



How does the Government Score on Chapter 2 of the Childhood Obesity Plan?

A Children's Food Campaign Briefing Paper

We welcome the publication of Chapter Two of the Government Childhood Obesity Plan, and in particular are pleased to see the announcement of a time-bound commitment to halve child obesity levels over the next 12 years, by 2030. We believe that the actions outlined in Chapter 2, if enacted following consultation, will enable much better progress towards this target. In particular, we're pleased to see that several issues in relation to junk food marketing, such as the introduction of a 9pm watershed for TV and online advertising, which were omitted from Chapter 1, are now back on the table. However, other issues, such as the use of children's TV, film and cartoon characters, which parents tell us are one of the marketing tactics they find most difficult to manage, have not been addressed.

In response to the plan, Ben Reynolds, deputy CEO of Sustain, says:

"Our Children's Food Campaign has been calling for years for more restrictions on the increase of junk food marketing and promotion which has fuelled our child obesity crisis. We applaud the Government's ambition to halve child obesity by 2030, and to tackle health inequalities that mean that children from poorer backgrounds are twice as likely to suffer from poor health.

Barbara Crowther, the Children's Food Campaign Coordinator, commented:

"If the Government's Child Obesity Plan released two years ago was a disappointing starter, then Chapter Two promises a wholesome and effective menu of action, but still leaving room for a healthy next course.

"We fully support the Government's intentions on junk food promotions and marketing, but the consultations to come will be crucial. A commitment to consider is not a commitment to act, and children's health needs decisive action.

“There are still many measures that parents and health experts tell us are needed and we believe deserve attention in future, such as restricting kids’ TV, film and cartoon characters on junk food packaging, junk food sponsorship in sports and more local powers to tackle this issue.”

Prior to the publication of the Childhood Obesity Plan Chapter 2, we issued a scorecard for the Government. We have read through the plan and here is our initial verdict on the commitments against the 20 issues in our scorecard. We would appreciate any further comments or feedback on our own assessment

Children’s Food Campaign Scorecard	Commitment to Action in Childhood Obesity Plan Chapter 2	Our Verdict	Score
Make Junk Free Checkouts the law	We intend to ban the promotion of unhealthy food and drink by location (at checkouts and the end of aisles and store entrances) in the retail and out of home sector through legislation. We will seek to extend a similar approach to online shopping and the out of home sector ahead of checkout.	Excellent to see this, Sustain and Children’s Food Campaign have been working on this issue since the mid-1990s! Although this proposal is subject to consultation, the strong language in the paper is wholeheartedly welcomed by us.	
No energy drinks sales to under-16s	We will therefore consult before the end of 2018 on our intention to introduce legislation to end the sale of energy drinks to children by all retailers.	We applaud the intention to legislate and take action in 2018 on an issue where the majority of large retailers have already acted, and government action can now create a level playing field for all retailers.	
Improve School Food Standards	In 2016, we committed to update the School Food Standards in light of the latest advice on nutrition which revised the recommended daily intake of sugar and fibre. Our update to the standards will be bold on reducing sugar consumption and will be coupled with detailed guidance to caterers and schools so they are well prepared to adapt to the changes.	We welcome language on being ‘bold on reducing sugar consumption’ and we look forward to contributing to the updated standards, which should address food for the whole school day, and promote best practice in making schools Healthy Eating Zones.	
Curb Junk Food Price Promotions	We intend to ban price promotions, such as buy one get one free and multi-buy offers (BOGOFs) or unlimited refills of unhealthy foods and drinks in the retail and out of home	We wholeheartedly welcome the strong intentions to introduce bans on unhealthy food price promotions, and the recognition	

	<p>sector through legislation. In doing so, we aim to stop promotions that encourage bulk buying and over consumption of unhealthy products.</p> <p>We intend to ban the promotion of unhealthy food and drink by location (at checkouts and the end of aisles and store entrances) in the retail and out of home sector through legislation. We will seek to extend a similar approach to online shopping and the out of home sector ahead of checkout.</p>	<p>that it is no longer just checkouts but store entrances and end-of-aisle promotions that pose challenges for parents and children. We couldn't have asked for more to be in the plan at this stage and hope these strong intentions are maintained through the consultation in 2018!</p>	
9pm Watershed for Junk Food ads	<p>We will consult, before the end of 2018, on introducing a 9pm watershed on TV advertising of HFSS products and similar protection for children viewing adverts online, with the aim of limiting children's exposure to HFSS advertising and driving further reformulation. We will explore options to ensure that any restrictions are proportionate, help to incentivise reformulation in line with the aims of the sugar and calorie reduction programmes, and consider a focus on those products that children consume and most contribute to the problem of childhood obesity.</p>	<p>Good to see this issue recognised, and a commitment to consult on this by end of 2018. However language around only 'limiting exposure' rather than a ban, and ensuring 'restrictions are proportionate' suggest a wholehearted approach to protecting children is still to be won.</p>	
Clearer nutritional labelling	<p>We therefore remain committed to exploring what additional opportunities leaving the European Union presents for food labelling in England that displays world-leading, simple nutritional information as well as information on origin and welfare standards.</p> <p>We will introduce legislation to mandate consistent calorie labelling in England for the out of home sector.</p>	<p>We welcome the commitment to introduce nutritional and calorie labelling in restaurants and cafés. There is no specific mention of making traffic-light or other best practice nutritional labels mandatory. More work to be done here.</p>	
Restrict hot takeaways near schools	<p>We will develop a trailblazer programme with local authority partners to show what can be achieved within existing powers and understand "what works" in different communities.</p>	<p>Good to see the government supporting action by Local Authorities to use their powers, and provide guidance to planning departments. We hope this will see local planning decisions aimed at restricting</p>	

	We will develop resources that support local authorities who want to use their powers. We will help set out the economic business case for a healthy food environment and provide up to date guidance and training for planning inspectors.	proliferation of unhealthy fast food outlets being upheld, should they be appealed by the brands involved. We hope the new guidance will be bold in its vision in support of the Childhood Obesity Plan.	
More cooking and food growing in schools	Ofsted is developing a new framework for September 2019. This will consider how schools build knowledge across the whole curriculum and how they support pupils' personal development more broadly, including in relation to healthy behaviours.	There is recognition of the importance of food education, and the need for Ofsted to update its framework, but there is no commitment to invest in infrastructure to support schools with practical food education such as cookery classes and growing schemes, in the same way as Government is pledging to invest more in physical exercise	
Tax sugary milky drinks and breakfast cereals	HM Treasury will consider the sugar reduction progress achieved in sugary milk drinks as part of its 2020 review of the milk drinks exemption from SDIL. Sugary milk drinks may be included in the SDIL if insufficient progress on reduction has been made.	We welcome the commitment to keep milk-based sugary drinks in scope, although there is no accelerated new proposal on this issue. We believe that sugary breakfast cereals should be in scope for review, and some organisations are also arguing that a sugar tax on confectionery should be considered.	
Reform VAT on food	We may also consider further use of the tax system to promote healthy food if the voluntary sugar reduction programme does not deliver sufficient progress.	Whilst there is no "pledge in bold" in Chapter 2, we welcome Government's willingness to consider further use of the tax system to make healthy food the easy, affordable option rather than unhealthy food.	
End Celebrity Endorsements of junk food brands	There are no current plans to place a ban on using brand equity and licensed characters, cartoon characters and celebrities to promote HFSS products.	No commitment to be proactive on this subject, only to review existing evidence.	
No child-friendly characters on junk food	There are no current plans to place a ban on using brand equity and licensed characters, cartoon characters and celebrities to promote HFSS products.	This was originally proposed in Chapter 1, it is one of the top issues raised by parents themselves, and we were expecting to see more progress in Chapter 2. However	

		there is only a commitment to keep monitoring evidence on advertising to children. We believe this is one of the main ways companies advertise directly to children, and will continue to build evidence in support of our campaign.	
No toys sold with unhealthy food	No mention at all.	Parents in our research with Food Active in the North West of England raised this as a major concern, but there is no recognition of this as being a problem. A definite fail.	
No healthy claims on unhealthy products	No specific commitment on this issue.	Although there is language around best practice in nutritional labelling, there is no specific commitment to stop health claims being used on HFSS products.	
Improve portion size information	We therefore remain committed to exploring what additional opportunities leaving the European Union presents for food labelling in England that displays world-leading, simple nutritional information as well as information on origin and welfare standards.	There is no specific mention of the issue raised by nutritionists and parents about misleading portion size information, especially use of adult Recommended Daily Amounts on products aimed at infants and children.	
Public Water Fountains	No mention at all.	Installing public water fountains in all schools, parks and other public spaces frequented by children would be a win-win for Government in reducing children's consumption of sugary drinks, providing free water and encouraging refillable bottle usage, meeting plastic reduction targets. Disappointing not to see a commitment to invest in this long term vision.	
Healthy Schools Ratings Scheme	No specific mention of this.	This was a commitment from Chapter 1 of the Childhood Obesity Plan which has not yet been implemented – we were expecting to see a clear deadline on formally consulting on the scheme with a	

		view to introducing this in schools. Where has it gone?	
Healthy High School Challenge Fund	No specific mention of the challenges affecting secondary level education	PHE data shows there is a significant increase in excess calorie consumption in the 11-14 age bracket, but Chapter 2 remains very focussed on primary schools (eg. References to primary PE, Daily Mile, sports premium and Ofsted guidance on physical education). Secondary schools urgently need more support and attention too.	
Public Health woven into trade talks	No mention at all.	We would have liked to have seen a recognition in the Prime Minister's preface, or opening remarks from the Secretary of State, that they intend to ensure public health and measures to tackle childhood obesity, will be strongly protected and advocated during any post-Brexit trade negotiations.	
Tackle junk food sponsorship of sports	No mention at all.	Public health minister Steve Brine has condemned sponsorship of sports by unhealthy food brands as being #baddecisions and we agree. Such association gives children the impression that these foods are part of a sporting culture. Over 64 leading health and nutritional institutions and experts, and children's organisations, have called on sports associations to end their partnerships with junk food companies, and partner instead with companies advocating a healthier lifestyle.	

In addition to the items in our own Scorecard, the Children's Food Campaign would like to acknowledge the Government's commitment to take action on further issues:

- We welcome the recognition that the self-regulation approach to online advertising by the Committee for Advertising Practice may not be the most effective one, and a commitment to keep this under scrutiny, and if necessary consider a stronger regulatory approach if evidence suggests this is needed. We are ready to contribute into any public dialogue or research on this issue.
- We welcome the commitments to support local authorities to take action in relation to the obesogenic environments on their own streets and in public facilities, and to support these with stronger guidance.
- We note the investments to be made in physical activity in schools, including the proposals for the Daily Mile and encouraging cycling and walking to school. We would argue similar measures should be adopted for secondary and not just primary schools.
- We support any action by Government to address the fact that children from disadvantaged and lower-income backgrounds are at greater risk of being overweight or obese by the age of 11, and to use programmes such as Healthy Start to target additional resources to them. We regret that the government did not take the opportunity earlier in 2018 to also allow eligibility for Free School Meals to roll out across the Universal Credit system, which would have increased take up of school meals. This, together with improvements to School Food Standards and a Healthy Schools Ratings Scheme, could have ensured that by 2022, more than a million more children were eating a healthy lunch every day, and removed the stigma of free school meals only being available to those with family incomes below £7400 net earnings per annum.

Feedback

This briefing paper represents our initial response to the Childhood Obesity Plan, and we look forward to further analysis and debate with policy makers, politicians, nutrition, health and children's organisations and, most critically, parents themselves, to help build our own thinking and contribution into the consultations to implement the proposals it contains.

If you have any comments, or views on our analysis, please do contact us via barbara@sustainweb.org

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