consultation on implementing the EU audiovisual media services directive"**

### **Introduction**

Cancer Research UK<sup>1</sup> is the world's largest independent organisation dedicated to cancer research. We funded £333 million of research in 2007/08 and our vision is that together we will beat cancer. We carry out world-class research to improve our understanding of cancer and to find out how to prevent, diagnose and treat different types of the disease. One of our absolute priorities is to reduce the number of people affected by cancer.

We welcome the opportunity to respond to this consultation.

### **General comments**

After smoking, an unhealthy diet and excess bodyweight are the most important modifiable risk factors for cancer. Researchers estimate that a third of all cancers are caused by dietary factors.<sup>i,ii,iii</sup> Obesity and being overweight in childhood and adolescence can increase the risk of cancer in later life. Eating habits established in childhood often endure after many years. Several studies have shown that obese children are more likely to become obese adults.<sup>iv,v</sup>

Rates of childhood obesity have dramatically increased over the last decade. In England, levels of childhood obesity have risen from 11% in 1995 to 19% in 2004 among boys aged 2-10, and from 12% in 1995 to 18% in 2004 among girls across the same age range.<sup>vi</sup> Further, childhood obesity levels are not only increasing among younger children. The latest Government figures show that around a quarter of 11-15 year olds are now obese.<sup>vii</sup>

Cancer Research UK believes that the prevention of obesity in children is an essential part of cancer and other chronic disease prevention and is supportive of appropriate initiatives to enable consumers to make healthy choices more easily.

We are therefore very concerned about product and prop placement. Advertising and promotions have an impact on children's food preferences, purchase behaviour and consumption at both brand and category levels, and these effects are independent of other factors, operating at both a brand and category level.<sup>viii</sup>

### **Response to consultation questions:**

#### ***Question 26: Should product placement be prohibited by law? Please explain the reasoning behind your preference.***

Yes. Cancer Research UK agrees with the Government's view that Option 3 (to legislate to prohibit product placement in all types of programming), is the only option to ensure continued viewer and consumer confidence in the integrity of television and video-on-demand programming, and to maintain a reasonable distinction between editorial and commercial material.

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<sup>1</sup> Registered charity no. 1089464

Product placement is a form of advertising and to permit it will have the effect of increasing promotional messaging communication to viewers/listeners, over and above current levels created by advertising and sponsorship.

The Government has accepted the principle that children should be protected from the advertising of high fat, salt and sugar food and drink products. With this in mind, the new Ofcom rules restricting such advertising and sponsorship on television would be undermined if product placement was permitted.

Furthermore, allowing product placement outside children's programmes would still not offer a sufficiently high degree of protection because the majority of children's viewing (68.9%)<sup>ix</sup> is outside dedicated children's programming. Therefore the only reliable option is a total prohibition on product placement in all types of programming, both on television and video on-demand services.

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

Yes. Cancer Research UK believes it is important that efforts are made to change the balance of food and drink advertising to children across all mediums, and as on-demand audiovisual media services are viewed 'like television', advertising on these services will have an equivalent impact on viewers/listeners. Therefore, there is no reason why different rules should apply.

By the same reasoning, the current Ofcom rules governing television food and drink advertising to children in the UK should be extended to include a prohibition on high fat, salt and sugar food and drink product (HFSS) advertising and sponsorship in on-demand services. This should apply to both programmes aimed at children and those of particular appeal to children. We recommend that rules in both TV and on-demand services should be tightened to restrict all HFSS advertising and sponsorship before 9pm (or according to an equivalent audience index where schedules do not operate).

***Question 32: Should prop placement continue to be permitted?***

The issue of food and drink 'props' should be given special consideration due to the very significant promotional impact on viewers/listeners, when featuring particular food and drink brands in programmes.

Cancer Research UK believes that the imbalance between the recommended diet and the advertised diet is unacceptable and that restrictions on both prop and product placement would have a positive impact on children's diets.

As before, children view programmes both designed with that intention, as well as those outside dedicated children's programming. Popular soap operas, such as Coronation Street, which attract very high child audiences, only use fictional brands and non-branded products. Such policy should be positively supported by any new or clarified regulations, to ensure other programmes follow suit.

**For more information contact Cancer Research UK's Policy and Public Affairs team  
on 020 7061 8360 or [publicaffairs@cancer.org.uk](mailto:publicaffairs@cancer.org.uk)**

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