

GUIDANCE ON HFSS FOOD AND DRINK ADVERTISING

When scheduling food or drink advertising in cinemas, the following question should always be asked:

Are any products shown in your ad HFSS or not, in line with the UK government nutrient profiling model?

YES

This trumps everything. It must be treated as an HFSS ad.

If you are unsure, then you are obliged to furnish that information which has been commonplace for TV advertising since 2011. Details of the nutrient profiling model and how to apply it can be found at

<https://www.gov.uk/government/publications/the-nutrient-profiling-model>

NO

You should submit written confirmation to Digital Cinema Media. When the ad is screened, the Cinema Advertising Association (CAA) will have received a submission form bearing your declaration and an appropriate approval letter will be issued.

The nature of the written confirmation is up to the CAA member company – letter, form, or email – but must specify the product or products being advertised, the agency and the ad. This is for self-protection to avoid a promise of coverage the company could not deliver if, when on submission for clearance, the CAA / CAP / ASA Council ruled the produce or brand was in fact HFSS.

Even if a product or products are not HFSS, or products do not feature at all, you should also consider whether the brand being promoted strikes you as being a classic, unhealthy fast food brand e.g. a brand known for its burgers, pizzas, high sugar fizzy drinks, sugary full fat ice-creams, cookies etc. If you consider it is, then you should consider the following:

Are 50% or more of the products sold under that brand HFSS?

YES

If **yes**, then it is presumptively an HFSS halo brand, and it may not be able to run with some films, or through sales routes, particularly attractive to under 16s. However, the final decision lies with the CAA, which will confirm whether it is an HFSS brand or not during clearance. At any point, you can ask the CAA or CAP copy guidance for advice.

CURRENT EXAMPLES OF HFSS HALO AND NON-HALO BRANDS

These are all subject to change consequent to more information or ASA investigations after 1 July 2017.

Brands which appear to be HFSS halo brands but which have asserted in writing they are NOT:

McDonalds & McDonalds Happy Meals – 50%+ non-HFSS lines

Red Bull – 50% non-HFSS lines

Brands which the CAA is currently not treating as HFSS halo brands:

Subway – infinite number of choices to make up a sandwich

Presumed HFSS halo brands until written assurances indicate otherwise:

Domino Pizza, Burger King and Ben & Jerry's

