



# The 21<sup>st</sup> century gingerbread house

How companies are marketing junk food to children online



[www.childrensfoodcampaign.org.uk](http://www.childrensfoodcampaign.org.uk)

**Children's Food Campaign**

## Foreword



### From the British Heart Foundation

This report examines the ways that food companies are marketing unhealthy foods and drinks to children online. We found the practice is widespread, with companies using a panoply of techniques to promote brands and products – techniques which many children will find difficult to identify as advertising.

These products are not allowed to be advertised during children’s television programmes because we know advertising influences food choices. That’s why we’re calling on the UK Government to take action by introducing consistent advertising regulations across all forms of media, to ensure that children are protected from the influence of junk food marketing.

Given the link between poor diet and the childhood overweight and obesity epidemic in the UK today, it is essential that government efforts to tackle the obesity crisis are proportionate to the scale of the problem we face.

Healthy eating and children’s diets are principal items on the public health agenda today. There is an acceptance that we all need to take responsibility for our food choices, and it’s important that children develop healthy habits early on in life which they can carry with them into adulthood.

We know that on average children’s diets contain too much salt, fat and sugar, and this could have serious implications for future levels of heart disease. But how can we realistically expect children’s diets to improve while they are surrounded by conflicting messages about health and food?

At school, children are taught the importance of healthy eating. Yet in their online space they are bombarded by promotions for foods and drinks high in fat, sugar, and salt. Children are being targeted for their own spending power, and because of their ability to influence their parent’s spending.

**Betty McBride**  
*Director of Policy and Communications*  
British Heart Foundation

### From the Children’s Food Campaign

Food marketing to children has become more sophisticated than ever, and the rules governing online marketing are simply not up to the job of protecting our children. Companies are exploiting gaps in the regulations to target children online with promotions for products that cannot be advertised on children’s television. As a result, children continue to be swamped with commercial messages with one purpose: to persuade them to consume unhealthy products.

Claims that marketing does not increase children’s consumption of unhealthy foods used to be commonplace. But research has now shown that the marketing of unhealthy foods to children influences not only which brands they choose, but the overall balance of their diet. Unsurprisingly, it encourages children to eat energy-dense fatty, sugary or salty foods rather than more nutritious options. If marketing didn’t work, the food industry wouldn’t devote multi-million pound budgets to developing slick campaigns to spread their messages.

Supported by more than 150 national organisations, and with financial help from the British Heart Foundation, the Children’s Food Campaign led the campaign which resulted in some of the strongest legislation in the world to protect children from unhealthy food advertising during children’s television. We also successfully campaigned for and secured a ban on product placement of unhealthy food in UK television programmes. However, loopholes in the current regulations mean that companies continue to target children online with promotions for unhealthy foods – cheaply and with a broad reach.

Given the continuing crisis in children’s dietary health, it is time to introduce more and better rules so that every child reaps the benefits from growing up in a healthy food environment.

**Charlie Powell**  
*Campaigns Director*  
Children’s Food Campaign

## Introduction

Our children's health is at risk. Parents' efforts to help their children eat healthily are being undermined by promotions for unhealthy foods and drinks – promotions which are exploiting loopholes in the advertising regulations.

Television advertising regulations acknowledge the particular susceptibility of children to the influences of advertising, and prevent unhealthy foods and drinks being advertised during children's programmes.

Yet the vague rules governing online advertising mean companies are free to market products and brands to children online which are not allowed to be advertised during children's television – as illustrated by the examples in this report. Given its relatively low cost, interactive nature, and popularity amongst young people, it is unsurprising that the internet is an attractive means for industry to communicate with children.

The internet plays a major role in young people's lives today. Over 90 per cent of children live in a household with internet access via a computer, and research shows that internet at home use increases with age, ranging from 65 per cent of 5–7 year olds to 93 per cent of 12–15 year olds. Children's internet use is no longer restricted to the home – over 40 per cent of 12–15 year olds have a smart phone which enables them to access the web on the move too.<sup>1</sup>

This report examines the pervasive nature of online promotions for high fat, salt and sugar products and brands, and proposes the urgent action that we need to close this regulatory loophole and protect our children's health.



## What's the problem?

The case for restricting advertising for unhealthy foods to children has already been accepted by the UK Government. The restrictions on television advertising of unhealthy foods to children have successfully reduced the number of advertisements children see. However, a weak self-regulatory system allows unhealthy foods and drinks to continue to be marketed to children online, and undermines the rationale that prevents them being advertised on children's television.

The internet enables advertisers to capture children's attention for longer periods of time compared with traditional forms of advertising. By developing integrated marketing strategies across a variety of media, including websites for children that are playful and highly interactive, companies are able to immerse children in their brands. Social media channels enable companies to build relationships on a one-on-one basis by communicating directly with children. Social sites also extend marketing messages into children's social media feeds when they opt to 'follow' or interact with a brand – effectively expanding their reach to the child's social network.

Concerns have been raised about children's ability to critically discriminate between advertising and other media content, and on the internet the boundaries between advertising and other content may be harder for a child to distinguish.<sup>2,3</sup>

It's important that children develop healthy eating habits that they can carry with them into adulthood. But constant exposure to marketing for unhealthy snacks and foods normalises these products into the mainstream diet of children.<sup>4</sup> A review commissioned by the Food Standards Agency concluded that food promotion influences children's behaviour in a number of ways – including their preferences, purchase behaviour, and consumption.<sup>5</sup> In 2011, the House of Lords Behaviour Change inquiry noted that tackling food advertising is 'particularly cost effective because of its low cost and broad reach'.<sup>6</sup>

The UK Government also recognised the impact that commercialisation can have on children by commissioning a review of how to protect children from pressure to consume vast ranges of goods and services. While the review missed the opportunity to specifically address the issue of junk food marketing, the recommendations recognised parental concerns around children and

the internet. It notes that whilst parents realise they have the main responsibility to help their children deal with the pressures of growing up, they need help in doing so, and businesses and broadcasters have a part to play in creating a more family friendly world.<sup>7</sup>

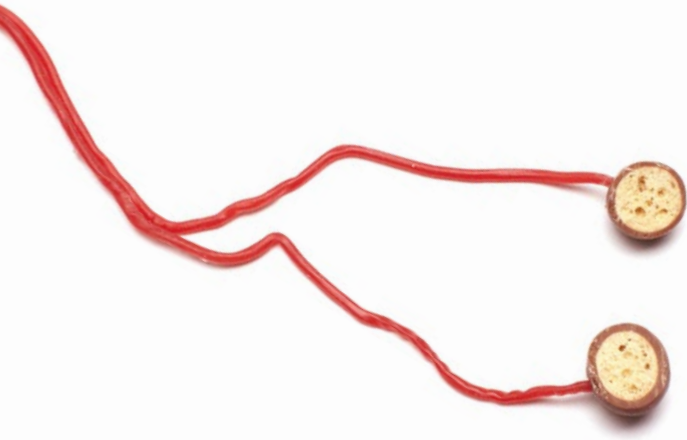
A combination of poor diet and lack of physical activity has led to high levels of children being overweight or obese in the UK. We know that children are eating too much sugar, fat and salt,<sup>8</sup> and 80 per cent are not getting their '5-a-day'.<sup>9</sup> This could have serious implications for their future health.

Obese children are more likely to become obese adults and this in turn is linked to an increased risk of serious health problems, including heart disease. In addition to the risks of obesity, regularly eating a diet high in salt or saturated fat increases the risk of developing high blood pressure and high cholesterol, which are both linked to heart disease.

A set of recommendations published by the World Health Organisation, and endorsed by the World Health Assembly of 193 Governments, state that clear definitions are key for effective implementation of policies to tackle junk food marketing to children.<sup>10</sup> Important definitions include the age group for which restrictions apply, the communication channels, settings and marketing techniques to be covered, what constitutes marketing to children, as well as what foods are to be covered by marketing restrictions. The recommendations conclude that it is governments that should be setting clear definitions for these key policies.

## The advertising rules

The Advertising Standards Authority is a self-regulatory body set up by the advertising industry to regulate the content of UK advertisements, sales promotions and direct marketing, and to ensure the industry adheres to the advertising codes. It is also responsible for investigating complaints against specific advertisements. The Committees of Advertising Practice (CAP) oversee the UK's advertising codes.



### Broadcast advertising

The broadcasting code regulates food and drink advertising on television by identifying products high in fat, sugar and salt (HFSS).<sup>11</sup> Products which do not meet specific nutritional criteria cannot be advertised during programmes or television channels made specifically for children, or during programmes of particular appeal to children under 16.

The code also provides guidance to identify unhealthy brands and works to prevent the advertising of HFSS brands to children. Product placement for HFSS foods and drinks is prohibited in all broadcast advertising.

### Online advertising

In 2011 the Advertising Standard Authority's remit extended to include online advertising on paid for and non-paid for space, including company websites and social networking platforms.<sup>12</sup>

Unlike the television regulations, the non-broadcast code does not distinguish between healthy and unhealthy food. Instead it exists to ensure that advertising is *'legal, decent, honest and truthful'*, rather than to protect and promote health. Consequently, when it does touch on health issues, the wording of the code is vague. For example, it states that *'marketing communications should not condone or encourage poor nutritional habits or an unhealthy lifestyle in children'* but what constitutes *'condoning and encouraging'* or *'poor habits'* is left open to interpretation.<sup>13</sup>

This means that companies can market HFSS products to children online which cannot be advertised during children's television programmes.

As well as promoting specific products, companies use advertising to build up relationships between their brands and young people. Whilst advertising of brands associated with HFSS products is prevented during children's television shows, it is not similarly regulated online.<sup>14</sup>

Although the code defines children as under the age of 16, some marketing techniques are only prohibited in advertising to children of pre-school or primary school age. The use of equity-brand characters – characters created by advertisers – is not restricted by the regulations at all.

In addition, there is the potential for conflicts of interest to arise as the code is effectively written and maintained by advertisers through their membership of the Committee of Advertising Practice. The Advertising Standards Authority, which monitors adherence and enforces the code, is funded by voluntary financial contributions from the advertising industry.

### Voluntary pledges

A number of food and drink companies and licensing bodies have developed their own policies on marketing to children, or signed up collectively to national, regional or global pledges.

Voluntary pledges vary in their definition of the nutritional profile of products which can be marketed to children, and in the marketing techniques they cover. A number of key marketing techniques are either completely, or mainly, unrestricted. This includes advertiser owned websites, equity brand characters, viral marketing, and brand marketing.<sup>15</sup>

There are inconsistencies in the ways in which a media audience is defined as consisting of a significant proportion of children, as well as in the age of children offered protection across the pledges. The majority of multi-company pledges set age restrictions at under 12 years, although Ofcom and CAP define a child as anyone below the age of 16.

Whilst the potential power of voluntary pledges lies in their international reach, the inconsistencies and gaps outlined above show that current voluntary efforts do not go far enough.

## What we did

Between April and July 2011 we conducted a content analysis of food brand and product websites to give a snapshot of how companies are marketing food items online. Products and brands were identified by preparing a list of food and drink products compiled from industry trade journals, trade association annual reports, and internet searches.

We focused on the types of food and drink products which children are likely to buy themselves as snacks, or ask their parents to buy on their behalf. This comprised:

- biscuits, cakes, and confectionary
- dairy products
- crisps and savoury snacks
- flavoured drinks
- cereals and spreads.

We identified 100 websites, including product sites, brand sites and company web pages, which were examined in detail. Over 80 per cent of these websites were associated with products classed as less healthy according to the Food Standard Agency's nutrient profiling model, which are therefore not allowed to be advertised during children's television programmes. See Appendix 1 for details.

To evaluate the marketing methods used by food manufacturers to promote high fat, salt and sugar products to children we developed a checklist of commonly used marketing techniques listed below.

- children represented on the website
- cartoon characters including licensed or brand-owned (characters created by marketers to appeal to children)
- people, personalities or celebrities whose name or image may be familiar or of appeal to children
- cartoons, animations or videos
- competitions, games or apps with appeal to children.
- free gifts or prizes e.g. downloads or merchandise, toys or other items with appeal to children
- links to social networking websites.

We also considered the overall presentation of the website, including the use of language intended for children or spoken by or directly to children, and the nature of the images and pictures shown. In addition we recorded the use of age verification systems. As part of the process our researcher created a child's identity and signed up to brand websites and social networking sites, and we followed the resulting communications from companies.

Standard information was recorded about each of the sites, and further details are listed in Appendix 1.



## What we found

We found clear evidence of HFSS products being heavily marketed to children online, with websites employing a variety of techniques to increase their appeal to a young audience. This report highlights just a few of the examples we found to illustrate the kinds of online promotions and HFSS marketing materials that directly target, or appeal to children. The examples in this report are all products which cannot be advertised during children's television programmes.

Over 75 per cent of the websites carrying HFSS products linked to a corresponding product or brand page on a social networking site, with Facebook and Twitter being the most common. Facebook pages allow young people to 'like' a product or brand. This interaction then allows companies to post information on that person's 'news feed', and the individual's Facebook friends will be notified of their interactions with the brand. We found examples of companies posting updates a couple of times a week.

For example, a post on the Nesquik UK Facebook page<sup>16</sup> said, "*Brrr, it's cold today. Has anyone tried drinking chocolate flavoured Nesquik with warm milk?*" In another example, 'Chewie the Chewitsaurus' of the UK Chewits Facebook page,<sup>17</sup> posted the following to promote free sweets in a children's magazine, "*The latest issue of Toxic mag is out now! Plenty cool stuff and includes all your faves, not to mention some absolutely great FREE gifts – some brilliant blackcurrant flavour Chewits bursting with flavour. Get your claws on a copy today!*"

When someone interacts with company pages, by sharing or 'liking' news feeds, writing on the company's 'wall', or uploading a 'tagged' photo for example – their Facebook friends can then see an update about this on their respective news feeds. In this way, social networking websites effectively offer companies easy and cheap access to a form of peer-to-peer marketing

Social networking websites, like Facebook, are especially popular amongst children and young people, 28 per cent of 8–11 year olds and 75 per cent of 12–15 year olds have an active social networking site profile. One third of 8–12 year olds have a profile on sites that require users to register as being aged 13 or over.<sup>18</sup>

Cartoons, animations and brand characters were the most commonly used techniques to create child friendly websites. Around half of the websites visited contained a combination of competitions, promotions, games and quizzes of appeal to children.

We found that companies are able to repeatedly contact children directly via email, by requesting contact details and other information when they register with a website or take part in an online activity, game or competition. Some websites we visited encouraged visitors to enter their own personal details, or enter their friends' email addresses to send them an e-card or information about a game.

More than half of the websites visited featured television adverts for their products, or linked to You Tube where promotional videos can be viewed. This gives children the opportunity to view adverts which regulations are designed to prevent them seeing on television.

Downloadable content is another common technique. Children can download free gifts of screensavers, desktop wallpaper, posters, mobile phone applications and ring tones, which enables a company's brand message to persist even after children have left their website.

In addition to these tactics to appeal to children, we found that companies are targeting mums and dads too, by offering activities, recipes and lunchbox ideas, and competitions and prizes for parents or the whole family.

Only nine of the websites we audited contained a form of age verification to prevent young people entering the website and viewing its content. We found that age verification systems, where they do exist, are easily eluded – simply entering a false date of birth allows under-age children to enter these sites or register to receive marketing updates. At first glance, these systems may suggest that companies are making efforts to avoid marketing to children, but our research shows they are not sufficiently robust to do so.

## The tactics

The examples in this report are not the only products being marketed in this way. We have included them as an illustration of the ways in which HFSS products are promoted to children online, a practice we have found to be widespread.





The Kellogg's Krave website features Krave superhero characters. The website promotes a poll encouraging visitors to vote for their favourite flavour to win 'choc-tastic prizes' and there are buttons to share the website on Facebook and Twitter. There is also a dedicated Krave Facebook page where the user can write on the Krave Facebook 'wall', and if they upload photos and 'tag' Krave, the photo will appear in the Krave photo album. The website also features a game called 'Krave Crusader' that can be played on Facebook and was promoted on Krave product packaging. Krave television adverts can be viewed in the video section of the website.

There is no age verification required to enter the website, but to sign up for the newsletter users must state they are at least 16 years old. In order to view the Krave Facebook page, an individual's Facebook profile must state they are at least 17 years old.

**Summary of techniques used to market to children**

-  Brand character
-  Cartoons or animations
-  Games, competitions or apps
-  Social networking websites
-  Videos



The website is hosted by a character called Mr Strings. On the homepage of the website, the child is asked to enter their name which is then used to personally address him or her. The website is clearly targeted towards children with a link entitled '101 things to do before you're 11.5' and there is also a child-friendly interactive game. There is a separate section dedicated to parents.

Videos on the site, hosted by a celebrity chef, promote Cheestrings as ideal lunchbox snacks and feature children eating lunchbox food that he has prepared. Children are invited to keep coming back to the site to see new videos in the 'Good Food Fight' series, including behind-the-scenes content. In addition, Cheestrings adverts can be viewed on the website.

There is no age verification requirement.

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-  Games, competitions or apps
-  Images of children
-  Videos



An excitable animated bunny character, holding out a drink and constantly moving, hosts the Nesquik website. There are links listing 'Fun for Mums', 'Fun for Dads' and 'Family Fun', including quizzes, recipes and a link to an 'Imagination Station' which links directly to the Nesquik Facebook page. This offers activities, including making a space suit, and competitions involving uploading photos of children with their entries. Children can also take 'Quickys quiz' to test their knowledge.

There is a dedicated Nesquik Facebook page, which is branded as the *Imagination Station* and links to the Nesquik website. Here you can subscribe to Nesquik SMS and RSS updates, write on the Nesquik Facebook 'wall', upload photos and 'tag' Nesquik to make your picture appear in the Nesquik photo album. There are a large number of photos of children with their Imagination Station entries uploaded on Nesquik Facebook.

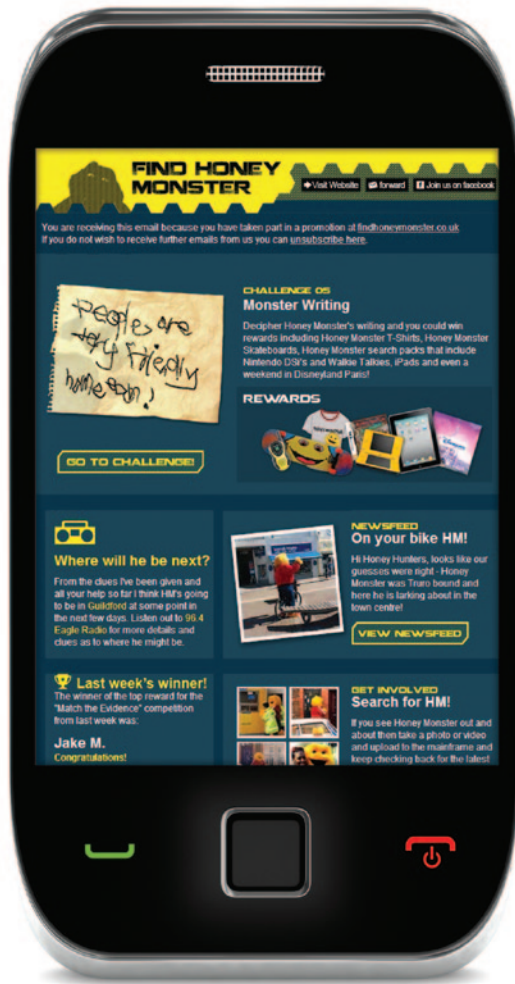
There is no age verification requirement.

### Summary of techniques used to market to children

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-  Images of children
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## Sugar Puffs honeymonster.co.uk



There are two websites for Sugar Puffs. The 'Find Honey Monster' website is hosted by a young boy called Charlie, Honey Monster's best friend. The Honey Monster is missing, and Charlie invites visitors to investigate where in the country he is. There is an explanatory video by Charlie, *Latest images* section showing images children have made of Honey Monster, and a challenges and rewards section offering prizes. The website asks for user generated content, for example, uploading photos and videos to show you have 'seen' the Honey Monster and also offers wallpaper and a poster to download.

After signing up for the Honey Monster newsletter, our researcher received an email update from Charlie, with challenges and competitions, every week over a three month period. The main challenge was based around the theme of finding the Honey Monster. Also, on the brand website there is a feature to share the site with 'your friends' from other social networks.

The 'Honey Monster' website features television adverts, jokes, e-cards, games and competitions, charity-endorsement by The Variety Club Children's Charity, and user generated content. There is a link to the Honey Monster Facebook page encouraging visitors to 'like' the page. Honey Monster is also shown at children's events and venues such as Battersea Park Children's Zoo.

Visitors can subscribe to Honey Monster SMS updates and follow the dedicated Twitter page to receive Honey Monster tweets. The Honey Monster YouTube channel shows adverts and other videos featuring Honey Monster.

Site visitors are asked to seek parental permission if they are under 16, but the advice to parents says consent is required for children under-12 years. The 'Find Honey Monster' site can easily be entered by a child of any age who simply ticks the parental consent "verify" box. Find Honey Monster website <http://www.findhoneymonster.co.uk/> Honey Monster Facebook page Honey Monster newsletter

### Summary of techniques used to market to children




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The website has a dedicated 'teenzone' with activities that would be of interest to much younger children too, such as making a plant pot with a Capri-Sun pack, fancy dress parties, and growing an avocado tree. A lot of activities link to offers on external sites, for example, one external link – 'Picture yourself as a pop star' – is to a site offering a 'Kid's Recording Studio Experience' from £205.

Users are invited to share the Capri-Sun website on Facebook and Twitter. Once the Facebook button on the website is clicked a 'Request for permission' pop-up appears, which requests access to almost all the information a Facebook-user can provide. If accepted, these requests give companies access to a child's Facebook personal information, including lists of their friends, their birthday and personal interests.

The site has no age restrictions, but to register for email updates you need to declare you are over 16.

### Summary of techniques used to market to children




-  Cartoons or animations
-  Images of children
-  Social networking websites



The animated Rowntrees website takes the form of a mansion with sweet packets scattered around each room. This includes a child's bedroom which has Rowntrees sweet packets and pieces of fruit scattered amongst each other. There are two interactive games on the website which users can play and share their score on Facebook. Rowntrees' television adverts can be viewed in the video section of the website. There are buttons to share the website on Facebook and Twitter and also a link to the Rowntrees Facebook page.

There is no age verification requirement.

**Summary of techniques used to market to children**

-  Brand character
-  Cartoons or animations
-  Games, competitions or apps
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## Chupa Chups chupachups.com

The website opens with an animated image of Chuck, the *Chupa Chups* brand character, who is sucking on a lolly. Below the image of Chuck several options are revolving, linking to the *Chuck Party Store*, *Chuck Channel*, *Chuck television*, and *Chuck Acoustics* sections of the website. Clicking through to these pages allows users to download wallpapers, icons, screen savers, mobile phone ring tones – ‘hear your phone fart’ – and watch adverts featuring Chuck. There is also a link to ‘*Spread chuck around*’ which moves the user to various social networking sites. Users are invited to share the link to the Chuck website on their Facebook wall for example.

There is no age verification requirement.

### Summary of techniques used to market to children

-  Brand character
-  Cartoons or animations
-  Free gifts or prizes
-  Social networking websites
-  Videos



## Cadbury Buttons buttonsfurrytales.com

Cadbury Buttons has an animated website hosted by many cartoon characters which will appeal to children and which also appear on packets of Cadbury Buttons. The website features interactive children's books. The stories include animated characters, one of which can be customised to the match child's name and features. Children's bespoke books can be shared on Facebook and Twitter.

Another section in the website is dedicated to games and activities, such as jigsaws, mazes, interactive paintings, recipes, crafts and puzzles, some of which can be downloaded and printed. There is also a 'Books for grown-ups' section which explains the different parts of the website to parents.

To enter the website, the user is asked to show that they are over 18 by selecting their birth year. However, this site can easily be entered by a child of any age who simply enters a false year of birth.

### Summary of techniques used to market to children

-  Brand character
-  Cartoons or animations
-  Free gifts or prizes
-  Games, competitions or apps
-  Social networking websites





## What needs to happen?

It is clear that the current regulations on online advertising do not go far enough in safeguarding children's health.

Today's food environment is different to that experienced by previous generations. The bombardment of messages promoting HFSS food has contributed to a shift in the balance of children's diets and is damaging their health. The potential health consequences cannot be underestimated, with a generation of children in danger of dying at a younger age than their parents.

Protecting children from the influence of HFSS food and drink marketing is not a magic bullet – but it is an important part of the solution. Without better regulations, promotions for HFSS products will continue to undermine efforts to encourage children to eat healthily.

The UK Government needs to introduce new rules that end the loophole allowing products outlawed from children's television to be marketed to young people online. New rules should:

- introduce equally stringent measures across the broadcast and non-broadcast codes
- include all online marketing techniques to maintain consistency in the messages to young people
- distinguish between healthy and HFSS products.

Responsibility for developing, monitoring and evaluating the new regulations should be given to a body independent of the advertising industry. Introducing a process for the independent development of non-broadcast regulations would remove the risk of conflicts of interest arising.

Clear and consistent marketing rules will be easier for parents and children to understand, and to make a complaint if they find the rules are being broken. Additionally, these regulations would help create a level playing field, where those companies making efforts to prevent under 16s viewing promotions for products high in fat, sugar and salt are no longer at a competitive disadvantage.

These changes would protect children from marketers and the undue pressure to choose unhealthy food over healthy food, whilst allowing advertising for healthy products.



## Endnotes

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We are the nation's heart charity, dedicated to saving lives through pioneering research, patient care, campaigning for change and by providing vital information. But we urgently need your help. We rely on your donations of time and money to continue our life-saving work. Because together we can beat heart disease.

[bhf.org.uk/  
junkfoodmarketing](http://bhf.org.uk/junkfoodmarketing)

 Heart Helpline  
**0300 330 3311**  
[bhf.org.uk](http://bhf.org.uk)

Information & support on anything heart-related  
Phone lines open 9am to 5pm Monday to Friday  
Similar cost to 01 or 02 numbers

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