

Written evidence submitted by Bite Back (FFS0020)

About Bite Back

Bite Back is a youth activist movement fighting for a fairer food system, seeking change in the way unhealthy food is made, marketed and sold. Our Youth Board is made up of 85 passionate young activists, and we mobilise other young people in the fight for better food: there are over 75,000 people in the Bite Back movement, who have taken 781,812 actions for child health since 2019.

Our submission

We are pleased to have the opportunity to submit evidence to this inquiry. The voice of young people is seldom heard in conversations about food - Bite Back is working to change that.

Access to affordable and healthy food

Our food system is broken. Global food giants, reliant on marketing and selling unhealthy, unsustainable ultra-processed food, dominate our supermarkets, high streets and screens. A 2024 Bite Back investigation conducted with the University of Oxford revealed that 7 of the UK's top 10 food manufacturers rely on the sale of products high in fat, sugar, or salt (HFSS).¹ A further investigation conducted with the University of Cambridge found that the 10 of the biggest food chains that appeal to young people have grown in number of outlets by 59% between 2014-2024. Specifically, the five fast food chains - Burger King, Domino's, KFC, McDonald's and Subway - have increased their number of outlets by nearly 50%.²

"There is a KFC and a McDonald's within a five minute walk of my college. The food is cheap and convenient. Big food chains work hard to draw young people in." - Rizwan, 16

At the same time, big food companies are bombarding young people with an ever-evolving myriad of marketing tactics. In 2022, the top 10 manufacturers spent £55 million on online advertising for products from four categories linked to children's excessive sugar and calorie intake (biscuits, chocolate, crisps, and ice cream).³ Whether it's online, on giant billboards or on the side of phone boxes and bus stops, junk food is always in the spotlight. We welcome the Government's commitments to implement the junk food advertising restrictions on TV before 9pm and online, but these restrictions need to go further.

"I think it's really a battle of David versus Goliath, these big food corporations, they can spend millions on their advertising. Whereas we as young people, we see what they're paying for." - Emmanuel, 18

The result: over a third of 10/11-year-olds leave primary school at risk of food related ill health in their future, including type 2 diabetes, tooth decay and heart disease. But their

¹ Bite Back (2024) Fuel Us, Don't Fool Us: Are food giants rigging the system against child health
https://cdn.bitebackmedia.com/media/documents/WEBSITE__Bite_Back_Manufacturers___high_res.pdf

² Bite Back (2024). Fuel Us, Don't Fool Us: Big food & our communities: Where are food chains expanding? (Out-of-home #1)
https://cdn.bitebackmedia.com/media/documents/Bite_Back___Out_of_Home_Report_Final___High_res_2.pdf

³ Bite Back (2024) Fuel Us, Don't Fool Us: Are food giants rigging the system against child health
https://cdn.bitebackmedia.com/media/documents/WEBSITE__Bite_Back_Manufacturers___high_res.pdf

future could look completely different. If we want to achieve Labour’s vision of creating the “healthiest generation of children ever”, we need to create a level playing field so the more progressive businesses aren’t penalised for creating healthier and affordable options for customers. And we need to create healthier high streets, where fast food outlets are not the only option for our children.

Recommendations:

- Mandate businesses to report publicly and consistently on the healthiness of their sales of food and drinks.
- Fully implement legislation restricting the marketing of food and drinks high in fat, sugar or salt (HFSS).
- Build on existing rules with new measures to curb outdoor advertisements, sport sponsorship, owned media and brand advertising by junk food giants.

Food and animal welfare standards

The current school food system isn't working, but we have the opportunity to redesign it. By providing nutritious, tasty, sustainable, properly funded school food, we can boost children’s health, wellbeing, attendance, and attainment. While the Department for Education is responsible for school food, the action needed requires collaboration with other departments including the Department for Environment, Food and Rural Affairs.

Bite Back is a member of the School Food Review, a coalition of 36 organisations spanning educational organisations, charities, councils, caterer representatives and academics. We have developed a School Food Policy Toolkit to support the government and ministers to implement and deploy the best school food policies.

The School Food Standards (SFS) were implemented in 2015, giving schools comprehensive guidance on providing the nutrition students need to thrive. These standards are mandatory, however compliance is not actively monitored in England. As a result, only 25% of state schools were known to be meeting these standards in 2022, effectively turning school food into a postcode lottery. ⁴ A pilot scheme run by the Food Standards Agency in 2022 to test whether food safety officers could also monitor the SFS was promising. And health experts and government advisors have long been calling for the standards to be updated, to reflect the latest evidence on healthy and sustainable diets.

Back in 2021, Bite Back’s *Spill the Beans* report included youth insights suggesting that the school food standards are routinely not being upheld, with participants talking about chocolate and sweets on offer⁵. Through the *Bite Back in Schools* programme, we frequently hear reports from pupils that healthier options are less affordable or accessible. And a new, **unpublished and confidential** Bite Back investigation has found that popular confectionery and snack brands are infiltrating the school gates, with many non-compliant products sold in canteens.

“School food has come a long way but still varies a lot from school to school. For example at my school the food is good but the drinks are unhealthy; at my friend’s school it’s the other way around, so there’s still a lot of inconsistency.”- Luke, 18

⁴ Food Foundation (2022) The Broken Plate 2022 https://foodfoundation.org.uk/sites/default/files/2023-01/FF_Broken_Plate_Report%202022_DIGITAL_UPDATED_2023.pdf

⁵ Bite Back (2021) Students’ voices on the school food standards https://cdn.bitebackmedia.com/media/documents/Spill_the_Beans_school_report_Subbed-Digital_FINAL.pdf

“Food at school is expensive and lots is high in sugar. It is cheaper to buy a waffle than a fruit pot.” - Anonymous Youth Activist

Recommendations:

- Review and update the School Food Standards to ensure they reflect the latest dietary and sustainability evidence and roll out new monitoring and reporting for compliance in schools.
- Ensure every child living in poverty receives a free school meal by extending eligibility.
- Introduce automatic registration for free school meals to enable all entitled children to access their right to free school meals.

Food labelling

Young people want food and drink companies to be more honest and transparent, including in how they market their products and communicate what is in them. The UK’s traffic light labelling (TLL) scheme has helped, reducing calories purchased from cookies, cereals, and soft drinks by 9.5% in the first five years succeeding its introduction. ⁶ Despite high levels of public support, only two-thirds of pre-packaged products display TLLs. ⁷ Making TLLs mandatory would ensure consistent and clear nutritional information.

It should be easy for young people to eat healthily, but the use of health and nutrition claims on the packaging of unhealthy products is misleading. Currently, no rules prevent their use on products that are HFSS and/or would qualify for a red traffic light. Such techniques can create a ‘health-halo’ that skews the consumers’ perceptions of healthfulness. ⁸ Young people are particularly vulnerable, with Bite Back research showing that 8 in 10 believe cereal bars are healthy based on misleading packaging claims. Yet 81% of cereal bars would qualify for a red traffic light label. ⁹

“There have been many times when I thought I was being healthy by buying a smoothie or non-fat yoghurt, but in fact, I was exceeding my daily sugar allowance. Being healthy should be easy, but misleading health claims make it harder for people to be healthy.” – Emily

Packaging design plays a crucial role in marketing and child-appealing packaging has particular power when it comes to children. ¹⁰ Findings from Bite Back’s ‘Fuel Us, Don’t Fool Us’ series found that 78% of products employing child-appealing tactics on packaging were unhealthy, with common tactics including bright visuals, appeals to fun, and use of mascots

⁶ Elshiewy, O., & Boztug, Y. (2018). When Back of Pack Meets Front of Pack: How Salient and Simplified Nutrition Labels Affect Food Sales in Supermarkets. *Journal of Public Policy & Marketing*, 37(1), 55-67. <https://doi.org/10.1509/jppm.16.100>

⁷ IGD 2021 ‘Three things to know about front of pack nutrition labels in the UK’ (18 January) <https://www.igd.com/articles/article-viewer/t/threethings-to-know-about-front-of-pack-nutrition-labels-in-the-uk/i/27499>

⁸ Ashwell M, Hickson M, Stanner S, Prentice A, Williams CM; Academy of Nutrition Sciences. Nature of the evidence base and strengths, challenges and recommendations in the area of nutrition and health claims: a position paper from the Academy of Nutrition Sciences. *Br J Nutr*. 2023 Jul 28;130(2):221-238. doi: 10.1017/S0007114522003300. Epub 2022 Oct 12. PMID: 36221317; PMCID: PMC10277662.

⁹ Bite Back (2021) Don’t Hide What’s Inside https://cdn.bitebackmedia.com/media/documents/Dont_Hide_Whats_Inside.pdf

¹⁰ Smith R, Kelly B, Yeatman H, Boyland E. (2019). Food Marketing Influences Children’s Attitudes, Preferences and Consumption: A Systematic Critical Review. *Nutrients*. 18;11(4):875.

and characters.¹¹ Some countries have taken action - in Chile and Mexico businesses cannot use child-appealing promotions on the packaging of foods classed as unhealthy. There are no such restrictions in the UK. We welcomed the recent move by a supermarket, which will scrap kid-friendly designs on packaging for its least healthy snacks and sugary sweets.¹²

“Companies aren’t putting cuddly bears on biscuits to make adults want to buy them.” – Mia, 17

Recommendations

- Bring in mandatory front-of-pack labelling and new regulations to restrict the use of child-appealing techniques, and health and nutrition claims on the packaging of unhealthy food and drink products.

Public sector procurement of food

Leisure centres are among the few places where children can socialise and take part in after-school activities in a setting designed to promote health. In 2023, Bite Back conducted a survey on council-owned spaces in Sheffield with young people aged 13-18. When given a range of positive and negative words to describe food in council-owned spaces, the top 2 responses given were “unhealthy” and “cold”. A young person summed it up by asking: “Why does my leisure centre smell like chips?”¹³ A new **unpublished and confidential** Bite Back investigation of leisure centres in Oxfordshire in November 2024 found that more than half (53%) of the products in the leisure centre vending machines were classified as HFSS (147 out of 272 products). For food products alone, this proportion increased to 88%. And there were shocking cases of unhealthy marketing used on the vending machines, including an M&M’s machine.

“Places like leisure centres and the ice rink offer ‘convenient’ food that are primarily chocolates, crisps and fizzy drinks. Some healthy options are there but are usually a bit more expensive. That affects the quality of a young person’s lifestyle as we would have just exercised and then the first thing we are offered is rubbish rather than something substantial and healthy to fuel our body.” - Romy

Recommendations:

- Empower local leaders to work with council-controlled spaces such as leisure centres, with support from the specialist team in Public Health, to reduce the prevalence of unhealthy food, while making healthy food more available, accessible and affordable for young people.

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¹¹Bite Back (2024) Fuel Us, Don’t Fool Us: Are food giants using child-appealing tactics responsibly?

¹²The Grocer (2025) Lidl ditching packaging that appeals to kids from sugary sweets and snacks <https://www.thegrocer.co.uk/news/lidl-ditching-packaging-that-appeals-to-kids-from-sugary-sweets-and-snacks/699921.article>

¹³Bite Back (2023) Why does my leisure centre smell like chips?