



Health Select Committee Follow-Up Inquiry on Childhood Obesity Written evidence submitted by Children's Food Campaign / Sustain

About Sustain: the alliance for better food and farming. Sustain advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. Sustain coordinates the Children's Food Campaign, the Campaign for a Sugary Drinks Tax and the Sugar Smart campaign. We work with our members and others to promote integrated healthy and sustainable policies and practices for food, farming and fishing.

About the Children's Food Campaign: Children's Food Campaign (CFC) aims to improve children and young people's health by campaigning for policy changes in our schools, in our communities and throughout our society that would promote healthy and sustainable food environments. It is a project of charity Sustain: the alliance for better food and farming. Children's Food Campaign is supported by over 100 UK-wide and national organisations, including children's and health charities and professional bodies, trade unions, school food experts and environmental organisations.

We welcome the Health Select Committee's follow-up inquiry on progress with the Government's Child Obesity: A Plan For Action. We note that Chapter One was originally launched in August 2016, Chapter Two in June 2018, and most recently further updated via the Government's Green Paper on Prevention, published in August 2019.

To follow up on any of the points in our submission please contact: Barbara Crowther, co-ordinator of the Children's Food Campaign, barbara@sustainweb.org on 020 3559 6777.

Healthy Weight, Healthy Future

- Everyone wants children to have a happy, healthy childhood, and healthy children are more likely to be healthy as adults. The government has rightly set a target for halving childhood obesity by 2030 – a 10-11 year horizon for reversing a trend that currently sees obesity or overweight affecting 22.6% of children entering primary schools, rising to one in three 10-11 year old children when they leave. This prevalence is doubled for children from disadvantaged and most deprived areas of the country.ⁱ Children with obesity are over five times more likely to have obesity as adults.ⁱⁱ There is no time for delay, this is a time for action.

Progress in Government Plans on Childhood Obesity

- Despite launching numerous Government consultations since the last Health Select Committee inquiry on childhood obesity, we remain disappointed with the slow pace of progress in the tangible introduction of any of the new measures being consulted upon.
- We welcome the confirmation in the Government's Green Paper on Advancing Health: Prevention in the 2020s that it intends to introduce a ban on sales of high caffeine energy drinks to under-16sⁱⁱⁱ. This measure had very strong backing from both teachers and parents we polled as part of the consultation, with a preference for a sales ban to be introduced at 18, rather than 16. However, we and the food retail industry are still awaiting details of when and how the sales regulation will come into force.

- The revised, updated Nutrient Profile Model, used for assessing HFSS products for marketing and advertising purposes, has still not been published, leaving uncertainty across the food and drink industry.
- Despite extensive work of the child obesity team in the Department for Health & Social Care, and despite huge and positive public response, consultations on calorie labelling in out-of-home, extending restrictions in HFSS food and drink advertising via a 9pm watershed, restricting multi-buy and in-store location promotional offers of HFSS foods, have not yet resulted in any clear commitment to act on proposals they contained. Three in four parents in our research want to see junk food comprehensively banned from all till and check out areas^{iv}.

Steps Government should take:

- The Government should immediately publish the details of the introduction of a ban on sales of energy drinks, in order to provide time for transition for business, and work with Public Health England and other stakeholders to deliver a public education campaign to accompany its introduction, targeting teenagers and parents.
- The Government should move decisively and quickly in relation introducing the measures outlined in current Childhood Obesity Plan consultations and review processes, including measures on advertising, marketing, promotions, calorie labelling, school food and a revised Nutrient Profile Model.
- The Government should establish a Children's Food Watchdog to co-ordinate across Government departments, to drive and monitor progress on ensuring all children's rights to healthy food, and ensure the voices of children and young people are heard.

Building on success of the Soft Drinks Industry Levy

- The Soft Drinks Industry Levy (SDIL) which came into force in April 2018 has resulted in a reduction of sugar of 29% between 2015-2018, compared with an average sugar reduction of 2.9% for food and drink covered by voluntary sugar reduction measures, with no other categories likely to achieve the 20% sugar reduction target by 2020^v. Evidence from sales data of soft drinks indicate that most of the reformulation took place in advance of the deadline levy coming into force, with a slower pace of change since April 2018, and therefore further action may now be required to trigger further reformulation in this category.
- According to the Office for Budget Responsibility (OBR), the SDIL is now forecast to raise £1.37bn in income over the next four years^{vi}, an average of around £340 million per year. HM Treasury has confirmed that in 2020/21 levy income has been included in the Department for Education budget, however the original Healthy Pupils Capital Fund has not been continued beyond 2018/19, whilst the £26 million allocated from the SDIL to the National School Breakfast Programme over two years is only committed to March 2020. The Department for Education has not confirmed future programme investment allocations from SDIL income. We are disappointed at the lack of monitoring or transparency on how income raised by the levy, intended to be ring-fenced for children's health, is actually being spent^{vii}, or will be spent in future.

Steps Government should take:

- Commit to maintain the Soft Drinks Industry Levy as part of any future comprehensive spending reviews and budgets, and to ring-fence forecasted income raised for direct investment in programmes to improve children's food, health and healthy weight. Ensure Department for Education is adequately monitoring and reporting transparently on how income from the SDIL is spent (and what that is achieving) as part of overall evaluation of impact of the levy and industry buy-in for it.
- Extend the scope of the Soft Drinks Industry Levy to include milk-based sugary drinks, which are currently exempted.
- Incentivise further reformulation of soft drinks by lowering the threshold for drinks qualifying for the levy, and increasing the rates to be paid.
- Consider uprating the cost of the levy, increasing it at least in line with inflation.
- Explore the potential for using further levy or fiscal mechanisms on other product categories failing in voluntary reformulation (eg. cakes, biscuits, confectionery, desserts), modelling a levy around calories or energy density, recognising the greater ingredient complexity of these product categories.

Reducing exposure to junk food advertising

- We welcomed the consultation to introduce a 9pm watershed for junk food advertising, however policy options presented watered down versions of restrictions, rather than the comprehensive watershed covering all HFSS products across all platforms that parents, health professionals and nutritionists are calling for. The proposal to exempt channels with fewer than 90,000 child viewers would still allow HFSS advertising on over 400 of the 480 TV channels available, according to Cancer Research UK^{viii}.
- The Children's Food Campaign has been monitoring compliance with CAP regulations in non-broadcast advertising of HFSS products since January 2018, and has had several cases of adverts on websites, social media channels, bus stops and telephone boxes upheld by the Advertising Standards Authority as breaches of regulations, including Kinder (Ferrero), Cadbury (Mondelez - twice), KFC, Subway, McDonalds, Burger King, Swizzels Matlow. In June 2019, the ASA published the results of its own investigations into online advertising using child avatars, and over a two week research period uncovered over 940 adverts for HFSS products on children's websites, whilst 13 out of 39 children's websites carried one or more HFSS adverts^{ix}.
- The last Health Select Committee report supported our recommendation to restrict the use of child-friendly cartoon characters on HFSS food and drink, which is omitted in current childhood obesity action plans. Research in June 2019 by Action on Sugar & Salt and Children's Food Campaign found over 500 products carrying child-friendly characters were high in either salt, fat or sugar, including more than half of the products carrying popular pre-school characters such as Peppa Pig or Paw Patrol^x. It is clear that voluntary action is failing to deliver a responsible or healthy approach to product packaging and labelling.
- Since the last Health Select Committee Enquiry on Childhood Obesity, a number of partnerships have been confirmed between HFSS brands and sports federations – including Coca Cola sponsorship of Euros2020, Monster Energy signing deals with 8 Premier League football teams^{xi}, and the new England and Wales Cricket Board format The Hundred being sponsored by 8 different brands of KP Snacks^{xii}, indicating that current informal arrangements between DCMS, DHSC and sporting federations are not failing to transform the associations between junk food and snacking culture and participation in sport.

Steps Government should take:

- The Government must move to introduce a comprehensive 9pm watershed on the advertising of HFSS food and drink as outlined in the consultation document, across all TV and digital platforms.
- The Government should close loopholes in current CAP regulations for non-broadcast advertising of HFSS food and drink that currently permit adverts banned outside primary and secondary schools to be displayed close to many other types of nurseries, children's centres, leisure centres, playgrounds etc. The Government should explore more effective sanctions and penalties (such as fines) to be imposed on companies in breach of regulations.
- In line with the commitment in the Prevention Green Paper to address marketing and labelling practices in relation to early years, the Government should restrict the use of child-friendly characters on all HFSS packaging, especially those with appeal to very young, pre-primary and primary aged children.
- Recognising current actions are utterly failing to halt the trend in promotion of HFSS food and drink through sports sponsorship, the Government should consider introducing restrictions on unhealthy food and drink sports sponsorship and partnerships, with the aim of reducing association between sporting bodies, leagues, venues and competitions and junk food brands and products.

Empowering local public health and community action

- In 2018 there were over 102 expressions of interest from local authorities in running local childhood obesity trailblazers, showing the potential for targeted action of the type that has so successfully started to transform health and weight in cities such as Amsterdam. However, the current programme has only resulted in funding for 5 areas for the next 3 years, each receiving £300,000 over 3 years (£1.5m in total). We welcome the introduction by the Mayor of London of a new healthier food advertising policy on all Transport for London sites as of February 2019. Several other local authorities are now exploring the potential both to use public spaces as a platform for healthy food education and promotion, and to restrict advertising of food, drink and brand advertising that is high in fat, salt and sugar. Sustain's report Taking Down Junk Food Ads, launched in April 2019, outlines the efforts by authorities, and the need for more powers to be devolved in terms of planning and local advertising regulations^{xiii}.
- Local authorities need access to long term sustainable funding through to 2030 in order to play their full part in prevention and weight management services for families. The current public health grant is £850 million lower than 2015/16 in real terms. We welcome the Chancellor's September 2019 announcement to increase the Public Health Budget in 2020/21, and we hope that such an increase will be sufficient to restore and expand investment in public health interventions at local level.

Steps Government should take:

- Commit to ongoing sustainable funding for public health services in the next long-term spending review.
- Provide additional targeted grants for innovation at local level. Given the Soft Drinks Industry Levy alone is forecast to raise an estimated £340m per year, there is huge opportunity being missed in supporting a greater number of well-planned and targeted local public health initiatives with efforts to support children's healthy food, weight and exercise. The current programme could be scaled ten times with just a fraction of the income the SDIL is raising.

Making our schools healthy food zones

- The Department for Education has still not published the ‘bold update’ to School Food Standards promised in June 2018, as part of Chapter Two of the Childhood Obesity Plan. Despite concerns that many schools are not compliant with mandatory School Food Standards, there is still no formal monitoring, and OFSTED’s new inspection framework announced in May 2019 removed all mention of healthy eating, and only following lobbying by school, education and children’s groups was it reinserted into the handbook for school inspectors.
- The long awaited Healthy School Ratings Scheme was published in a ‘beta-version’ form in July 2019, as a self-assessment survey to be completed by schools as part of Sports England’s Active Lives Children & Young People Survey^{xiv}. However, in 2017/18 this survey only involved 110,000 of the 8.05 million children in our state-funded primary and secondary schools, and adding 15 self-assessment questions for schools to a survey that is mainly focused on physical education is a long way from independent monitoring and reporting on delivery of mandatory School Food Standards and mandatory nutrition education curriculum that we and many of our member organisations have been calling for. A properly managed Healthy Schools Ratings Scheme, overseen by an official government body such as OFSTED, has the backing of parents and teachers alike, as showing in research with almost 1000 teachers, governors and parents conducted by our partner School Food Matters in 2019^{xv}.

Steps Government should take:

- Publish a ‘bold update’ to School Food Standards, including tighter rules on replacing all sugary puddings and desserts with fresh fruits, yoghurts and other healthier options, in time for school caterers to start implementing changes no later than the 2020-21 academic year.
- Commit to extending mandatory School Food Standards to all schools in receipt of public funding, including all types of academy.
- Commit to building on the current ‘beta-version’ test phase for a full roll out of a mandatory, accessible and comprehensive Healthy Schools Ratings Scheme in time for the 2020-21 academic year, and ensure ratings are based on objective evidence, not just self-declaration.
- Support and incentivise schools to adopt water (or water and milk) only policies, including financial support to reinstate drinking fountains where needed.

ⁱ NHS Digital (2019) <https://digital.nhs.uk/data-and-information/publications/statistical/national-child-measurement-programme/2018-19-school-year/age>

ⁱⁱ Simmonds M et al. (2016) Predicting adult obesity from childhood obesity: a systematic review and metaanalysis. *Obesity Reviews*.

ⁱⁱⁱ https://www.sustainweb.org/news/jul19_preventiongp/

^{iv} https://www.sustainweb.org/news/apr19_promotions/

^v <https://www.gov.uk/government/news/new-report-shows-further-sugar-reduction-progress-by-food-industry-1>

^{vi} https://cdn.obr.uk/AnnexA_March_2019.pdf

^{vii} https://www.sustainweb.org/news/sep19_csr/

^{viii} Data used by Cancer Research based on BARB figures in March 2019, and supplied to DHSC as part of the government consultation.

^{ix} https://www.sustainweb.org/news/jun19_avatars/

^x https://www.sustainweb.org/resources/files/press_releases/Children_Packaging_Report.pdf

^{xi} <https://www.sportindustry.biz/news/monster-energy-multiple-pl-partnerships>

^{xii} https://www.sustainweb.org/news/oct19_cricket/

^{xiii} https://www.sustainweb.org/publications/taking_down_junk_food_ads/

^{xiv} https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/814914/Healthy_schools_rating_scheme.pdf

^{xv} https://www.sustainweb.org/news/mar19_hsr/