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I am Professor of Interdisciplinary Studies of Childhood and Youth at The Open University.

My expertise spans child/youth well-being and rights, including research and policy on the marketing of unhealthy foods and beverages to children and youth, particularly in digital media. In this capacity I also consult and research for UNICEF and the World Health Organization and civil society organizations (but not the food/beverage industry).

The Committee has already heard powerful evidence from key experts on food and food marketing. To address aspects of the Committee's questions 8, 10 and 11, I build on this with some specific reflections arising from my research on children/ young people's responses to food marketing and my engagement with the UK policy process.

8: The role of the food and drink industry in driving food and diet trends

The food and drink industry are involved in shaping children's food knowledge and preferences from before they can speak. Children become **expert in unhealthy food brands when they are very young and typically know their food brands before they know their ABCs**: at 3 years of age, 57% young children in the UK¹ can already match unhealthy food images (e.g., of crisps, chocolate-flavoured cereal, a fizzy drink, burger and chips, etc) to relevant brand logos. By age 5 this is over 90%, with the significant increase in knowledge taking place between the ages of 3 and 4 years (Tatlow-Golden et al, 2014). Notably, children recognised unhealthy items significantly more frequently than the similarly frequently advertised healthier items in the study.

Children's active engagement with, and preferences for, unhealthy food marketing persists into adolescence, when effects favouring unhealthy foods over healthier foods are found in social media. Using eye-tracking and other measures, we examined attention, memory, and social responses in 151 participants aged 13-17 years to mocked-up social media feeds containing age-relevant content including advertising posts for unhealthy foods, healthier foods, and non-food items (such as tech, sports and fashion) (Murphy et al., 2020). **We found that, on 5 of 6 measures, teens had significantly greater positive responses to advertising posts for unhealthy food, compared to similar posts**

¹ Several of these studies were conducted on the island of Ireland, i.e., spanning the UK and the Republic of Ireland. The two jurisdictions share a similar diet, food brands and 'advertised diet' (Tatlow-Golden et al., 2016).

for non-food or healthy food items. The participants viewed unhealthy advertising posts for longer; rated peers more positively if they had unhealthy posts in their feeds; were more likely to wish to 'share' unhealthy advertising posts; and recalled and recognised a greater number of unhealthy food brands. In sum, when comparing ad posts for different kinds of products in social media, **not only do teens look at unhealthy food ads for longer, and remember these brands better, they also share the ads more – and even like unfamiliar peers more when they see unhealthy ads in their feeds.** This indicates food advertising in social media has not only individual but also social psychological effects including setting peer norms – findings that echo several decades of qualitative studies of young people's food attitudes, purchasing and eating practices. For example, in a National Institutes of Health Research-funded study (Boyland et al., 2023), we carried out focus groups in Stirling and Liverpool with children and young people aged 9 to 16 years, in which they reported being exposed to extensive HFSS food advertising both online and offline. This, participants said, drove interest and hunger, and brought about mixed feelings: frustration and scepticism about some advertising, irritation at scrolling being interrupted, and yet at the same time anticipation and satisfaction towards the marketing of advertised products and recognition of its impact.

The important point to note is that **advertising for unhealthy foods does not focus, for the most part, on communicating information about products.** Rather, it primarily creates positive associations with taste and enjoyment, fun, friends, admired influencers and family, special events and times of year, beloved or admired cultural figures and sporting heroes, and exciting, high-stakes emotionally laden events such as Premier League and World Cup matches, as well as on videogame livestreaming platforms.

As leading advertisers note, this kind of advertising generates brand-building; it relies on

“emotional priming, since that cuts through regardless of whether people are interested in the product, and it helps create long-term memory structures. For this reason, emotions tend to have more impact than messages (which mostly get screened out).” (Binet & Field, 2017, p.11).

The use of **emotional messaging is particularly significant for the domain of food** which is an emotionally laden issue from early childhood, for children and parents alike. From their earliest years, food and eating is one of the earliest, most frequent and most intimate ways in which children interact with the physical and social environment (this topic is widely researched; for a summary relating to preschool children see e.g., Tatlow-Golden, 2019).

In this context of intimate, frequent, emotionally-freighted engagement with food, children live in an environment that is saturated with positive messages about unhealthy foods (including beverages). They absorb this positive emotional priming about commercial, ultra-processed foods before they have even started school; rapidly become expert about it; are surrounded by it throughout their childhoods, and respond positively to it during adolescence. Advertisers make no secret of the fact that emotion trumps information (see Binet and Field's study of 880 IPA Effectiveness Awards: Binet & Field, 2009). And yet public health and educational authorities consistently promote *information* as the solution, under a faulty individualistic, informational frame actively promoted by unhealthy commodity industries (Ennis, 2023). Children, young people and parents, exhorted to 'make healthy choices', are handed the responsibility to resist the very messaging about unhealthy food with which they are surrounded.

We therefore argue (Tatlow-Golden and Garde, 2020) that unhealthy food marketing to children is exploitative, violating several rights under the United Nations Convention on the Rights of the Child – most particularly so in digital media where marketers can draw on personal data to identify targets with particular interests, locations and vulnerabilities.

10: Effectiveness of Government planning and policymaking re food and drink policy

8: Role of food and drink industry on policymaking process

Perhaps the major challenge currently facing researchers, advocates and policymakers in the field is the profound measurement challenge in digital media – no-one knows yet exactly how much unhealthy food advertising children and young people are exposed to. In this context I offer a reflection on government policymaking process, and apparent different evidential standards to which different sectors are held.

The challenge of measuring digital food marketing is due to several features: the complexity of digital advertising markets; the fact that digital advertising is not broadcast, but rather narrowcast individually to each device based on its user's interests; and the fact that accessing children's individual digital devices, to assess marketing content served, presents privacy as well as resource challenges (see WHO 2016; Tatlow-Golden et al., 2021).

As measurement is challenging, so is assessing the impact of any proposed marketing restrictions. In 2019, for its Impact Assessment (IA) of proposed marketing restrictions, DHSC/DCMS commissioned Kantar Consulting to estimate the costs and benefits of restricting unhealthy food and beverage advertising on digital devices. This IA created a novel

method, an Online Baseline Methodology, based on one underlying premise and a 7-step set of assumptions. It estimated UK digital unhealthy marketing to children at 0.73 billion advertising impressions annually, compared to television impacts of 3.6 billion. To assess the accuracy of this method, the Obesity Health Alliance commissioned us to examine the model Kantar developed for the IA to generate this estimate. We submitted our findings to the Consultation and subsequently published these: see the step-by-step analysis in Tatlow-Golden and Parker (2020).

We examined the plausibility of the underlying premise and used existing data to assess each of the 7 analytic steps undertaken in the DHSC/DCMS Online Baseline Methodology (the 'Government Model'). We concluded that the Government Model's underlying premise was problematic. It used digital advertising *spend* data to estimate digital advertising exposure. The nature of digital marketing – its capacity to generate network effects, to 'go viral' and create reach far beyond spend is such that spend is a poor proxy for reach. Indeed this is the very characteristic of digital marketing that advertisers aim for. It means that the entire model was unlikely to reflect actual market scale. Furthermore, we evidenced that, in each and every one of the 7 steps, the Government Model's assumptions, and the data sources selected, underestimated the scale of digital advertising of unhealthy foods. We concluded that the Government Model very substantially underestimated the impact of digital unhealthy food advertising restrictions on health.

In the subsequent government consultation response², some of our conclusions were accepted. The IA was adjusted to multiply up, 14-fold, the estimate of digital food advertising impressions seen by children and young people.

We were then surprised to find, in the same consultation response, that a new step had now been introduced into the Government Model: a measure of *attention*, which removed the impact of the 14-fold multiplication of digital food advertising impressions.

Furthermore, this relied not on peer-reviewed research but linked only to industry studies, a level of evidence that would not typically be accepted from civil society. As far as we could ascertain, the source studied attention to digital advertising among *adults*, not children or young people, and to *unknown categories of advertising*, not food, in which children and young people are expert and consistently respond positively to, as our research has identified above. Attention is interesting and long-debated in advertising research, but there are several conceptual and empirical reasons to question the research cited in this new step in the

² See Table 2 which shows methodology changes to the 2019 IA at <https://www.gov.uk/government/consultations/total-restriction-of-online-advertising-for-products-high-in-fat-sugar-and-salt-hfss/evidence-note>

consultation. However this opportunity was not made available to other stakeholders.

As a reflection on government policymaking process, and industry involvement, this suggests the possibility that advocates and academics were in part heard in the policymaking process, but are **held to different evidential standards than industry**. Finally, it also suggests that the **potential impact of advertising restrictions could be greater** than the attention-adjusted IA indicated.

Note: Ongoing work that will report in 2024. Currently, I am involved in two studies underway that are measuring children and young people's exposure to unhealthy digital marketing in the UK. Using two different methods, these are exploring actual (not estimated) exposure in England and Scotland (funded by NIHR, led by Prof Boyland and Liverpool) and Northern Ireland (funded by Safefood, led by me at OU). These will provide some indication of levels of exposure at present.

11: The impact of recent policy tools and legislative measures intended to prevent obesity

Needless to say, the impact of any policy lies in the detail of its design. To consider the potential impact of the policy of online restrictions as first proposed in 2020 we consulted with experts in diverse fields spanning this area – digital media, digital privacy, digital marketing, food marketing policy, and child rights in the digital age (Harris et al., forthcoming 2024 – accepted manuscript available on request). These restrictions were passed with amendments in the Health and Care Act 2022, but their implementation remains paused, at present to early 2025.

Taken together, the views of these experts led us to conclude that **the policy represented a 'major breakthrough' in principle**, with the potential to substantially impact global food marketing policies by establishing the principle of no unhealthy advertising online to consumers of all ages. Yet at the same time, ironically **the policy might, due to its design, be 'entirely ineffective', experts felt** – due to rapid innovations in digital marketing as well as loopholes in the policy such as the exclusion of common forms of digital marketing, especially brand marketing and marketing integrated within entertainment content; virtual/augmented reality, and 'advertainment' as particularly likely spaces for rapid growth of digital food marketing; and technical digital media issues that raise significant barriers to effective monitoring and compliance.

In particular, the likelihood that marketers would evade proposed restrictions via brand marketing (not covered as the restrictions rely on nutrient profiling of products) and new forms of integrated entertainment

were highlighted. These caveats present future challenges to policymakers.

Overall, in my view, the ever-mounting evidence indicates the need for a fundamental shift in the food and marketing environments, saturated with positive messages about unhealthy foods, in which children in the UK learn – cognitively but importantly also emotionally – about food and what they love to eat.

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