

## Vale of Glamorgan Council Food and Drink Advertising Approval Guidance

### 1. General Principles – determining HFSS products

- 1.1. The UK Government Nutrient Profiling Model (NPM) is widely used and has been subject to rigorous scientific scrutiny, extensive consultation, and review. Furthermore, the scoring system it uses balances the contribution made by beneficial nutrients that are particularly important in children's diets with components in the food that children should eat less of.
- 1.2. It has therefore been concluded that the NPM model is the best way of identifying food that contributes to child obesity. Such food and non-alcoholic drink is not only purchased directly by children but is bought for them by others.
- 1.3. Guidance on how to identify whether a product is considered a high fat, salt, sugar foodstuff (HFSS) under the NPM has been [published by the Department of Health and Social Care](#).

### 2. Practical exceptions

- 2.1. The NPM allocates points on the basis of the nutrient content of 100g of a food or non-alcoholic drink and does not differentiate between products on the basis of typical portion size or manner of consumption.
- 2.2. There are no exceptions to the policy. The Vale of Glamorgan Council understands there may be some limited unintended consequences of applying this policy, but has concluded that these consequences do not justify the public expenditure required to establish, run and monitor a general exceptions process.
- 2.3. Ad hoc exemptions can be granted by the Vale of Glamorgan Council. Where exemptions are granted:
  - 2.3.1. Advertisements and/or supporting copy should not suggest that the product(s) are 'healthy', given their overall HFSS rating;
  - 2.3.2. Advertisements and/or supporting copy should be presented in a way that is targeted at adults and adult settings; and
  - 2.3.3. Advertisements and/or supporting copy must comply with the Vale of Glamorgan Council Advertising & Sponsorship Protocol.

### 3. Advertisements featuring only non-HFSS food and non-alcoholic products

- 3.1. These would normally be approved but would still need to comply with other sections of the Vale of Glamorgan Council Advertising and Sponsorship Protocol.

### 4. Advertisements featuring only HFSS products

- 4.1. Where a proposed advertisement features only food and/or non-alcoholic drink which is rated HFSS, such copy would be rejected
- 4.2. It is therefore recommended that, before committing to advertising production, if advertisers are unsure, they should discuss their eligibility with the Vale of Glamorgan Council's agents.

### 5. Advertisements where there is a range of food/non-alcoholic drink featured, some of which is HFSS

- 5.1. The advertising of any HFSS products is unacceptable under the Vale of Glamorgan Council Advertising and Sponsorship Protocol, so a range or meal could not feature them (i.e. a meal could only be featured if all products were non-HFSS). This would also apply to any collection

of ingredients or meal settings being shown, including those for restaurants, aggregator platforms and delivery services.

- 5.2. It is the responsibility of advertisers and their agents to verify the status of the products featured using the NPM.

## 6. Advertisements where no food or non-alcoholic drink is featured directly but the advertisement is from or features a food and/or non-alcoholic drink brand

### 6.1. This may include:

- advertisements where the brand's logo is included but no products (e.g. a brand values campaign);
- directional or promotional signage to a store, app or website;
- promotional advertising which is price led but features no products (e.g. '50% off everything');
- advertising about a business or its performance; and
- sponsorship of an event or attraction by a food or non-alcoholic drink brand.

- 6.2. Food and non-alcoholic drink brands (including food and drink service companies or ordering services) will only be able to place such advertisements if the advertisement promotes healthier options (i.e. non-HFSS products) as the basis of the copy.

- 6.3. Where advertisers are uncertain about the classification of proposed copy under these guidelines, they should discuss this with the Vale of Glamorgan Council's agents.

## 7. Advertisements where food and non-alcoholic drink is shown 'incidentally' (i.e. it is not the subject of the advertisement but is included (or implied) by visual or copy)

- 7.1. HFSS products should not be promoted by being featured in advertisements for other products. It is the responsibility of advertisers and their agents to verify the HFSS status of the products featured using the NPM.

- 7.2. Where a food or non-alcoholic drink item is featured incidentally and does not relate to a specific identifiable product which can be assessed for its HFSS status, the closest product may be analysed or advertising copy may be rejected by the Vale of Glamorgan Council or its agents on the basis that the advertisement promotes the consumption of HFSS foods.

## 8. Advertisements where food and non-alcoholic drink is referenced in text, through graphical representations or other visual representation

- 8.1. HFSS products should not be promoted through references in text, graphical images or other visual representations of food and non-alcoholic drink. Where a food or non-alcoholic drink item is featured in this way and does not relate to a specific identifiable product which can be assessed for its HFSS status, advertising copy may be rejected by the Vale of Glamorgan Council or its agents on the basis that the advertisement promotes the consumption of HFSS foods.

## 9. Indirect promotion of HFSS food and/or drink

- 9.1. Where a product is non-HFSS but falls within a category covered by Public Health Wales (PHW's) recommendations for sugar or calorie reduction, the product should always carry a prominent product descriptor to help differentiate it from non-compliant products (e.g. where an advertisement features a non-HFSS pizza or burger, the image should be accompanied by prominent text that names the specific product and retailer).
- 9.2. Children should not usually be shown in advertisements for products which are compliant in a category which is covered by PHW's recommendations for sugar or calorie reduction.

## 10. Portion sizes

- 10.1. The NPM model is based on nutrients per 100g of a product, rather than recommended portion size. Advertisers should always ensure that they promote products in portion sizes which encourage healthy eating. For products that are non-HFSS but fall within a category covered by PHW's recommendations for sugar or calorie reduction, the product should be displayed as a single portion.