

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA150519-2647

26 July 2019

Dear [REDACTED]

Thank you for your further refined request for information which the GLA received on 14 May 2019. Your request has been dealt with under the Freedom of Information Act (FOIA) 2000.

You asked for a list of 69 priority responses (excluding any parties which have not responded to the advertising ban section of the consultation). Please find attached the information within scope of your request. 22 of the companies within scope of your request responded online and their responses have been placed into a spreadsheet at the end of this response.

A detailed summary of the consultation response, including the GLA's responses to issues raised and subsequent changes made to the final strategy following the feedback from the consultation responses we received is available online. Here is the link to the consultation report:

https://www.london.gov.uk/sites/default/files/appendix_b_-_consultation_report_final_09.01.19.pdf

In terms of the responses we received during the consultation process. Of the 149 responses from stakeholder organisations, 68% (101) were in favour of an advertising ban, 17% (26) opposed and 15% (22) did not expressing a view on this element of the draft LFS. In addition, a total of 592 emails and letters were received by members of the public relating to the proposed ban on advertising junk food on the TfL estate, of which 98% were supportive of a ban.

Please note that employee details are exempt from disclosure under s.40 (Personal information) of the Freedom of Information Act. This information could potentially identify specific employees and as such constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

A small amount of information within 5 of the consultation responses is being withheld from disclosure section 43 (2) (Commercial interests) of the FOIA. This provides that information can

be withheld from release if its disclosure would, or would be likely to, prejudice the commercial interests of any person.

A commercial interest relates to a person's ability to participate competitively in a commercial activity and in this instance, relates to commercially sensitive contractual information regarding revenue and occupancy rates. Disclosure would be likely to prejudice the ability of third parties in their negotiation of future commercial opportunities.

Section 43(2) constitutes a qualified exemption from our duty to disclose information under the FOIA and consideration must be given as to whether the public interest favouring disclosure of the information covered by this exemption outweighs the public interest considerations favouring maintaining the exemption and withholding the information. In this instance we regard it not to be in the public interest to release information that would be likely to be detrimental to commercial activities, for example, if obtained by competitors and in relation to management of advertising rights.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely


Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

Advertising Association Response

Draft London Food Strategy

Introduction

1. The Advertising Association brings together the whole of the advertising and marketing communications industry, including the advertisers, the agencies and the media owners. The advertising industry supports a responsible and proportionate framework of rules, and regularly reviews these to ensure they are up to date and in line with evidence.
2. We welcome the opportunity to respond to the Mayor of London's Draft Food Strategy. We recognise the wider societal issues caused by obesity and commend the Mayor's attempts to ensure access to affordable healthy food. We also support, in particular, the responses from Outsmart, the IPA, the FDF, the BSDA, ISBA, and CAP.

Executive Summary

3. We do not agree with the proposed 'unhealthy' food and drink advertising ban on the Transport for London (TfL) network. We do not agree that there is a need for further advertising restrictions, we question the use of the phrase "unhealthy" to describe food and drink products to be restricted, and we believe that a full economic impact assessment should be carried out.

Restrictions

4. **We do not believe there is any need for further advertising restrictions.** The current advertising rules are proportionate, evidence-based and already apply across all media, including the TfL estate.
5. The consultation document asserts that *"advertising of foods that are unhealthy is often unregulated and widespread during family TV viewing times, through the internet and on the streets"*. This is incorrect and misleading, as the advertising in all of those situations is regulated through the BCAP and CAP Codes.¹ Strict, clear rules apply to the advertising of food and drink products high in fat, salt and sugar (HFSS) in all the media listed in the consultation document and these rules are actively enforced by the ASA².
6. Academic research has also failed to establish a direct link between food marketing and obesity, hence we are not convinced by the necessity and proportionality of further restrictions.

Definition of foods

7. **We question the use of "not healthy" and "unhealthy" throughout the consultation document.** The document requests views on the proposed ban across the Transport for London estate of advertising of food and drink that is "not healthy" and explains *"healthy as defined under the Food Standards Agency Nutrient Profiling Model"*. However, the guidance on the Nutrient Profiling Model ("NPM") to which the document provides a link, makes clear that the purpose of the NPM is to help classify foods and drinks which exceed a particular score as "less healthy", not "healthy" or "unhealthy" as the consultation suggests.
8. The NPM is simply not an appropriate mechanism for determining whether food and drink products are "healthy" or "unhealthy". Food categorised as HFSS by the NPM clearly includes products which

¹ The rules on food and soft drink advertising to children are set out in sections [13.9-13.15](#) of the BCAP Code (for broadcast advertisements) and in sections [15.11-15.18](#) of the CAP Code (for all non-broadcast marketing communications).

² The ASA investigates alleged violations of the BCAP and CAP Codes and publishes its rulings on a weekly basis. See the [rulings of 4th July 2018](#) for example, where 5 rulings related to the advertising of HFSS products to children.

have a role to play in a balanced diet. In fact, some products which are mentioned in Government advice as part of a balanced diet to be included as part of a consumer's 5 a day would be categorised as HFSS under the NPM and, if the proposed restrictions go ahead, not be able to be advertised.

9. Evidence also indicates that some of the products that the document deems as "healthy" would in fact be classed as HFSS when using the NPM. Our concerns are more pertinent while the NPM is being reviewed, insofar as it is currently unclear which further products would be classified as HFSS under the new model and therefore included within any proposed advertising restrictions.

Commercial impact

10. We also are concerned that the unintended commercial consequences for TfL's revenue has not been considered in the consultation document and urge that an impact assessment is carried out. Advertising revenue across the UK supports the delivery of a number of products and services, including transport such as London's network. It will be important to be clear what impact this proposal will have on TfL and its ability to provide a level of service that Londoners demand, given significant other pressures it faces from, for example, declining passenger numbers.

About the Advertising Association and UK advertising

11. The Advertising Association promotes the role, rights and responsibilities of advertising and its impact on individuals, the economy and society. We bring together companies that advertise, their agencies, the media and relevant trade associations to combine strengths and seek consensus on the issues that affect them.
12. Every £1 spent on advertising generates £6 to UK GDP and so advertising is a driver of economic growth, generating more than £120bn per year for GDP, and also supports the wider creative industries. Nearly one million jobs in communities right across the country are supported by advertising services. The UK is a world-class hub for advertising, with the latest available figures also showing exports of British ad services reached a record high of £5.8bn in 2016.
13. The current rules for advertising in the UK are among the strictest in the world. The rules are comprehensive and apply across all forms of media, whether on TV, online, on the street or on public transport. Restrictions prevent any advertisement for HFSS products being targeted at children under 16 through any medium, not just children's channels. As children's media consumption habits have changed, so have the rules. In July 2017, the restrictions were extended to cover non-broadcast media, online, social media, advergames and TV-like content such as video-sharing platforms, if directed at children or in media with a significant audience of under 16s (over 25% of the audience).
14. Working with Public Health England ("**PHE**"), Outsmart voluntarily took steps (in July 2017) to restrict OOH marketing of HFSS products in areas most likely to be seen by children, by preventing HFSS advertising being placed on static OOH sites within 100 metres of school boundaries.
15. In [July 2018](#) CAP will be conducting a one-year review of the food and drink advertising rules to ensure these are operating effectively. We believe this review should be completed before further restrictions are proposed.
16. In April 2018 the Broadcast Committee of Advertising Practice (BCAP) issued a call for evidence on HFSS TV advertising and children. Stakeholders were invited to submit evidence on the impact advertising has on children's food consumption. BCAP will evaluate the latest evidence and publish its analysis in the Autumn. We believe the Mayor should duly consider both this review and the earlier referred to CAP review prior to announcing the outcome of this consultation.

QUESTION: Do you agree with the proposed ban of advertising food and drink that isn't healthy across the Transport for London network?

17. We do not agree with the proposed ban. Research has consistently failed to establish a link between food and drink advertising and childhood obesity rates. Restrictions on media should be proportionate and evidence based, and we firmly believe that the current advertising regulatory system in the UK answers this requirement. Given the lack of evidence of a link between advertising and obesity, it would be disproportionate to pursue further restrictions considering the impact such restrictions would have on media, advertisers, and the wider creative economy across London.

Limited impact of advertising restrictions

18. Research has consistently found restrictions on media to have an extremely limited impact on behaviour change. For instance, the comprehensive McKinsey Global Institute report on obesity ranked media restrictions twelfth of sixteen interventions.ⁱ This is in line with other academic research which quantifies advertising as accounting for a 2% variation in children's food choice.ⁱⁱ Others have cited the 'modest' impact of food marketing on obesity.ⁱⁱⁱ
19. The academic view on advertising and food choices is reinforced by TGI data which shows only 3% of overweight or obese people consider advertising to be an important factor when choosing food or drink products, compared to price (85%), quality (84%), sales promotions (34%), brand (28%) and origin (15%).^{iv} Likewise, Public Health England survey data shows only 6% of adults believe less advertising would help them consume less calories.^v

Amsterdam approach

20. We note the Strategy proposal refers to the Amsterdam 'Healthy Weight for All Children' policy, and says that a similar ban on the advertising of food and drink to that proposed for the Transport for London estate formed a "key part" of the wider Amsterdam policy which has led to a reduction in childhood obesity rates since implementation. However, as the advertising restrictions on the Amsterdam metro were introduced in January 2018, this specific advertising ban measure cannot have contributed to the statistics on reduction in childhood obesity.
21. The Amsterdam programme consists of a wide range of interventions, including intensive work with at risk families, help during the first 1000 days of life and increased access to physical activity. We believe it is misleading to imply that obesity reduction rates can be related to advertising bans on the metro.

Proportionality

22. We welcome the Mayor's focus on reducing childhood obesity. This, however, must be done in a proportional way. The framework underpinning advertising regulation means that adults may have their exposure to food and drink advertising restricted so that the aim of reducing children's exposure can be achieved. For instance, the CAP rules dictate that HFSS advertising may be restricted where 7.5 out of every ten audience members are adults.
23. However, most TfL property has an overwhelmingly adult audience during almost the entire day. Banning advertisements for HFSS products on the TfL estate would reduce adults' exposure to these ads, but do almost nothing to reduce children's exposure to them. We believe therefore that an outright ban is entirely disproportionate to the stated aim of reducing childhood obesity.
24. As outlined by Outsmart, only a small proportion of the users of TfL services are under 16. The National Travel Survey (conducted by the Office of National Statistics) shows that trips in England to and from school per child (aged 5-16 years) per year, using local bus services, fell from 16% in

2010 to 12% in 2016 across England. Estimates of the proportion of children that use the London Underground to travel to and from school range from 1-3%. Therefore, schoolchildren would make up a very small proportion of the people impacted by a ban of HFSS across the entire TfL estate.

25. We are also concerned by the statement that “*advertisements for food and drink companies that just advertise the company’s brand or restaurant*” would also be banned. CAP guidance³ already exists covering brand advertising that has the effect of promoting an HFSS product. Most, if not all, food and drink companies and restaurants produce and sell a wide range of products which would include many non-HFSS items. Therefore, there is no requirement for a separate “brand advertising” ban, given that this is already covered and regulated by the CAP code.

TfL estate and commercial impact

26. We also note the peculiar situation which would arise whereby restaurants and shops, which currently reside on the TfL estate, would be able to sell their HFSS products on the TfL estate but not to advertise them.
27. We also are concerned by the lack of impact on TfL revenue discussed in the consultation document. Advertising revenue across the UK supports the delivery of a number of products and services, including transport such as London’s network. It will be important to be clear what impact this proposal will have on TfL and its ability to provide a level of service that Londoners demand, given significant other pressures it faces from, for example, declining passenger numbers.
28. As discussed in the response from Outsmart, there would be a severe impact on the out-of-home advertising industry, as the affected outdoor advertising space could not simply be resold or substituted with alternative products. Occupancy rates would be likely to fall, putting further downward pressure on prices and therefore revenues.
29. Outsmart estimate that the reduction in revenue for the industry would be £375m over the next 5 years. As they make clear, this would (i) undermine the out-of-home advertising industry’s ability to invest in targeted measures to reduce childhood exposure to advertising and (ii) make it more difficult for them to commit current levels of funding to investments such as the installation of bus shelters and the provision of free WIFI. In addition to this significant adverse impact on the public interest, there would also be knock-on consequences for jobs and investment in local communities in London.

Regulatory uncertainty

30. We are concerned with the current level of regulatory uncertainty facing food and drink manufacturers, brands, and media owners.
31. Industry fully accepts it has a role to play in encouraging a balanced diet and healthy lifestyle. Food and drink manufacturers have been heavily engaged in efforts to reformulate their products to reduce sugar and salt content. Given ongoing regulatory uncertainty related to the classification of products as HFSS and proposed further restrictions on the advertisement of these products, companies may face a disincentive to reformulate, thus fundamentally undermining a key plank of the Strategy.

Nutrient Profiling Model

32. Food and drink products are classed as high in fat, salt and sugar (HFSS) through the Nutrient Profiling Model (NPM). Public Health England is currently consulting on a revised NPM, which would

³ The CAP guidance can be found [here](#).

encompass significantly more food and drink products if implemented as currently proposed. As this model forms the basis of restrictions on food and drink advertising, it would cause significant uncertainty for companies if new rules around food and drink advertising were to be introduced before the new model has been consulted on and implemented.

33. We are concerned that the nature of the discussion around childhood obesity has meant that products which are classified as HFSS under the NPM are described as “junk food”. The Model is not intended to define products as “unhealthy”. As per the Government’s guidance, the purpose of the NPM is to classify food and drinks that exceed a particular score as “less healthy”, being high in fat, salt or sugar (“HFSS”). The NPM does not classify foods as “healthy” or “unhealthy”. Indeed, the Government webpage itself points out that foods and drinks classified as HFSS “can form part of a balanced diet”.^{vi}
34. In this consultation, the labelling of food and drink products as “unhealthy”, and the use of the new NPM should it be adopted, does not acknowledge that restrictions would be placed on products rightly considered a part of consumer’s five a day as “junk food” (such as pure fruit juice), as well as products which have a rightful place as part of a balanced diet, such as olive oil, vegetable oil, nut oils, cheese, peanut butter, some pasta sauces, and pure fruit juice, amongst others.
35. It seems to be the case that food that the authors of the Strategy consider to be “unhealthy” does not correlate with what the NPM classifies as HFSS. If we take the example of oils, annex 2 of the Strategy entitled “Our Definition of Good Food” sets out what the authors define as “Healthy, nutritious and appropriate to all cultures and needs” and includes in this list of foods “healthier cooking oils”. We question what is meant by “healthier cooking oils”. Our understanding is that this would mean olive oils, flaxseed oil, walnut oil, and similar products. However, the proposed ban would include these oils that are deemed to be “healthy” foods, because they would be classified as HFSS (and consequently, in the words of the consultation, “unhealthy”) if they are using the NPM.
36. We support the collective aim from the Mayor, Government and industry to ensure that children are proportionately protected from exposure to HFSS advertising. However, we are concerned that the proposed ban on ‘unhealthy’ food and drink would include products which have little or no appeal to children or the advertising of which is predominantly or exclusively aimed at adults. These include butter, oils, cheese (including half fat versions), Marmite, some pasta sauces, and mayonnaise (including low calorie), condensed milk, pastry, soy sauce, stock cubes and pesto.

Wider uncertainty

37. Companies in the food and drink sector are already facing a number of challenges specific to its sector, including reformulation, the SDIL, a potential packaging tax, and a DRS scheme for bottles, as well as unresolved issues regarding the supply chain and talent in the sector as part of the Brexit negotiations. Further disproportionate restrictions on companies’ abilities to advertise and market their products would be an addition to the challenging environment the sector is operating in and reduce its competitiveness.

ⁱ McKinsey Global Institute; Overcoming obesity: An initial economic analysis.

ⁱⁱ Buckingham, ‘The Impact of the Commercial World on Children’s Wellbeing: Report of an Independent Assessment, DCFS and DCMS’, *December 2009*, p11.

ⁱⁱⁱ Livingstone, Sonia (2004) A commentary on the research evidence regarding the effects of food promotion on children: prepared for the research department of the Office of Communications (OFCOM).

^{iv} Based on a survey of 20,000 UK households.

^v Public Health England, ‘Calorie reduction: The scope and ambition for action’.

^{vi} Department of Health Nutrient Profiling Technical Guidance, page 4.

ASA submission to Mayor of London: Consultation on the draft London Food Strategy

1. Background and Introduction

- 1.1. This submission is provided by the Advertising Standards Authority (ASA), the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) – the ‘ASA system.’
- 1.2. The ASA is the UK’s independent advertising regulator. We have been administering the non-broadcast Advertising Code (written and maintained by CAP) for 56 years and the broadcast Advertising Code (written and maintained by BCAP) for 14, with our remit further extended in 2011 to include companies’ advertising claims on their own websites and in social media spaces under their control.
- 1.3. We are responsible for ensuring that advertising is legal, decent, honest and truthful and our work includes undertaking proactive projects and acting on complaints to take action against misleading, harmful or offensive advertisements. We are committed to evidence-based regulation and we continually review new evidence to ensure the rules remain fit-for-purpose.
- 1.4. In addition to investigating ads, we also provide a wealth of training and advice services (most of which are free) for advertisers, agencies and media to help them understand their responsibilities under the Codes and to ensure that fewer problem ads appear in the first place. CAP and BCAP provided over 389,000 pieces of advice and training in 2017.
- 1.5. The ASA is providing this written submission in response to the Mayor of London’s consultation on the draft London Food Strategy.

2. Consultation question: Do you agree with the proposed ban of advertising food and drink that isn't healthy across the Transport for London network?

- 2.1. Advertising for food and drink on TFL properties, including ads for products high in fat, salt or sugar, are already regulated by the ASA system under some of the strictest rules in the world.
- 2.2. The ASA regulates the content and placement of ads in outdoor spaces. This means if an ad is for a product (such as HFSS, alcohol, gambling, a premium-rate service or medicine) to which the Advertising Codes apply special scheduling or placement restrictions, advertisers need to ensure that the ad isn’t placed in media that appeals particularly to certain groups of people, e.g. people aged under 18 in relation to alcohol ads or under 16’s in relation to HFSS or medicine ads.
- 2.3. Most ambient media is generally targeted; it is not directed at children and is subject to the HFSS placement restrictions but its creative content is controlled by the other HFSS rules. However, certain outdoor environments are likely to slant the audience, for instance, a site’s close proximity to a school. We would not expect there to be outdoor HFSS advertising within 100m of a school perimeter or any other areas (such as a theme park of particular appeal to children) which is very likely to have a disproportionately high number of children.
- 2.4. The ASA welcomes the draft strategy’s focus on protecting children, which chimes with our own objective to reduce and appropriately limit children’s exposure to HFSS ads while taking

into account the rights of advertisers and adults to, respectively, communicate and receive food and drink ads.

- 2.5. In order to protect children, the current CAP rules consider it's a fair price to pay to ban HFSS ads to a predominantly adult audience i.e. where 7.5 out of every ten audience members are adults (the 25% rule). However, most TFL properties at most times of day have an entirely or almost entirely adult audience. Banning HFSS ads on these properties, at these times wouldn't do anything to reduce child exposure to HFSS ads and, therefore, an outright ban would appear to be completely disproportionate to the stated aim.
- 2.6. It is commonly accepted that obesity is a multi-factorial disease, which calls for a multidimensional set of interventions. In line with better regulation principles, these interventions must be evidence-based, proportionate and targeted at the problem, while minimising any undesirable costs of interventions.
- 2.7. The evidence consistently shows that advertising has no more than a modest influence on children's food preferences. This is crucial to any consideration of advertising restrictions because it suggests that reducing children's exposure to advertising for food and soft drink high in fat, salt or sugar (HFSS products) would have no more than a modest effect on their food preferences.
- 2.8. Conversely, the impact of advertising prohibitions on media revenue is known to be significant. In 2007, Ofcom forecasted that £211 million net would be lost to broadcasters from a 9pm watershed ban on HFSS ads. There may be material and adverse consequences arising from lost ad revenue for TFL.
- 2.9. Today, CAP and BCAP provide comprehensive, cross-media standards on HFSS advertising, which bans HFSS ads in all children's media. These represent some of the strictest regulations in the world and have led to a dramatic reduction in children's exposure to HFSS ads. On proposals on outdoor advertising, CAP rules require advertisers to ensure that ads are not placed in media that appeals particularly to under 16's in relation to HFSS.
- 2.10. In the knowledge that advertising of HFSS products has no more than a modest effect on children's food preferences, CAP nevertheless proposed and introduced, in July 2017, a comprehensive ban on the advertising of HFSS products in all children's non-broadcast media i.e. media attracting an audience where 25% or more of the audience are aged 15 or younger. This covers outdoor, print, cinema, online - including TV-like content online, such as video sharing platforms - and social media.
- 2.11. The new restrictions significantly reduce children's exposure to HFSS product advertising and the opportunities for advertisers to promote HFSS products to children, especially online. We believe the new ad restrictions will have a positive impact in contributing to wider efforts to reduce harm to children.
- 2.12. In order to help advertisers comply with the rules, we've produced various pieces of guidance to help advertisers get to grips with the broadcast and non-broadcast rules on advertising food and soft drinks to children in non-broadcast media. This includes new guidance on non-broadcast ad placement¹ – including outdoor advertising - to protect children and young people when it comes to age-restricted products such as HFSS and

¹ [Media placement restrictions: protecting children and young people](#), July 2017

alcohol. We have also produced guidance on brand advertising². If a piece of branding is synonymous with a specific HFSS product, using it even without featuring or referencing the product itself could be a problem. The guidance helps advertisers identify such issues.

Contact

██████████
Advertising Standards Authority
██████████ or publicaffairs@asa.org.uk
██████████

² [Identifying brand advertising that has the effect of promoting an HFSS product](#), July 2017

BSDA'S CONSULTATION RESPONSE TO THE DRAFT LONDON FOOD STRATEGY

Background

The British Soft Drinks Association (BSDA) represents UK producers of soft drinks, including carbonated drinks, still and dilutable drinks, fruit juices and bottled waters. Our membership includes the majority of Britain's soft drinks manufacturers as well as franchisors, importers and suppliers to the UK soft drinks industry.

Overall, soft drinks sector activity has been estimated to sustain over 340,000 jobs in the UK and adds more than £11 billion to the economy on a UK scale.

The role of the soft drinks sector

As an industry we recognise we have a role to play in tackling childhood obesity, which is why soft drink companies have been engaged in calorie reduction initiatives for a number of years. The soft drinks sector has proactively taken in many areas, including:

- new product development, with more zero and no calorie options available
- reformulation of existing recipes to lower sugar content
- widening the availability of smaller pack sizes
- increasing advertising spend on low and no calorie drinks
- voluntarily agreeing not to advertise HFSS soft drinks to children under 16 – a year ahead of the CAP code revision in 2016
- becoming the only category to set a voluntary calorie reduction target of 20% by 2020, which we are well on the way to achieving.

These initiatives have seen sugar intake by 4 – 10 year olds from soft drinks (including fruit juice) decline by 15% (and 11% for 11 – 18 year olds) since 2012 (NDNS data combined years 7 and 8).

Voluntary action of the soft drinks sector

Soft drinks companies voluntarily took a decision not to advertise any drinks high in sugar to under 16s across all media channels - including online, advergames, around schools, and specific sporting events – a year ahead of the CAP code revision in 2016.

In addition, the sector has increased advertising spend on low and no calorie drinks substantially in recent years – a trend which is reflected in sales (no/low calorie options now make up the largest segment of the soft drinks market – 58%¹).

In addition, the soft drinks industry has been involved in, and has led on a series of initiatives to this end, including sponsored exercise and school initiatives².

HFSS advertising and the current advertising code

The draft strategy states that *“advertising of foods that are unhealthy is often unregulated and widespread during family TV viewing times, through the internet and on the streets”*. This is not correct, as the advertising in all of those examples (including the TfL estate) is regulated through BCAP and CAP. In particular for outdoor advertising (including posters on the underground, streets and bus shelters) there is an additional requirement that no sites can carry HFSS advertising within 100 meters of a school. All of these measures mean that there has been a dramatic fall over the last decade in the exposure of under 16s to HFSS advertising. In addition, academic research has consistently failed to establish a direct link between food and drink marketing and childhood obesity, therefore we are not convinced by the proportionality of further restrictions, and would request that an evidence base for any proposals be developed prior to taking forward any of the proposals in the draft strategy.

In July 2018, CAP will be conducting a review of the food and drink advertising rules to ensure these are operating effectively. We believe that in terms of due process, this review should be completed before further restrictions are proposed, insofar as these may detract from the operation of the self-regulatory review process.

It should be noted that PHE have recently consulted on a revised Nutrient Profile Model, and we have a number of concerns around the proposals. We believe the scope of the reviewed model should be determined before further restrictions are considered using NPM as a marker. Further, the draft Strategy states *“healthy as defined under the Food Standards Agency Nutrient Profiling Model”*. However, this model is to define products as HFSS, not as “unhealthy” and therefore we do not believe the NPM is the appropriate mechanism for determining whether food and drink products are “unhealthy”.

We request that in relation to this proposal that soft drinks that are below the soft drinks industry levy level (5g sugar per 100ml) are permitted to be advertised in order to promote the healthier alternatives Government policy was intended to encourage.

RECOMMENDATION

That soft drinks that are below the soft drinks industry levy level (5g sugar per 100ml) are permitted to be advertised in order to promote the healthier alternatives Government policy was intended to encourage.

¹ Global Data

² <http://www.britishsoftdrinks.com/Industry-Initiatives>

Fruit and Vegetable Juice

Fruit and vegetable juice play a positive role in the nutrition of children and if the revised Nutrient Profile Model categorises fruit and vegetable juice as HFSS, and these products are not permitted to be advertised, there may be unintended consequences for children's health.

The number of children achieving 5 a day and fruit juice consumption is decreasing (and consumption of fruit and vegetable juice is already well below the 150ml recommendation at 62g/day for children aged 4 – 10 and 64g/day for children aged 11 – 18), therefore it would seem counter intuitive to implement a policy that may further decrease children's consumption of fruit and vegetables, particularly when there is no evidence that fruit and vegetable juice is being over consumed by children.

Smoothies made with whole crushed fruit contribute to fibre intake and both smoothies and fruit and vegetable juice provide 1 of your 5 a day; and contain a range of minerals, vitamins and bioactive compounds, such as phytochemicals, that are increasingly recognised as important for good health. Guidelines for a healthy, balanced diet typically recommend consumption of plenty of fruits and vegetables to supply our vitamin and mineral needs. And, within these guidelines, moderate consumption of 100% juices and smoothies can make a significant contribution to intake of potassium and other important micronutrients. Intake of some of these essential micronutrients is of concern in a substantial proportion of children in the UK.

- In 2016, only 16% of children aged 5 to 15 were consuming the recommended 5 portions of fruit and vegetables a day, and over half of boys (54%), and 49% of girls consumed fewer than 3 portions a day³
- A quarter of children's fruit and vegetable intake is from fruit and vegetable juice⁴
- The most recently published NHS figures state that only 8% of 11-18 year olds are meeting the 5 a day recommendation.⁵

The fruit juice industry has invested significantly in promoting PHE's 150ml messaging – from on-pack through to TV and billboard advertising. An advertising ban would undo the public facing work industry has undertaken to actively promote PHE's own guidance.

We urge that the negative implications that may be associated with this proposal be rigorously assessed prior to proposals being further developed.

RECOMMENDATION

That fruit and vegetable juice continue to be permitted to be advertised on the Transport for London estate, regardless of the outcome of the NPM review, in order to encourage children to meet the 1 of 5 a day recommended daily intake of fruit and vegetables.

³ <https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-obesity-physical-activity-and-diet/statistics-on-obesity-physical-activity-and-diet-england-2018>

⁴ [NDNS Years 7 and 8 \(combined\)](#)

⁵ [NDNS Years 7 and 8 \(combined\)](#)

The draft Food Strategy makes reference to the Amsterdam 'Healthy Weight for All Children' policy, but the advertising restrictions on the Amsterdam metro were only introduced in January 2018, and so there is as yet no evidence that this specific measure has contributed to a reduction in child obesity (further, the statistics referred to in the draft Food Strategy were collected prior to the introduction of the Amsterdam Metro advertising restrictions).


Obesity is a complex issue and is caused by the interaction of many complex factors, requiring a multi faceted solution, such as that implemented in Amsterdam, which majored in helping people to change their diet and exercise patterns. Simple, cost effective and social exercise initiatives in schools and communities, and the Daily Mile, are also successful and can help tackle childhood obesity. The soft drinks industry has interest in, and will continue to support, initiatives to this end, including sponsored exercise and school schemes⁶.

Conclusion

We understand the desire for a solution to obesity and the soft drinks sector has stepped up and played its part, through its actions on sugar reduction, portion size and promotion of low and no calorie products, and a commitment not to advertise HFSS products to under 16s. We ask that any solutions brought forward should be proportionate and evidence based.

Contact Information

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www.britishsoftdrinks.com



⁶ <http://www.britishsoftdrinks.com/Industry-Initiatives>

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July 4 2018

Response to **The Draft London Food Strategy**

Diabetes UK welcomes The Draft London Food Strategyⁱ.

Are the six priorities the right ones? Are there other priorities that should be considered?

Diabetes UK are pleased to see that the Government has published Childhood Obesity Chapter 2. The Child Obesity Plan (August 2016) fell short of the urgent and ambitious action that is needed to reduce childhood obesity including areas on junk food marketing to children, price promotions on unhealthy food and out of home calorie labelling. The new Government consultation paper strengthens these aspects. The Draft London Food Strategy tackles some of these issues and Diabetes UK supports the priorities set out in the strategy and feels that London should be leading the way in light of the ambitious national plan.

Diabetes UK would like to see mandatory, comprehensive and consistent nutrition labelling such as calorie labelling, with additional contextual information, at the point of choice in restaurants, cafes and takeaways,

What are your views on the proposed advertising of food and drink that is not healthy across Transport for London estate?

Diabetes UK are particularly interested in the proposal to ban 'band only' advertising as well as banning advertising for specific products that are high in fat, sugar and salt.

This will be a controversial and hasn't been attempted anywhere else with a similar transport infrastructure. Diabetes UK would like to see a ban in advertising these products across the Transport for London estate.

What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?

Diabetes UK has a Food Upfront campaign, we're calling on the Government to introduce clear, consistent and compulsory labelling, including better information on carbs. Specifically, we want to see:

- a) Compulsory front-of-pack traffic light labelling on all processed foods and pre-packaged foods sold in the UK, when it is possible to legislate for this post-Brexit.
- b) Compulsory calorie labelling in key restaurants, cafes and takeaways, with carb content available online or when requested in store.

- c) Clearly and consistently displayed on products per portion or per individual unit as prepared.
- d) Research into how to incorporate free sugars into the current labelling system. As well as the public's understanding of what free sugars are.

We acknowledge that the Government will be consulting on some of this at a national level within the Childhood Obesity Chapter 2. We ask the Mayor of London to support the Diabetes UK campaign so that the capital leads the way on food labelling in the UK.

Part of the work that was done as part of the Diabetes UK, Tesco and British Heart Foundation Partnership included Make, Move and Munch Clubs in East London. These were family based clubs and which place in school holidays. The sessions were delivered by partner organisations and involved activities which enabled food based learning with key messages about portion size, salt, sugar and fat intake. A cookery demonstration took place and then participants made the same meal. This meal was then eaten at lunchtime by the adults and their children. There was also a physical activity element. ⁱⁱ

Diabetes UK trains Community Champions to raise awareness in local diverse communities about the risk factors in developing diabetes. This includes healthier eating. Aside from this Diabetes UK London Region has trained volunteers to attend awareness raising events which are organised by companies, communities and other charities across London. Healthy eating is promoted by speakers and volunteers running information stands.

How could your organisation support the Mayor to do more to achieve good food in London and pledge to support the final strategy?

Much of what is being outlined in this strategy fits with the Diabetes UK prevention policy.

Is the strategy inclusive and does it consider the needs and priorities of all Londoners?

The number of people over the age of 17 years diagnosed with diabetes is 494,933ⁱⁱⁱ. When the London Assembly Health Committee wrote *Blood Sugar Rush: Diabetes time bomb in London* in April 2014 that figure was 475,000.

London has some boroughs with the highest prevalence of diabetes in the UK. Whereas the England prevalence is 6.67%. Harrow has the second highest prevalence in England with 9.4% of the population having diabetes^{iv}. This is followed by Brent (8.84%), Newham (8.58%) and Redbridge (8.31%). These are all areas with large BAME communities. This compares with Richmond with a prevalence of 3.63%.^v

The diverse population of London means that we have groups that are of higher risk developing Type 2 diabetes at an earlier age than in the white population. The South Asian and African Caribbean populations are at 2 – 4 times more at risk of developing the condition and are at risk from 25 years old.^{vi} With earlier onset of the condition these groups are also at risk from earlier onset of complications.

Chapter 4 Good Food for Maternity, Early Years, Education and Health

London and the South East have a third of the adolescents in the UK who have been diagnosed with Type 2 diabetes, a condition usually seen in those over 40 years old.^{vii} The National Diabetes

Paediatric Audit (NDPA) breaks the numbers in to the regional networks hence London and the South East are presented together. However, as the predominance of adolescents with the condition are South Asian girls we can surmise that London has the majority of the cases diagnosed will be in London.

Of the children and young people diagnosed with Type 2 diabetes twice as many females than males are diagnosed. The majority of these children and young people, from both white and non-white communities, come from deprived areas. At diagnosis 78.5% of these children and young people were obese. The true prevalence and incidence of children and young people with Type 2 diabetes is not shown in the Audit as this is based on those receiving specialist care and some are being seen only in primary care as pathways about referral and treatment are not yet in place.^{viii}

It is welcome to see that the proposals put forward in the Government's Childhood Obesity Chapter 2 is the outcome to 'reverse the emergence of Type 2 diabetes in children'. This should be an aim in the final London Food Strategy.

Diabetes UK would welcome restrictions on new hot food takeaways from being permitted to open within 400 meters of existing or proposed primary or secondary schools.

Other points

It is now 4 years since the Health Committee of the London Assembly published Blood Sugar Rush: Diabetes Time Bomb in London and we welcome The Draft London Food Strategy which builds on some of the recommendations made in that report.^{ix}

Diabetes UK

ⁱ Diabetes UK's aim is creating a world where diabetes can do no harm. Diabetes is the most devastating and fastest growing health crisis of our time, affecting more people than any other serious health condition in the UK - more than dementia and cancer combined. There is currently no known cure for any type of diabetes. With the right treatment, knowledge and support people living with diabetes can lead a long, full and healthy life. For more information about diabetes and the charity's work, visit www.diabetes.org.uk

Diabetes is a condition where there is too much glucose in the blood because the body cannot use it properly. If not managed well, both Type 1 and Type 2 diabetes can lead to devastating complications. Diabetes is one of the leading causes of preventable sight loss in people of working age in the UK and is a major cause of lower limb amputation, kidney failure and stroke.

People with **Type 1 diabetes** cannot produce insulin. About 10 per cent of people with diabetes have Type 1. No one knows exactly what causes it, but it's not to do with being overweight and it isn't currently preventable. It's the most common type of diabetes in children and young adults, starting suddenly and getting worse quickly.

Type 1 diabetes is treated by daily insulin doses – taken either by injections or via an insulin pump. It is also recommended to follow a healthy diet and take regular physical activity.

People with **Type 2 diabetes** don't produce enough insulin or the insulin they produce doesn't work properly (known as insulin resistance). About 90 per cent of people with diabetes have Type 2. They might get Type 2 diabetes because of their family history, age and ethnic background puts them at increased risk. They are also more likely to get Type 2 diabetes if they are overweight. It starts gradually, usually later in life, and it can be years before they realise they have it. Type 2 diabetes is treated with a healthy diet and increased physical activity. In addition, tablets and/or insulin can be required.

ⁱⁱ Three Years. Three Partners. One Goal. Project Evaluation National Charity Partnership 2015-2017 Diabetes UK, British Heart Foundation, Tesco

ⁱⁱⁱ Quality and Outcomes Framework 2016-17

^{iv} Quality and Outcome Framework 2016-17. Bradford has the highest prevalence with 10.45% of its population having diabetes.

^v Quality and Outcomes Framework 2016-17

^{vi} Us, diabetes and a lot of facts and stats (Diabetes UK 2018)

^{vii} National Diabetes Paediatric Audit 2015/16 (last Audit done)

^{viii} National Diabetes Paediatric Audit 2015/16

^{ix} Blood Sugar Rush: Diabetes Time Bomb in London, London Assembly Health Committee (April 2014)

Paul Robinson

From: [REDACTED]@dominos.co.uk>
Sent: 05 July 2018 23:28
To: london food
Subject: Domino's submission to London Food Strategy consultation

F.A.O. London Food Strategy Team,

Please find below our consultation submission on behalf of Domino's.

Please could you confirm safe receipt of this tomorrow?

Best wishes,

[REDACTED]

DOMINO'S SUBMISSION

Domino's is proud of the food that it serves and we use fresh ingredients to handmade our pizzas to order.

We understand the challenges in public health and work hard to be transparent, give customers information and choice to make informed decisions.

We publish detailed calorie and nutritional profiles for all our pizzas on our website and app and customers can choose the toppings and crust, the type of cheese and most importantly, the number of slices they eat.

Domino's doesn't market to under 16s. This includes no advertising in TV programmes specifically targeted at children and no marketing practices designed specifically to attract children. Nor is any part of our menu designed with children in mind.

To support the Mayor's objectives, we would be pleased to go further and agree to ban advertising of HFSS foods within 200m of any primary or secondary school in London, we currently have in force an exclusion zone of 150m.

We would also consider including some advice in our print advertising in London to encourage people to eat a more healthy diet.

Other areas to consider include harnessing new technologies for advertising on the underground. This might mean changing the time of day at which our ads are shown to avoid them being seen by children, for example, stopping them in late afternoon when children are on their way home from school. The planned digital advertising boards on the new Elizabeth Line are a good example of where this would be possible.

We are keen to work with the Mayor and his team on the proposed changes to the Health Catering Commitment. On this, we are happy to take our place alongside other members of the industry.

[REDACTED]



July 2018

The Draft London Food Strategy

Uber Eats in the UK

Uber Eats is Uber's standalone food delivery app and website that makes ordering food just as easy as ordering a ride. The service has been available in London since 2016, and we currently operate in over 65 UK cities.

Uber Eats helps local restaurants grow by connecting them with customers via our online platform. Already over 7,000 restaurants – from local small businesses to international brands – partner with Uber Eats in the UK to deliver their food to customers quickly and reliably. Using our technology, restaurants are able to access valuable data and insights about their sales and how customers rate their food. Restaurants are also able to pursue new business opportunities – from delivery-only kitchens to chef-driven pop-ups – using Uber Eats as a virtual storefront to reach more customers with lower overhead costs.

Our service helps customers discover new foods, local restaurants and enjoy more of what their cities have to offer. We aim to offer a wide selection of restaurants, cuisines and price points. Delivery is quick and convenient. Food delivery normally takes under 30 minutes, and can be ordered to home, office, or even the park for a picnic.

The benefits of food delivery

Food is an integral part of our lives. That is why we are proud about our mission to make eating well effortless at any time, for anyone. This mission is well aligned with the aims described by the Mayor in his foreword to the Food Strategy. We share the aims to:

- *Enable every Londoner to have access to healthy, affordable, culturally-appropriate good food – regardless of where they live, their personal circumstances or income;*
- *Create decent jobs and a sustainable food system;*
- *Leverage emerging food technologies to give fresh ways to solve London's evolving food needs*
- *Celebrating the world-class fare cooked by Londoners of all backgrounds.*

As recognised in the Food Strategy, online delivery platforms are changing people's perception of food delivery by making a range of food available for all occasions, and any location, at the touch of a button.

Benefits to eaters

Food delivery provides a number of benefits to Londoners.

Our service is convenient: customers are able to get meals for all occasions, in any location delivered at the push of a button. Whether you want breakfast after the gym, lunch at work, or dinner at home with the family, Uber Eats gives access to a wide selection of your favourite meals, freshly prepared and reliably delivered.

In the first quarter of 2018, we had 44 different cuisines available in London. In the same time period, we brought the taste of London to people from 79 countries.

Uber Eats understands the importance of a balanced diet and eating healthily. This is why we want our technology to help facilitate healthy eating. Consumers are able to set dietary preferences such as vegetarian, vegan and gluten free. Indeed, we are seeing a growing interest in healthy options, and our technology can help restaurants tweak their offering to suit the needs of the customers – including the trend for healthy food.

The Food Strategy encourages businesses to make healthy food options available 24 hours a day, which could help shift or night workers who may be at risk of being unable to access a healthy diet whilst at work. Uber Eats is available in London from 7:00 AM – 4:00 AM, seven days a week. Thus, be it a lunch order to the office or a meal after a long night shift, our service can help people access a more diverse selection of food than what might be available locally, or in the workplace.

Benefits to restaurants

Our promise to restaurants is to help them reach new customers and grow their business. We do this by building technology to serve the needs of restaurants of all sizes, offering delivery at the push of a button; access to actionable data and analytics; and a new way to reach more customers, more efficiently, with less overheads.

Whereas before, only some restaurants had the capacity and resources needed to build their own delivery service, today all restaurants can benefit from a reliable delivery option. Our service is built in a way that enables restaurants to focus on what they do best: creating amazing food for their customers. Restaurants have the flexibility to decide when they wish to offer their food for delivery. For example, during busy times they can focus on serving the customers in the restaurants. During quieter hours, delivery can help keep the orders coming in and increase the efficiency of the kitchen.

The Food Strategy outlines both the importance of the food sector as a route to employment and entrepreneurship, as well as the challenges food businesses in London are facing. While restaurants create a high number of jobs and make a significant contribution to our economy, we know that many restaurants struggle to access data on customer satisfaction, understand consumer trends. This can limit growth and create inefficiency. Uber Eats helps overcome this challenge by giving access to data and helping to distill it into meaningful insights.

That's why we're focused on building technology to help restaurants of all sizes unlock the potential of their business. Through Uber Eats, restaurants have access to insights about their service quality,

customer satisfaction, and sales alongside access to the tools to make specific adjustments to improve their business. Access to this information makes it easy to ensure that there are enough people working in the kitchen during busy times, and to adjust the menu according to the feedback received from customers. Better data and optimised menus can also help restaurants to reduce food waste as they are able to plan for and anticipate demand more efficiently.

Tackling childhood obesity

The Food Strategy outlines a number of initiatives directed at tackling childhood obesity, ranging from supporting voluntary schemes for restaurants and promoting healthier choices at an individual level to the outright ban of 'unhealthy' food advertisement and planning restrictions on new hot food takeaways. In general, we support the Mayor's plan on reducing obesity. Eating well – our mission – is fundamental to health and happiness. However, we believe that some of the measures proposed could actually work against the broader aims of the Food Strategy and have a detrimental effect on the restaurant sector.

Before focusing on the specific proposals we wish to highlight some of the features of our service and the way we work. As detailed above, the Uber Eats platform makes it easier for customers to find food suitable to their diet. In the context of childhood obesity, it is worth noting that the app is only available to those above 18 years of age. If a child is using an account to receive food, a parent or guardian must be with them when the order is delivered. All of our paid online marketing is targeted to reach over-18's only.

Although we already have measures in place that effectively minimise our potential link to the issue of childhood obesity, we understand the Mayor's need to use every means at his disposal to help tackle child obesity.

On the surface, the proposed ban on advertising of food and drink that is not healthy across the TfL estate appears straightforward: reduce exposure to unhealthy food and drink imagery, and so reduce obesity. However, it entails impracticalities. First of all, the proposal could lead to counter-intuitive results; under the criteria of the Nutrient Profiling (NP) model some foods that are generally considered healthy are not, and vice versa. For example, a burger might qualify but an acai bowl not. Second, we believe the ban could be unfair towards smaller restaurants. Larger chains have the resources to map their food offering to the NP model, and can more easily find and utilise alternative advertising channels. This applies especially to the idea of banning 'brand only' advertising.

Instead of an outright ban, we believe a more proportionate response could consist of the following elements:

- a tagline included in advertising encouraging eating a varied diet;
- voluntary expansion of the high fat, salt and sugar foods (HFSS) advertising ban near schools;
- utilising technology to avoid children's exposure to HFSS advertising on the TfL estate; and
- working together to encourage participation in the Healthy Catering Commitment.

The above approach is more practical, while still actively encouraging and facilitating healthier eating in London. There is also broader industry alignment around such a nuanced approach.

Similarly, we consider that the proposal to restrict the opening of new hot food takeaways could limit the

entrepreneurial freedom of many Londoners. As is illustrated in the London Plan topic paper: 'hot food takeaways',¹ the opening of new hot food takeaway locations would be almost completely prohibited in central London. We believe that working to improve the food offered by hot food takeaways through schemes such as the Healthy Catering Commitment would be a better solution. Uber Eats would be pleased to work together with the Mayor to increase awareness of and participation in the Healthy Catering Commitment among its restaurant partners, to ensure we can all enjoy and celebrate the food prepared by Londoners of all backgrounds.

Vision for the future of food delivery

Uber Eats brings many benefits to eaters and restaurants in London already. But we believe that we are only getting started. Developing our service and technology can help support many of the aims outlined in the draft Food Strategy even better than we do today.

For example, what if in the future, the actual dishes themselves are automatically customised to what the customer wants? This could involve every component of the dish (portion size, amount of protein etc.) adjusted according to the eaters' preferences. By enabling people to input their health goals – for example, less sodium, more vegetables – these could be taken into account in preparing the dishes. Technology would make it easier for people to make conscious choices regarding their diet.

And the same applies for restaurants: what if restaurants no longer ever have to guess what their customers want? By developing the feedback restaurants receive and building predictions, we can help restaurants drive their business further and serve their customers better. Data could be used to suggest new food restaurants could make to meet particular demands – this could be optimised based on the kitchen and current ingredients, so restaurants didn't need to make big investments to implement such changes. This would be a future where entrepreneurs can truly make the most out of their food business, a world with less food waste, and more satisfied customers.

¹ London Plan topic paper: hot food takeaways, January 2018. ([Link](#))

Paul Robinson

From: [REDACTED]@foodethicscouncil.org>
Sent: 05 July 2018 12:19
To: london food
Subject: Response to London Food Strategy consultation - Food Ethics Council

To whom it may concern,

Unfortunately we have not had opportunity to submit a full response. However, I felt it important to highlight a few key points from an initial read of the draft London Food Strategy document that is open for consultation:

- Overall, we welcome the draft strategy document – particularly the **breadth of issues** covered (from household food insecurity to food growing, from Healthy start to public procurement and beyond) and the **proposal of some bold interventions** (e.g. banning junk food marketing in certain places), which – done well – are much needed, given the scale of challenges we as society (and Londoners) face in relation to our food system.
- We welcome the inclusion of different ways that people in London can participate in the food system, from eating together to food growing and beyond. However, some of the language is too consumer-centric and is focused only on buying better food (which is important, but is only one piece of the jigsaw). Treating people as ‘consumers’ limits their agency and misses out on lots of the other ways people can and should be able to participate in food and farming. Instead, I would like to see people called ‘people’ or ‘food citizens’. Also, it would be good to explicitly encourage Londoners to ask questions of people selling/ providing their food about their food (where it comes from, how it was made etc). Asking better questions encourages food providers to better understand their food value chains and to be transparent about the story behind their food offerings
- Much as the excellent People’s Food Strategy has attempted to do at a national level, are there opportunities for bottom-up people’s food strategies at the London level or a London Borough level - developed by Londoners for Londoners?
- We challenge some of the assumptions used in the draft document, particularly the one on P.35 that says “By 2050, global demand for food will increase by 70 per cent, which will be largely met by the intensification of farming including increasing food grown for animal feed.” This (a) implies that more food needs to be produced (as opposed to changing diets and tackling food loss and waste) and (b) suggests that intensification and a growth in meat consumption are somehow inevitable, when in our view, they are not. It would also be good to have more up-to-date references in the document, particularly on climate change.
- Whilst we acknowledge there are some references to animal welfare, which are welcome, we would like to see animals on a level footing (e.g. rather than Annex 3 of the strategy document saying “Food that is good for people and the planet”, it should say “Food that is good for people, animals and the planet”) and more mention of higher welfare schemes, including those that promote positive welfare outcomes. On a separate note, we welcome reference to meat and livestock issues, but we would prefer to see more consistent promotion of ‘less and better meat’, rather than just ‘less meat’ (which is sometimes used in the document), which is too simplistic.
- In relation to food waste, we would like to see more explicit promotion of *avoiding* food waste in the first place, rather than a focus on redistribution of surplus food (which risks getting entrenched) – i.e. a genuine food waste hierarchy, with most effort focused on avoiding/ reduction.
- There is very little mention of fish in the draft document. Whilst we recognise that almost all of London’s fish will be supplied from outside of Greater London, nevertheless it would be good to include more promotion of supporting community fisheries, fish box schemes, small-scale fishers that don’t rely on industrial scale fishing techniques etc
- Some language can be tightened up and made bolder – rather than “Try supporting local shops...”, I’d prefer the document to be bolder and say “Support local shops....”; instead of “look for healthier options on menus”, why not “Choose healthier options on menus” etc
- In conclusion, notwithstanding the points above, implementation of this strategy would be a significant step forward and we would like to see London become famous for being a pioneer on fair, healthy, humane and environmentally sustainable food systems.

Apologies that these are in note form for reasons of time. Happy to discuss any of these further if of value.

Kind regards



Food Ethics Council
Kings Cross Hub
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Registered address: Food Ethics Council, King's Cross Hub, 34b York Way, London, N1 9AB, UK. Charity no. 1101885. Company
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FoodExchange.org.uk

After reading the “DRAFT LONDON FOOD STRATEGY” issued by the London Mayor’s office; there were some interesting points to be considered as well as how our organisation FoodExchange can help this to be a success.

I believe that some views on the dependency of food banks, charities and other organisation that help families and individuals with extra food be it fresh or canned has become the norm. My opinion is due to a lot of other system failures that I have personally experience therefore having to rely on some assistance from the food banks. Based on my situation and those of others; I created FoodExchange.

Views on the 6 questions:

1. Are the six priority areas the right ones? Are there other priorities that should be considered?

Based on the information provided and what I know from everyday experience: the six priority areas seem okay except number 3. The support for the SME and community base organisations most likely will work but for the public sector; it iss debatable (e.g with all the safety issues, risk, expectation, how would you get a hospital to prepare food with nearly out of date products??)

2. Are the most effective actions the Mayor, external stakeholders and individuals can take set out? Are there other actions that should be included?

All information provided about what the London Mayor will support is very encouraging and the fact his office is prepare to work with third parties to ensure these objective are delivered.

The only point that needs to be clear is when it comes to funding; it should be done on results or perceived outcome, not who is the biggest or more established organisations as this does not allow for creative ideas, solutions and high impact. Let there be opportunity to challenge the status quo, as this allow for fresh view point to be considered as well as agility in the delivery.

Funding should be available to fund innovative organisations / projects which haven’t been tested yet.

3. What are your views on the proposed ban of advertising of food and drink¹ that is not healthy² across the Transport for London estate?

Personally I like the idea and think it would be a step in the right direction but being realistic there is an impact that has to be considered, “financially”. Is the Mayor’s office prepared to take on the loss of revenue from the reduction in advertising??

A better option is to consider what was done with smoking; negative advertising through awareness might be an option being that we as a nation are more pictorial therefore will notice this change. It might not be to everyone’s liking/taste but is effective with the age group you are trying to change. Also means more advertising rather than less.

4. What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?

FoodExchange is a collaborative digital solution providing information on the real-time availability and access to surplus fresh food to individuals, organisations, etc. that require it. It aims to help improve access to healthier fresh food, reduce fresh food waste and improving logistics therefore also helping the environment.

The project is about helping everyone that depends on food banks, hot food and charity food services to have better awareness of availability of it. FoodExchange is designed to be replicated anywhere and any place in the country that needs this capability.

This is to allow local communities to function better when it comes to fresh food wastage. Local shops, super markets, etc dealing with local food banks and charities which expedites the fresh food reaching the families & individuals that need the help.

Best practice is around our mission: - to help everyone that depends on food banks, hot food and charity food services to have better awareness of availability of it. FoodExchange is designed to be replicated anywhere and any part of the country that needs this capability.

This is to allow local communities to function better when it comes to fresh food wastage. Local shops, super markets, etc dealing with local food banks and charities to expedite the fresh food reaching the families & individuals that need the help.

This should be something that need to be considered in any delivery that their processes, delivery methods, capabilities, etc are repeatable and the solution can be replicated to help other parts of the country once the London delivery has been achieved.

5. How could you or your organisation support the Mayor to do more to achieve good food for London and pledge to support the final strategy?

FoodExchange can support the Mayor across these:

- a) GOOD FOOD AT HOME AND REDUCING FOOD INSECURITY
- b) GOOD FOOD FOR THE ENVIRONMENT "MAKING THE FOOD SYSTEM WORK BETTER"
- c) GOOD FOOD FOR MATERNITY, EARLY YEARS, EDUCATION AND HEALTH "SUPPORTING HEALTHIER HABITS"
- d) GOOD FOOD GROWING, COMMUNITY GARDENS AND URBAN FARMING "INCREASING SUSTAINABLE FOOD GROWING"

The above 4 points can be supported through its functionality directly and/or indirectly.

Points "a" and "c" are directly covered in FoodExchange by getting fresh or prepared health food to those demographics. By increasing access it will lead to a reduction in food insecurity. There are various organisation that once they have access to free fresh food can increase their services reach.

Point "d" - with the ability for the growers, farmers and producers being able to register on FoodExchange will open opportunities for them to reach the right organisation that could use their produce. This provide some assurances, gives the feeling of being productive and having an outlet for their produce through communication on FoodExchange.

Point "b" - as FoodExchange is about reducing fresh food wastage and, feeding the individuals and families, whilst reducing the logistics and improving the availability of fresh food or meals to those that need the help the most. This directly aligns with the point "b" and improving the Food System.

6. Is the strategy inclusive and does it consider the needs and priorities of all Londoners?

FoodExchange strategy is inclusive of everyone but the initial focus in London and the surround areas. The reason for giving priority to the Londoners is that we understand how it works here and enables us to get the system efficient and effective before bring the rest online.

FoodExchange will be able to help Kitchen Social through the redistribution of surplus fresh food to local projects from local suppliers. Also, other parts of the strategy as future functionality for providing healthy recipes, skills development (directly and indirectly through other organisation in the food industry) and healthy food/nutrition knowledge is planned.

Priorities to be led by external partners

Base on the 4 points that where referred to in the document under this section the following is how FoodExchange aligns and supports the London Mayor's office:

FoodExchange encourages and simplifies the process for the organisation that provide the fresh food to engage with local communities groups whether SME, charities or local council lead that can redistribute it and/or used it to provide meals.

Point 4 really stands out in the supporting children and young adults through their education. There is something that I think should be considered; after school meals which could help a lot in their lives.

We have morning clubs, afternoon free meals in schools which is adequate for most whilst at school but what happen when they finish school for the day. They buy junk food as that is all they can afford and in most cases this is what they have as supper. So one way to help with obesity might be to allow organisation that can provide meals to use community centres or space near to schools to provide activities and after school meals for those that need/require it.

What the Mayor will do to support change

On this point within all the different sections, there is clarity of what is supported or not. This is very helpful and easy to develop programmes around them to ensure that the support required is aligned to the Mayor's plans.

The Draft London Food Strategy, *Healthy and sustainable food for London,*

Good Food in Greenwich (GFIG) response, July 2018

Consultation Process

Good Food in Greenwich is part of the Sustainable Food Cities network, formed in July 2013. It is coordinated by GCDA but represents a partnership across the borough of over 30 organisations. We work across the 6 themes as outlined by SFC and engage with numerous individuals in a variety of different settings.

This document was devised and consulted at a meeting on the 11th June, by 23 people who attended from the following organisations:

- [REDACTED]
- RBG Public Health
- University of Greenwich
- RBG Waste Services
- RBG Families First
- GS Plus, School Meals Catering
- Optivo
- Central Greenwich Children's Centres
- Baxter Storey
- Greenwich Visitor
- PPG Health Watch

About this response

This response is a collaborative response from a public consultation with the GFIG network in June and we welcome this opportunity to comment on the London Food Strategy.

Contact for further information:

[REDACTED]
[REDACTED]
[REDACTED]

Executive Summary

Overall, we support all points in the strategy and think it is an excellent start to some very exciting changes to the food landscape in the city. We are particularly supportive of the proposed ban of advertising junk food across TFL. However, our main concern is that the advertising vacuum created is not given over to other 'nuisance class' products e.g. gambling, infant formula and food targeted at babies.

However, we think there are some areas missing, and we would like to see the strategy go even further and be more radical.

We would also like it to be known that we fully support ALL the points in the following responses:

- **Sustain, the alliance for better food and farming**
- **Good Food Lewisham**
- **London Food Link**
- **Royal Borough of Greenwich**

Consultation questions

1. Are the six priority areas the right ones? Are there other priorities that should be considered?

Yes, we think the priority areas are correct, but a number of vulnerable groups are under-represented:

- Older people
- Homeless
- Mental health
- Drug and alcohol addiction /recovery
- Nil-recourse to public funds
- Asylum seekers / refugees
- Those with disabilities

We suggest that supporting vulnerable groups to access good food is a 7th priority area.

In addition, we would like to see more clear links between actions under the different priority areas, as well as to other Mayoral Strategies, to show connections across the strategy. A number of actions are cross-cutting e.g. increasing uptake of Healthy Start vouchers and good food retail plans. A visual representation of how the areas work together and cross over would provide a helpful overview.

2. Are the most effective actions the Mayor, external stakeholders and individuals can take set out? Are there other actions that should be included?

We support all the actions in the strategy and are looking forward to seeing a robust action plan that will detail how these actions will be implemented.

We would like to see more 'required' or 'mandatory' action, rather than just promoting and encouraging.

Regarding the 'what you can do' boxes for individuals, some actions are quite complex and difficult to act on without knowledge about and motivation to eat well. For example, 'look for healthier options on menus' (page 19) is difficult to achieve without knowledge of healthy eating principles and/or mandatory menu labelling in restaurants and cafes. There should be more actions for the Mayor and external stakeholders to support individuals to develop this knowledge and motivation. See recommendations below relating to cookery skills courses and other public-facing food-related interventions.

Consultation questions

1. Are the six priority areas the right ones? Are there other priorities that should be considered?

Yes – priority areas are correct but other vulnerable groups are under-represented:

- Older people
- Homeless
- Mental health
- Drug and alcohol addiction /recovery
- Nil-recourse to public funds
- Asylum seekers / refugees
- Those with disabilities

Could this be a 7th priority area as they have specific actions relating to them

In addition, we would like to see more clear links between actions under the different priority areas, as well as to other Mayoral Strategies, to show connections across the strategy – eg Healthy Start. Perhaps a visual representation of how the areas work together and cross over to illustrate the plan. For example, Good Food retail plans comes up in priority areas 1 and 2.

A clear definition of ‘Good Food’ is needed so people understand what this refers to. Perhaps a box clearly explaining what the Mayor means would be a good addition.

2. Are the most effective actions the Mayor, external stakeholders and individuals can take set out? Are there other actions that should be included?

We support all the actions in the strategy and are looking forward to seeing a robust action plan that will detail how these actions will be implemented.

We would like to see more ‘required’ or ‘mandatory’ action, rather than just promoting and encouraging.

Regarding the ‘what you can do’ boxes for individuals, some actions are quite complex and difficult to act on without knowledge about and motivation to eat well. For example, ‘look for healthier options on menus’ (page 19) is difficult to achieve without knowledge of healthy eating principles and/or mandatory menu labelling in restaurants and cafes. There should be more actions for the Mayor and external stakeholders to support individuals to develop this knowledge and motivation. See recommendations below relating to cookery skills courses and other public-facing food-related interventions.

With regards other actions that should be included, we have listed these below under the priority area headings:

Chapter 1: GOOD FOOD AT HOME – AND REDUCING FOOD INSECURITY

2)ii) Are there other actions that should be included?

To support people to make good food choices (see ‘what you can do’ box), actions to increase people’s knowledge, skills and motivation are needed. For example, there needs to be

additional funding for cooking skills courses across boroughs via public health commissioning and third sector organisations. This should be across population groups and locations.

We would like to see more specific actions around maximising incomes such as help for those affected by welfare reform, and those in debt.

As mentioned above, there is cross-referencing here. Under Good Food for the Environment, the intro on page 35 mentions adoption of the Eat Well Guide but the 'What can you do' box only talks about reducing food waste. In the 'What can you do' box under Good Food at Home (p14), it mentions reducing meat consumption. These points need to be clarified and consistent across the sections. If we all follow the Eat Well Guide, then this will automatically reduce peoples' meat consumption.

Either reference the other relevant priority areas in each section or repeat the points across each section. In addition, in Good food at home, food growing is missing, so reference priority area 5 (as seen in priority area 5)

You are advising people to sign up to a cookery course, but how many boroughs actually run these? And do people know how to find out about them? It would be good to have some links to pages where people can find out this info. And where is the funding to provide these city-wide?

Additional areas identified from GFIG are as follows:

- Connecting with delivery services (Just Eat, Deliveroo) to support healthier and more sustainable food. Also links with priority 2;
- Broadening the appeal, motivation and access to buy and consume more healthy and sustainable food. Increase the status of Good Food. We need people to want to access it – change stigma that it is only for those who can afford it;
- Food Growing at home to link with priority 5;
- Pro-active healthy advertising to help broaden appeal;
- Reduce food waste at home and separation of food waste – links to priority 6 (unless boroughs don't already collect food waste)
- Can younger people challenge the food offer? Motivating people to want to make changes – Cordwainers Grow, Hackney Public Health-funded approach.
- Increasing community resilience by increase local / individual knowledge of cooking and food growing
- Elderly also need to be referenced here, links to our suggested 'priority 7'.

Chapter 2: GOOD FOOD SHOPPING AND EATING OUT – A HEALTHIER ENVIRONMENT

We need broaden the appeal of good food, so people want to access it. This section needs to include action to improve peoples' knowledge of what a healthier diet is and ways to motivate people to make those choices.

In addition, we need to be aware of how the food industry manipulates our food choices. Young people in particular love junk food and many are growing up in an environment where this is the norm. We should be empowered to challenge the food system and the local food environment. Local authorities (schools & youth service) should be required to implement projects such as Hackney-based Cordwainers Grow 'Where the Lies Are'.

The strategy needs to target London-based food industry, challenging them to make healthy food more affordable and tasty. New food businesses should be referred by planning for HCC accreditation. What other incentives could there be for existing businesses for HCC accreditation.

A key action should be to ensure market traders and small, local convenience shops are registered to accept Healthy Start vouchers for fruit, veg and milk.

Food labelling standards need to be more consistently applied - not a voluntary scheme. Whilst we appreciate this is out of the Mayor's control, he could be lobbying for it at a national level.

Sugar Smart has been a successful initiative for making healthier choices more accessible, however sugar shouldn't be singled out as the dietary issue of concern, high intakes of saturated fat and salt and lack of fibre also need addressing, not to mention more sustainable options. If London was 'Food Smart' and its boroughs took on this initiative, e.g. combining and building on the Healthier Catering Commitment and Sugar Smart, this would support the Mayor's aims to be a world-renowned food location. Greenwich and Lewisham have developed a charter that could form a basis for this and it covers all the existing schemes.

We believe there should be a different approach to HCC - e.g. work with chicken shops to support them to become 'safe havens' for children and then build on this positive relationship to work with them on HCC, preferably with input from children/customers.

In addition, we think the following things should be considered:

- Working with delivery services (as above); Regulate unregulated delivery services which currently run 0-hour contracts - LLW: Just Eat, UberEats, Deliveroo
- How is the food strategy going to support high street trade and independent local businesses?
- Incentivise food businesses to recycle food waste and other recycling - Links to priority 5
- The use of technology to support small businesses to more easily redistribute surplus;
- TfL advertising ban:
 - We are very supportive of this. We have done a very brief survey to show how wholly inappropriate and overwhelming these adverts are. Please see appendix 1
 - But, what will replace this advertising? We are concerned the gap will be filled with other 'nuisance class' advertising – can we advertise more healthy options to broaden the appeal of healthier food and info on Peas Please – could the veg cities campaign be included into TfL advertising?
 - We are concerned the ban only applies to products, not companies, so the likes of Coca Cola and McDonald's will still be able to advertise other products on TfL
 - We would like to see more on sponsorship. Will the ban extend to sponsorship of events? We think the Mayor should write guidance for Local Authorities of how to legislate procurement at events
 - We want the ban to include infant formula and baby foods
 - We would like to see an integrated Public Health campaign across London

- We would like to see an improvement of food options available in TfL vending machines (and all vending machines...)?
 - Could other apps which reduce food waste and plastic bottles, e.g. Refill, TooGoodToGo, OLIO, the Waste app, be promoted in place of junk food to improve the environment and increase awareness of these applications? Also links to priority 6
- How can the Mayor influence advertising in cinemas and other entertainment venues, as well as improving the food and drinks offer in these venues – could there be a similar ‘food for life’ type requirement for these locations?
 - Can the Mayor write a standardised food offer into policy for events venues?
 - Mayor to use ground expertise from ‘the trenches’ to help inform decisions around food businesses – voices from local food businesses
 - We want to see more in terms of helping healthy food businesses succeed. Could they be prioritised as businesses used at events for example? Whilst we welcome Urban Food Fortnight and think this is a fantastic initiative, it needs to be broader. This is a great initiative but too narrow in its brief and doesn’t appeal to everyone and is too exclusive. This needs to be linked with not just vilifying small independent take aways who get all the blame, but are actually providing some valuable other services to young people in the city
 - Improve food offer in convenience stores
 - We think rate relief for good food businesses is a good idea, but what is the ethical similarity for other businesses – ‘Healthy and Ethical Business Charter’ - % Fairtrade, LLW etc so it is fair across the board? And how could councils be compensated for rate relief?
 - Good Food at Home promotes reducing meat, but could this be encouraged more broadly across all food businesses?
 - All markets should have a trading requirement, perhaps a charter they sign up to which could include, no plastic, LLW, Sugar Smart etc

We also feel that the food sector is an under-recognised route to training and employment and is undervalued as an industry

Chapter 3: GOOD FOOD IN PUBLIC INSTITUTIONS AND COMMUNITY SETTINGS – BETTER FOOD PROCUREMENT

Once again, we need people to want to consume good food, so this section needs to include action to improve people's knowledge of what constitutes good food and their motivation to choose these foods, as above.

On Pg 23 you acknowledge the importance of local community and leisure centres where food can help celebrate and build inclusive communities. This is incompletely reflected in the priorities to be led by local partners as it has been translated into priorities led by the Local Authority around Social Isolation – this is not the full picture. We recommend that every London borough should have at least one community food hub based at an existing community centre / school / Children’s centre (ideally one per key areas of deprivation). This would include a community café /kitchen/community meal area where programmes such as cookery clubs, holiday meals, lunch clubs and FareShare pantries are accommodated– these link to priorities 1 and 2 by increasing knowledge and skills as well as

supporting and serving disadvantaged communities. Ideally each location would have a paid member of staff to coordinate and sustain activities

See Charlton Manor for an example of how elderly and children's provision can overlap effectively – [link](#)

We would like to see how local authorities could be empowered to enforce more guidance to support this agenda. For example, **the London Plan embedded a fast food takeaway ban. This meant local authorities could include this in supplementary planning guidance which gave them more teeth. What other actions could be approached like this?**

We feel the following actions are missing, or could be worked on

- Vending machines in public institutions and community settings - Vending machines are not mentioned in the strategy and we think they should be targeted specifically
- Resurrecting Community Centres: Fund a community hub model that could tackle many of these issues including food pantries, debt relief advice, energy & fuel support etc. (see above)
- Specify other public institutions. In 'Priorities led by external partners' – hospitals are mentioned, but what about prisons, care homes etc. These are mentioned in the intro to this section, but not in the actions
- There needs to be more on procurement and how the Mayor can support boroughs to help them write in procurement documents e.g. when procuring services, the contracted organisation has to convene to a charter, pay the LLW, support holiday meals, serve healthy food, don't use polystyrene, recycle etc
- Malnutrition could be emphasised

Chapter 4: GOOD FOOD FOR MATERNITY, EARLY YEARS, EDUCATION AND HEALTH – SUPPORTING HEALTHIER HABITS

We think that the name for this priority doesn't capture areas such as youth services or non-educational settings for school aged children. Whereas Early Years can capture nurseries, schools, children's centres etc. 'Education' does not capture provision such as Youth Clubs, which can play as big a role on healthy eating as 'education'/school settings for young people. Can the heading be changed to be more inclusive?

The actions are very schools focused in terms of external partners. When the third sector is mentioned it is in relation to schools rather than as organisations that have an influence in their own right. We suggest adding the following:

"Local authorities and third sector organisations through their work with young people in the community should ensure they are encouraging healthy eating. This could include provision such as youth services, children's centres and residential children's homes."

More action needs to be considered for the Healthy Start programme. Wider promotion of Healthy Start should be prioritised with an action for the scheme to be discussed by all early year's practitioners and not only a priority for Health Visitors.

The statement 'signposting to practical nutritional advice for families planning a pregnancy and pregnant women is essential' (page 27, paragraph 2) is vague. It should be made clear Children's Centres are part of the community BFI accreditation.

The school food environment needs greater consideration within priority 4, in particular secondary schools. There are no proposed actions to consider the movement of secondary aged children and their access to unhealthy foods and drinks across the school day. In addition, Food for Life does not currently have a secondary schools programme so it is not clear how they could participate in school food transformation programmes outside of Healthy Schools London, which as a side note does not have to feature food/healthy eating as a priority.

On page 29 action 4 is a good idea but extending the eligibility would presumably be a central government function and there are concerns about how this could be funded.

We also think the following actions are missing:

- Specific reference to secondary schools – the teenage years are crucial, and this is the age where many will adopt the worst eating habits. Where there is a lot of work being done at primary schools, secondary schools tend to be missed out. This is linked to changing the food culture as well as building skills, knowledge and confidence. How can schools be mandated to join schemes like Food for Life?
- Push for universal free school meals and include breakfast; meals provision should be mandatory during the holidays

Chapter 5: GOOD FOOD GROWING, COMMUNITY GARDENS AND URBAN FARMING – INCREASING SUSTAINABLE FOOD GROWING

Another very valuable area we support in the strategy. We would like to see specific reference to biodiversity, though, and the importance of preserving and increasing this. Policy for councils should include practice of planting, not strimming too excessively, and foraging.

We have been thinking about the development of a ‘gleaning app’ to track fruit trees in the city (including parks and gardens) so people can find fresh fruit when it’s in season. This could also represent a public service as much of the fruit from these trees falls and rots on the floor. Could the Mayor fund something like this?

Chapter 6: GOOD FOOD FOR THE ENVIRONMENT – MAKING THE FOOD SYSTEM WORK BETTER

Other points for consideration should include:

- As above (chapter 1), cross reference messages re following eat well guide
- There is wide support from the network of the need to reduce plastic waste
- Responsible Procurement Charter for London; Events and events-venues in particular. To include responsibilities to minimise production of waste (as mentioned in chapter 2)
- Could other apps which reduce food waste and plastic bottles, e.g. Refill, TooGoodToGo, OLIO, the Waste app, be promoted in place of junk food to improve the environment and increase awareness of these applications? Also links to priority 2 around TFL advertising
- Utilise the Thames for food growing

3. What are your views on the proposed ban of advertising of food and drink that is not healthy across the Transport for London estate?

This is an excellent and ambitious idea and we fully support it. We would like to add that the ban should include adherence to the International Code on Marketing of Breastmilk Substitutes to protect and support breastfeeding and minimise advertising of breast milk substitutes that undermine breastfeeding.

There should also be encouragement for Local Authorities to adopt the same approach through the advertising contracts they hold.

Can we have proactive healthy advertising where the unhealthy ads leave space? Also improve the digital offer and develop London-level positive role models. (I don't understand the latter point!)

We think the ban should extend to alcohol too. The rationale for the advertising ban on junk food/drink seems to be to reduce children's exposure to unhealthy messaging around food and drink, but surely adults are also susceptible to the same influences.

4. What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?

Good Food in Greenwich runs an extensive food partnership under the Sustainable Food Cities programme and has activity under each of the key 6 themes. We think this is the best approach to tackling food systems and should be promoted across London as best practice.

We have an extensive work programme under this partnership, but some highlights include the Food Poverty Needs Assessment and subsequent Action Plan, Sugar Smart work, Surplus Feasts and holiday meals provision. More information can be found at www.goodfoodingreenwich.org

However, much of the work we plan is increasingly difficult to implement due to extensive funding cuts and the impacts that these have had on our services. For example, significant sections of our Food Poverty Action Plan are planned for the longer-term as there are no resources to implement them at present.

5. How could you or your organisation support the Mayor to do more to achieve good food for London and pledge to support the final strategy?

Good food in Greenwich is already doing many of the activities pledged in the strategy and would welcome further sharing and learning from best practice.

The Borough's Sub Group is a great way of disseminating information and sharing best practice, so thinking about how to expand this and maybe move it around the city to get more engagement.

6. Is the strategy inclusive and does it consider the needs and priorities of all Londoners

There should be more in the strategy reflecting the Mayor's observations in his foreword about the value of vibrant, multicultural communities - more about food as a way of bringing people together across cultures and celebrating this more e.g. food festivals in schools, community settings etc. A London 'Big Feast' 1 day a year. However, this needs to be fully representative and inclusive.

As mentioned above, a number of vulnerable groups are under-represented in the strategy, including:

- Older people e.g. those in residential and care homes
- Homeless
- Those with poor mental health
- Drug and alcohol addiction /recovery
- Nil-recourse to public funds
- Asylum seekers / refugees
- Those with disabilities

The Greenwich Food Poverty Needs Assessment has identified these as groups particularly vulnerable to food insecurity. We suggest that supporting vulnerable groups to access good food is a 7th priority area or that they are represented more in the existing priority area actions.

It doesn't necessarily address some particular issues around food consumption and those with disabilities who are a disproportionately impacted group

There may also be cultural differences in how we view food and what constitutes a 'healthy weight' – if there is evidence for this the strategy to seek to address this

Appendix 1

Survey of TfL advertising on bus stops over 2 days in June

To illustrate one reason for implementing the ban, we did a basic survey of bus-stop advertisements on the journey between Greenwich and Woolwich (approx 4 miles).

Pictures were taken over 2 days. Some ads changed overnight, indicating that people are exposed to varied unhealthy products on a regular basis.

On day two we counted the ads. 24 of a possible 37 advertising spaces on bus stops were advertising high fat/salt/sugar foods and drinks (65%). Note also the logo of our local football team on the McDonald's ad directly below. McDonald's ads for Chicken Legend burger and Raspberry Ripple cup and Dairy Milk ads dominated, occurring 5, 6 and 6 times respectively.

Many people living in deprived communities along this route will be exposed to these ads daily as they travel up and down this road to work, school etc.





Response to Mayor of London: *Draft London Food Strategy*

June 2018

About ISBA

1. ISBA represents the UK's advertisers. We champion the needs of marketers through advocacy and offer our members thought leadership, consultancy, a programme of capability building and networking. We influence necessary change, speaking with one voice to all stakeholders including agencies, regulators, platform owners and government.
2. ISBA is one of the tripartite stakeholders that make up The Advertising Association, which represents advertisers, agencies and media owners. We are the only trade organisation representing advertisers exclusively and play a unique advocacy role, ensuring our members' interests are clearly understood and are reflected in the decision-making of media owners and platforms, media agencies, regulators and Government.
3. Our members represent over 3,000 brands across a range of sectors, including the majority of the UK biggest advertisers and best loved brands old and new, in the private, public and third sectors.
4. We seek to:
 1. **Champion improved standards** in digital media to create a transparent, responsible and accountable market which serves the needs of advertisers;
 2. **Promote innovation in advertising** and new ways of working to improve effectiveness and ROI for advertisers;
 3. **Promote a diverse, high quality media environment**, offering choice for advertisers; and
 4. **Champion the freedom to advertise responsibly and effective industry self-regulation**
5. ISBA represents advertisers on the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) - sister organisations of the Advertising Standards Authority - which are responsible for writing the Advertising Codes. We are also members of the World Federation of Advertisers (WFA) and use our leadership role in such bodies to set and promote high industry standards as well as a robust, independent self-regulatory regime.

Overview

6. ISBA support the stated aim of the Government, devolved administrations and London Mayor to tackle the issue of childhood obesity. As is universally understood, childhood obesity is a multi-dimensional issue. It requires a multi-dimensional response.
7. ISBA therefore support an approach which is holistic in nature. As such, we support the breadth of the Mayor's proposed plan. We firmly believe that any such approach should be led by evidence, proportionate in nature, practical and calculated to tackle the issue. In doing so, we feel strongly that policy measures should be individually measured and independently assessed to ensure that their efficacy and value is clear to policy makers, civil society and the general public.
8. As part of a holistic approach to tackling childhood obesity, we recognise that marketing and advertising has a role to play in promoting a healthy lifestyle and balanced diet. As with any policy intervention, any measure should be evidence-led and properly measured to ensure that they are addressing the policy challenge of childhood obesity.
9. We also believe that the public seek policy debate which is well-informed and open. In the Draft London Food Strategy it is stated that:

"Advertising of foods that are unhealthy is often unregulated and widespread during family TV viewing times, through the internet and on the streets."

This statement is untrue, misleads the public and we would call for this to be acknowledged in any response. To underline this point, below is an extract from the Government's Childhood Obesity: a plan for action, Chapter 2² in which they more accurately state:

To protect children from this exposure the UK currently places strong restrictions on the advertising of high fat, salt or sugar (HFSS) products. Strict new rules came into effect in July 2017 banning the advertising of HFSS food or drink products in children's media - content that is directed to, or likely to appeal to children. These restrictions complement similar measures already in place for broadcast media (television and radio) where advertising of HFSS products is prohibited during, before and after programmes commissioned for, principally directed at, or likely particularly to appeal to children (children's programming). This is in addition to rules that apply across broadcast media that adverts must not be used to condone or encourage poor nutritional habits, unhealthy lifestyles or use of pester power. There are also specific content restrictions on adverts for HFSS foods. Together, these restrictions mean that irrespective of the time shown, HFSS products cannot be deliberately targeted at children; limiting marketing tactics such as the use of character or celebrity endorsements, promotional offers with appeal to children, or nutritional claims.

10. To expand on this point, CAP and BCAP provide wide-ranging cross-media standards on HFSS advertising. The rules are comprehensive and prevent any advertisement for HFSS products being targeted at children under 16 through any medium, not just children's channels. They apply across all forms of media, whether broadcast, online, on the street or on public transport. As such, the UK is recognised as upholding among the strictest rules in the world.

¹ Draft London Food Strategy, p. 17

² Childhood Obesity: a plan for action, Chapter 2

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718903/childhood-obesity-a-plan-for-action-chapter-2.pdf

11. As an evidence-based regulator, in recognition of changes in children's viewing habits, the rules were extended in July 2017 to provide a comprehensive ban on the advertising of HFSS products in all children's non-broadcast media. This covers print, cinema, online - including TV-like content online, such as video sharing platforms - and social media. The rules also apply to social influencers, in-game advertising and advergames subject to the 25% child audience test.
12. Furthermore, CAP have recently issued a Call for Evidence on HFSS advertising (which concluded on 14 April 2018) and will undertake a review of the rules brought in last year from 1 July 2018 to assess the evidence on the need for further action. ISBA believe that the Mayor should take due consideration of both of these prior to announcing any outcome of this consultation.

The Nutrient Profile Model

13. As it stands, the Mayor of London, UK Government, Scottish Government, and the Welsh Assembly are all either consulting on – or believed to be considering - new proposals which relate to the restriction of advertising of high fat, sugar and salt (HFSS) products.
14. In the Draft London Food Strategy the Mayor refers to “plans to ban advertising of food and drink that is not healthy across the TfL estate”³. This is further defined to be those foods determined as “healthy” under the Nutrient Profile Model (NPM).
15. To explain, the NPM is used by CAP and BCAP to identify HFSS products and to ensure that children are prevented from seeing advertisements for these products in children's media, and in any media where children make up more than 25% of the audience. In that sense the purpose of the NPM is primarily technical.
16. However, as evidenced by the content of the Draft London Food Strategy, the NPM has also gained public awareness as a framework which defines what is and what is not “healthy”, more commonly subjected to the pejorative term “junk food”.
17. The NPM is currently under review by Public Health England (PHE). The public consultation on the proposed new NPM closed on 15 June 2018. However, an outcome isn't expected until 2019, before any proposals could then, in turn, be considered by the code writing bodies. This raises a practical question on the efficacy of the policy under consideration.
18. In short, we assume that these proposals are based on the current NPM, or under the expectation that the proposed new NPM will only further strengthen the categorisation of products considered by the Mayor to be “not healthy”.
19. As such, we would raise the following concerns:
 - a. As we understand it, as dietary impacts beyond sugars and fibre were not considered in the development of the proposed NPM, there are a number of products which are important contributors to children's diets which would likely fail the new model. These include high fibre breakfast cereals, yogurts, no added sugar fruit juices and smoothies.
 - b. An unintended consequence of the proposed NPM would be to define such products as “not healthy” and therefore subject to advertising restrictions. This

³ Draft London Food Strategy, pp. 9,17 and 19

would include a variety of products contained within the 5-a-day, Eatwell Guide and Change-4-Life messaging.

- c. The proposed new model would also capture products which are rightly thought to be part of a balanced diet, such as peanut butter, condensed milk, pasta sauces, cheese and pure fruit juice. Or products which it could be reasonably said are predominantly or exclusively aimed at adults such as butter, olive oil, cheddar cheese (including half fat versions), Marmite, some pasta sauces, and mayonnaise (including low calorie).

20. This presents an invidious choice. Either:

- a. An outcome based on the current NPM, without understanding the impact of the proposed new model, currently under consideration.
- b. An outcome fully cognisant of the proposed new model, which would capture products exclusively or predominantly consumed by adults, endorsed under government public health campaigns and which are rightly thought to be part of a balanced diet.
- c. An outcome based on a new definition of products which are “not healthy”, which may or may not be consistent with the proposed NPM, any definition adopted by the UK Government, Scottish Government or any future policy decisions. The impact of which would be to create a deeply confusing picture for consumers, regulators and industry alike.

21. Taking all of this into account, ISBA would recommend that a decision be delayed until PHE has finalised the new NPM so that both the science, impact and practicality of the new model can be fully understood.

Practicality of Implementation

22. The consultation states that:

“A ban of this nature would represent the largest intervention of its type in any city in the world, and would transform the exposure that children and young people have to unhealthy food advertising and associated brands on their journeys to school and within their local communities.”⁴

23. ISBA and the current regulatory model support the aim of proportionately reducing children’s exposure to HFSS advertising. However, we have some concerns about the practicality of delivering a measure which **consistently** seeks to “transform the exposure that children and young people have...brands on their journeys to school and within their local communities”.

24. For example:

- a. TfL own and operate 19,000 of London’s bus-stops (XX%), with the remainder owned and operated by London’s 33 boroughs. Those boroughs in turn apply disparate rules when it comes to advertising and marketing decisions. In practical terms, should the Mayor ban HFSS advertising on a TfL bus-stop, it is plausible that the next bus-stop may carry HFSS advertising as it is not part of the TfL estate.

⁴ Draft London Food Strategy, p. 17

- b. Similarly, whilst TfL license taxi and private hire vehicles, they do not have a direct relationship with the companies who provide wrap-advertising. In reality, this could lead to confusion, or – at worst - a licensee being removed from the road in order to remove advertising deemed to be non-compliant. This will lead to loss of income or a shift towards alcohol advertising (which is outside the scope of this consultation).
 - c. In terms of proportionality, a far greater percentage of children and young people use the bus to get to and from school than use the underground. It may be that, based on that evidence and a desire for proportionality, a varied approach would be more appropriate to avoid encroaching on adult freedom of choice.
 - d. It is unclear how a ban on HFSS advertising on the TfL estate and the desire for a policy which “transforms exposure” sits with the food retail offer on the TfL estate and those outlets ability to advertise from within their premises.
25. In short, we have concerns that the landscape will become hugely inconsistent. That consumers will find the message confusing and that it is difficult, if not impossible, to stop short of encroaching on adult freedom of choice when the aim of any measure is to limit the exposure of HFSS products to children and young people.

Consultation Options

26. In the drafting, the Draft London Food Strategy appears to offer a binary choice between a ban and no ban. The lack of options which take account of the other consultations underway or about to be launched, the technology at hand and current regulatory framework is disconcerting.
27. Once again, ISBA believes that advertising and marketing does have a role to play in promoting healthy lifestyles and balanced diet. We would welcome further discussion on a broader range of options which may allow that role to be fulfilled practically and proportionately, in such a way that draws on real-world examples of successful intervention.
28. One such example is the ‘Healthy Weight for All Children’ policy in Amsterdam. However, it is once again important to ensure that debate is informed and accurate. The Draft London Food Strategy states that:
- “A similar approach [to that being explored], but on a smaller scale, was implemented across Amsterdam’s metro system and formed a key part of a whole-system citywide intervention that achieved a 12 per cent reduction in the number of children who were overweight or obese between 2012 and 2015.”⁵*
29. This statement is untrue. The headline 12% reduction between 2012 and 2015 took place without any restrictions on HFSS advertising being in place. The ban on advertising and marketing was implemented by Amsterdam City Council at its own and subsidised events and at council owned locations from 1 January 2018. It has been in place for 5 months and is therefore not included in these headline reductions.

⁵ Draft London Food Strategy, p. 17

30. That said, we believe that there are real lessons that can be drawn from Amsterdam – particularly the success of evidence-led targeting and intervention, the use of existing resource and the provision of holistic support. We would welcome further discussion around these points and the role that advertisers could potentially play.
31. Furthermore, the increase in digital marketing – particularly on the underground network – would allow for a targeted approach rather than the blunt instrument proposal currently at hand and, again, we would welcome further discussion on measures such as this.

Conclusion

32. As previously stated:

- a. The Mayor of London, UK Government, Scottish Government, and the Welsh Assembly are all either consulting on – or believed to be considering – new and divergent proposals which relate to the restriction of advertising of high fat, sugar and salt (HFSS) products.
- b. The model which underpins any intervention – the NPM – is currently under review by Public Health England (PHE). An outcome isn't expected until 2019, before any proposals could then, in turn, be considered by the code writing bodies. This raises a practical question on the efficacy of any policy under consideration.
- c. The practicality of actually implementing these proposals in a way which is coherent within London, let alone consistent with national policy yet to be defined, is questionable.
- d. The consultation is narrowly drafted to avoid broader consultation on options which could support the holistic nature of the Mayor's approach, deliver proportionate and evidence-led outcomes and use of the technology in place.
- e. Industry accepts it has a role to play in encouraging a balanced diet and healthy lifestyle, with varied examples of schemes and partnerships already in train. Further discussion on the lessons that can be drawn from these should also be considered.

33. ISBA would welcome further discussion on each of the above points in the coming months and further notes the desire to create a Child Obesity Taskforce. ISBA would greatly value to feed into, or be part of, such a taskforce.

Submission #31

Submission information

Form: Have your say on the draft London Food Strategy

Submitted by Anonymous (not verified)

July 3, 2018 - 10:39am

193.23.120.230

Type of organisation

Advertising body/organisation

Name of organisation

Kinetic Worldwide

Are the six priority areas (set out above) the right ones?

Yes

Are there other priorities that should be considered?

No

Are the most effective actions the Mayor, external stakeholders and individuals can take set out?

No

If no, please tell us why:

We have particular concerns relating to the proposed blanket ban on HFSS foods advertising on the TfL estate - our rationale is outlined in the subsequent sections.

Are there other actions that should be included?

Yes

If yes, please tell us what they are:

These are outlined in the subsequent sections

Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network?

No

Please tell us why:

- The OOH (Outdoor) media sector currently self-regulates. The industry has a demonstrable history of successful self-regulation and the structure of the industry itself allows simple, robust policing of self-regulation.

o Self-regulation is easier to manage from a regulatory perspective, as detailed and comprehensive regulations do not need to be drafted and enacted. Unilateral estate-specific regulation, as proposed here, would be under the same scrutiny as government regulation, but may have a higher potential for legal challenge.

- Current self-regulation in OOH for HFSS Products follows the Nutrient Profiling Model and excludes HFSS products from advertising on Roadside frames within

100m of a pre-school, primary, or secondary school boundary. The industry has invested in boundary mapping and the necessary software to ensure that such self-regulation can be efficiently implemented on both the buy and sell-side.

- o Although the (near universal) practice of exclusion dates back several years, the industry-wide adoption of self-regulation took place in April 2017.

- Current self-regulation stems from techniques applied for alcohol advertisers to minimise as far as possible for a broadcast media channel to limit exposure to under 18 audiences.

- o Further techniques to avoid exposure to certain groups have improved over this time and can be applied to OOH advertising across London. We would welcome the opportunity to advise and expand on these techniques to encompass LU, Rail and Bus OOH advertising.

- o Better interior mapping of LU and Rail inventory, alongside better route mapping for buses will allow us to further minimise direct exposure of under 16s to HFSS advertising. Additional data from Oyster card and contactless payment usage would allow us to apply under 16s blackouts on digital displays at times and places where under 16 audiences were disproportionately most prevalent.

- The advantages of applying a targeted and evidence-based approach to reducing under 16's exposure to HFSS messaging are as follows:

- o Allows the continued use of the medium by food and drink companies in a fair and regulated manner

- o Reduces the pressure for legal testing of the regulation. Especially regarding brand prohibitions

- o Allows the TfL model to be more readily adopted nationally

- o Reasonably minimises the impact on advertising revenue to TfL

- The blanket ban on HFSS advertising across the regulated OOH medium could arguably encourage some manufacturers and retailers to increase unregulated forms of promotion such as point of sale positioning, price promotion, shop facias, shop window decals and of course on-line and mobile advertising, which can also be consumed on the TfL estate or in proximity to schools.

- A self-regulated market could more flexibly consider a contributory model to invest in healthy food messaging by the Mayor's Office, either as advertising space within any live campaigns or as "credit" to be used to purchase OOH media space as planned by the GLA.

- o The management of this could be conducted by the GLA, TfL or by the major media vendors operating on TfL property. The advantage of the latter option is that the model can more readily be adopted in other parts of the country and requires a light touch in terms of management time and cost to the GLA/TfL.

- A self-regulated market can more readily adopt a standard proportion of advertising copy to carry a 'Food Aware' Compliance Notice to run on all HFSS advertising, similar to the DrinkAware and BeGambleAware notices on alcohol and gambling advertising. The messaging could call out the need for a balanced diet, direction to further information online, or other appropriate messaging from the Mayor's office. Again, this self-regulated approach would allow the TfL model to be more readily adopted across London and the industry nationally.

- Brand-only advertising prohibitions will be almost impossible to manage, predominantly as it will be extremely difficult to codify which brands should be prohibited through association with HFSS products – almost all food retail, grocery, restaurant, food delivery and e-commerce brands will have some HFSS products within their portfolio range. Clothing stores with chocolate 'impulse buys' at their checkouts, for example - should they be included?

- o Additionally, most brands that advertise on OOH are larger companies that are more easily regulated or are more likely to already be adopting balanced nutritional standards and product choices across their portfolios and are more likely to have active CSR programmes. Smaller operators and sole outlets are less likely to use OOH advertising, and are more prone to have less transparent food sourcing and labelling, but would be unaffected by this prohibition. Here we refer to the independent fast-food outlets found more predominantly in more deprived inner-city areas.

- Obesity rates are more closely related to broader societal challenges such as deprivation, lifestyle choices and exposure to under-regulated fast food outlets than exposure to OOH advertising:

- o "There is a clear link between deprivation and the number of takeaways in an area, with the poorest areas of the country having far more takeaways than the richest areas... children living in the most deprived areas of London are twice as likely to be overweight and obese. For example, Barking and Dagenham has the highest level of overweight or obese Year Six children (44 per cent)" – Draft London Food Strategy

- o OOH advertising in London delivers disproportionately against upscale audiences and in upscale areas - even more so in the Rail and LU environments. Mandating a commitment from vendors/advertisers as a proportion of OOH would allow redeployment of positive food messaging into the areas where it may have the greatest effect.

- The reduction of income to TfL is likely to be far in excess of the current HFSS product and brand spend on the TfL estate. A moderate (e.g. 3-5%) reduction in advertising spend would increase under-occupancy and could have a knock-on effect on TfL pricing across the whole estate. The removal of price pressure will have a short-to-medium-term effect in reducing yields and income from all other advertiser categories.

- We believe that an outright HFSS advertising ban across the TfL Outdoor advertising estate would be disproportionate in relation to other media or areas of the

UK.

o We believe that to address this multi-layered societal issue, a partnership solution that builds on existing self-regulatory practices would deliver substantially better long-term outcomes. It would allow focus on key community locations and investment in more valuable initiatives such as increasing access to quality food, food education choices and promoting other healthy lifestyle options.

o Such an approach could also act as a model to be extended beyond the TfL estate across Greater London – or indeed the country as a whole.

The above comments are entirely Kinetics' independent viewpoint and do not seek to directly represent our clients and media partner views. Additionally, it should be noted that we understand that the Advertising Association and Outsmart will also be submitting responses to the consultation.

What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?

The industry has invested in boundary mapping and the necessary software to ensure that such self-regulation can be efficiently implemented on both the buy and sell-side. Kinetic has invested, both financially and in terms of time and resource, in ensuring that its clients' advertising campaigns are not placed in areas where exclusions can be sensibly employed.

How could you or your organisation support the Mayor to achieve good food for London and support the final strategy?

Further techniques to avoid exposure to certain groups have improved over this time and can be applied to OOH advertising across London. We would welcome the opportunity to advise and expand on these techniques to encompass LU, Rail and Bus OOH advertising.

We believe that to address this multi-layered societal issue, a partnership solution that builds on existing self-regulatory practices would deliver substantially better long-term outcomes. It would allow focus on key community locations and investment in more valuable initiatives such as increasing access to quality food, food education choices and promoting other healthy lifestyle options. Anything Kinetic could do to support such an approach would be welcomed.

Is the strategy inclusive and does it consider the needs and priorities of all Londoners?

No

If no, please tell us why

OOH advertising in London delivers disproportionately against upscale audiences and in upscale areas - even more so in the Rail and LU environments. Obesity rates are more closely related to broader societal challenges such as deprivation, lifestyle choices and exposure to under-regulated fast food outlets than exposure to OOH advertising:

o “There is a clear link between deprivation and the number of takeaways in an area, with the poorest areas of the country having far more takeaways than the richest areas... children living in the most deprived areas of London are twice as likely to be overweight and obese. For example, Barking and Dagenham has the highest level of overweight or obese Year Six children (44 per cent)” – Draft London Food Strategy

Our contention is that the effect of the proposed ban would be minimal on those audiences who the Mayor should be most concerned about - younger, vulnerable people in the poorer areas of London. We applaud and support the prioritisation of this issue as a whole, and as outlined, we have been active in developing the means of self-regulation in OOH. Additionally, we are proposing a range of measures that we feel will more effectively impact the audiences most at risk from the effects of poor nutrition.

The Draft London Food
Strategy,
***Healthy and sustainable food
for London,***

Good Food Lewisham (GFL)
response, July 2018



About this response

This response is a collaborative response from a public consultation with the GFL network in June and we welcome this opportunity to comment on the London Food Strategy.

Contact for further information:

██████████
GFL Coordinator
██████████

GFL Partners who contributed to this response are Fareshare London, AgeUK, Lewisham Homes, Lewisham Public Health, University of Goldsmiths, parlez Brockley, Chartwells Lewisham, Voluntary Action Lewisham, New Cross Gate Trust, GCDA, Prevention and Early Actions Lewisham, as well as 2 independents. In total, 19 representatives from the Good Food Lewisham Network contributed to this consultation.

GFL are also hugely supportive of the responses produced by Good Food in Greenwich, Lewisham Concil, London Food Link and Sustain.

Executive Summary

Overall, we support everything in the strategy and think it is an excellent start to some very exciting changes to the food landscape in the city. We are particularly supportive of the proposed ban of advertising junk food across TfL. However, our concern here is that the advertising vacuum created is not given over to other 'nuisance' offers e.g. gambling, infant formula and food targeted at babies.

We are so excited by this transformational, cross-sector plan to improve London's food scene. We feel that think there are a few areas missing, and we would like to see the strategy go even further and be even more radical!

We would also like to highlight our appreciation for this opportunity to comment on such an important London-wide strategy which will impact us all. It is a brilliant action by the Mayor's office showing concern for what the people of London think. We are very impressed.

Consultation questions:

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| 1. Are the six priority areas the right ones? Are there other priorities that should be considered? |
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| <p>Yes, we think the priority areas are correct and organising these ideas into place settings provides a good framework of key action areas. We do feel, however, that several vulnerable and marginalised groups are under-represented across all 6 settings of the strategy:</p> |
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| <ul style="list-style-type: none">• Older people• Homeless people• People with mental ill-health• Drug and alcohol addiction / recovery• Nil-recourse to public funds• Asylum seekers / refugees• Those with disabilities |
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| <p>These groups could be more thoroughly explored in Priority 3, as well as being covered across the other five priorities as they are relevant to each. Alternatively, <i>Supporting Vulnerable Groups to Access Good Food</i> could be a 7th priority area.</p> |
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| <p>In addition, we would like to see more clear links between actions under the different priority areas, as well as to other Mayoral strategies and campaigns, to show connections across the strategy. A visual representation of how the areas work together and cross over would provide a helpful overview and will increase the clarity of the strategy.</p> |
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| 2. Are the most effective actions the Mayor, external stakeholders and individuals can take set out? Are there other actions that should be included? |
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| <p>We support all actions in the strategy and are looking forward to seeing a robust action plan that will detail <u>how</u> these actions will be implemented at each level.</p> |
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| <p>We would like to see more 'required' or 'mandatory' action, rather than just promoting and encouraging. We have also highlighted particular areas that the Mayor could lead or champion.</p> |
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| <p>Regarding the 'what you can do' boxes, some of our partners were unsure as to who 'You' referred to and felt this needed some clarification – perhaps more specification that these are actions for the individual. Partners felt that, for individuals, some of these actions are quite complex and difficult to act on without knowledge about and motivation to eat well. For example, 'look for healthier options on menus' (page 19) is difficult to achieve without knowledge of healthy eating principles and/or mandatory menu labelling in restaurants and</p> |
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cafes. There should be more actions for the Mayor and external stakeholders to support individuals to develop this knowledge and motivation. See recommendations below relating to cookery skills courses and other public-facing food-related interventions.

With regards to other actions that should be included, we have listed these below under the priority area headings.

3. What are your views on the proposed ban of advertising of food and drink that is not healthy across the Transport for London estate?

This is an excellent and ambitious idea and we fully support it. Not only could such a pioneering idea instigate city-wide change to London's health picture, but it will instigate conversations nationally and internationally about what food systems in cities should look like. Beginning the process of banning junk food advertising will send a clear message to food manufacturers that they need to more carefully consider their food offer.

A focus on children provides a brilliant line of argument to provoke initial change which can then extend to further changes in the future, for example, reducing the advertisement of alcohol to equally improve adult health in London.

We would like to add that the ban should include adherence to the International Code on Marketing of Breastmilk Substitutes to protect and support breastfeeding and minimise advertising of breast milk substitutes that undermine breastfeeding – equally crucial for curbing childhood obesity.

There should also be encouragement for Local Authorities to adopt the same approach through the advertising contracts they hold. This could be a brilliant Mayoral campaign.

The Partnership voiced concern over what advertisement content may replace the junk food advertising. Lewisham's Partners would like to see proactive healthy advertising in its place. London-level positive role models could support healthy advertising.

GFL Partners would also love to see this extend to the entertainment industry to include chains of events venues, cinemas and theatres, as promotion of junk food and drink at these venues is staggering.

Overall a great target campaign to instigate and effect city-wide change and create a national and international talking point to launch London in the global eye as a city which is using food to promote solutions to some of our biggest challenges.

4. What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?

Good Food Lewisham is an emerging food partnership under the Sustainable Food Cities programme and has activity under each of the key 6 themes. We think this is the best approach to tackling food systems and should be promoted across London as best practice.

Our current actions areas and work programmes under this partnership fit under the 6 key SFC themes, which we feel compliment the framework of the London Food Strategy well.

It is important for us to state that much of the work we plan is increasingly difficult to implement due to a lack of funding.

We are, however, working on targeting those actions which we can implement with minimal funding through the strength of our partnerships.

- **Food Businesses:** GFL have been working with Good Food in Greenwich to develop a Food Business Charter which aims to encourage healthy and sustainable practise across Lewisham Food Businesses and features national schemes including Sugar Smart, the Healthier Catering Commitment, Fairtrade, Refill London, as well as encouraging the London Living Wage. It also promotes local spending schemes. We have partners working on each of these campaigns who will be helping us to disseminate the charter and encourage local sign up. We value cross-borough sharing and would be happy to share this initiative if it was considered useful London-wide.
- **Food Poverty Sub Group:** GFL is a Food Power-registered SFC. We have an active food poverty sub group which is working to implement our Food Poverty Action Plan. Partners in this group are currently working on developing their own community-based holiday meals provision service following our pilot scheme last summer. We are also working on increasing our work around elderly provision*. Our Food Poverty Sub Group meetings also provide opportunity for our partners in Public Health to inform other members about Healthy Start Vouchers and encourage them to promote the vouchers in their individual settings as Healthy Start Champions.
- **FareShare Pantries and Local Collection Points:** Since the launch of these schemes at our meeting in February, we have been working with several partners, including Fusion Lifestyle Leisure centres and Lewisham Homes, to set up FareShare pantries and local collection points at locations across Lewisham.
- **Drinking Fountains:** GFL is currently working with Lewisham Public Health as well as partners in parks, community settings, housing providers and other areas, to develop an action plan to install drinking fountains across the borough of Lewisham.
- **Veg Cities:** GFL have recently secured funding to run a Veg Cities campaign across Lewisham, where we will be setting up 4 new fruit and veg stalls in physically isolated areas of Lewisham to improve the healthy and affordable food offer in these more deprived areas. The stalls will accept Healthy Start.
- **Stronger Partnerships:** At GFL we believe strong partnerships enable greater capacity. We have active partners under each of the 6 key SFC areas.
- **Be Inspired:** Is a contract running under GFL which supports healthy eating and physical activity for adults in Lewisham and includes our cookery clubs contract to support good food at home.

5. How could you or your organisation support the Mayor to do more to achieve good food for London and pledge to support the final strategy?

In our remit as a Sustainable Food City, Good Food Lewisham are committed to supporting the action areas of the London Food Strategy through our own action plan, strategy and working areas. We will continue to develop partnerships to encourage wider engagement and support of the Strategy action areas in the Borough of Lewisham through external partners.

LBL is already doing many of the activities pledged in the strategy and would welcome further sharing and learning from best practice. The Borough's Sub Group is a great way of disseminating information and sharing best practice, so thinking about how to expand this and maybe move it around the city to get more engagement.

6. Is the strategy inclusive and does it consider the needs and priorities of all Londoners

There should be more in the strategy reflecting the Mayor's observations in his foreword about the value of vibrant, multicultural communities - more about food as a way of bringing people together across cultures and celebrating this more e.g. food festivals in schools, community settings etc. A London 'Big Feast' 1 day a year. However, this needs to be fully representative and inclusive.

As mentioned above, several vulnerable groups are under-represented in the strategy, including:

- Older people e.g. those in residential and care homes and those who are less mobile
- Homeless
- Those with poor mental health
- Drug and alcohol addiction /recovery
- Nil-recourse to public funds
- Asylum seekers / refugees
- Those with disabilities

These groups are particularly vulnerable to food insecurity. We suggest that supporting vulnerable groups to access good food is a 7th priority area or that they are represented more in the existing priority area actions.

GFL partners also felt that there needs to be a greater understanding of the needs and priorities of food businesses which could be addressed through involving 'experts by experience' 'from the trenches'.

2)ii) Are there other actions that should be included?

Chapter 1: GOOD FOOD AT HOME – AND REDUCING FOOD INSECURITY

- ✓ GFL strongly support the Mayor's commitment to measure Household Food Insecurity, as well as the principle of not accepting food banks as a fact of life in London through preventative measures to support food crisis and hunger.

- ✓ We strongly agree that the ‘lack of meals-on-wheels provision at borough level’ is a London-wide issue and feel that this is a campaign element the Mayor could champion through Local Authorities and with external partners.
- ✓ The expansion of the London Living Wage, as well as maximising the uptake of Healthy Start Vouchers support actions around maximising incomes; both campaigns we support. However, GFL partners would like to see more specific actions to help maximise income, for example, help for those affected by welfare reform, and those in debt as this is a huge element of preventing food crisis and hunger. Food Growing at home and cookery clubs are also a big contributing factor to maximising household income.
- ❖ To support people to make good food choices (see ‘what you can do’ box), actions to increase people’s knowledge, skills and motivation are needed. For example, there needs to be additional funding for cooking skills courses across boroughs via public health commissioning and third sector organisations. This should be across population groups and locations.
- ❖ Creating a portal of information on *how* to set up, run and sustain community cookery clubs across London would be a great action to take forward from the Mayor’s office.

A note on cross-referencing:

As mentioned above, there is cross-referencing here. Under Good Food for the Environment, the intro on page 35 mentions adoption of the Eat Well Guide but the ‘What can you do’ box only talks about reducing food waste. In the ‘What can you do’ box under Good Food at Home (p14), it mentions reducing meat consumption. These points need to be clarified and consistent across the sections. If we all follow the Eat Well Guide, then this will automatically reduce people’s meat consumption – therefore the Eatwell Guide should be added in under Good Food at Home as well.

We feel that it would work to either reference the other relevant priority areas in each section, or to repeat the points across each section. In addition, in Good food at home, food growing is missing, so reference priority area 5 (as seen in priority area 5)

Additional areas identified from the GFL Network are as follows:

- There is a current need to connect with delivery services (e.g. Just Eat, Deliveroo, Uber Eats) to support healthier and more sustainable food in the home (McDelivery is now a real thing!), as well as regulation of wages for those working at these establishments. *Also links with priority 2;*
- Broadening the appeal, motivation and physical access to encourage purchase and consumption of more healthy and sustainable food. Increase the status of Good Food. We need people to *want* to access it – change stigma that it is only for those who can afford it. This can be supported by...;
- ...Pro-active healthy advertising to help broaden appeal;
- Food Growing at home to link with priority 5;
- Reduce food waste at home and separation of food waste – *links to priority 6* (unless boroughs don’t collect food waste already);

- Can younger people challenge the food offer? Motivating people to want to make changes – Cordwainers Grow, Hackney Public Health-funded approach. Involvement of Young Mayors could be another route to this;
- Increasing community resilience by increase local / individual knowledge of cooking and food growing;
- Elderly also need to be referenced here, along with other vulnerable groups – where do those with insufficient facilities to cook at home fit in? *This links to our suggested 'priority 7'.*

GFL's work in this area includes:

- Community cookery clubs across the borough;
- Promotion of healthy start vouchers and training partners to promote and deliver vouchers;
- Encouragement of local employers to sign up to be a LLW employer;
- Building Community Skills Sub Group;
- Food Poverty Sub Group and associated work.

Chapter 2: GOOD FOOD SHOPPING AND EATING OUT – A HEALTHIER ENVIRONMENT

We need broaden the appeal of good food, so people want to access it. This section needs to include action to improve peoples' knowledge of what a healthier diet is and ways to motivate people to make those choices.

- ✓ We fully support the TFL advertising ban proposal. We need to be aware of how the food industry manipulates our food choices. Young people love junk food and many are growing up in an environment where this is the norm. We should be empowered to challenge the food system and the local food environment.
- ✓ We support the idea of a Good Food Retail Plan. The strategy needs to target London-based food industry, challenging them to make healthy food more affordable and tasty. The Good Food Retail Plan could include requirements for new food businesses to be referred by planning for HCC accreditation, as well as encouraged to be, and trained in how to be a LLW establishment.
- ✓ We agree with the need to increase Healthy Start Voucher uptake to at least 80%. A key action should be to ensure market traders and small, local convenience shops are registered to accept Healthy Start vouchers for fruit, veg and milk.
- ✓ We feel that Sugar Smart has been a very successful initiative for making healthier choices more accessible. However, if London was 'Food Smart' and its boroughs took on this initiative, e.g. combining and building on the Healthier Catering Commitment and Sugar Smart, this would support the Mayor's aims to be a world-renowned food location. Greenwich and Lewisham have developed a charter that could form a basis for this and it covers all the existing schemes. Our partners feel that sugar shouldn't

be singled out as the dietary issue of concern, high intakes of saturated fat and salt and lack of fibre also need addressing, not to mention more sustainable options.

- ❖ We would love to see some other incentives for existing businesses for HCC accreditation as it could be so instrumental in improving the health of London's residents, however it is currently incredibly difficult to get small independent businesses on board due to the lack of incentive for them to make changes to the way they run.
- ❖ We would love to see how the Mayor can influence advertising in cinemas and other entertainment venues, as well as improving the food and drinks offer in these locations – could there be a similar 'food for life' type requirement for these locations? Can the Mayor write a standardised food offer into policy for events venues?
- ❖ Local authorities (schools & youth service) should be required to implement projects such as Hackney-based Cordwainers Grow 'Where the Lies Are' to help local people to challenge the food system and the local food environment.
- ❖ We feel that it is important that individuals have power and control over their food choices and feel that food labelling standards need to be more consistently applied - not a voluntary scheme. Whilst we appreciate this is out of the Mayor's control, he could be lobbying for it at a national level.
- ❖ We believe there should be a different approach to HCC - e.g. work with chicken shops to support them to become 'safe havens' for children and then build on this positive relationship to work with them on HCC, preferably with input from children/customers.
- ❖ We feel that the food sector is an under-recognised route to training and employment and is undervalued as an industry and could very positively be used to increase education of healthy and sustainable food practises London-wide with a goal of embedding these practises and principles into London's food offer. This will inadvertently impact food in the home as people learn more skills.

In addition, our network flagged the following items for consideration:

- Working with delivery services (as above); Regulate unregulated delivery services which currently run 0-hour contracts - LLW: Just Eat, UberEats, Deliveroo
- How is the food strategy going to support high street trade and independent local businesses?
- Incentives for food businesses to recycle food waste and other recycling to reduce our carbon footprint and improve our environment (Let's challenge Sweden's 99% recycling rate!) - *Links to priority 5*
- The use of technology to support small businesses to more easily redistribute surplus;
- TfL advertising ban:
 - We are very supportive of this;

- But, what will replace this advertising? We are concerned the gap will be filled with other 'nuisance class' advertising – can we advertise more healthy options to broaden the appeal of healthier food and info on Peas Please – could the veg cities campaign be included into TfL advertising?
- We are concerned the ban only applies to products, not companies, so the likes of Coca Cola and McDonald's will still be able to advertise other products on TfL
- We would like to see more on sponsorship. Will the ban extend to sponsorship of events? We think the Mayor should write guidance for Local Authorities of how to legislate procurement at events
- We want the ban to include infant formula and baby foods
- We would like to see an integrated Public Health campaign across London
- We would like to see an improvement of food options available in TfL vending machines (and all vending machines...)?
- Could other apps which reduce food waste and plastic bottles, e.g. Refill, TooGoodToGo, OLIO, the Waste app, be promoted in place of junk food to improve the environment and increase awareness of these applications? Also links to priority 6
- Mayor to use ground expertise from 'the trenches' to help inform decisions around food businesses – voices from local food businesses
- We want to see more in terms of helping healthy food businesses succeed. Could they be prioritised as businesses used at events for example? Whilst we welcome Urban Food Fortnight and think this is a fantastic initiative, it needs to be broader. This is a great initiative but too narrow in its brief and doesn't appeal to everyone and is too exclusive. This needs to be linked with not just vilifying small independent take-aways who get all the blame, but are actually providing some valuable other services to young people in the city
- Improve food offer in convenience stores
- Good Food at Home promotes reducing meat, but could this be encouraged more broadly across all food businesses?
 - All markets should have a trading requirement, perhaps a charter they sign up to which could include, no plastic, LLW, Sugar Smart etc

GFL's work in this area includes:

- Development of a Food Business Charter with a cross-sector / cross-programme promotion plan;
- Support of Sugar Smart, HCC, LLW, Fairtrade, Local Spending Schemes;
- Promotion of healthy start vouchers and training partners to promote and deliver vouchers;
- Encouragement of local employers to sign up to be a LLW employer.

Chapter 3: GOOD FOOD IN PUBLIC INSTITUTIONS AND COMMUNITY SETTINGS – BETTER FOOD PROCUREMENT

Once again, we need people to want to consume good food, so this section needs to include action to improve people's knowledge of what constitutes good food and their motivation to choose these foods, as above.

- ✓ We are pleased to see a commitment to increase in the number of drinking fountains across London with a specific target. This is great.
- ✓ We are very pleased to see that breastfeeding is going to be supported, however we feel that this could be translated into a stronger action, for example, naming a London-wide Breastfeeding Campaign, backed by Sustain, which can be rolled out by external partners with funding.
- ✓ We are glad that reducing social isolation amongst older citizens and those with disabilities has been stated as a Mayoral action, however we feel that there are other groups missing, whom we have highlighted elsewhere in this document.
- ✓ On Pg 23 you acknowledge the importance of local community and leisure centres where food can help celebrate and build inclusive communities. This is a very important point to make. We do feel, however, that this is incompletely reflected in the priorities to be led by local partners as it has been translated into priorities led by the Local Authority around Social Isolation – this is not the full picture.

Community Food Hubs:

We recommend that every London borough should have at least one **Community Food Hub** based at an existing community centre / school / Children's centre (ideally one per key areas of deprivation). This would include a community café /kitchen/community meal area where programmes such as cookery clubs, holiday meals, lunch clubs and FareShare Pantries are accommodated– these link to priorities 1 and 2 by increasing knowledge and skills as well as supporting and serving disadvantaged communities. It would also link provisions across vulnerable and marginalised groups of the population. (See Charlton Manor for an example of how elderly and children's provision can overlap effectively.)

Ideally each location would have a paid member of staff to coordinate and sustain activities. We feel that this would hugely impact the food scene in some of the more deprived areas of London and contribute in such a positive way to the improvement of health, social well-being and sustainability in communities London-wide.

- ❖ We would like to see how local authorities could be empowered to enforce more guidance to support this agenda. For example, **the London Plan embedded a fast food takeaway ban. This meant local authorities could include this in supplementary planning guidance which gave them more teeth. What other actions could be approached like this?**

We feel the following actions are missing, or could be worked on

- Vending machines in public institutions and community settings - Vending machines are not mentioned in the strategy and we think they should be targeted specifically

- Resurrecting Community Centres: Fund a community hub model that could tackle many of these issues including food pantries, debt relief advice, energy & fuel support etc. (see above)
- Specify other public institutions. In 'Priorities led by external partners' – hospitals are mentioned, but what about prisons, care homes etc. These are mentioned in the intro to this section, but not in the actions
- There needs to be more on procurement and how the Mayor can support boroughs to help them write in procurement documents e.g. when procuring services, the contracted organisation has to convene to a charter, pay the LLW, support holiday meals, serve healthy food, don't use polystyrene, recycle etc
- Malnutrition could be emphasized as opposed to just obesity.

GFL's work in this area includes:

- Drinking fountains installation plan;
- Community cookery clubs under Be Inspired;
- Promoting healthy and sustainable food through our charter;
- Promote Refill Lewisham through our Food Business Charter;
- Work in partnership across Lewisham's third sector to create communal food opportunities;
- Promote breastfeeding friendly initiatives.

Chapter 4: GOOD FOOD FOR MATERNITY, EARLY YEARS, EDUCATION AND HEALTH – SUPPORTING HEALTHIER HABITS

We think that the name for this priority doesn't capture areas such as youth services or non-educational settings for school-aged children. Whereas Early Years can capture nurseries, schools, children's centres etc. 'Education' does not capture provision such as Youth Clubs, which can play as big a role on healthy eating as 'education'/school settings for young people. Can the heading be changed to be more inclusive?

- ✓ We fully support the proposed restriction on new hot food takeaway near to schools.
- ✓ We agree with the expansion of initiatives such as Healthy Start, the Child Obesity Taskforce, Healthy Schools London. Could our 'Food Smart' idea be included in this alongside Sugar Smart to improve the food offer from existing businesses to school-aged children?
- ✓ We agree with action 4 on page 29, this is a great idea, however extending the eligibility would presumably be a central government function and there are concerns from the network about how this could be funded.
- ❖ We agree that schools should lead the way in this priority, however we feel that it is important to also reference actions by external partners outside of the schools-sphere. When the third sector is mentioned, it is in relation to schools rather than as organisations that have an influence in their own right. We suggest adding the following:

“Local authorities and third sector organisations through their work with young people in the community should ensure they are encouraging healthy eating. This could include provision such as youth services, children’s centres and residential children’s homes.”

- ❖ Whilst we are hugely supportive of the Healthy Start programme, we feel that more action needs to be considered. Wider promotion of Healthy Start should be prioritised with an action for the scheme to be discussed by all early year’s practitioners and not only a priority for Health Visitors. The statement ‘signposting to practical nutritional advice for families planning a pregnancy and pregnant women is essential’ (page 27, paragraph 2) needs to be much more specific. It should be made clear Children’s Centres are part of the community BFI accreditation.
- ❖ We feel that the school food environment needs greater consideration within this priority, particularly secondary schools. There are no proposed actions to consider the movement of secondary aged children and their access to unhealthy foods and drinks across the school day. In addition, Food for Life does not currently have a secondary schools programme so it is not clear how they could participate in school food transformation programmes outside of Healthy Schools London, which as a side note does not have to feature food/healthy eating as a priority. A positive action could be broadening Food for Life to include secondary schools within the scope of its remit and mandating the accreditation for all secondary schools.

We also think the following actions are missing:

- Specific reference to secondary schools – the teenage years are crucial, and this is the age where many will adopt the worst eating habits. Where there is a lot of work being done at primary schools, secondary schools tend to be missed out. This is linked to changing the food culture as well as building skills, knowledge and confidence. How can schools be mandated to join schemes like Food for Life?
- Push for universal free school meals and include breakfast; meals provision should be mandatory during the holidays

GFL’s work in this area includes:

- Work on holiday meal provision in community settings through network partnerships;
- Work with the Lewisham school meals provider to continuously improve Lewisham’s food offer. Chartwells are currently a Silver Food for Life provider.

Chapter 5: GOOD FOOD GROWING, COMMUNITY GARDENS AND URBAN FARMING – INCREASING SUSTAINABLE FOOD GROWING

- ✓ Another very valuable area we support in the strategy.
- ✓ We agree with the initiative to create new spaces for food growing, as well as to protect existing food growing spaces. Increasing Urban and Peri-Urban Farming is could be instrumental to increase London’s sustainability, as well as our resilience post-Brexit.

- ✓ Increasing social prescribing to improve health and well-being is very important. It would be brilliant to see the Mayor championing this initiative.
- ❖ We would like to see specific reference to biodiversity, and the importance of preserving and increasing this, and how this will be maintained through increasing London's urban farming. Policy for councils should include practice of planting, not strimming too excessively, and foraging.
- ❖ We would like to see a wider scope of types of farming which could be implemented as part of an *Urban Farming for London* plan (see below).

Other comments from the network:

- Could a *Urban Farming for London* plan be developed to increase the locality of our food source? A workforce could be provided through members of the community undertaking community service – this would increase their well-being and outlook, as well as providing an invaluable service for London, giving us all something to be proud of!
- Promote food growing through TfL!

GFL's work in this area includes:

- Food growing sessions are included in the final week of our cookery clubs;
- We support partners who promote food growing, community gardens and urban farming, e.g. Wildcat Wilderness, Lewisham Gardens, The Albany in Deptford, as well as independent residents who are setting up growing projects across the borough – these are in schools, community centres, and on street corners.
- Promoting Lewisham's community gardens and allotments.

Chapter 6: GOOD FOOD FOR THE ENVIRONMENT – MAKING THE FOOD SYSTEM WORK BETTER

- ✓ We agree with increasing promotion to adopt the Eatwell Guide for environmental benefits. Could this statistic 'adoption of PHE Eatwell Guide standards would lead to a 30% reduction in CO2e GHGs' be the basis for an advert to encourage use of the EWG from an angle that is not health-related?
- ✓ We support the Mayor's commitment to initiate a debate on improving the efficiency of our food transport system. We strongly feel that this should include food waste and recycling and most importantly, lead to a robust action plan in partnership with the London Climate Change Partnership in this area.
- ❖ We wonder how the Mayor is going to go about 'encouraging London public sector institutions to promote more plant-based, seasonal and locally-sourced foods'?
- ❖ Creating a scenario whereby businesses can get free collection of food and recycling waste would significantly reduce our environmental impact across London.

Other points for consideration should include:

- As above (chapter 1), cross reference messages re following eat well guide
- There is wide support from the network of the need to reduce plastic waste
- Responsible Procurement Charter for London; Events and events-venues in particular. To include responsibilities to minimise production of waste (as mentioned in chapter 2)
- Could other apps which reduce food waste and plastic bottles, e.g. Refill, TooGoodToGo, OLIO, the Waste app, be promoted in place of junk food to improve the environment and increase awareness of these applications? Also links to priority 2 around TFL advertising
- Utilise the Thames for food growing

GFL's work in this area includes:

- Promoting the Refill app, as well as TooGoodToGo and OLIO;
- Promotion of the Eatwell Guide through cookery clubs;
- Encouragement of businesses to implement more sustainable practices.

**CONSULTATION RESPONSE TO MAYOR OF LONDON'S PROPOSED BAN ON FOOD AND
DRINK ADVERTISING ACROSS THE TRANSPORT FOR LONDON ESTATE**

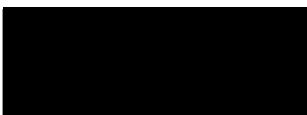
Dear Sirs

As a company we welcome action to reduce childhood obesity. We recognise the seriousness and urgency of the issue and support the Mayor's commitment to addressing it. We also believe that both as a company and the wider outdoor industry we can play a positive role in delivering the kind of behavioural change that is needed to tackle this problem.

We are aware of the response submitted by Outsmart and are wholly supportive of the points made in their submission. We have little to add which hasn't already been covered in the Outsmart response but would particularly like to highlight two issues which we feel are of particular importance.

Firstly, both actual evidence, (The Amsterdam Metro), and intuitive sense suggest that the limiting of adverts targeted at children combined with education campaigns, dietary advice and the promotion of healthier living will be the best way to achieve a significant fall in obesity. We believe that by working with the Out of Home industry and using our powerful communications channel to promote the above a far greater result will be achieved than by merely banning HFSS advertising. Secondly, a blanket ban on advertising HFSS on Outdoor sites is likely to merely shift such advertising spend onto other, often less well regulated, platforms.

Yours sincerely





About School Food Matters

School Food Matters is a charity on a mission to ensure that every child enjoys fresh sustainable food at school and understands where their food comes from. We work with children, schools, parents, local authorities and government departments to get the very best food for children during their time at school for their health and happiness.

Since 2007, School Food Matters has been devising, developing and delivering exciting food education programmes which have reached tens of thousands of children across London and beyond.

For the purpose of this response document we will reflect on the proposals within the six priority areas and highlight our work to support good food in London. Our response is framed around our areas of expertise; school food, food education and issues relating to children's health and wellbeing.

1. Good food at home; help to tackle rising levels of household food insecurity and ensure all Londoners can eat well at home.

- We support the recommendations under 'What you can do'
- We welcome the Mayor's commitment to reducing holiday hunger through the scheme Kitchen Social. We encourage the expansion of Kitchen Social to provide additional funding to reduce the reliance on voluntary contributions of food and staffing. The school infrastructure offers a unique opportunity for delivering nutritious holiday food and a safe and trusted place for children therefore we would encourage further investment replicating the Welsh Food and Fun programme piloted in Cardiff.
- We welcome the Mayor's acknowledgement that food poverty is partly due to low income and the promotion of London Living Wage
- We are encouraged by the Mayor's support of the annual publication of "Beyond the Food Bank" as it challenges the London Boroughs to secure children's access to food 365 days a year.
- We support the suggestion that businesses should donate more surplus food to charities. We would caution however, that whilst this is a positive move, it does not replace essential efforts businesses must take to decrease the amount of surplus food produced.

What is School Food Matters doing to help?

- For the past seven years, we've partnered with Borough Market, FareShare London and United St Saviour's Charity to deliver our Young Marketeers¹ programme. Children at schools in LB Southwark learn about food surplus and raise money for FareShare London by selling fruit and veg they've grown at school or soups and baked goods created in the school kitchen, to raise money for FareShare.

¹ <https://www.schoolfoodmatters.org/projects/young-marketeers>

- This year we'll be piloting a holiday food and fun programme in partnership with Belazu Ingredient Company, Harrison Catering and Kitchen Social to allow children from low-income families in Northolt to access a hot meal and fun, safe enrichment activities during the summer holidays.
- School Food Matters is a London Living Wage employer.

2. Good food shopping and eating out; support food businesses to improve London's food environment and make healthy, affordable options more widely available to Londoners.

- We support the recommendations under 'What you can do'. We suggest that businesses might appreciate some guidance on how best to communicate the 'healthier options' to consumers.
- We whole-heartedly support the Mayor's plans to consult on a ban on advertising of food and drink that is not healthy across the TfL estate. This will support children's health and wellbeing by limiting their exposure to unhealthy messages.
- We are encouraged by the Mayor's acknowledgement that food plays a part in making streets healthy places, where people are surrounded by more healthy food and less marketing and promotion of unhealthy food. We know that obesity is now seen as a 'normal response to an abnormal environment'² so this focus on healthy places is welcome.
- We are pleased that the Mayor recognises that the food sector is a great route to employment and skills development and would like to see the Mayor encourage restaurants and food businesses to offer work experience and outreach projects to local schools.

What is School Food Matters doing to help?

- We promote and support local food markets through our Know your Onions³ programme, which invites secondary school students to grow veg to sell at their local community market.
- We are supporting and contributing to the VegPower campaign⁴ to build support for a permanent advertising fund to increase consumption of veg in the UK.
- We are promoting the Soil Association's Out to Lunch⁵ campaign which encourages businesses to think about their food offer by ranking them according to their commitment to creating healthy menus for children.
- We have partnered with Belazu Ingredient Company to create Fresh Enterprise⁶, a programme that offers local secondary school students the opportunity to learn about product development and explore a whole range of careers in food.

² https://www.gsttcharity.org.uk/sites/default/files/Bite_Size_Report.pdf

³ <https://www.schoolfoodmatters.org/projects/know-your-onions>

⁴ <https://vegpower.org.uk/>

⁵ <https://www.soilassociation.org/our-campaigns/outtolunch/>

⁶ <https://www.schoolfoodmatters.org/projects/fresh-enterprise>

3. Good food in public institutions and community settings; work with public sector partners to improve their food procurement for the communities they serve.

- We support the recommendations under ‘What you can do’
- We welcome the Mayor’s promotion of Food for Life as it demonstrates clearly that fresh sustainable food is affordable but would urge the Mayor to lead by example by making Food for Life Served Here bronze a minimum standard for all outlets within the GLA Group and Family
- We celebrate the Mayor’s commitment to funding for a programme to introduce water refill schemes and to find locations to install 20 drinking water fountains in London in 2018 but suggest a more ambitious target of 2,020 new drinking water fountains by 2020!
- We’re encouraged by the Mayor’s support for creating environments where those who wish to breastfeed can do so, but feel that this must be a requirement of all settings within the GLA Group and Family.

What is School Food Matters doing to help?

- School Food Matters worked with LB Richmond and Kingston to transform the food served in 60 primary schools by developing a stringent food specification. Primary schools across both boroughs now deliver menus meeting the Food for Life Gold standard and we continue to work with Achieving for Children to get the best school meal service for parents and their families.
- We have created a template food specification for schools to use when tendering a school meal contract to support them to get the very best school meals.
- We use the platform of London Food Board and its boroughs working group to promote our projects and campaigns to encourage local action.
- We took the lessons learned from Richmond and Kingston to both Department for Education and Defra and contributed to both the School Food Plan and the Plan for Public Procurement.
- We’re working with Guy’s & St Thomas’ Charity to establish Healthy Zones⁷ in three Southwark schools; places where children’s health and wellbeing is consistently and actively promoted through the policies and actions of the whole school community.

4. Good food for maternity, early years, education and health; using good food to help give Londoners the best possible start to life.

- We support the recommendations that Londoners take an interest in the food their children eat at school and apply for free school meals. However we would go further and suggest that:
 - a. Parents/carers are encouraged to be proactive and ask their school or local authority if they are entitled to Free School Meals. The new eligibility criteria, introduced with Universal Credit, have caused some confusion. If in doubt, parents/carers should go to Department for Education’s eligibility checker⁸.

⁷ <https://www.schoolfoodmatters.org/projects/healthy-zones>

⁸ <https://www.gov.uk/apply-free-school-meals>

- b. Londoners encourage their schools to work towards a Healthy Schools London Award **and** a Food for Life Award. Healthy Schools London is a broad framework to measure the actions schools take across the whole health and wellbeing agenda, whilst Food for Life is a better measure of the steps schools are taking to ensure that children receive healthy sustainable food and quality food education.
- We are encouraged by the Mayor's commitment to continue to support Healthy Schools London (HSL) but would recommend a review of the award criteria. Currently schools can be awarded Gold without offering a school meal service. This means that a HSL Gold school could be giving children entitled to free school meals a packed lunch, increasing the risk of those vulnerable children being stigmatised, and preventing all children at the school accessing a hot, nutritionally balanced school meal when there is evidence to show that only 1% of packed lunches meet the school food standards⁹.
- We wholeheartedly support the Mayor's commitment to implement new policies to restrict hot food takeaways opening within 400m of existing and proposed schools.
- We support the move to convene a Child Obesity Taskforce.
- We are pleased that the Mayor will support measures to increase uptake of Healthy Start vouchers to 80% of eligibility but would recommend a target of 90% in line with Food for Life Silver school award for take-up of free school meals.
- We fully support any initiatives by local authorities to increase take up of free school meals and consider extending eligibility to more families, particularly in view of the new eligibility criteria introduced in April 2018 which could create confusion within schools and leave some families without access to free school meals.
- We will actively support all the suggested priorities to be led by external partners.

What is School Food Matters doing to help?

- Our Founder/CEO is co-Chair of the School Food Plan Alliance tasked with championing the School Food Plan and its 17 actions.
- With charity partners, we are actively lobbying government to deliver the actions on the Childhood Obesity Plan chapters 1 and 2.
- We are working with The Children's Society on campaigns around access to free school meals and continue to work with charity partners to protect the policy of universal free school meals for all infant school children.
- We are contributing to Ofsted's Advisory Panel on obesity, healthy eating and physical activity and continue to campaign for Ofsted to measure the steps schools take to support children to keep themselves healthy.
- We are actively campaigning for the Department for Education to deliver the Healthy Rating Scheme described in the Childhood Obesity Plan chapters 1 and 2 as a means of monitoring and evaluating school's efforts to tackle childhood obesity.

⁹ Evans C, Greenwood D, Thomas J, Cade J, "A cross-sectional survey of children's packed lunches in the UK: food and nutrient based results", *Journal of Epidemiology & Community Health*, 2010

- We are determined to ensure that secondary schools are included in the Healthy Rating Scheme (HRS). Despite great improvements being made in primary schools, secondary schools are being left behind and require special attention from government to address the complex issues of feeding 1000s of students (rather than 100s) in a canteen style arrangement which lends itself to snacking and poor food choices. By including them in the HRS, secondary schools can be guided towards becoming Healthy Zones and develop a culture that normalises healthy eating and where unhealthy snacking is the exception rather than the rule.
- We devise, develop and deliver food education programmes for schools to help them establish a whole school approach to food through cooking and growing food.
- We are delivering our Healthy Zones programme in three Southwark schools (see above)
- We disseminate updates on school food policy and free school meal entitlement to our mailing list of 6,000 and to our 6,000 followers on Twitter.
- We have a vibrant website to promote our campaigns and food education programmes to schools and families.

5. Good food growing, community gardens and urban farming; promoting the multiple benefits of food growing for individuals and communities.

- We support the recommendations under ‘What you can do’ and particularly the focus on schools getting involved in food growing initiatives.
- We welcome the Mayor’s commitment to use planning to protect and develop food growing spaces and areas for urban farming.
- We are encouraged by the fact that the Mayor acknowledges the value of food growing in relation to enterprise, skills development and job creation.
- We welcome the Mayor’s ambition for London to become a leader in urban agriculture and the commitment to invest in green infrastructure and would like to see efforts to link these urban agriculture/green infrastructure initiatives to London schools.
- We are delighted that the Mayor has committed to support the London Food Board to explore the potential for increasing social prescriptions of fruit and veg and referrals to food growing schemes.

What is School Food Matters doing to help?

- We have linked with local business and charities to support food growing in schools by offering programmes with an enterprise theme. Programmes include Schools to Market¹⁰ with Whole Foods Market, Young Marketeers¹¹ with Borough Market and United St Saviour’s Charity and Know your Onions¹² with City Bridge Trust.
- We have managed School Garden Grants¹³ for Whole Kids Foundation across six London boroughs dispersing £125,000 to schools to support food growing.
- Since 2012, we have been delivering a Food Growing Grants¹⁴ programme on behalf of ISS Education across five London boroughs dispersing £70,000 to schools along with training for teachers and children.

¹⁰ <https://www.schoolfoodmatters.org/projects/schools-market>

¹¹ <https://www.schoolfoodmatters.org/projects/young-marketeers>

¹² <https://www.schoolfoodmatters.org/projects/know-your-onions>

¹³ <https://www.schoolfoodmatters.org/projects/school-garden-grants>

¹⁴ <https://www.schoolfoodmatters.org/projects/iss-food-growing-grants>

- Our Founder/CEO is chair of Capital Growth working group.
- We share good practice in schools on our website with Growing Ideas¹⁵

6. Good food for the environment; reducing the environmental impact of our food system by making it more efficient and less wasteful.

- We support the recommendations under 'What you can do' but would add that Londoners should encourage their local school to engage with programmes such as Eco-Schools and link with their local food surplus charity such as FareShare London or The Felix Project to either donate or receive surplus food. These charities can deliver assemblies to educate young people about food surplus and waste to help them become environmental stewards.
- We celebrate the Mayor's target to reduce food waste by 20% by 2025.
- We are encouraged by the Mayor's commitment to promote the use of reusable water bottles but would recommend that the Mayor challenge schools to introduce a plastic water bottle ban in exchange for grants to install refill stations and issue reusable water bottles to students.
- We welcome the Mayor's commitment to initiatives to engage Londoners with the provenance, values and environmental impact of food but would extend this to schools, highlighting schemes such as Food for Life, which promotes sustainable school food and educates young people about the impact of their food choices.

What is School Food Matters doing to help?

- With partners, we have designed food education programmes for schools with a focus on food waste. This includes Young Marketeers Winter Sale¹⁶ which challenges secondary school students to make soup from surplus to sell at Borough Market to raise funds for FareShare London.
- We educate children about food surplus and waste by partnering with FareShare London, delivering assemblies to schools as part of our Young Marketeers programme.
- We encourage schools to compost to make good use of food waste and to support food growing. We have partnered with Whole Kids Foundation to deliver Compost Matters¹⁷, a new programme for secondary schools.

This submission has been prepared by [REDACTED], School Food Matters with contributions from [REDACTED].

School Food Matters

Charity Number 1134094

[REDACTED]
www.schoolfoodmatters.org

¹⁵ <https://www.schoolfoodmatters.org/growing-ideas-retrospective>

¹⁶ https://www.youtube.com/watch?time_continue=10&v=uog-PYecPRM

¹⁷ <https://www.schoolfoodmatters.org/projects/compost-matters>

Type of organisation

Business

Name of organisation

Subway(r)

Are the six priority areas (set out above) the right ones?

Yes

If no, please tell us why:

At Subway, we have always offered affordable menu options as part of our core range, that are low in fat and saturates, across the UK and Ireland. This has enabled us to partner with PHE as part of their One You campaign. We are proud to have been named as 'leading the way' in the calorie reduction effort by including calorie labelling on menus, as part of the Government's 'Childhood obesity: a plan for action, chapter 2' recent announcement.

With 20% of the estate based in London, the region makes a substantial contribution to the success of the Subway business. From a media perspective, OOH is a key driver of this, with around 24% of all outdoor media spend invested within the capital. The importance of OOH to London is intensified by consumer media consumption trends, with Londoners being harder to reach through other broadcast mediums such as TV and Radio. We estimate that the impact of the proposed changes to OOH on Subway campaign effectiveness would be substantial, directly leading to a reduction in footfall and business performance.

Across the UK and Ireland there are over 2,500 Subway stores in large urban centres and smaller high streets, to out of town locations, shopping centres and retail parks. Approximately 800 of them are in a wide variety of off-high street locations, including fuel forecourts, convenience stores, transport hubs, hospitals and universities. One of the key reasons for the success of Subway's expansion is that all stores are classified as meeting the A1 planning criteria as well as having to meet local authority permissions, licenses and approvals. We partner with our local independent franchise owners to select locations based on several factors, however, Subway does not prioritise the location of stores close to where schools are situated.

██████████ Marketing Director of Subway UK and Ireland, comments: "It's really important that customers know they have a choice on the high street and can find meal choices that are low in fat and saturates. Our menu includes an extensive range of Six-inch Subs, salads and flatbreads, all fitting into the calorie intakes for meal occasions recommended as part of Public Health England's One You 400-600-600 campaign. At Subway customers have a lot of choice, including breads like our 9-grain wheat bread that's high in fibre and salads that guarantee you get two of your 5-a-day. In addition, all stores only offer low or no sugar drinks via the drinks dispensers, which is something we know very few other high street operators offer customers."

Are there other priorities that should be considered?

Yes

If yes, please tell us what they are:

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Are the most effective actions the Mayor, external stakeholders and individuals can take set out?

No

If no, please tell us why:

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Marketing Director of Subway UK and Ireland, comments: "It's really important that customers know they have a choice on the high street and can find meal choices that are low in fat and saturates. Our menu includes an extensive range of Six-inch Subs, salads and flatbreads, all fitting into the calorie intakes for meal occasions recommended as part of Public Health England's One You 400-600-600 campaign. At Subway customers have a lot of choice, including breads like our 9-grain wheat bread that's high in fibre and salads that guarantee you get two of your 5-a-day. In addition, all stores only offer low or no sugar drinks via the drinks dispensers, which is something we know very few other high street operators offer customers."

Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network?

No

Please tell us why:

At Subway, we have always offered affordable menu options as part of our core range, that are low in fat and saturates, across the UK and Ireland. This has enabled us to partner with PHE as part of their One You campaign. We are proud to have been named as 'leading the way' in the calorie reduction effort by including calorie labelling on menus, as part of the Government's 'Childhood obesity: a plan for action, chapter 2' recent announcement.

With 20% of the estate based in London, the region makes a substantial contribution to the success of the Subway business. From a media perspective, OOH is a key driver of this, with around 24% of all outdoor media spend invested within the capital. The importance of OOH to London is intensified by consumer media consumption trends, with Londoners being harder to reach through other broadcast mediums such as TV and Radio. We estimate that the impact of the proposed changes to OOH on Subway campaign effectiveness would be substantial, directly leading to a reduction in footfall and business performance.

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Is the strategy inclusive and does it consider the needs and priorities of all Londoners?

No

If no, please tell us why

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[REDACTED]
[REDACTED]
Draft London Food Strategy
SME, Food and LEAP Team, DEE
londonfood@london.gov.uk

04/07/2018

Consultation response on Draft London Food Strategy

This submission is on behalf of the **Sutton Food Forum** which met on 30/05/2018 to discuss the Draft Plan. Sutton Food Forum is the local food partnership in the London Borough of Sutton. It brings together different organisations concerned with the health, environmental and social impacts of food in the borough.

Our comments on the Draft London Food Strategy are as follows;

- The six priority areas seem too broad, meaning that in essence everything that can be thought of is a 'priority' which could result in nothing being delivered.
- We strongly support the Mayor's proposal to ban advertising of food that is not healthy across the TfL estate. This also gives a good message to other organisations and authorities.
- We query whether priority area 1. 'Good Food at Home and Reducing Food Insecurity' should be lumped together or be two separate issues. Although there are links between poor diet and lack of food, there are many families which are not in food poverty but whose diet is leading to obesity. Most of the focus of priority area 1. is about food insecurity. Quite a few of the issues that relate to families with children eating healthily at home are covered in section 4, but not by any means everything that could be covered regarding the support needed to help families eat Good Food at Home.
- As regards the action to fund the development of food poverty action plans by London Boroughs on page 14 - what about funding for the delivery? Some boroughs already have food poverty strategies/action plans, but funds are needed to deliver the plans.
- There are no actions around building on the work of food banks
- Actions that could help people eat Good Food at Home that we felt were missing from the strategy are:
 - Teaching families how to cook (feedback from families EcoLocal have worked with is that they want help to learn how to cook healthy meals from cheap raw ingredients)

- 'Change for Life' and 'One You' literature isn't referenced. These are free resources which should be promoted. They are well received by young parents and children and authorities should be distributing them frequently.
 - Courses for parents /families on healthy eating/meal planning/shopping
- The boxes which list actions for individuals to take, seemed out of place in a strategy of this sort. Who is the report aimed at? Surely it is not expected that families in food poverty are going to read this strategy of an evening and take action on the basis of a box telling them to 'sign up to local community cookery course'. It would be better to have an action around supporting communities to run cookery courses which are not viable to run at the price that families on a low income can afford to pay. Clearly individuals do have a role to play and it's good to encourage people to take actions such as 'volunteer at community food growing schemes' or 'reduce your food waste' but we seriously query whether the boxes in this strategy are the place to do this.
 - To some extent the strategy appears to be directed at the London boroughs, but it doesn't seem to take account of their capacity, resources and level of control. The whole strategy requires funding, instead of telling the local authorities what to do, it should focus on the how.
 - Can local authorities be supported to avoid unhealthy food being sold near to schools?
 - It's very important to consider the routes needed to work with different cultures / community groups. These will each need different approaches. Working with faith groups should be referenced, particularly as a way to reach young families.
 - We support the recognition of community food growing for access to affordable, healthy food, mental wellbeing and it's role in reducing our carbon footprint. Especially the reference to social prescriptions on page 32.
 - There is little, if any, mention of Farmers' Markets and the contribution they make to providing locally produced food directly to Londoners, creating new social enterprise, local jobs and providing good food. Farmers' Markets face many challenges and need supporting through local authorities especially as regards licensing arrangements which can, and have, killed farmers' markets locally.
 - The role of organic food as an environmentally friendly and lower carbon food is not referenced at all. For example procurement of organic food by local authorities and schools.
 - We support the call for local authorities to use public procurement powers to encourage local food production on page 37
 - Perhaps there is insufficient emphasis on getting children involved, both growing food and cooking it. This would tackle a number of issues mentioned in the strategy, and would fit well in priority areas 4 and 5.

best wishes



On behalf of the Sutton Food Forum

Type of organisation

Advertising body/organisation

Name of organisation

Taxi Media

Are the six priority areas (set out above) the right ones?

No

If no, please tell us why:

What does "good" mean? The current trends in what is and isn't healthy? People should have a choice and be accountable for their own decisions.

Are there other priorities that should be considered?

Yes

If yes, please tell us what they are:

Where the food is sourced from. Locally sourced environmentally friendly manufactured should have a tax break. We should see this as an opportunity to support our local farmers and food producers. And encourage them to produce food in an environmentally friendly way.

Are the most effective actions the Mayor, external stakeholders and individuals can take set out?

No

If no, please tell us why:

It seems to be more about what companies can sell and advertise rather than encouraging what is right for us as humans. We should have choice and companies should be able to make whatever they want. Don't tax the unhealthy, rather reward the healthy.

Are there other actions that should be included?

Yes

If yes, please tell us what they are:

Yes, small business' that want to promote healthy food should get allowances from the government on council tax and corporate tax.

Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network?

No

Please tell us why:

For what purpose? To appease a fashionable agenda? Should we ban advertising for holidays in the dangerous sun? Or automotive advertising to polluting our streets? Companies should be able to make whatever they want within the law. Unhealthy foods are only unhealthy in moderation. Humans should be able to decide for themselves what they do with their body. Government shouldn't dictate what is put in front of them if the subject matter is a legal product. This process will affect livelihoods within many companies and is knee jerk and unthought out. Work with the media industry to help promote healthy lifestyle rather than blanket ban an entire sector.

What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?

We do not allow our staff to take clients to restaurants that do not support local and environmentally friendly farming or food production. We then let this be a topic of agenda with our clients on the meetings.

How could you or your organisation support the Mayor to achieve good food for London and support the final strategy?

We can offer media space to promote healthy living and support companies who are active in this area.

Is the strategy inclusive and does it consider the needs and priorities of all Londoners?

No

If no, please tell us why

It is a knee jerk reaction that is self serving to the current political agenda. This is not supporting Londoners needs. We can make out own minds up what products to buy. Ads or no ads. And many Londoners livelihoods come from the industry this decisions could affect.



Comments on the draft London Food Strategy

UKHospitality (UKH) is the voice of hospitality across the UK, representing a sector spanning restaurants, pubs, coffee shops, contract catering, hotels, nightclubs, bars and visitor attractions. The sector is a major contributor to the UK economy, employing 2.9 million people and generating £130bn in economic activity, while paying £38bn in taxation to fund important local and national services. Hospitality is the 3rd largest private sector employer in the UK; double the size of financial services and bigger than automotive, pharmaceuticals and aerospace combined.

Hospitality plays a key role in London's economy, employment and culture. The sector is also important in our communities, and creating great experiences for both the capital's residents and visitors alike. We welcome this opportunity to contribute to the draft London Food Strategy, and support the Mayor's comments in the introduction where he highlights the excellence and diversity of the food available in the city, much of which is provided by restaurants, pubs, caterers and other hospitality businesses.

UKHospitality takes food issues extremely seriously. The UKH Food Experts Group and Nutrition Group respectively bring together specialists in food regulation and nutrition/health from the major hospitality companies in the UK. These groups have good working relationships with stakeholders such as the FSA and Public Health England, and we would be pleased to continue to engage with the Mayor's office regarding the London Food Strategy if helpful.

Priority areas

- good food at home
- good food shopping and eating out
- good food in public institutions and community settings
- good food for maternity, early years, education and health
- good food growing, community gardens and urban farming
- good food for the environment

We agree that the above priority areas are appropriate for the strategy. We comment below on the areas of interest to UKHospitality members.

Good food - shopping and eating out

We welcome the strategy's aim to support good food businesses to improve London's food environment, and recognition of the variety of businesses in the eating out sector and their importance to London.

The strategy rightly highlights the pressure food businesses are under, and we believe a number of factors are contributing to the current difficulties faced by high-street and town centre businesses. These include business rates, disparity with digital platforms (both in regulation and tax), employment costs, commercial rents and excessive regulatory enforcement. Hospitality businesses welcome action

to help consumers make healthier choices, however it should be borne in mind the difficult environment and pressures on costs.

We welcome the strategy's focus on ensuring 'a flexible approach to migration to make sure the food and hospitality sectors can meet demand, innovate and continue to grow to ensure a strong food economy.' We have also been calling for this, and were pleased with the recent announcement regarding settled status for workers already in the UK. We are pressing for a simplified and flexible visa system, so that hospitality businesses can continue to recruit the staff they need in the future.

On the skills objective, UKHospitality is working with other stakeholders to develop a sector deal for tourism – a key plank of which is the development of skills and promotion of careers in hospitality. Therefore business is already working towards the priority of 'promoting the range and excellence of careers available in the food and hospitality sectors' and will continue to do so.

We also support the aim of enhancing London's reputation as a world-leading food destination both at home and abroad.

UKHospitality and its membership are engaged at a national level with Public Health England regarding calorie, sugar and salt reduction and reformulation programmes and the Government's childhood obesity strategy, and the FSA regarding regulation. With regard to the London Food Strategy, we hope this continues to ensure consistency with these bodies and other food and nutrition schemes companies are involved in.

Good food in public institutions and community settings

Contract caterers are an important part of UKHospitality membership and play a vital role in the food sector, providing services to public bodies, schools and others. Contract caterers are fully engaged in Public Health England's Childhood Obesity strategy and reformulation of products.

Advertising – Tfl

UKHospitality represents hospitality businesses, rather than advertisers or producers, but some of our membership advertise in a number of sites including Tfl premises. We look forward to engaging with the upcoming consultation announced in this strategy, however we do have concerns around the definitions as to what is 'healthy' or 'unhealthy' in terms of proposed banned advertising (as this could capture a whole host of products unnecessarily), and we would like to see more clarity around this going forward.

Good food for the environment

UKHospitality and a number of our member companies are already involved in sustainability and environmental initiatives with WRAP, EFCOA and joint projects such as Courtauld 2020 to reduce food waste. We look forward to continuing these relationships and ensuring the hospitality sector is as environmentally aware and sustainable as possible.

UKH

July 2018

COMMERCIAL IN CONFIDENCE

Response from Clear Channel UK Limited to the Mayor of London's proposed ban on HFSS food and drink advertising across the Transport for London (TfL) estate

Clear Channel UK Limited (**Clear Channel**) supports the fight against childhood obesity and welcomes the opportunity to participate in the Mayor's consultation. As a member of Outsmart, the UK out of home advertising industry body, Clear Channel has already seen and approved the contents of the response to the consultation submitted by Outsmart. This paper sets out Clear Channel's perspective on the consultation, in addition to the Outsmart response.

Current measures

Along with other members of Outsmart, Clear Channel has already implemented a 100 metre exclusion zone around school boundaries within which it does not place HFSS advertising. The 100 metre exclusion zone affects 15% or 900 Clear Channel sites in London.

This is in addition to the advertisements that are displayed by Clear Channel complying with the HFSS media placement restrictions set out in the Committee of Advertising Practice code (**CAP Code**).

The voluntary exclusion zone and the CAP Code mean that the regulation of HFSS advertising in the UK is already amongst the strictest in the world. The current regulation is, in Clear Channel's opinion, targeted and proportionate to enable the policy outcome of reducing childhood obesity because it removes HFSS advertising from where children are most likely to see it. It is also clear for advertisers and easily administered.

Proportionate and targeted action

Clear Channel is concerned that the ban on HFSS advertising on the TfL estate, as proposed, will not achieve the Mayor's aim of reducing childhood obesity. The proposed ban is not targeted or proportionate, and does not appear to be evidence-based. There are several factors that suggest an outright ban will not be effective:

- Clear Channel understands that only around 3-4% of trips on the London Underground are made by children travelling to and from school. The proposed ban therefore does not appear to be targeted;
- A 2014 McKinsey report, *Overcoming obesity: an initial economic analysis*, found other measures, including education from family members and at school and portion control to be much more effective than advertising bans or restrictions; and
- The city of Amsterdam introduced a holistic approach to obesity that covered many initiatives, including dietary advice, educational campaigns, and sporting activities. The advertising restrictions relating to adverts targeted at children in Amsterdam were only introduced in January 2018, meaning the recent 12% reduction in childhood obesity in Amsterdam cannot be attributed solely to the advertising restrictions.

COMMERCIAL IN CONFIDENCE

Clarity

The parameters of the proposed ban are unclear. We note that Public Health England is currently consulting on a revised Nutrient Profiling Model (**NPM**) which will be used to classify products as HFSS. Any measures relating to HFSS advertising should be introduced following consultation on and development of a revised NPM. The use of NPM could also produce counter-intuitive results with some products, such as pure orange juice, coming within the scope of the proposed ban.

Infrastructure investment

If advertising of HFSS products is banned on the TfL estate, this will likely result in advertising spend moving from the out of home sector (not just the TfL estate) to other advertising platforms because advertisers will find it easier and more justifiable to advertise on those platforms.

The migration of advertising spend from the out of home industry to other media platforms would lead to reduced revenue for Clear Channel. This will mean that Clear Channel has less money available to invest in local infrastructure when contracting with local councils in Greater London and across the rest of the UK. This would likely impact:

- The number of people Clear Channel employs, particularly in Greater London;
- Investment by Clear Channel relating to the installation, maintenance and cleaning of street furniture, including thousands of bus shelters across the UK;
- Clear Channel's investment in new technology, such as live bus timetable information provided to commuters at bus shelters;
- The provision of WiFi, maps and wayfinding services, and free emergency and charity calls from Clear Channel's New World Payphones;
- Clear Channel's ability to continue planting trees in association with Trees for Cities. Since 2016, Clear Channel has invested £800,000 on planting trees, largely in London; and
- In the past 12 months Clear Channel has supported 30 charities and donated media space worth £15m.

Looking forward

As a responsible media owner, Clear Channel would like to actively contribute to the fight against childhood obesity by participating in the development of proportionate, targeted measures to achieve the Mayor's policy objective following proper consideration of clear, well defined proposals that are supported by evidence and formal impact assessments.

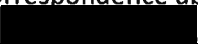
Lord Darzi, Chair of the London Health Commission, has supported using out of home inventory to advertise and promote healthy lifestyle messages, such as walking between stations and using stairs instead of escalators. Approaches such as this are targeted, proportionate and appear more likely to support the Mayor's policy objectives.

COMMERCIAL IN CONFIDENCE

Clear Channel would like to work with the Mayor and the broader out of home advertising industry to develop proportionate, targeted and effective actions, like those suggested by Lord Darzi, that will achieve the Mayor's aim of reducing childhood obesity and that can be used elsewhere in the UK. It is important that any actions are objective, and straightforward to implement. These actions could include:

- The use of unsold inventory to promote a healthy lifestyle and to provide information on healthy eating;
- The targeted use of out of home inventory in areas that have the highest levels of childhood obesity to promote healthy eating and exercise;
- The proportionate extension of the 100m exclusion zone around schools – the area of the zone could be extended and potentially other sites such as theme parks and leisure centres could be included;
- A requirement for nutritional information to be included on each advertisement – this could be “traffic light” style with green, amber and red information, or a message to the public to maintain a healthy and balanced diet; and
- Ensuring digital out of home advertising screens do not show HFSS advertising at the times children are most likely to be travelling.

Clear Channel will participate fully in further consultations and discussions to develop clear, effective, proportionate measures that address childhood obesity and that can be implemented in London and on a national scale.

Please direct any correspondence about the contents of this response to Clear Channel UK Limited, for the attention of  at 33 Golden Square, London, W1F 9JT or



Draft London Food Strategy

GLA Food Team

Post Point 19A

City Hall

London SE1 2AA

By Email to londonfood@london.gov.uk

05 July 2018

Dear Sirs,

Consultation Response to Mayor of London's proposed ban on food and drink advertising across the Transport for London ("TFL") Estate

1. Introduction

Exterion Media is Europe's largest privately held out-of-home ("OOH") advertising business. Our core business is engaging and delivering valuable audiences for advertisers through a variety of formats and environments including transport, billboards, street furniture and retail. We are also one of the leaders in digital outdoor advertising.

This letter sets out Exterion Media's response to the consultation that was issued by the Mayor of London in May 2018¹. Exterion Media welcomes the Mayor's ambition to take action on childhood obesity and we support the Mayor's commitment in taking proportionate and effective measures to address this issue. We set out below our concerns with the proposed course of action and what we believe are more effective alternative options for the Mayor to take into consideration when deciding which measures he will implement to restrict the advertising of unhealthy food and drink across the TFL estate.

We would urge the Mayor to accord significant weight to the substantial impact the measures he has currently proposed would have on our business both from a revenue and investment in jobs perspective. As we detail below, a ban in the form proposed would have material consequences for our company. We do not believe the proposed ban will achieve the Mayor's stated objective of reducing childhood obesity. We agree with Sally Davies, the Chief Medical Officer for England and Chief Medical Advisor to the UK Government who urges that "We must ensure sustained, evidence-informed action effectively tackles the multi-faceted determinants of obesity ..."². The proposed ban, as currently drafted, does not achieve this required and necessary standard.

We want to work with the Mayor to harness the power of advertising to deliver lasting changes in behaviours and attitudes that Londoners have actively said they want, by providing more information³ on making healthy eating choices and promoting physical activity and ensuring consumers can make informed and healthy decisions.

¹ https://www.london.gov.uk/sites/default/files/two-sider_of_advertising_proposals_v2.pdf

² <https://blogs.bmj.com/bmj/2018/06/25/tackling-childhood-obesity-evidence-persistence-and-political-will/>

³ https://www.london.gov.uk/sites/default/files/better_health_for_london.pdf Page 19

This letter should be read in conjunction with the response that has been submitted by Outsmart to the consultation ("**Outsmart Response**"). Outsmart are the OOH media trade sector body. We have collaborated and contributed to the Outsmart Response (for ease we have appended a copy to this letter) and we fully endorse Outsmart's position.

2. Background

a. TFL advertising revenue

Exterion Media UK is a collaborative partner of TFL. In 2016, TFL selected Exterion Media to be its media partner for its advertising concession contract until 2025. The partnership sees Exterion Media deliver a significant investment to upgrade the TFL advertising estate ([REDACTED]) and manage the commercialisation of these new as well as existing advertising assets at over 400 stations across TFL's extensive network. It was the first time that the contract combined advertising space across London Underground, London Overground, Tramlink, Docklands Light Railway, Victoria Coach Station and, once it is operational, the Elizabeth line. The contract operates as a revenue share and TFL receives a significant portion of the revenues earned under the partnership.

We note that the TFL Business Plan for 2018/19 to 2022/23⁴, states the revenues earned under the advertising partnership agreement between Exterion Media and TFL make a material contribution to TFL's non-fare commercial revenues. We understand that this is an important revenue stream for TFL, one which the Transport Commissioner has committed to grow, particularly in light of the government subsidy of £700m ending in 2018/19.

b. Childhood obesity crisis

Exterion Media understands the scale of the obesity crisis in children and we appreciate that childhood obesity is a significant and complex public health crisis. As the Health and Social Care Select Committee noted in its report 'Childhood Obesity: Time for Action' published in May 2018, current estimates suggest that nearly a third of children are overweight or obese in the UK as a whole and younger generations are becoming obese at earlier ages and staying obese for longer. Obesity rates are highest for children from the most deprived areas and this situation is getting worse. The Committee concluded: "The case for stronger action on this unacceptable and widening health inequality is compelling."

The situation in London is even more stark. More than 3.8 million Londoners are obese or overweight. Research has demonstrated that London has the highest rate of childhood obesity of any major global city. By school year six almost 40 per cent of children are classed as overweight or obese, with children living in the most deprived areas of London twice as likely to be overweight and obese as those in more affluent boroughs. Labour Peer, and former Health Minister, Lord Darzi branded London's obesity emergency as "a national disgrace" in his 2014 London Health Commission report commissioned by the previous Mayor of London⁵.

We understand that the Mayor must balance the two priorities of ensuring that TFL continues to be a well-funded public service as well as taking measures to reduce childhood obesity. We consider that these

⁴ <http://content.tfl.gov.uk/tfl-business-plan-december-2017-.pdf>

⁵ https://www.london.gov.uk/sites/default/files/better_health_for_london.pdf

priorities can be achieved by considering and fully understanding the current regulatory framework surrounding HFSS advertising and through an appropriate range of proportionate and targeted measures, as set out in paragraph 4d below.

3. Effectiveness of current regulations

As you will already know, the current UK rules for advertising of HFSS are among the strictest in the world⁶. These strict new rules came into effect in July 2017, and they ban the inclusion of HFSS product advertisements in children's media and other media where children make up 25% or more of the audience. The rules provide comprehensive coverage of non-broadcast media environments, from social media and TV-like services online to poster sites located near schools and cinema advertising. These restrictions complement similar measures already in place for broadcast media.

At the same time as the changes were implemented by the CAP committee, Outsmart members voluntarily took steps in July 2017 to restrict marketing of HFSS products in areas most likely to be seen by children, by preventing HFSS advertising being placed on static OOH advertising sites within 100 metres of school boundaries. As an industry body member, we voluntarily supported investment in terms of time and software to put this exclusion in place.⁷

We took this step, going beyond our existing regulatory requirements, because we considered it to be a targeted and proportionate response that removed HFSS advertising in particular areas where children are most likely to be exposed to it, even though CAP advises advertisers that it usually considers OOH advertising to be directed to the general public and not targeted at children under the age of 16.

As is this case with the measures implemented by the CAP committee at the same time, they have now been in place for less than a year and we consider that it is too early to take an evidence-based decision about whether further measures are needed to reduce children's exposure to HFSS OOH advertising. The CAP committee has announced that it will be reviewing the effectiveness of these measures, with their results due in the Autumn of 2018. We believe that this review should be completed and assessed before further restrictions are imposed, especially when the evidence of such restrictions being effective has not been provided.

4. Impact of proposed ban on HFSS advertising across the TFL network

a. Scope of the proposed ban

The Mayor's proposed ban offers two choices, either do nothing or "ban of all food and drinks advertisements across the Transport for London network unless they are advertising healthy food and drink". This means that advertisements for food and drink defined as unhealthy would be banned, as well as advertisements for food and drink companies that just advertise the company's brand or restaurant name. Whether a food or drink would be healthy will be determined by reference to Public Health England's nutrient food profiling model.

6

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718903/childhood-obesity-a-plan-for-action-chapter-2.pdf page 20

⁷ <https://www.outsmart.org.uk/news/out-homes-action-hfss-advertising>

We disagree with this binary choice and we ask the Mayor to consider a wider range of options that are more targeted and proportionate to deliver his stated objective. We, together with Outsmart, have developed some proposals as potential alternative options that could be explored in partnership with industry. These are set out in paragraph 5 of the Outsmart Response.

The parameters in the proposed ban are unclear and wide in scope. It is difficult for us to respond in depth to the consultation without a greater level of detail of the intent, basis and scope of the ban.

Brand-only advertising

In relation to the brand only advertising ban, it is not clear whether this ban is proposed to cover all food and drink companies and restaurants, any food and drink company and restaurant that sells one or more HFSS products or only food and drink companies and restaurants that sell predominantly HFSS products. As written in the consultation, it appears that all food and drink companies and restaurants will be included. This is unjustifiably broad. It would cover brand-only advertising by a vast range of companies such as supermarkets, food delivery providers, restaurants, coffee shops and e-commerce brands, including the likes of trusted high street brands such as Marks & Spencer Food, Waitrose and Leon and restaurants such as Jamie Oliver's Italian to local family run restaurants. It would also inevitably cover companies with product ranges that are largely or even completely free from HFSS food and drink. We cannot therefore understand how it would meet its intended objective. In fact, the ban would have the perverse result of covering companies, such as Leon, who are actively promoting the consumption of healthier food.

The consultation does not provide any methodology to determine whether an advertisement would be compliant or not. This lack of clarity will result in the OOH medium being viewed as too difficult and advertisers will simply stop using the medium. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

SMEs and micro-businesses

We also believe that the proposed ban will disproportionately impact SMEs and food and drink start-up's ability to advertise, as they do not have the resources to be able to comply with complicated and opaque rules. A good example would be Jimmy's iced coffee⁸. This comes at a time when SMEs in London need the support of the Mayor in order to survive, not to be burdened unnecessarily with extra red tape. It is for this reason that UK Government in its Childhood Obesity Report, will be consulting on excluding micro businesses from some of the measures they are considering⁹ and we would urge the Mayor to consider a similar exclusion.

Food and drink advertising

The proposed ban on advertising unhealthy food and drinks equally lacks clarity. By using the Nutrient Profiling Model (which itself is currently subject to consultation, and therefore will further add to the

⁸ <https://www.jimmysicedcoffee.com/products/>

⁹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718903/childhood-obesity-a-plan-for-action-chapter-2.pdf

uncertainty) will result in perverse outcomes. Under the current model, the advertising of products such as oils, pesto and milk-based products such as cheese, will be banned on the TFL estate. Advertisements of these types of products have limited or no appeal to children and are targeted at adults.

Directional advertising

Finally, we note that in the consultation, the Mayor specifically highlights directional advertising. We have reviewed the directional advertising that we have provided on the TFL estate and we have found that they are or have been principally located in Zone 1 and in locations that are mainly used by tourists, namely Piccadilly Circus and Leicester Square. Again, we would therefore suggest that directional advertising within Zone 1 on the London underground estate should be excluded from any restrictions.

b. Practical implications of how the ban will be implemented

We are surprised that the consultation does not contain clear parameters as to how the proposed restrictions will be implemented and enforced in practice. Whilst we do operate a mature and comprehensive copy approval process in conjunction with TFL, we are not nutritional experts and cannot be made responsible for determining whether an advertisement from a food and drink company and/or restaurant complies with restrictions that may be introduced by the Mayor.

As the Mayor will be aware, media campaigns are planned months in advance (for example media campaigns for Christmas 2018 are currently under planning) and we have ongoing contractual commitments with advertisers who may be captured by the proposed ban. The consultation does not provide for any transitional arrangements that would allow for existing contractual commitments to be met without risking non-compliance. Transitional arrangements would be a vital part of the implementation of any new measures and would need to be devised in conjunction with industry. At minimum we would need at least six months to implement any form of new restrictions given the media buying cycle.

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[REDACTED]

d. Duty to consider and consult on alternative options

In consultation with Outsmart, we as part of the OOH industry, have explored potential alternative options to the proposed ban by the Mayor. These proposals would require proper consultation and further development and we would like to discuss with the Mayor how these options could be implemented. These alternative options are set out in Outsmart's Response and we refer you to paragraph 5.

We would add that TFL has access to significant and insightful data that could be used in conjunction with the existing copy approval process to understand the exposure children have to advertising from food and drink companies on their journeys to and from school. For example, we know that children between the ages of 10 to 16 represent 1.4% of the entries and exits on the London Underground in Zone 1 on a normal school week and this percentage only increases by 0.2% over the average weekend. We also know that only four London Underground tube stations have children making up more than 10% of the users on an average school week and that all of these stations are located outside of Zone 1. Therefore, placing restrictions within Zone 1 will have very limited impact. Using this data would enable the Mayor to develop solutions that are targeted and effective particularly in light of the evidence that obesity rates among young people vary significantly across the UK, and increased rates correlate strongly with areas with increased social deprivation.

In place of a ban or some other form of restriction, we strongly urge the Mayor to consider the recommendation made in Lord Darzi's report that the TFL estate should be used in conjunction with advertisers to deliver information on healthy eating and to encourage an increase in physical activity. Information on such issues is something that Londoners have specifically stated they want and we assert this is likely to have a greater impact on reducing childhood obesity. We would be willing to work closely with the Mayor and the team at TFL to fully develop this proposal.

5. Evidence based approach needed to make an effective impact on the childhood obesity

We endorse the statements made in the Outsmart Response under paragraphs 4.4-4.11. We agree that there is insufficient evidence demonstrating the efficacy of a wholesale ban and for such a ban to be justified as a proportionate means of reducing childhood obesity, at least without considering other options which are likely to have less of an adverse impact on our and TFL's commercial interests.

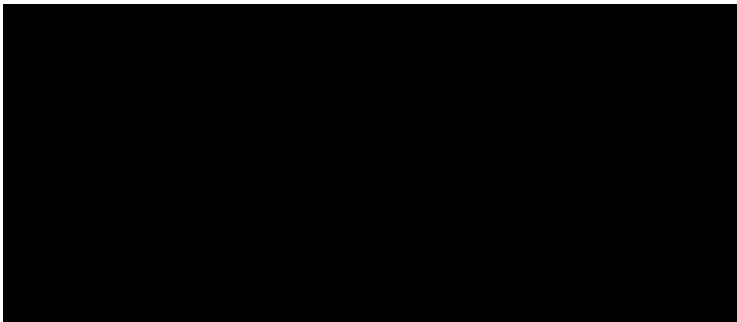
6. Summary of EM's position

Exterion Media is an active member of Outsmart and we fully support and endorse the Outsmart's Response to the Mayor's consultation. We do not agree with the proposed ban of advertising food and drink that is not healthy across the TFL network. This is supported by evidence that media restrictions are the least

effective policy interventions and that education and information are proven to be much more effective measures¹¹. We do agree that proportionate and targeted action needs to be taken, where there is evidence to show that it will be effective, and we have provided the Mayor with viable alternative options that should be given due and careful consideration.

We wish to engage positively with the Mayor and his team and our partners at TFL and contribute meaningfully after the end of the consultation period by working with you to deliver measures to address this worrying health crisis. Accordingly, I and the rest of the team at Exterion Media look forward to developing a close collaborative relationship over the coming months and working together to make a difference on this important issue.

Yours sincerely,



¹¹E.g. https://www.mckinsey.com/~media/McKinsey/Business%20Functions/Economic%20Studies%20TEMP/Our%20Insights/How%20the%20world%20could%20better%20fight%20obesity/MGI_Overcoming_obesity_Full_report.ashx

COMMERCIAL SENSITIVE & CONFIDENTIAL
RESPONSES TO LONDON FOOD STRATEGY CONSULTATION
Mayor's London Food Strategy

JCDecaux recognises the seriousness of the issues surrounding Child Obesity and welcomes the opportunity to consult with the Mayor on this initiative. We are keen to find effective, targeted measures that will address the problems of Child Obesity.

As an industry we have introduced voluntary measures to help reduce incentives which encourage over eating by children by the establishment of a 100m ban on HFSS advertising near schools. This exclusion zone captures 16% of JCDecaux's advertising estate UK-wide and 20% of our TfL estate - and reduces exposure to the target audience. The exclusion zones are managed by the Out-of-Home trade body Outsmart and all advertisers and agencies have open access to the data and can apply zonal boundaries to all HFSS campaigns.

We remain open to further measures where it is evidenced that such a restriction would result in a reduction in Child Obesity. We have concerns as to the effect of banning advertising on the whole of the TfL estate and whether such a step will help to achieve the Mayor's stated objective.

TfL do not control all advertising in the capital and it is likely, in our view that the revenue from HFSS advertising currently spent on the TfL estate [REDACTED] in 2017 would simply move to other sources outside the control of TfL. Alternative sources of advertising in the online world will remain unaffected. At the moment 55% of all advertising revenue is spent online and increasingly on the mobile phone where controls on brand and child safety do not have the same stringent codes. It is estimated that the TfL estate represents approximately 3% of advertising spend in London.

[REDACTED]

In addition, we believe the current proposal is binary and would benefit from a more nuanced approach. Most studies we have reviewed demonstrate that media restriction are among the least effective (reference McKinsey report, 2014). Education and portion control have been listed as far more effective. In Better Health for London, Lord Darzi recommended the promotion of exercise in order to tackle weight problems effectively. The Amsterdam metro ban limited adverts directly targeted at children - a step already undertaken in the UK - but crucially this initiative was accompanied by a strategic campaign to promote education and

dietary advice and encourage with sporting activities – and it was this combined approach that resulted in a 12% fall in obesity.

JCDecaux is a company that was founded on the basis of providing public realm infrastructure to cities, transport authorities and local authorities in return for the advertising rights. Our business model enables us to provide exceptional services to suit the changing needs of those who live, work and visit cities in the UK. We work on a principle of continuous evolution, future-proofing what we build, and helping cities to develop a Smart City proposition. In addition, we provide a maintenance and servicing regime that further relieves operational burdens from our partners. We currently work with over 120 authorities across the UK providing bus shelters, council Information panels and wayfinding in addition to a sustainable source of revenue that is highly valued by our partners. If the advertising revenue these services generate is compromised this would adversely affect our clients. London is at the heart of our business and we believe a loss of revenue here would impact our revenues widely.

Our business model benefits all stakeholders – councils, advertisers and consumers. It is unique and sustainable. We constantly innovate for the benefit of all, ensuring we adapt our products to society's ever-changing needs with integrated technology solutions. Our design and development studios in Plaisir, France employ over 100 engineers and designers and we have registered more than 200 patents in innovation. All this is funded by advertising revenue and many of our partners benefit greatly from this source of income and the supply of public utility in the form of bus shelters, bins, street lighting and toilets.

In London alone we have contracts with 20 London Boroughs, including Kingston upon Thames, Kensington & Chelsea, Hammersmith & Fulham, Camden, Croydon, Hounslow, Hackney and Lewisham. As a company we invest [REDACTED] per annum in capital projects.

We believe there is an opportunity here to work more closely and openly to collaborate not just with TfL and City Hall but across the capital by means of the extensive relationships we have with the majority of the London Boroughs. We envisage a proportionate approach which embraces the need to educate and promote healthy living to the targeted audience. This type of collaboration would enable us to harness the value of our total advertising estate in Greater London (11,000 classic 6-sheets, 700 roadside digital 6-sheets, 300 rail digital 6-sheets, 115 mall digital 6-sheets, 70 digital roadside billboards and 35 digital rail billboards) to promote positive messaging and education in a consistent and aligned manner, in order to meet the Mayoral objectives.

We are currently in discussion with Dr Danny Ruta of Lewisham Borough Council in order to scope and research a pilot scheme in the Borough designed to tackle Child Obesity. It is envisaged that the research we obtain as a result of this trial would inform policy and initiatives that could be implemented not just in London but across the UK also, ensuring the efficacy of market intervention. JCDecaux and Lewisham Council are planning to work together to structure a pilot scheme in the London Borough of Lewisham in order to properly research the effects of a targeted and non-targeted ban on HFSS coupled with positive promotional initiatives including Sugar Swaps campaigns and promoting the healthy schools

programme. The structure and timeline for the Pilot will be determined by both parties following consultation with a professional research body.

As part of our pilot, we would propose to carry out a smart sugar campaign similar to previous campaigns which have taken place at Tesco that resulted in reduced High Sugar Cola sales and increased Low Sugar Cola sales as evidenced below:

INFLUENCING BEHAVIOUR

SUGAR SWAPS CASE STUDY

Promoting Change 4 Life Sugar Swap app for shoppers to evaluate sugar content

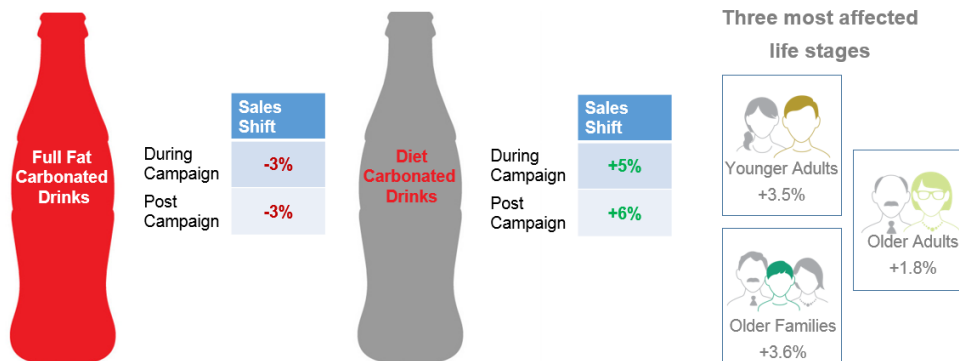
Influencing purchase decisions at Point of Sale to seek alternatives to sugary products



TESCO

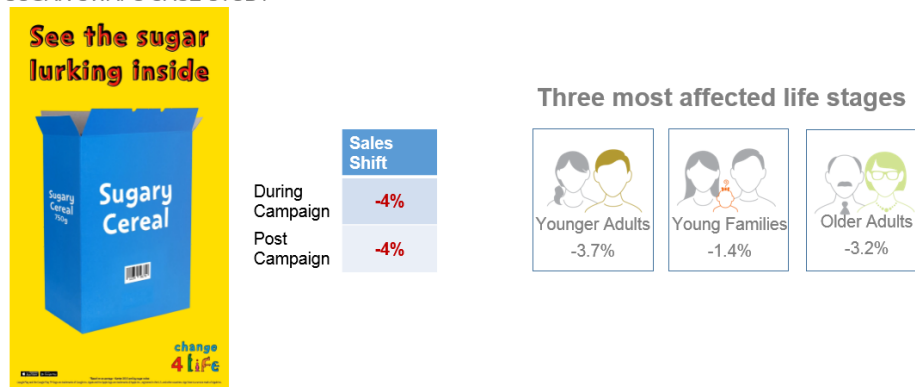
PROVEN BEHAVIOUR SHIFT FROM OOH

SUGAR SWAPS CASE STUDY



PROVEN BEHAVIOUR SHIFT FROM OOH

SUGAR SWAPS CASE STUDY



As the Mayor's office will be aware, JCDecaux and Exterior Media are sponsoring, as part of the Mayoral initiative #BehindEveryGreatCity research into The Women We See, Experiences of Gender and Diversity in Advertising in London's Public Spaces. This diversity research will be used to form the framework of a creative agency competition to produce advertising that drives more diversity on the TfL estate. In the results of the research, the TfL estate was seen as the least problematic and the findings demonstrate that social media is perceived as most problematic. In addition, there has been a marked increase in positive perceptions of diversity on the TfL estate since the last research. Working with clients and agencies through education has delivered positive results. An education programme coupled with a targeted ban maybe the most appropriate way forward for HFSS.

JCDecaux supports the work Design & Art Direction (D&AD) does with young creatives. Since 1962 D&AD has been inspiring a community of creative thinkers by stimulating and celebrating the very best in advertising and design. Their Awards are recognised globally as the ultimate creative accolade, entered and attended by the best. Creatives and clients are inspired by a world class training. In addition, they curate a New Blood programme that is designed to help future talent excel and JCDecaux is promoting this programme in association with D&AD for the Mayor's office #LondonIsOpen. Creatives delivered by young Londoners for London has delivered exceptional work that could have a positive impact on the perceptions of London. The theme for 2019 could focus on challenging creatives to produce content that focuses on tackling Child Obesity. Harnessing young London creative talent for good would be part of our Lewisham Council pilot of targeted exclusion, education programmes and monitoring of results.

In summary, JCDecaux believes that a proportionate, targeted exclusion zone around schools of 100m provides real benefit to the Mayor's campaign. In addition we also believe that running a pilot scheme in Lewisham will provide the real evidence that a targeted proportionate exclusion coupled with proactive educational messaging on the whole of the out of home estate will provide the Mayor with a real and tangible outcome. Supported by Dr Danny Ruta, we will provide an impact assessment that can inform decision-making across the whole of the UK. As a business that is built on providing public services and utilities to cities we want to play an active and positive role in city life. Therefore we are enthusiastic to work with the Mayor's office on a campaign to promote healthy eating, exercise and healthy schools and would support the harnessing of the creative input of London's young creatives.

PRIVATE AND CONFIDENTIAL

THE DRAFT LONDON FOOD STRATEGY RESPONSE FROM LUCOZADE RIBENA SUNTORY 4TH JULY 2018

1. ABOUT LUCOZADE RIBENA SUNTORY

Lucozade Ribena Suntory (LRS) was formed in 2014 and is part of Suntory Beverage & Food, a core part of Japan's global Suntory Group. We are the third largest branded soft drinks supplier in the UK, and our much-loved brands – including Lucozade Energy, Lucozade Sport, Ribena and Orangina – account for 7% of the UK market¹.

Our business is driven by our “Yatte Minahare” (Go for it!) spirit and our role is to have a positive impact on the lives of our consumers, providing them with a responsible choice of great tasting drinks and inspiring them to lead more active lifestyles.

Health and Wellbeing

2017 was the biggest year in the history of LRS and our brands as we put into action an industry-leading reformulation and Health & Wellbeing plan.

From March 2018, all existing and new drinks with added sugar contain less than 5g of total sugar per 100ml (approximately a teaspoon) – and zero and reduced calorie alternatives are available for each brand. In total, we have reduced the average sugar content of our portfolio by 50% - removing 25,500 tonnes of sugar and 98.1bn calories - but still delivering great tasting drinks.

Alongside changes to our drinks, we are investing £30 million over three years to help get the nation moving more. We are seeking to inspire 1 million people to move more with our ‘Made to Move’ campaign, fronted by unified world heavyweight champion Anthony Joshua OBE.

LRS has also partnered with Active Communities Network (ACN) to launch ‘B Active’ programmes across five different regions in the UK, including one in the London boroughs of Southwark and Brent². The programmes have been designed to help increase physical activity as well as improve the lifestyles and prospects of young people aged 16-24. They include youth-led activity programmes running five days a week, 50 weeks of the year and, in a collaboration with the Open College Network and 1st4Sport, ACN is offering volunteers a range of qualifications (including: enterprise, diversity & inclusion and developing community activities for youth at risk).

Promoting Health and Wellbeing in London

Headquartered in Stockley Park, Uxbridge, LRS is committed to helping encourage Londoners to live more active and healthy lifestyles. Our work includes:

¹ EXT IRI Marketplace, GB, latest 52-week data ending 1st April 2018

² <http://www.activecommunities.org.uk/b-active/>

Our Parks – In January 2018, we announced our partnership with Our Parks, a London based organisation that puts on free exercise classes in 18 London borough parks. Our partnership will enable them to expand into a further 15 boroughs, leading to over 100,000 Londoners moving more.

B Active – In July 2018, our B Active programme in Southwark and Brent was launched. The sessions will run five days a week for 50 weeks of the year at sports facilities across the boroughs for 16-24 year olds. Each practice will be focused around a different sport, including football, basketball, boxing and tennis.

Running – Lucozade Sport has long inspired the nation to run more. In the last two years alone, we have supported 714,500 runners across the UK, including through the London Marathon which we have been involved with for the past 17 years.

Inspiring Staff – Our focus on health and wellbeing starts at home, and we seek to encourage all our staff (both in London and at our factory in Coleford in the Forest of Dean) to live healthier lives. This includes through regular exercise classes and mindfulness sessions hosted in our offices, reduced gym membership and securing places in competitive sports events for colleagues.

Our Responsible Marketing Code

We are committed to marketing our drinks responsibly and playing our part in helping consumers of all ages make informed choices. Our unique responsible code of marketing³ was created to shape the company's marketing behaviours, and goes above and beyond the UK industry standards. In particular:

- We do not advertise any products or target marketing communications to any children under 12 years of age. We will not sponsor events or celebrities that are likely to be of particular appeal to children under 12.
- We do not directly market HFSS products to those under the age of 16. Any sponsorship which appeals to 12-16 year olds must encourage physical activity and promote a balanced and healthy lifestyle.
- These rules apply online and offline, to television and all other forms of communication. They go further than those operated under UK legislation and the Committee of Advertising Practice.

In addition to compliance with local laws and regulations, we require all our employees, partners and agencies to adhere to this code.

Our environmental footprint

Lucozade Ribena Suntory is committed to reducing its environmental footprint.

We have taken significant steps to ensure that the business supports and actively follows the 3 R's – reduce, reuse, recycle – and have been 'zero-waste to landfill' since 2008. Our water efficiency programme has been designed to minimise our potential impact on local resources, and the second borehole we opened at our factory in 2015 means almost half of the water we use⁴ is sourced directly from our land. In 2016, we also consolidated our distribution centres, saving 1.09 million transportation miles, an estimated 1.56 million kg of CO2 emissions every single year.

All of our drinks containers are recyclable and we encourage consumers to recycle with on-pack messages. Ribena led the soft drinks industry in creating the first ready-to-drink bottle from 100% recycled plastic in

³ <https://www.lrsuntory.com/dyn/assets/pdfs/lrsresponsiblemarketingcodeuk.pdf>

⁴ 49.9%

2007. Now, in 2018, 25% of all our drinks bottles are made using 100% recycled plastic (rPET) and we are continually looking at ways to reduce plastic usage. In the last four years alone, we have reduced annual plastic usage by 2,606 tonnes. We are currently undertaking an internal project looking at further designs to aid recyclability and, through ongoing discussions with the recycling industry, have identified further areas for improvement.

We are proud to be a founding signatory of The UK Plastics Pact. Together with more than 50 businesses and organisations in the UK, we share a desire to work together to change the way we use plastic to minimise its impact on the environment. We are also a founding member of The Future of Plastic Packaging Research Programme run by the University of Cambridge Institute for Sustainability Leadership. Working with other parts of the supply chain, this 6-month project has been designed to identify the practical steps needed towards eliminating plastic packaging waste from across the soft drinks supply chain within the UK.

We are also seeking to expand consumer communications and widen our outreach within communities. We are proud of our partnership with anti-litter charity Hubbub, including our three-year rural anti-litter education campaign, 'LoveYourForest', in the Forest of Dean where our Coleford factory is located. We are also a funding contributor to Keep Scotland Beautiful's Roadside Litter campaign, 'Give Litter a Lift', and are looking to do further work in this area.

2. THE DRAFT LONDON FOOD STRATEGY

Our role is to have a positive impact on the lives of our consumers, providing them with a responsible choice of great tasting drinks and inspiring them to lead more active lifestyles. As a London Headquartered company, LRS welcomes the opportunity to be able to provide feedback on the Mayor's priorities and plans to improve food across our city.

Tackling Obesity

Current levels of obesity in London, like the rest of the UK, are too high and significant action is needed to address the issue. We agree with the Mayor that good food is an important part of the solution.

Of course, the causes of obesity are deep and complex. Solving it requires a multi-faceted approach that also includes the reduction of calories in food and drink through reformulation, promoting healthy diets through consumer awareness campaigns, ensuring healthy food and drink remains attractively priced, and promoting and encouraging more active and healthy lifestyles.

The key to success is a holistic approach that brings about lasting changes in consumer behaviour. This will require action by and support from all stakeholders, including central and local government, manufacturers, retailers, schools, civil society and the general public.

Advertising

LRS does not directly advertise to anyone under 16 years of age, regardless of the fact that our industry-leading reformulation work means the majority of our drinks are currently designated non-HFSS. However, we have some concerns about the proposed plans for a blanket advertising ban of HFSS food and drinks across the TfL estate.

HFSS blanket advertising ban

We do not agree that a blanket advertising ban for all HFSS food and drink would be the most effective way to address obesity. The advertising rules in force in the UK are among the strictest in the world and already ban the advertising of HFSS food or drink products in any and all media where under 16s make up more than

25% of the audience. This includes TV, online, social media, on the street or on public transport, as well as a 100m exclusion around schools.

Crucially, the Nutrient Profiling Model (NPM), under which the proposed ban would be delivered, was designed to inform advertising restrictions to children. As such, we would recommend serious consideration is given as to whether it is the most appropriate measure for the proposed advertising ban, or whether London should be using different metrics or the NPM in combination with additional metrics.

Public Health England is currently reviewing the NPM which may make it even less appropriate as a means of measurement for the proposed advertising ban. Under the proposals, cut off values for non-HFSS status will change from $\leq 4.5\text{g}$ of total sugars to $\leq 0.9\text{g}$ of free sugars. This will mean many more products will be impacted by the ban. In LRS's case, it would reclassify all of our recently reformulated reduced sugar drinks as HFSS as well as existing low-calorie drinks. For instance, Lucozade Sport Low Cal Orange (1g sugar per 100ml) will be designated high in fat, sugar or salt under the new model whilst, paradoxically, the drink can also be labelled low in sugars⁵ and low in energy⁶ under current EU law and green on current Front of Pack Labelling⁷. In essence, the ban will prevent us from promoting our healthier, natural, low calorie and functional drinks to London's adults, including as a part of an active lifestyle.

Rather than seek to distance itself from brands through advertising bans, we would recommend the Mayor's Office should work with brands to help inspire Londoners to live more active and healthy lifestyles, particularly where those brands include products that are widely viewed as low in sugar and low in energy.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Additional solutions to address obesity

As the obesity crisis is a complex issue that requires a multi-faceted approach, there are a number of additional policy areas London could consider for action in the final Food Strategy:

Supporting reformulation - To help support manufacturers reformulate their products, the Mayor could be doing more to promote low calorie sweeteners as alternatives to sugar. Despite sweeteners being thoroughly tested and confirmed as safe by regulatory authorities across the world, unsubstantiated negative health impacts reported by the media can influence some consumers away from them. It would be helpful if London could publicly support sweeteners and promote their benefits, helping to shift this narrative. This would help other brands follow in LRS's lead and reformulate their drinks to remove sugar.

Physical activity - Physical activity is necessary to address the obesity crisis and help people lead more active and healthy lifestyles. Rather than seek to distance itself from brands through advertising bans, we would recommend London should think more about how it can leverage brands to help achieve wider participation

⁵ Product contains no more than 5 g of sugars per 100 g for solids or 2,5 g of sugars per 100 ml for liquids, https://ec.europa.eu/food/safety/labelling_nutrition/claims/nutrition_claims_en

⁶ Product does not contain more than 40 kcal (170 kJ)/100 g for solids or more than 20 kcal (80 kJ)/100 ml for liquids (equivalent to ~5g sugars/ 100ml), https://ec.europa.eu/food/safety/labelling_nutrition/claims/nutrition_claims_en

⁷ Guide to creating a front of pack (FoP) nutrition label for pre-packed products sold through retail outlets, <https://www.gov.uk/government/publications/front-of-pack-nutrition-labelling-guidance>, p.20

in physical activity. For instance, there is scope to support Lucozade Ribena Suntory's 'Made to Move' campaign by helping us to better engage with the population and more effectively deploy elements of the programme in London.

Advertising - We are keen to work with our advertising partners to find pragmatic and proportionate responses that can further support the Mayor's objectives, including looking at how we can enhance the robust self-regulatory advertising measures already in place, while ensuring that manufacturers who have done the right thing by reformulating their products are able to communicate with consumers looking to live healthier lives.

The Environment

LRS is committed to reducing its environmental footprint and welcomes the Mayor's consideration of the environment in The Draft London Food Strategy.

Food waste

The Mayor is right to consider how we can prevent food waste. From the beginning of this year we have supported FareShare, the UK's largest charity fighting hunger and food waste. The charity redistributes surplus food and drink from the food and drink industry to charities and community groups that turn it into nutritious meals for vulnerable people. Through its 21 regional centres, including Deptford, LRS has so far provided over 13 tonnes of product to 550 frontline charities and community groups across the UK. In order to minimise road miles and emissions, we utilise our existing transport network to deliver the donated products.

Packaging and plastic waste

LRS is committed to reducing the amount of plastic it uses and ensuring it is used better as a resource. All of our drinks containers are recyclable and we encourage consumers to recycle with on-pack messages. 25% of all our drinks bottles are made using 100% recycled plastic (rPET) and, in the last four years alone, we have reduced annual plastic usage by 2,606 tonnes.

We want to go further and increase the number of our bottles made from recycled plastic, as signalled by our commitment to The UK Plastics Pact. However, the availability and quality of UK food-grade quality rPET (as determined by EFSA) does not satisfy the increased demands of the UK market.

There is an urgent need to boost collection rates and the quality of the material that is collected to help deliver the food-grade quality rPET manufacturers like LRS need to increase recycled content in our products and to move away from virgin PET. We agree with the Mayor's policy to encourage local authorities to offer better waste recycling services but think London can go further.

For instance, we would recommend the Mayor helps to ensure greater consistency in kerbside recycling and collection between local authorities. As Wales' 'Blueprint' example has shown, consistency can significantly boost recycling rates – in 2016 Wales' household recycling rate was 57.3% compared to the rest of the UK at 45.2%⁸.

There is also a role for London in helping to promote long-term consumer behavioural change. We are extraordinarily proud of our work with social causes Hubbub, including our involvement in the Neat Streets project run on Villiers Street in 2015. The project, run on the second busiest street in London, harnessed

⁸ UK Statistics on Waste, DEFRA 22 February 2018 -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683051/UK_Statistics_on_Waste_statistical_note_Feb_2018_FINAL.pdf

behavioural change insights to successfully decrease littering by 26% in the trial area. Based on this experience, and our three year LoveYourForest campaign run in the Forest of Dean, we believe a range of innovative and collaborative solutions that are targeted locally and run in close partnership with the public, private and voluntary sectors are necessary to deliver sustained improvements in littering and recycling rates. Structural changes are tools that may help achieve this but will not bring about sustained change by themselves.

Brexit

We welcome the Mayor's recognition of the risk to London food businesses due to Brexit. Like any responsible business, we are planning for the UK's withdrawal from the EU and any potential impact this will have on our business, supply chain and workforce. Regardless of the future trade deal that is agreed, we remain committed to our staff, suppliers and customers across the UK and look forward to continuing to grow our contribution to UK plc through innovation, job creation and skills. However, given the uncertainty around Brexit, any certainties that can be provided are welcome, including an appreciation of the need to avoid too many regulatory changes occurring at the same time, especially when the EU has some existing competencies around advertising.

3. FURTHER INFORMATION

For further details or any specific questions arising from the content of this response, please contact:

[REDACTED]

[REDACTED]

5TH July 2018

By email to: londonfood@london.gov.uk

COMMERCIAL: IN CONFIDENCE

Response to London Food Strategy Consultation; Mayor's London Food Strategy

Dear Sir or Madam,

Ubiquitous is the UK's leading taxi advertising company and an active member of Outsmart, the representative body of the UK's out-of-home advertising industry. We exclusively offer brands the opportunity to advertise on Hackney Carriage taxis nationally, with more than 3,000 in London alone.

We have been operating for 13 years and have experienced strong growth in recent years; in fact, in the past three years we have returned approximately 40% of our London media revenue to the London taxi trade, enabling drivers and fleet owners to underwrite the cost of operating their taxis and helping to maintain and promote this vital and accessible service for everyone in the Capital.

We have read in detail the Mayor's London Food Strategy and with it, the proposed ban of the advertising of unhealthy (HFSS) food and drink across the Transport for London network. Firstly, let me state that Ubiquitous supports the Mayor in his recognition of the seriousness of the childhood obesity issue and welcomes a positive, many-pronged action plan to tackle it. However, along with the other members of Outsmart, we feel that more work is needed to define the parameters of the proposed ban of HFSS foods across the TfL network.

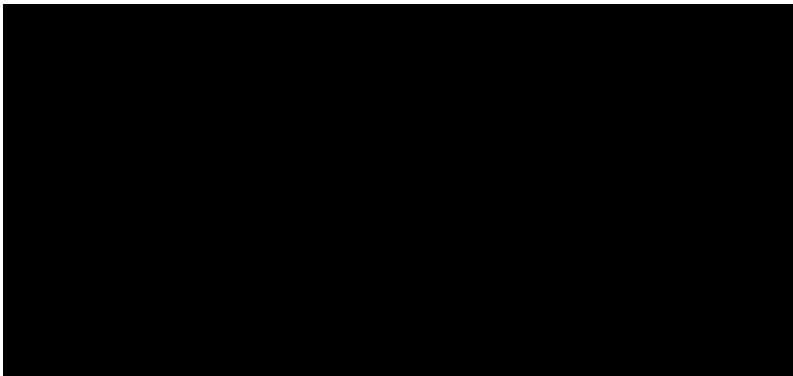
In relation to taxi advertising, research shows it is a media channel that's predominantly seen by working, city-centre adults. Moreover, we have a very small advertiser list of HFSS products and brands, accounting for less than 5% of our revenue.

However, we do know that such brands make a significant contribution to the revenue of the whole OOH advertising industry each year and the proposed ban would have a very negative impact industry-wide, while only serving to drive advertising spending into other media channels, including digital and print.

We, along with the rest of the out-of-home industry, welcome action on childhood obesity; nevertheless, we feel strongly that a total ban should not be the only option on the table.

We urge the Mayor to undertake further consultation and discussions with Outsmart members and other industry stakeholders to arrive at a well-defined, targeted and proportionate strategy to help tackle this important issue; one which would harness the potential of the OOH industry to contribute to this issue while allowing those who work within it, to continue to thrive.

Yours Sincerely,





Response to the Draft London Food Strategy from the British Takeaway Campaign

The British Takeaway Campaign (BTC) is an umbrella group, championing all those involved in the supply, preparation and delivery of takeaway food. The group comprises 14 member organisations, representing the breadth of the industry, from curry and kebab houses to fish and chip shops, Chinese restaurants and pizzerias.

These members are Just Eat, the British Kebab Awards, the National Federation of Fish Friers, SeeWoo UK, UKHospitality, the Foodservice Packaging Association, K10 Restaurants, CurryLife Magazine, QuickBite Magazine, the Night Time Industries Association, the UK Bangladesh Catalysts of Commerce and Industry, the Bangladesh Caterers Association, Westmill Foods, and the Catering Equipment Suppliers Association. The BTC also works in collaboration with the Pizza, Pasta and Italian Food Association.

The BTC exists to champion an industry which makes a significant economic, social and cultural contribution to the UK. The takeaway industry is a fast growing sector, utilising the latest technology and creating jobs whilst contributing significantly to the UK economy.

Independent research carried out for the BTC by economic consultancy the Centre for Economics and Business Research showed takeaway restaurants directly contributed £4.5 billion in gross value added (GVA) to the UK's GDP in 2016. That rises to £9.4 billion when factoring in the multiplier effect of supply-chain and employee spending – equivalent to 0.5% of GDP and more than telecoms, advertising or Premier League football.

The sector is also hugely popular in London – where our research shows the sector packs a huge economic punch. Indeed, Londoners spent £1.4 billion on takeaways in 2016, with the sector supporting over 23,000 jobs, and boosting London's economy by almost £700 million.

The sector is rightly proud of its economic impact, but its contribution to local communities is equally important – bringing people together, revitalising high streets and regenerating town centres. The takeaway industry also has a rich and diverse culinary heritage which has enriched the lives of British people over many decades, introducing us to new cuisines, ingredients and flavours. Indeed, there are now more than 100 cuisines available in the UK.

The BTC shares the Mayor's determination to improve food in London. We welcome the opportunity to respond to the draft strategy, and are keen to work with the Mayor and the Greater London Authority (GLA) as final proposals are developed. We have commented on the relevant priority areas below.

Unless otherwise stated, all statistics used in this response are drawn from research commissioned by Just Eat for the BTC and compiled by the Centre for Economics and Business Research, or a survey carried out by Just Eat of 300 restaurants on its platform.

Should you have any questions about this response, or wish to discuss its contents further, please contact us at [REDACTED].



Q1: Are the six priority areas the right ones? Are there other priorities that should be considered?

The Draft London Food Strategy's six priority areas cover the full spectrum of food policy, and the BTC welcomes its ambition. We welcome the comprehensive nature of the draft strategy and our comments focus on the aims and proposals within chapter 2 (*Good Food Shopping and Eating Out*) and chapter 4 (*Good Food for Maternity, Early Years, Education and Health*), reflecting the BTC's goal to champion all those involved in the supply, preparation and delivery of takeaway food.

Ensuring that the takeaway sector is able to recruit staff with the necessary skills is a core focus for the BTC, and our work in this area is outlined in a separate section. As this consultation acknowledges, the food and hospitality sector is already facing a skills crisis – one that Brexit threatens to exacerbate. Indeed, our research shows that 23% of takeaways claim that they are already unable to recruit the staff needed to run their business, while 37% believe that Brexit will make it more difficult to recruit the staff they need.

Given this, and the importance of having the right skills to ensure the wide availability of healthy, high quality food, we would suggest that proposals to develop the necessary skills within London could form a separate priority area within the draft strategy.

Aside from the skills agenda – the BTC's activity on which is set out further below – we believe that other key priorities must include supporting takeaways to offer healthy options, and to provide more nutritional information to customers. Activity already being taken forward by BTC members in these areas is outlined in the remainder of this response.

Q2: Are the most effective actions the Mayor, external stakeholders and individuals can take set out? Are there other actions that should be included?

The BTC supports the broad goals of the draft strategy, particularly the sentiments around skills and migration. The strategy is, for example, right to assert the importance of ensuring the food and hospitality sectors can meet demand – and therefore to champion a flexible approach to migration. We also welcome the comments around helping food businesses to access the necessary skills.

We do, however, have real concerns with some specific proposals – most significantly the intention, also included in the draft London Plan, to restrict the opening of new hot food takeaways within 400 metres of an existing or proposed primary or secondary school. Our more detailed comments on these particular elements of the draft strategy are set out below.

Healthy food

The BTC welcomes the Mayor's aim to support businesses to improve London's food environment, and significant progress has been made across the takeaway sector in offering healthy options. Championing this work – and identifying where the sector can do more – is a central element of the BTC's work.



It is to be welcomed that the draft strategy references a variety of initiatives, such as Sugar Smart and Peas Please, which are aimed at promoting healthier eating. Indeed, the Nationwide Caterers Association (NCASS), a BTC member, has pledged to support the Food Foundation's Peas Please project by working with traders to reduce meat offerings and replace them with at least two portions of fruit or vegetables. The BTC recognises that the takeaway sector has a role to play, and we are pleased to see the progress that the sector has been making (further outlined below).

The principle of informed consumer choice is central to the BTC's approach to healthy food. Ensuring that customers have access to nutritional information is another area in which progress has been made, which we set out elsewhere in this response. To maintain this momentum, we are calling on the Government to provide assistance to smaller takeaway businesses – which cannot afford expensive independent testing running into the many thousands of pounds – by providing an online calorie calculator. The Mayor's support for this effort would be very welcome in helping small independently-run restaurants to provide the nutritional information of their dishes.

Planning regulations

The BTC is concerned by the proposal – also contained within the draft London Plan – to restrict new hot food takeaways from being permitted to open within 400 metres of an existing or proposed primary or secondary school.

We do not believe that there is an obvious rationale for the 400 metres figure, and are concerned that artificially restricting competition and forcing takeaways to clump together in areas outside the exclusion areas would cause long term distortion to local high streets. We would also point to other businesses which often have sites close to schools – such as convenience stores – which would be unaffected by this proposal. In this regard, we note that chapter 2 specifically references the challenges facing convenience stores, "including the obvious need to be profitable". As small, independent businesses running on tight margins and facing rising costs, takeaways face the same issues, and should not be unfairly targeted. When considering this proposal, it should also be borne in mind that takeaways have often played an important role in regenerating high streets, and are mainly small businesses and local employers.

Furthermore, such an approach to deliberately hold back the takeaway sector – which packs a huge economic punch – would not help to address the underlying and complex causes of obesity, which include sedentary lifestyles, lack of exercise, and genetics. With the sector increasingly offering healthy options on its menus, efforts should be primarily focused on how to facilitate informed decision making by consumers. That is why we are calling for the Government to provide an online calorie calculator in order to help small independently-run restaurants to provide the nutritional information of their dishes. To have this analysed independently would exceed the resources of most takeaway businesses – running into the many thousands of pounds.

The principle of working with schools to educate children about healthy lifestyles is also central to the BTC's approach to tackling obesity, and we are pleased that takeaway restaurants are getting directly involved in children's education, where appropriate. As an example, Chris's Fish and Chips in Barwell (a previous winner of best takeaway in Britain at the British Takeaway Awards and the inaugural winner



of the Sustainable Restaurant Association's "Good to Go" award in 2017) goes into local schools to educate children about the food chain – from healthier options to sustainable sourcing.

We recognise that this proposal reflects the determination of the Mayor to reverse the trend in childhood obesity. The BTC shares this determination, and to this end, enjoys constructive engagement with the Department of Health and Social Care on the subject. In the same spirit, we would welcome similar collaboration and involvement with the Mayor's Child Obesity Taskforce.

Skills

We welcome the draft strategy's comment that the food sector is a great route to employment and skills development. As we have referenced above, the takeaway sector supports more than 23,000 jobs in London, and offers a valuable career path for budding entrepreneurs – many of whom go on to run successful businesses and chains. For example, BTC Chair Ibrahim Dogus climbed the ranks of the takeaway industry before setting up multiple Turkish and other cuisine restaurants across London.

Whilst employment within the sector is set to rise over the next five years, demand for employees is expected to exceed supply. Our research shows that already, 23% of takeaway restaurants are unable to recruit the staff they need to run their business. These shortages are felt most acutely in skilled kitchen roles, where 78% of those reporting problems have had issues recruiting chefs, particularly in curry and sushi making roles, while 37% believe Brexit will make recruitment harder.

For the BTC, Further Education providers have a crucial role to play alongside employers – and both the draft London Food Strategy and draft London Plan should therefore include such providers, which are well placed to upskill Londoners at an earlier and more accessible stage. The introduction of the Government's new technical qualifications (T levels) is welcome, and – as set out below – the BTC is actively engaging Government on this matter. We are pleased that the Mayor is exploring what can be done in this area at a London level, and would be keen to explore options with the Mayoral team. The Skills for Londoners Taskforce would appear to present an opportunity for such engagement, which we would welcome.

For the BTC, the crucial issue of upskilling is intrinsically linked to that of future migration policy – so we also welcome the Mayor's commitment to champion a flexible approach to migration in the future. As with other areas of policy, the BTC is actively engaging Government on these matters and our work on the subject is further outlined below.

Q3: What are your views on the proposed ban of advertising of food and drink that is not healthy across the Transport for London estate?

As the majority of our members are membership organisations whose members are in turn small businesses, most of them do not currently advertise across the Transport for London (TfL) estate. The exception to this is Just Eat, a marketplace for online food delivery, which does advertise on the London Underground and elsewhere on the TfL network. We understand that Just Eat is responding to this consultation separately and is addressing this question in particular in its response.



The BTC supports Just Eat's position that a whole-system approach is needed to successfully tackle obesity in the UK – it is not just a question of restricting advertising of products that are deemed unhealthy.

In fact, when looking at the takeaway sector more broadly, it is important to note, as stated elsewhere in this response, the diversity and variety of food that is offered by takeaway restaurants in London. It is this variety which Just Eat aims to showcase in its advertising, on behalf of its restaurant partners. Similarly, as Just Eat works with over 5,000 restaurants in London alone, it does not have standardised recipes or formulations for different food types and it would therefore be difficult to work out, without further specific guidance from TfL and the Mayor's office, which types of food are deemed to be "unhealthy" and which are not. Currently, the only tool to determine this is Public Health England's Nutrient Profile Model which is in the process of being reviewed.

We would urge the Mayor and TfL to work with other national bodies, such as Public Health England, to develop consistent and standardised definitions of "healthy" and "unhealthy" food to help companies interpret future policies and guidelines accurately.

Q4: What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?

Our work covers a number of issues set out within the draft strategy. These are outlined below, alongside examples of best practice in the sector.

Promoting healthy options and informed choice

The takeaway industry recognises that it has a central role to play in tackling obesity by promoting healthy choices and the industry is making real progress in this space. For example, 65% of takeaways now offer low fat options, with 59% offering low salt options. Vegetarian options are available in 96% of takeaways, and small portion sizes in 73%.

Embracing different cooking techniques is an important part of this. Many takeaways are switching to alternative cooking methods such as air-frying, grilling and poaching, as well as ensuring that products are fried in a manner which keeps fat and calorie content to a minimum, through measures such as using the correct oils at the optimum temperature and draining excess fat from food before serving.

As an example, a 2016 report, *Does Size Matter*, by Enjoy Fish and Chips – supported by BTC member the National Federation of Fish Friers – advises fish friers how to achieve the lowest values for energy, fat, saturates, trans-fatty acids and salt. Friers are advised to use cod or haddock, with thin, light batter, and rapeseed oil. A medium sized piece of cod prepared in this way contains 234 kcals, and 1.2g saturated fat per 100g. BTC members from the fish and chips sector, such as Mark Drummond – winner of the "Contribution to the Industry" award at last year's British Takeaway Awards – are also involved in running "healthier frying workshops" for other restaurant owners representing all takeaway cuisine groups.



As a further example, Just Eat has communicated the Healthier Catering Commitment (HCC) to its restaurant community – comprising 28,000 restaurant partners across the UK, of which 5,400 are in London – to support local authorities in engaging takeaways. Just Eat also supports its restaurant partners with advice from qualified nutritionists about how they can adapt their menus to reduce fat and salt. This includes encouraging takeaways to reduce portion sizes, reformulate current recipes, and highlight and upsell healthier dishes on their menu. In addition, restaurants are being encouraged to switch from saturated fats to lower saturated oils, such as coconut oil.

To ensure that the BTC can contribute fully to this effort, we are also developing our own Food Charter, which includes four commitments that all signatories will deliver. We are currently consulting with our members on these proposals but the Food Charter will look to focus on portion sizes, alternative cooking methods and ingredients, water and low-sugar drinks, and salt. We would welcome the opportunity to discuss this in further detail with the team developing the London Food Strategy.

We note the Mayor's commitment to work with partners to lobby Government to build on the recommendations of the Childhood Obesity Plan. The BTC is also actively engaging Government on this matter, and would welcome any possible discussions on the subject with the Mayor. We also note the draft strategy's reference to Public Health England continuing to work with hot food takeaways, which we would welcome.

Separately to the matter of takeaways offering healthy options, one of the BTC's guiding principles is that informed consumer choice is the best way to tackle the complex issue of obesity and promoting healthy diets. As part of this, takeaways are increasingly providing more information to their customers.

Kichn in Islington, for example, provides the calorie, saturated fat, protein and carbohydrate information for its dishes, while the National Federation of Fish Friers encourages the use of standardized portion size names so customers know what to expect. The BTC also welcomes the fact that nutritional information is available from other sources, such as the NHS Choices website. We are in fact calling for the Government to take this approach further, by providing an online calorie calculator and downloadable calorie sheets or posters.

This is particularly important given the fragmented nature of the takeaway sector. Many takeaways are small, independent businesses, and therefore do not have the resource to support expensive reformulation and nutritional analysis. This is why, though supportive of the HCC, we believe it will take time to fully "bed in".

We also note the draft strategy's reference to new technologies (such as online delivery platforms) having an important role to play. The BTC fully agrees that such innovation should not be at the expense of health, and some of our members are taking proactive steps to ensure that this is the case. As an example, trials involving takeaways on the Just Eat platform have found that publishing information about calories and hygiene ratings can translate into more orders, suggesting that customers value this further information. However, as Just Eat does not own or control its restaurant partners, it can only provide this information should the restaurant have the capacity to calculate the data and this is where small businesses need more support, as mentioned above.



Skills

As referenced above, the BTC is proactively engaging government on its skills agenda, emphasising the importance of ensuring that the takeaway sector is able to recruit staff with the necessary skills.

Indeed, our research shows that 23% of takeaways claim that they are already unable to recruit the staff needed to run their business, while 37% believe that Brexit will make it more difficult to recruit the staff they need. We therefore welcome the draft strategy's reference to using the devolution of adult skills funding and employment services support to London, from next year.

The Government's T-levels are a welcome and significant development in this space – particularly the Catering and Hospitality T-Level, due to be introduced in 2022/23. We look forward to working with the Department for Education to shape the T-level so that it meets the needs of the industry – by ensuring that compulsory components in shortage cuisines (such as curry, sushi and fish frying) are included, as well as components on hygiene, nutrition and sustainability.

From the BTC's perspective, Further Education providers are well placed to upskill the next generation – and the Government's T-level agenda is a crucial step towards plugging the skills gap facing the takeaway industry. With this in mind, we would welcome any discussion with the Mayor regarding how he intends to use the new powers devolved to London. The Skills for Londoners Taskforce would – even following the publication of the Skills for Londoners Strategy – appear to present a valuable opportunity to involve the hospitality industry, and we are keen to work with the Mayor and the GLA on this issue.

We are delighted that some BTC members are already developing their own initiatives. Just Eat, for example, is partnering with Springboard, a skills and training charity, on a new initiative – the Just Eat Skills Kitchen. This helps restaurants fill skills gaps and inspire young people about the career opportunities available within the independent restaurant – from kitchen to front of house, supporting the Government's vocational education agenda. Initiatives such as this demonstrate the positive, responsible contribution that takeaways can make to their local communities – including through helping children to have a healthy relationship with food.

Inseparable from the skills agenda, however, is the question of migration. Recognising this, the BTC is calling for the Shortage Occupation List to be amended so takeaways can recruit the staff they need, and to develop a fairer immigration system – based not on country of origin or skill level, but on areas of skills shortage.

Community involvement

In addition to its economic contribution, takeaways also play a valuable role in their communities. Across the UK, 41% of takeaways are involved in community-based activities. Of these, 62% sponsor local activities or sports teams, and 61% provide food to charities, care homes or local events. In London, for example, Amigos Mexican Takeaway in Holloway, takes part in charity bike rides, while Tarka Indian Cuisine in Dagenham sponsors a local football club.



Street markets are particularly important in this respect, providing a valuable economic, social and cultural role across the capital. As an example, the Nationwide Caterers Association (NCASS), a BTC member, has pledged to support the Food Foundation's Peas Please project by working with traders to reduce meat offerings and replace them with at least two portions of fruit or vegetables. Meanwhile, the Eighth Plate project is tackling food waste and hunger, working in conjunction with FareShare to salvage food waste from traders and donate it to food banks, soup kitchens and charities, benefitting both the community and the environment.

Street markets also play a key role in rejuvenating town centres. As an example, NCASS works with small and medium-sized enterprises, council departments and other local stakeholders as part of the Streetfood Alliance to support the development of diverse and innovative new businesses, revitalising high streets and encouraging tourism and inward investment. With a Streetfood Alliance already up and running in Birmingham, NCASS is working to set up an Alliance in London with KERB food to help develop the street food scene in London's markets further.

Whilst the cost of opening a restaurant can be expensive, street markets provide an alternative way for people to start-up a business, create jobs and contribute to the diversity of the capital's high streets. This can be illustrated with the examples of Boxpark or Dinerama in Shoreditch, Pop Brixton and similar concepts that have followed – regenerating shipping container sites which provide a wide-ranging choice for consumers and have become profitable community hubs of diversity.

Q5: How could you or your organisation support the Mayor to do more to achieve good food for London and pledge to support the final strategy?

The BTC fully supports the aims of the Draft London Food Strategy, though we do not agree with all of the steps proposed.

We have set out above the wider activity that the BTC is undertaking on key issues affecting the sector – including food policy, planning regulations, migration and skills. We would welcome the opportunity to discuss any of this work with the Mayor and his team to inform the strategy's development.

Q6: Is the strategy inclusive and does it consider the needs and priorities of all Londoners?

As the Mayor's foreword to the strategy suggests, London's vibrancy and multicultural communities are important strengths of the city.

This is reflected by the breadth of the takeaway sector, with more than 100 cuisines available in the UK. Given this diversity – and the huge value and contribution of the takeaway sector to London's economy – we believe that policymaking in this area must strike a balance between interventions to tackle complex public health issues, and the need to support such a dynamic industry.

London Food Strategy Consultation

Written evidence submitted by Cancer Research UK

About Cancer Research UK

Cancer Research UK (CRUK) is the largest charitable funder of cancer research in the world and the only charity funding research into all 200 types of cancer. In 2016/17 we spent £432 million on research. We receive no Government funding for our life-saving work, and for every £1 donated, over 80p is invested in research. Our work has seen survival double over the past forty years so that, currently, two in four people will survive their cancer. We want to accelerate progress so that three in four people survive by 2034. We work to prevent, diagnose and treat all cancers more effectively to achieve that ambition.

Cancer Research UK is a member of the Obesity Health Alliance (OHA), a coalition of over 40 leading health charities, medical royal colleges and campaign groups working together to influence Government policy to reduce obesity across the life course.

Obesity and cancer

Obesity is the biggest preventable cause of cancer after smoking in the UK. It is linked to 13 types of cancers, including two of the most common (bowel and post-menopausal breast) and two of the hardest to treat (oesophageal and pancreatic). Each year, it is estimated that obesity costs £5.1bn to the NHS and £27bn to the wider UK economy.ⁱ

Around 30% of children aged 2-15 in the UK are overweight or obese and, if trends continue, it is predicted that half of all children will be obese or overweight by 2020.ⁱⁱ We estimate that more than 7 in 10 millennials are set to be overweight or obese between the ages of 35-44,ⁱⁱⁱ making them the most overweight generation since current records began. An obese child is around five times more likely to remain so as an adult^{iv}, so acting early can protect them from a lifetime of avoidable ill-health and disease.

Obesity and health inequalities

There is strong evidence that obesity is linked to social class, which has significant consequences for health inequalities.^v Obesity is twice as prevalent among the most deprived 10% of children in England^{vi} compared to the most affluent 10%, with similar patterns across Scotland^{vii} and Wales.^{viii} Moreover, the obesity gap between the most deprived and least deprived areas has increased in the last decade.^{ix}

The highest prevalence of excess weight is found among low socio-economic groups for both men and women,^x and these adults are more likely to have a higher sugar intake compared to all other income groups.^{xi} If trends continue, almost half (49%) of women from the lowest income quintile could be obese in 2035.

Guys and St Thomas' Charity recently called for a 'whole-systems, cross-sector approach' to addressing children's obesity in urban, diverse and deprived areas,^{xii} prioritising interventions that reduce unhealthy choices. We welcome their focus on changing the food environment, and on recognising that local or regional action must be supported by a national approach.

We are calling for population-level interventions to tackle obesity and improve dietary behaviours, as these are likely to have the most positive effect on health inequalities.^{xiii} Tailored interventions for specific groups may only lead to behaviour change among more affluent groups, but population-level activity often benefits the most deprived communities where obesity rates are highest.

Background

High levels of obesity in the UK cannot be attributed to one single factor, but rather the obesogenic environment in this country – of which marketing is one important element. Our research shows that marketing across all platforms – including broadcast, non-broadcast, social media and ‘added value’ – plays a significant role in influencing young people’s consumption of HFSS food and drink. While our previous research has focused on the enormous impact of broadcast advertising, we believe that the key findings are likely relevant to other forms of marketing as well.

We support the Obesity Health Alliance’s submission to this consultation and welcome the opportunity to provide more detail on evidence from recently published CRUK research, covering the junk food environment and the impact of junk food marketing on young people.

Cancer Research UK’s evidence

The junk food environment

Our research paints a picture of an environment where young people are constantly exposed to junk food marketing in various forms: on TV, through non-broadcast channels and on social media.^{xiv}

Young people feel that their dietary choices are notably shaped by this environment. In a CRUK survey of 11-19-year olds, 44% of participants agreed that they felt pressure to eat unhealthily.^{xv} For obese participants this figure was even higher, rising to 52%.

Young people also engage substantially with brands that produce HFSS products. 80% of the ten food and drink brands young people recalled most frequently have at least one HFSS product in their top sellers. This indicates the imbalance between healthy and unhealthy messaging and young peoples’ need for further support.

Young people reported high levels of consumption of HFSS items: almost 30 per week.^{xvi} The estimated calorie intake from this many HFSS products is approximately 6,300 calories per week, Young people consume 30 HFSS items per week, which amounts to 30-40% of a young person’s weekly guideline amount.



The appeal of HFSS adverts

Our research shows that almost all (87%) of young people in the study find HFSS advertising appealing, with three-quarters tempted to eat a product when viewing an advert. The majority also thought HFSS adverts would be appealing to their peers. People who are obese are statistically more likely to find a higher number of adverts appealing, or to believe it would be appealing to their age group. More deprived groups had higher odds of being directly tempted by an advert.^{xvii}

There was also substantial agreement that HFSS adverts made products seem healthy, popular or fun. Over 80% of participants liked at least one of the three HFSS adverts they were shown. Young people with obesity were particularly susceptible to adverts, being significantly more likely to feel an advert made a product popular or fun.^{xviii}

Brands with HFSS products amongst their best sellers were far more likely to be recalled by young people and, of the top ten brands recalled, eight were marketing products that can be easily associated with the category. Rates of recall were as high as 68% for some of these brands. By contrast, brands without HFSS products amongst their top sellers had lower levels of awareness.^{xix} This result is compounded by comprehensive links between brand recall/recognition and consumption habits established elsewhere.^{xx xxi} Content analyses have previously highlighted the extensive advertising for HFSS products compared to little advertising for healthy products.^{xxii}

Role of marketing

Our research found that marketing can influence young people's diet by increasing brand familiarity, recognition and recall.^{xxiii}

Young people dislike 'dishonest' marketing and are able to identify the tactics and techniques used in adverts to make HFSS products more appealing to their age group. However, they are still vulnerable to their influence as these negative perceptions do not diminish junk food marketing's appeal.^{xxiv} This makes a clear case for reducing children's exposure to junk food marketing across platforms.

Our research shows a clear and consistent correlation between HFSS marketing and HFSS consumption.^{xxv} On average, children with obesity see one extra broadcast advert, two extra offline non-broadcast adverts and half an extra 'added-value' advert than their healthy weight counterparts. And whether a healthy weight or obese, children were more likely to recall seeing junk food ads on billboards and other 'offline' forms of marketing, than on TV or through influencer or licensed character endorsements.^{xxvi}

Policy implications

The majority of our research has focused on broadcast advertising, which is where the evidence is strongest. However, this does not mean that outdoor advertising does not have a significant role to play.

Given the high levels of junk food marketing across platforms to which children are exposed on a daily basis, and the impact this has on HFSS consumption, we welcome all efforts to reduce the number of adverts they see.

Removing HFSS adverts from the Transport for London estate has the potential to be an important element of a wider approach to tackling obesity and we support the Mayor of London in using his powers to regulate in this area.

For more information, please contact [REDACTED] at Cancer Research UK, at [REDACTED]@cancer.org.uk.

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July 2018

DAIRY UK POSITION ON THE DRAFT LONDON FOOD STRATEGY

Dairy UK is a trade body representing the interests of producer co-operatives, processors, manufacturers and distributors of dairy products within the UK. Between them, Dairy UK's membership collect and process approximately 85% of UK milk.

Dairy UK welcomes constructive policies which can be effective and appropriate for tackling the obesity problem in London. It is essential that the citizens of London have access to healthy, nutritious and affordable food. Reviewing how food is delivered and advertised presents a real opportunity to reinforce positive dietary behaviour and to promote the consumption of nutrient-rich foods which can provide the nutrients needed during all stages of life, e.g. dairy products.

For this reason, Dairy UK agrees with the principle of restricting advertisement of less healthy food across the TfL estate. However, using the UK nutrient profiling model (NPM) to determine which foods can and cannot be advertised is not appropriate: this model is not fit for purpose as it does not adequately take into account levels of beneficial nutrients within a food, and instead is heavily biased towards levels of nutrients of concern. As a result, use of the model would end up restricting advertisement of whole milk and hard cheese in the same way as for confectionery and fizzy drinks.

For this reason, Dairy UK believes it is appropriate to review aspects of the UK NPM, as this could be improved to better address unhealthy eating habits in London.

It is crucial to remember that significant proportions of the UK population do not meet recommended intakes for a number of essential nutrients from the food they eat. According to the latest National Diet and Nutrition Survey (NDNS) figures¹:

- 16% of teenagers (11-18 years), 9% of adults (19-64 years) and 8% of the over-75s do not meet their recommended dietary intake for calcium;
- 20% of teenagers (11-18 years), 10% of adults (19-64 years) and 9% of the over-75s do not meet their recommended dietary intake for riboflavin;
- 28% of teenagers (11-18 years), 17% of adults (19-64 years) and 26% of the over-75s do not meet their recommended dietary intake for potassium;
- 20% of teenagers (11-18 years) and 12% of adults (19-64 years) do not meet their recommended dietary intake for iodine;
- 11% of children (4-10 years), 22% of teenagers (11-18 years) and 10% of the over-75s do not meet their recommended dietary intake for zinc.

This is worrying – calcium in particular is established as being essential during the critical phases of growth of childhood and adolescence², as it helps achieve peak bone mass and reduce risk of osteoporosis later in life³.

Dairy products provide a vast array of important nutrients (including those listed above) and can deliver great health benefits to all age groups.

For this reason, we strongly believe that any model used to define which foods can be advertised across the TfL estate should be aligned with the main basic principle of the Soft Drinks Industry Levy: any dairy product containing over 75% milk, cheese or yogurt should be excluded from advertising restrictions.

This solution recognises the essential benefits that dairy provides to our diets, and sets a sufficient threshold which allows exempted dairy products to reflect the nutrient-richness of dairy. Products with a minimum 75% dairy content would still provide significant amounts of much needed essential vitamins and minerals. It is a solution which gives due consideration to the need to protect the health of citizens of London and to deliver solutions which are targeted, meaningful and appropriate.

Below we illustrate the nutritional benefits which arise from exempting these products from advertising restrictions.

Cheese

Using the UK NMP, 94% of cheeses would be categorised as “less healthy”, regardless of whether they have been reformulated or not. A hard cheese, even with the lowest achievable fat content, does not pass the strict NPM criteria, owing also to the fact that the model is based on 100g rather than on portion size.

However, cheese is a nutrient-rich food which contains a number of essential minerals and vitamins. For example, a 30g portion of cheddar cheese provides the following:

| Table 1: Contribution of 30g Cheddar Cheese to recommended nutrient intake^{4,5} | | | |
|---|-----------------------|------------------------|---------------------------|
| | 4-10 year-olds | 11-18 year-olds | Adults (19+ years) |
| Protein | 27-39% | 14-18% | 14-17% |
| Calcium | 40-49% | 22-28% | 32% |
| Phosphorus | 34-43% | 20-24% | 28% |
| Zinc | 18-19% | 13-18% | 13-18% |
| Riboflavin | 12-15% | 9-11% | 9-11% |
| Vitamin B₁₂ | 72-90% | 48-60% | 48% |

Research also points to the beneficial effects of cheese on oral health, which is crucial considering that so many people in the UK suffer from poor dental health. As an example, almost 25% of five-year-old children in England has experience of dental decay with one or more teeth that are decayed to dentinal level, extracted or filled because of caries⁶. In 2003, WHO and FAO reported that a number of scientific studies point to the fact that hard cheese decreases the risk of dental caries and of dental erosion. The anti-cariogenic properties of dairy products have been attributed to components such as calcium, phosphate and casein³. This position is supported by the Oral Health Foundation.

It is easy to see how a product containing 75% of cheese has the potential to deliver significant amounts of essential nutrients and make a fundamental contribution to a healthy balanced diet.

Of course excessive amounts of cheese are not recommended (as with any food), but the latest NDNS data¹ shows that **cheese contributes the following amounts to nutrient intakes in the UK:**

- **2-4% of calories**
- **8-11% of saturated fat**
- **4-6% of sodium.**

Yogurts and fromage frais

Using the proposed new NPM, only 31% of yogurts and fromage frais would be considered “healthy”.

As is the case with most dairy products, yogurts and fromage frais are rich in nutrients and have an important role to play in delivering those nutrients to our diets. Even flavoured products have an overall positive nutritional value and Table 2 illustrates the contribution that an average low-fat fruit yogurt (as analysed in McCance & Widdowson’s “The Composition of Food”, 7th Ed.) makes to a number of nutrient intakes.

| Table 2: Contribution of 150g pot low-fat fruit yogurt to recommended nutrient intake^{4,5} | | | |
|--|-----------------------|------------------------|---------------------------|
| | 4-10 year-olds | 11-18 year-olds | Adults (19+ years) |
| Protein | 22-32% | 11-15% | 11-14% |
| Calcium | 38-47% | 21-26% | 30% |
| Phosphorus | 40-51% | 23-29% | 33% |
| Iodine | 65-72% | 51-55% | 51% |
| Potassium | 15-28% | 9-10% | 9% |
| Thiamin | 26% | 16-26% | 18-23% |
| Riboflavin | 32-39% | 24-29% | 24-29% |
| Vitamin B₁₂ | 45-56% | 30-38% | 30% |

According to the latest NDNS data¹, **yogurts and fromage frais contribute the following to nutrient intakes in the UK:**

- **1-3% of calories**
- **2-4% of saturated fat**
- **3-6% of free sugars**

NDNS data, however, reports results for “yogurts and fromage frais” and “other dairy desserts” together, so the values for yogurts and fromage frais are likely to be even lower.

It is also important to bear in mind that significant sugar reformulation of yogurts and fromage frais has been carried out over the years, particularly recently (driven partly by Public Health England’s reformulation programme). Given the new sugar targets for these products, we expect their sugar content to decrease at a steady pace in the next couple of years.

Although we are unable to determine the ingredients of the yogurts analysed for the purposes of the McCance and Widdowson’s data, current market information suggests that the yogurt content of a low-fat fruit yogurt is consistently higher than 75%. This confirms the nutritional benefits of yogurts with at least 75% yogurt content, and – given their small contribution to free sugar, saturated fat and calorie intake – we strongly believe they deserve an exclusion from the scope of the proposed advertising restrictions.

Milk-based drinks

According to analyses conducted by Public Health England, milk-based drinks are negatively affected by the UK NPM: no yogurt drink would pass the new model, and only 55% of flavoured milks would pass it. However, milk-based drinks are sources of protein, calcium, potassium, phosphorus, iodine, riboflavin and vitamin B₁₂.

Due to the lack of targeted information on this particular category in official UK statistics, Dairy UK has collected nutritional information on flavoured milks and yogurt drinks sold by its members, including their portion size, milk content, sugar content and macro- and micronutrient composition. Results are reported in Table 3.

| Table 3: Contribution to recommended nutrient intake of average milk-based drink (per single serve portion size) | | | |
|--|----------------|-----------------|--------------------|
| | 4-10 year-olds | 11-18 year-olds | Adults (19+ years) |
| Protein | 32-46% | 16-22% | 16-20% |
| Calcium | 57-69% | 31-39% | 44% |
| Phosphorus | 54-70% | 31-39% | 44% |
| Potassium | 20-37% | 12-13% | 12% |
| Iodine | 71-78% | 56-60% | 56% |
| Riboflavin | 62-78% | 48-57% | 48-57% |
| Vitamin B₁₂ | 234-292% | 156-195% | 156% |

It is clear that milk-based drinks have a significant role to play in contributing to the intake of many essential nutrients, including vitamins and minerals. They also contain free sugars, but dairy companies have been reformulating their products over the years to meet consumer choice for lower-calorie and lower-sugar products and, in view of Public Health England's reformulation programme, the sugar content will decrease by a further 20% in the next few years.

It is important to bear in mind that, at the moment, **milk-based drinks contribute 1-2% to the free sugar intake of the UK population**, according to the latest NDNS figures. The main contributors are cereals and cereal products (24-33%) non-milk-based soft drinks (11-33%) and sugars and confectionary (21-33%)¹.

Milk-based drinks also contribute the following¹:

- **1% of calories**
- **1-2% of saturated fat.**

NDNS data, however, reports results for "cream" and "other milk" together, so the values for milk-based drinks are likely to be even lower.

Given the information provided, Dairy UK believes that the nutritional benefits of milk-based drinks with at least 75% milk content, and their small contribution to the current free sugar, calorie and saturated fat consumption of people living in the UK, warrants an exclusion of these from the scope of the proposed advertising restrictions.

Conclusions

Dairy products are heavily penalised by the UK NPM due to their levels of calories, saturated fat, sodium and/or free sugars. We would argue that dairy products should be allowed to contribute to these nutrient intakes, as these come within a natural package comprised also of beneficial minerals and nutrients, many of which are under-consumed by the UK population. We strongly believe that nutrient-poor discretionary HFSS foods should be targeted, not nutrient-rich dairy products.

For this reason, we ask that any model used to restrict advertisement of food across the TfL estate exclude products containing over 75% milk, cheese or yogurt, on the basis of their nutrient richness and the health benefits they provide. These comments are in line with those which Dairy UK submitted to Public Health England in the context of their revision of the NPM.

We are keen to enter into further more specific discussions around which products should benefit from an exemption from the restrictions.

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FDF Response to Draft London Food Strategy

This submission is made by the Food and Drink Federation (FDF), the trade association for food and drink manufacturing. Food and drink is the largest manufacturing sector in the UK (accounting for 19% of the total manufacturing sector) turning over £95.5bn per annum; creating GVA of £28.2bn and employing around 400,000 people.

Consultation Questions:

1) Are the six priority areas the right ones?

We agree that to deliver healthy and sustainable food for London the broad areas covered in the six priorities need to be considered, from how food is produced, to the food people buy and prepare at home, through to eating out. Food and drink manufacturers are proud to make a wide variety of great-tasting, safe and nutritious products which are affordable and available to everyone. We take seriously our responsibility in helping people achieve balanced lifestyles and are committed to working in partnership with Government and others to tackle the complex, multi-faceted issues of obesity and diet-related diseases. We also recognise our role in helping consumers make sustainable choices which will secure these benefits for the future, and work with partners across the food chain to help achieve this.

Within the priority areas outlined, we welcome that the food sector is seen as an important one for the economy. Food and drink is the largest manufacturing sector in the UK, in London, food and drink manufacturing includes around 1400 businesses, and employs over 26,500 people.

As stated, there is much uncertainty for food businesses at the moment, and we welcome the Mayor's stated intention to work with businesses to find solutions to the challenges of Brexit.

Are there other priority areas that should be considered?

We do not have a view on whether anything further should be included as a priority area. However, we would like to comment on some of the definitions made in annex 2 on how 'good food' is defined and that therefore underpin the entire strategy.

We have some concerns that 'good food' appears to be being defined as only that produced by small businesses. Food manufacturing is an incredibly diverse sector, and we represent global brands and thriving small businesses. We strongly believe that 'good food', meaning safe, sustainable and nutritious, can be made and sold by businesses of all sizes.

We are also concerned that within 'healthy and nutritious food' it is referenced that food should reduce 'unnecessary additives'. Additives are added to food in small quantities to perform a necessary technological function. For example, additives can act as antioxidants and preservatives to prevent spoilage and keep food safe. Far from being unnecessary they can therefore help to ensure we have a safe and secure food chain, and reduce food waste.

2) Are the most effective actions the Mayor, external stakeholder and individuals can take set out?

We have comments on some of the specific actions as outlined in the strategy, as follows.

Good food at home – and reducing food insecurity

➤ Promoting employers to pay London Living Wage

Food and drink manufacturing (FDM) is the UK's largest manufacturing sector accounting for 20% of UK manufacturing GVA with 12% cumulative growth during 2005-2015. The industry employs over 400,000 people, spread across the entirety of the UK and working across all skill levels. The diversity of the sector is demonstrated both by the range of sector specialisms and the range of businesses that make up the sector, from global multi-nationals to the SMEs making up 97% of our industry and contribute 17% of the industry's turnover. Issues relating to fair pay, are of great importance for FDF members in helping to maintain the competitiveness of, and employment levels in, the UK food and drink sector. As an industry, we realise that in order to attract more people into the sector we need to offer attractive salaries.

Given the geographic spread of our industry, the majority of FDF's members are not based in London and therefore would not fall under the remit of the voluntary London Living Wage, set at £10.20 for all workers aged 18 and above. There are some FDF members and Professional Affiliate members who are accredited Living Wage Employers. Challenges remain that prevent the majority of food and drink manufacturers from paying the voluntary London Living Wage or Living Wage Foundation rate of £8.75 an hour. These challenges include the added costs of the Apprenticeship Levy, Soft Drinks Industry Levy, Tier 2 Skills Levy and various added reporting requirements which use company resource.

All FDF members do pay the Government's National Living Wage (NLW), often paying above this rate and according to the market for both employees and apprentices. If FDF members do employ younger workers they tend to be treated the same as workers over 25, which creates a great incentive for younger workers to get jobs in the food and drink industry. However, we are aware that hourly wages in some parts of the food and drink sector have remained relatively low in comparison to other sectors.

To ensure future success, we would ask that the London Living Wage and voluntary Living Wage learn from the challenges that have faced businesses in terms of the NLW. Following the introduction of the NLW, there has been an impact on FDM businesses in three key areas: salary sacrifice schemes and shift premiums offered to staff, which are not covered in the NLW calculations and have an impact on pay differentials, which FDM manufacturers struggle to maintain when complying with the NLW. These unintended consequences are causing some of the lowest paid to be penalised, facing unequal access to salary sacrifice schemes and a reduced incentive to contribute into benefits like pension savings.

A successful food and drink manufacturing sector deal as part of the Government's Industrial Strategy has the potential to deliver more highly skilled and higher paid jobs as a result in further investment in innovation and automation.

Good food shopping and eating out – a healthier environment

- **Work with business to find solutions to the challenges that Brexit poses including championing a flexible approach to migration**

In August 2017, the FDF-led UK Food and Drink Workforce Strategy Group published '[Breaking the Chain](https://www.fdf.org.uk/publicgeneral/Breaking-the-Chain.pdf)'¹ which outlined the key workforce considerations for the UK food and drink supply chain as we leave the EU. The UK Food and Drink Supply Chain Strategy Group is a group of eight trade associations from across the UK food and drink supply, who represent and advise businesses large and small, across food manufacture, retail, hospitality, farming and growing.

At a glance, our Breaking the Chain report found:

- Of the two million EU nationals working in the UK, one in five currently work in the UK food and drink supply chain:
These 400,000 are broken down into:
 - 30% in food and drink manufacturing (19% of the high skilled roles are filled by EU nationals);
 - 18% in food wholesaling;
 - 5% in food retailing workforce;
 - 12% in food and drink service;
 - 9% of the permanent agricultural workforce.
- Almost half (47%) of businesses surveyed in Breaking the Chain said EU nationals were considering leaving the UK due to uncertainty surrounding their future.
- Over a third (36%) of business surveyed said they would become unviable if they had no access to EU workers.
- Almost a third (31%) of businesses surveyed had seen EU nationals leave since the EU referendum.
- 17% of respondents said they would look to relocate overseas if they had no access to EU nationals.
- In the Breaking the Chain report, Manufacturers, farmers and retailers were all surveyed on their preferences for a new migration system. Across the three sector surveys a 'short and simple process' and 'timely access to workers' came top for each of them.

¹ <https://www.fdf.org.uk/publicgeneral/Breaking-the-Chain.pdf>

We are aware that London and the South East is the area employing the most EU workers in the UK and the food and drink supply chain is one of the industries most impacted if there were sudden limitations to accessing EU workers.

Importance of EU migrants to food and drink industry

Food and drink manufacturing employs 117,000 highly valued EU workers within the food and drink manufacturing and they play a vital role in guaranteeing the success of the £112 billion 'farm to fork' food chain. EU nationals play a vital role in our industry. Without our dedicated and valued workforce, we would be unable to feed the nation.

Food and drink manufacturers are already facing significant challenges now with the availability of seasonal and temporary labour beginning to tighten and predicted to worsen. Businesses need an urgent solution from Government, in place before the UK leaves the EU in December 2020, that allows access to a competent and reliable workforce, flexible enough to allow businesses to adapt to consumer peaks and demand throughout the year.

While our industry is often characterised as poorly paid and low skilled, our research shows that a high percentage of EU nationals are carrying out vital production, technical and specialist roles. In food and drink manufacturing, access to EU workers has enabled us to fill gaps at all skills levels, including the 19% of EU workers working in higher skilled jobs (with a higher education or degree). Many companies in the food and drink supply chain use intra-company transfers to bring in overseas research specialists and are looking for reassurance that they can benefit from this expertise after Brexit.

However, as an industry we recognise the need to do move away from our reliance on EU migrants and recruit and train up the UK's resident labour population'. It is important to recognise the challenges presented by the current high levels of employment in the UK. Companies are finding it increasingly difficult to source the local skills or labour they need and there is no overnight solution to this.

Going forward it is important that there is both a broad understanding of "skilled" labour and the differences across each sector as well as a more user-friendly and low-cost system that provides continued access to highly skilled science talent from overseas. Whilst automation will be part of a solution to our future workforce needs, it is not the catch-all solution to replacing EU nationals. There are certain sectors that simply cannot replace people with an automated process.

A future immigration system

FDF strongly believes in a flexible immigration system, for both companies and workers. We need to be able to attract talent to ensure we remain a world leading sector. Food and drink manufacturers will often plan their workforce needs of more than a year in advance and will need to know what the future immigration system will look like to begin preparing.

The future immigration system must recognise the different skill levels required and be based on a realistic expectation of the ability and availability of UK workers to fill the jobs currently carried out by EU workers. Business has accepted that freedom of

movement is coming to an end, but we now need clarity on what will replace it and how long we will have to adapt to a new system.

- **Business organisations should promote the range of careers available in food**

The food and drink manufacturing industry has faced a skills gap for some time. Food and drink manufacturing will require 140,000 new workers by 2024 to meet the needs of a growing sector requiring more highly technical skills and to manage demographic change.

FDF is actively working with the newly formed Food and Drink Sector Council, a formal industry partnership with Government to create a more productive and sustainable food and drink sector. One of the Sector Council's early priorities has been identified as the future workforce and skills requirements of the food industry. The whole of the food supply chain is coming together to consider joint industry and government action focused on the image of the food supply chain, upskilling our workforce, delivering apprenticeships and future digital skills. This work will also look at the image of the industry and how to promote careers within food, not just to schools but across all ages.

3) Do you agree with the proposed ban of advertising food and drink that isn't healthy across the Transport for London network

No.

The UK has one of the strictest advertising regulatory regimes in the world; rules that are proportionate, evidence-based and comprehensively followed and enforced by the regulators. This includes measures on TV, digital and outdoor space advertising (including the TfL estate), which have been shown to reduce children's exposure to advertising for HFSS products².

We consider a complete ban of advertising of HFSS products on the Transport for London (TfL) estate is a disproportionate response. Obesity is a multi-faceted and complex issue, with various causal factors but there is no easy solution. Previous reviews of the evidence on food advertising and obesity found limited impact, for example, independent expert Professor David Buckingham found:

*"advertising does have some impact, but the evidence is that the impact is very small" and that 'food choice is only one factor in obesity, and other factors – such as the availability and price of food, the influence of parents, patterns of physical activity, and the lack of access to outdoor play areas – play a much greater role"*³

Research by the McKinsey Global Institute found media restrictions only have a limited population impact, ranking twelfth in a list of sixteen interventions ranked by disability-

² HFSS – Foods high in fat, sugars or salt as defined by the government's nutrient profile model.

³ Buckingham, 'The Impact of the Commercial World on Children's Wellbeing: Report of an Independent Assessment, DCFS and DCMS', December 2009, p11.

adjusted life years lost.⁴ The evidence for media restrictions was ranked as 'limited evidence for behaviour change'.

In 2015 as part of its sugars reduction work, Public Health England published an evidence review across the range of marketing interventions including advertising. When reviewing the published evidence from 2010, it found the evidence to be 'highly heterogeneous' and 'with a reliance on relatively small, variable quality experimental or observational studies'. In total thirteen studies were looked at, only two of which were conducted in UK children, and the findings of impact were variable⁵. Further, a recent survey by PHE found only 6% of adults (including those overweight and from lower socioeconomic groups) thought less advertising would help them to consume less calories⁶.

In July 2017, the Committee on Advertising Practice (CAP) strengthened its non-broadcast codes to prevent HFSS advertisements in media seen by under 16's. This restriction extends to the internet as well as outdoor space, including billboards and transport hubs. The restrictions not only apply to HFSS products, but brands that are synonymous with HFSS products.

CAP will shortly be evaluating the success of this extension to non-broadcast advertising codes. In addition, the Broadcast Committee on Advertising Practice (BCAP) is currently undertaking a review of evidence on the effect of TV advertising on children. We believe it would be premature to take additional action around advertising until the outcome of these reviews is known.

The draft Strategy notes a similar approach that was implemented across Amsterdam's metro system, and that a 12% reduction in the number of children overweight or obese was reported. However, the obesity reduction data covers the period between 2012 to 2015, three years before the metro advertising intervention was introduced (1 January 2018). The approach taken in Amsterdam and the results to date is undoubtedly impressive, but consists of a wide range of interventions, including intensive work with at risk families, help during the first 1000 days of life and increased access to physical activity. We believe it is one of many approaches around the world that the Mayor's recently formed Childhood Obesity Taskforce should consider in its entirety, however it is misleading to imply that obesity reduction rates can be related to advertising bans on the metro.

We believe food companies should be allowed to advertise to an adult market – this enables companies to compete, and new products to break into the market, helping to create the vibrant food economy discussed in the document. The CAP codes will already restrict advertising where the 'child audience' is more than 25%. The proposal would for the first time in the UK create a ban on food products being advertised regardless of the proportion of children and adults seeing the adverts, and would impose stricter regulations on food compared to alcohol.

Advertising allows companies to communicate product features and innovations to consumers, including products which have been reformulated to be healthier.

⁴ Page 38 of McKinsey Global Institute; [Overcoming obesity: An initial economic analysis](#).

⁵ PHE Sugar Reduction: The evidence for action (Annex 3)

⁶ Public Health England, 'Calorie reduction: The scope and ambition for action'.

Companies have spent a lot of resource, both time and money, to reformulate products as they try to achieve the governments challenge of reducing sugars by 20% by 2020. Restricting companies access to advertising could have the unintended consequence of limiting companies' ability to promote these new products, and therefore their ability to meet these stretching targets.

Nutrient Profiling Model

We are concerned that the proposed ban on advertising 'unhealthy' food and drink would include products which have little or no appeal to children, or where the advertising of such is predominantly or exclusively aimed at adults. For example, the current UK nutrient profiling model (used to differentiate between HFSS and non-HFSS products) embedded within the CAP and BCAP codes prevents advertising of products such as butter, olive oil, cheese, mayonnaise, soy sauce, stock cubes and pesto.

It should also be noted that Public Health England is currently [undergoing a review](#) of the UK nutrient profiling model. The proposed model would greatly widen the range of products classed as HFSS, including pure fruit juices and smoothies, many yogurts / fromage frais and high fibre breakfast cereals. It is therefore currently impossible to provide an impact assessment of this proposal in terms of impact to business, or impact to revenue for TfL.

4) What are you or your organisation doing to support good food in London?

Reformulation

FDF and its members take their responsibility in tackling obesity seriously. For the last decade, the UK's food and drink companies have been reformulating their products to reduce sugar, calories, fat and salt, as well as limiting portion sizes. Industrially produced trans fatty acids have virtually been eliminated in the UK diet following extensive voluntary reformulation work across the last decade. In addition, over the last 5 years FDF members have⁷:

- Reduced calorie content in the average shopping basket by 5.5%
- Reduced average sugar content by 12.1%.
- Reduced salt content by a further 11.4%, on top of over 15 years of steady reformulation work.

FDF members are working closely with Public Health England to continue working toward strict sugars reduction guidelines and will shortly be starting discussions on calorie reduction. In order to help businesses of all sizes reformulate products, we have also produced a [reformulation guide](#) aimed at smaller businesses. This has been downloaded more than 10,000 times to date.

Food Waste

FDF's environmental ambition, Ambition 2025, sets out FDF and members commitment to food waste reduction. FDF members are committed to sending zero food waste to landfill from direct operations and to reducing food waste across the whole supply chain

⁷ Kantar Worldpanel UK data for FDF total membership (2013 – 2017).

from farm to fork. Also under Ambition 2025, and as an engagement partner to Courtauld 2025, FDF has committed to contribute to the WRAP target to reduce UK food waste by 20% by 2025 per capita against a 2015 baseline.

Under Courtauld 2025, FDF member company signatories along with other business signatories have committed to double food redistribution tonnage by 2020 against a 2015 baseline. FDF participates in the [Courtauld 2025 Food Redistribution Working Group](#). The group provides a forum to look at practical ways to increase food redistribution, discuss and share best practice, identify barriers and opportunities and oversee the development of relevant new resources and approaches to monitoring progress. Particular areas of current focus include developing guidance on redistribution of surpluses past the Best Before date, developing a redistribution landscape map and working with Third Party Logistics companies to mobilise more surpluses.

FDF has worked with WRAP on the previous Courtauld Commitments and between 2011 and 2014, according to WRAP analysis, food and drink manufacturers have achieved a 200,000 tonne reduction in food waste.

As part of Courtauld, FDF supported the development of the 'Your Business is Food' campaign for the food and drink manufacturing industry. Your Business is Food is a digital communications campaign that is particularly targeted at smaller companies to get them started on the journey of food waste reduction by helping them better understand the business cost of food waste. In March 2018, FDF launched the campaign to FDF member companies. The FDF [Your Business is Food campaign webpage](#) provides members with resources and advice on how they can reduce food waste and save money.

During 2016, FDF worked with FoodDrinkEurope on the producing [Every Meal Matters](#), a set of food donation guidelines to encourage and help food and drink manufacturers donate their food surpluses to food banks

Plastics

FDF is proud to be a founding signatory of the UK Plastics Pact, designed to bring together the entire plastics value chain under one holistic approach and one ambitious set of targets. We are committed, with our members, to invest in research and development and new business practices, that will move us towards a circular system where we keep plastic in the economy and out of the natural environment. Several FDF Members have also signed the pact as business signatories.

Low-carbon Transport

Under FDF's Ambition 2025, Members have committed to the following two targets:

- Reduce the environmental impact of our Members' transport operations, whether from own fleet operations or third-party hauliers, in terms of both carbon intensity and air quality aspects.
- Embed a fewer and friendlier food miles approach within food transport practices.

As part of the Five-Fold Environmental Ambition, predecessor to Ambition 2025, transport commitment FDF Members had already been making a contribution to the Logistics Carbon Reduction Scheme (LCRS) administered by the Freight Transport Association. Results for the seventh year of the LCRS showed that manufacturers

contributed to a 7% reduction in average kilogram CO2 equivalent emissions per vehicle km in 2015 compared to 2010 and based on the sample of Scheme Members who consistently provided data since the launch,

FDF continues to work with other stakeholders to encourage greater collaboration and sharing of best practice around transport and logistics activities, including IGD's Efficient Consumer Response Programme and its Reducing Waste Miles Initiative.

5) How could you or your organisation support the Mayor to achieve good food for London and support the final Strategy?

See question 4 above.

6) Is the strategy inclusive and does it consider the need and priorities of all Londoners?

No comments on this question.

Consultation Annex

The UK Food and Drink Manufacturing Industry

The Food and Drink Federation (FDF) is the voice of the UK food and drink manufacturing industry, the largest manufacturing sector in the country. Our industry has a turnover of £97.3 billion, which is 19 per cent of total UK manufacturing, with Gross Value Added (GVA) of £28.8 billion. Food and drink manufacturers directly employ over 400,000 people in every corner of the country. Exports of food and drink make an increasingly important contribution to the economy, exceeding £20 billion in 2016 for the first time. The UK's 7,000 food and drink manufacturers sit at the heart of a food supply chain which is worth £112 billion to the economy and employs four million people.

The following Associations actively work with the Food and Drink Federation:

| | |
|--------|--|
| ABIM | Association of Bakery Ingredient Manufacturers |
| ACFM | Association of Cereal Food Manufacturers |
| BCA | British Coffee Association |
| BOBMA | British Oats and Barley Millers Association |
| BSIA | British Starch Industry Association |
| BSNA | British Specialist Nutrition Association |
| CIMA | Cereal Ingredient Manufacturers' Association |
| EMMA | European Malt Product Manufacturers' Association |
| FCPPA | Frozen and Chilled Potato Processors Association |
| FOB | Federation of Bakers |
| GFIA | Gluten Free Industry Association |
| PPA | Potato Processors Association |
| SA | Salt Association |
| SNACMA | Snack, Nut and Crisp Manufacturers' Association |
| SSA | Seasoning and Spice Association |
| UKAMBY | UK Association of Manufacturers of Bakers' Yeast |
| UKTIA | United Kingdom Tea & Infusions Association Ltd |

FDF also delivers specialist sector groups for members:

Biscuit, Cake, Chocolate and Confectionery Group (BCCC)
Frozen Food Group
Ice Cream Committee
Meat Group
Organic Group
Seafood Industry Alliance

From: [REDACTED]
Sent: 04 July 2018 18:04
To: london food
Subject: Comments on Draft London Food Strategy

Dear London Food,

My name is [REDACTED]. It is in this context that I am writing with some comments about the Draft London Food Strategy. Overall, I think the Strategy is excellent and in particular would like to support the proposed ban on advertising junk food on public transport and the opening of new fast food outlets close to schools. There are, however, some areas in which I think the Strategy could be even stronger. Explicitly, I think there could be more emphasis in the Strategy on the power of planning and design in promoting London as a better food city. I have added some comments about this and other suggestions below.

1. GOOD FOOD AT HOME – AND REDUCING FOOD INSECURITY

The Strategy rightly focuses on poverty as a key driver of food insecurity; however, I think there could be a stronger emphasis on other key drivers, such as a lack of food knowledge/cooking skills and access to fresh food. Many things feed into these, of course, but I wonder whether the Mayor might consider some of the following:

- * Require boroughs to map food deserts and make specific proposals for tackling these, for example by lowering rates for local grocery shops that provide fresh food.
- * Draw up planning policies to create and protect good food spaces. This might include new spaces for food markets, especially in areas of food desert, formal 'drop off' spaces for farmers linked to community buying groups, such as those in the Belgian 'Voedselteams' model (<https://www.voedselteams.be>) and requirements for all new homes to be built with adequate kitchens (some flats are now built with kitchens that are too small to cook in).
- * Provide for the creation of more community kitchens and adult cookery classes (I realise this may be part of other ongoing strategies, but it does not harm to spell it out if so).
- * Provide or fund a network of mobile 'Green Vans', which could be like milkman's vans but with fresh veg on board. Such vans serve local communities very effectively in places such as Sicily, and have also helped to address food deserts in Toronto, thanks to the network set up by the charity Fareshare. (<http://fareshare.org.uk/giving-food/who-we-work-with/our-work-with-co-op/>)

2. GOOD FOOD SHOPPING AND EATING OUT – A HEALTHIER ENVIRONMENT

Once again, I think there could be much more emphasis here on design and planning regulation. It would be great, for example, to see a spatial food strategy for London – the Mayor could perhaps think of organizing a competition for this – many architects are now thinking increasingly of food. There are also many examples from abroad of what good design and planning can do to protect/enhance good food systems and spaces, for example:

- * Protect existing local independent food shops, grocers and greengrocers from being converted to other uses, as has been practiced very successfully, for example, in Paris.
- * Restrict supermarket development close to existing food markets. This has been practiced successfully in Barcelona, which provides numerous examples as to how planning and other legislation can protect markets, as

listed below.

* Subsidise market stall rents: this would also go a long way to helping London markets to thrive: in Barcelona, where markets are officially seen as a public good', market traders are heavily subsidized, meaning they pay far less than London market traders, who struggle to make a living due to their higher rental costs.

* Restrict the sale of takeaway foods in or close to food markets, since these often undermine fresh food sales.

Behavioural Economics are another powerful way in which to affect food choices. For example, the Mayor could work with Government to lobby for a ban on sweets at tills.

Business rates are of course a key concern too, since many small independent shops are being priced out of existence. Perhaps there is scope for seeing local fresh food shops as 'community assets' that are exempt from such high rates?

3. GOOD FOOD IN PUBLIC INSTITUTIONS AND COMMUNITY SETTINGS – BETTER FOOD PROCUREMENT

The proposal to start building a new drinking fountain network and encourage the supply free drinking water is excellent, however it feels as though there is scope for more specific proposals to improve public institution food procurement, particularly in schools and hospitals and prisons, for example by setting targets for local and organic food or minimising the amount of meat served.

* Set targets: In the 1990s, the city of Rome had a very successful programme that set just such targets for the proportion of organic and local food served in schools (which was unfortunately dismantled by the incoming Mayor).

* Mix commercial/institutional: Another very successful project in the Groningen in the Netherlands involved bringing a fresh food market into the foyer of the local hospital, which not only provided fresh food for patients but also became a key social hub for patients and visitors.

I do realise that the Mayor probably has limited powers here and therefore cannot replicate the sweeping reforms that Rudi Giuliani brought to New York regarding fast food, but perhaps something could still be done to encourage institutions to sign up to such schemes, perhaps along the lines of the Food For Life medal programme? Perhaps this is already planned.

4. GOOD FOOD FOR MATERNITY, EARLY YEARS, EDUCATION AND HEALTH – SUPPORTING HEALTHIER HABITS

Food education is of course absolutely vital to the success of all of the above. In this context, I would love to see more specific proposals for the continued and increased support for growing spaces, kitchens and also teaching kitchens in schools. Perhaps where it is not possible for every school to have such facilities, they could be shared, as sports facilities often are? Food spaces, indeed, could go hand in hand with sports facilities, where space and funds allow?

5. GOOD FOOD GROWING, COMMUNITY GARDENS AND URBAN FARMING – INCREASING SUSTAINABLE FOOD GROWING

Once again, I think the Strategy could go further, not just in supporting and protecting existing food growing spaces, but in having a strategic spatial plan to link these to a wider food growing network.

* Commission such a spatial plan: this would, I think, be a crucial step in starting to address how London can move towards a more localised, low carbon food economy.

Apart from the Garden City model as envisaged by Ebenezer Howard, two contemporary models stand out in relation to this, one is Julie Brown's Food Zones model, which has an educational drive to encourage more local and seasonal food purchases, and the other is Bohn and Viljoens' concept of Continuous Productive Urban Landscapes (CPULs), which attempt to link inner city growing spaces to the countryside (and are thus not unlike Patrick Geddes' model of urban growth).

Last but not least, I think the strengthening and encouragement of more food links directly between the city and its immediate growing environment – ie the Green Belt – should be encouraged wherever possible. The protection and promotion of Borough Farms, which allow young people interested in taking up farming to get access to land, could be crucial in this.

6. GOOD FOOD FOR THE ENVIRONMENT – MAKING THE FOOD SYSTEM WORK BETTER

Many of the initiatives mentioned above clearly fit into this category too. I wonder why the explicit suggestion that people think of eating less meat and dairy, which appears in the first section, is not here too? It bears repeating.

I also wonder whether there should be specific mention of support for the sustainable restaurant network here.

General Remarks:

The grey boxes sections with 'what you can do' in them feel rather vague. Clearly they are meant to be as inclusive as possible, but the result, for me at least, is that they feel a bit generalized and uninspiring. I wonder whether it might be worth considering making them more directed, so for example, if you are a chef/shop-keeper/teacher/mother/employer/architect, consider this....? Just a thought.

Best wishes,



This message has been scanned for viruses by the Greater London Authority.

Click [here](#) to report this email as spam.

[REDACTED]

From: [REDACTED]
Sent: 05 June 2019 15:12
To: [REDACTED]
Subject: FW: innocent's thoughts on the London Food Strategy

From: [REDACTED]@innocentdrinks.co.uk>
Sent: 04 July 2018 17:31
To: london food <londonfood@london.gov.uk>
Subject: innocent's thoughts on the London Food Strategy

Hello,

Thank you very much for giving us the chance to share our thoughts on the food strategy for London.

Here at innocent, we're on a mission to help people live well and die old so we are right behind you in wanting to put good food at the heart of healthy living. Our way of doing that is making tasty, healthy drinks that make it easy for people to get more fruit and veg into their diet – at a time when less than one in three adults and one in 10 teenagers are getting their 5 a day.

Your report caught our eye when it proposed a ban of advertising of food and drink that is not healthy across the Transport for London estate. We have long used bus and tube advertising to tell busy Londoners about our drinks. The draft nutrient profile model would classify juice and smoothies as HFSS, so a combination of the proposed changes would mean no juice and smoothie ads on the tube. That's despite them being made of 100% fruit and veg and being recognised as 1 of your 5 a day. It defies the common sense test to us.

So we have a request: please have a read of our response to the nutrient profile model consultation which lays out the evidence for the positive contribution juices and smoothies make to a healthy, balanced diet. It's attached. Then, when you are shaping your proposal for a ban, please consider an exemption for 100% juice and smoothies so that we can keep helping Londoners get more fruit and veg into their diets.

One last request, would you fancy a visit to Fruit Towers? We'd love to tell you more about a campaign we run called The Big Grow – this year alone it has got over 20,000 children in London growing their own veg, over a million children nationally since it started. We're just at the top of Ladbroke Grove and would love to show you round and hear your thoughts on what more we could be doing to put good food at the heart of healthy living for London.

Thanks for reading.

[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

innocent is very proud to be a B Corp:
a community of companies using business as a force for good
<https://www.bcorporation.net/what-are-b-corps>

innocent Ltd, Fruit Towers, 342 Ladbroke Grove, London, W10 5BU

5 July 2018

Mayor of London Draft London Food Strategy

Introduction

The IPA is the professional body for advertising, media and marketing communications agencies based in the United Kingdom. We have approximately 300 agency brands within our membership.

As a not-for-profit membership body, incorporated by Royal Charter, the IPA's role is two-fold: (i) to provide essential core support services to our corporate members who are key players in the industry; and (ii) to act as our members' spokesman.

The IPA supports the fundamental purpose of the Draft London Food Strategy (the "draft strategy"): to enable *"every Londoner to have access to healthy, affordable, culturally-appropriate good food"*, and the Mayor's priority in tackling child obesity in particular, as also noted in the separate document: *"Proposals to consult on restriction of food and drink advertising across Transport for London advertising estate to help reduce child obesity"* ("Proposal to Consult on Ad Restrictions").

The IPA is a member of the Advertising Association. We have contributed to, and support, the Advertising Association's response to the draft strategy and, in the hope that it will assist, have set out some further points here (which are also relevant to the Proposal to Consult on Ad Restrictions).

What are your views on the proposed ban of advertising of food and drink that is not healthy across the Transport for London estate?

The draft strategy sets out 6 questions, question 3 (noted above) being the most relevant to our organisation and its members. We would, of course, be very willing to do what we can, in collaboration with our members and the London Mayor and his team, to help champion the causes underlined by the draft strategy. We do not, however, agree with the proposal to ban the advertising of food and drink, as described, across the TFL estate.

What is "healthy" / "unhealthy"?

The draft strategy refers repeatedly to food and drink products that are "unhealthy" or "not healthy". This terminology is also central to the question noted above. The footnote on p.9 (and on the second page of the Proposal to Consult on Ad Restrictions) which attempts to define "Healthy", refers to the Food Standards Agency Nutrient Profiling Model ("NPM") and provides a link to a Government webpage that includes a copy of the Department of Health Nutrient Profiling Technical Guidance (January 2011). This guidance explains on p.4 that the purpose of the NPM is to classify food and drinks that exceed a particular score as "less healthy" (my emphasis), being high in fat, salt or sugar ("HFSS"). The NPM does not classify foods as "healthy" or "unhealthy". Indeed, the Government webpage itself points out that foods and drinks classified as HFSS "*can form part of a balanced diet*".

Our concern is, therefore, that by proposing a ban on all ads across the TfL estate for "food and drink that is not healthy", and determining what is and what is not "healthy" by reference to the NPM, the draft strategy will inadvertently lead to the banning of advertising for foods and drinks which, in fact, could form part of a balanced diet and which it did not intend to prohibit from being advertised.

Further, Public Health England, on behalf of the Department of Health and Social Care, has carried out a review of the NPM to bring it in line with current UK dietary recommendations. The results of this review have yet to be published and will fundamentally affect the categorisation of food and drink products as HFSS.

Advertising of Food and Drink is not "unregulated"

The draft strategy says on p.17: *"Advertising of foods that are unhealthy is often unregulated and widespread during family TV viewing times, through the internet and on the streets."* This is simply not true. The UK has one of the strictest and most respected advertising regulatory systems in the world. The Committees of Advertising Practice CAP and BCAP Codes contain detailed rules on non-broadcast¹ – including across the TfL estate – and broadcast² advertising, respectively, of food and drinks to children – including HFSS products – and all ads must comply with the Codes: they are mandatory. The Codes even include rules on "pressure to purchase"³, an issue specifically raised as a concern in the Proposal to Consult on Ad Restrictions.

The Advertising Standards Authority ("ASA") is responsible for regulating advertising and ensuring its compliance with the Codes. Only this week (4 July), the ASA upheld complaints against three advertisers for breaching the CAP Code rules on the advertising of HFSS ads to children.⁴

Effect of an ad ban to protect children, on ads for adults

As noted above, a fundamental aim of the draft strategy and a priority for the Mayor, is to protect children from obesity. Whilst, of course, we support this aim, we do not believe that a ban on advertising across the TfL estate would achieve it and would be disproportionate. If the intention, as stated, is to classify what is "healthy" by reference to the NPM, a ban on ads for food and drinks which are categorised as HFSS would result in banning ads for products that are of interest to adults rather than children, such as cooking oils, pesto, butter etc. And, as noted above, the results of the review on an updated NPM have yet to be published. Further, we would expect that the majority of people seeing ads on the TfL estate are adults.

¹ <https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html>

² <https://www.asa.org.uk/codes-and-rulings/advertising-codes/broadcast-code.html>

³ <https://www.asa.org.uk/type/non-broadcast/code-section/15.html>

⁴ <https://www.asa.org.uk/codes-and-rulings/rulings.html>

Introducing a ban on Brand Ads

The draft strategy proposes a ban not just on the advertising of food and drink products considered to be not healthy, but on ads for food and drink companies that just advertise their company's brand or name.

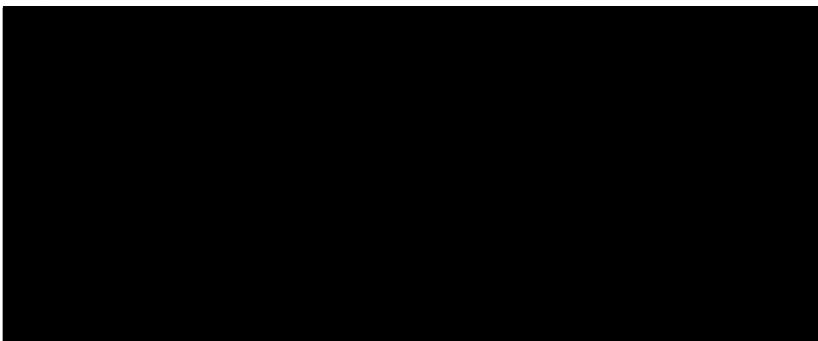
As noted above, the CAP and BCAP Codes place restrictions on the advertising of food and drinks to children, including HFSS products. These restrictions apply to ads that promote HFSS products directly but also to those that have the effect of promoting specific HFSS products through the use of branding that is synonymous with an HFSS product or a range of products that is mainly HFSS. In other words, the advertising Codes already restrict the use of brand advertising that would have the effect of promoting HFSS products and all such advertising is subject to the scrutiny of the ASA.

Conclusion

The Proposal to Consult on Ad Restrictions asks for views on whether a full advertising ban for all unhealthy food and drink advertising across the TfL estate should take place or whether the Mayor should do nothing. It seeks views from individuals or organisations that do not think the Mayor should introduce restrictions or have other suggestions of how to use the TfL estate as part of bold action against child obesity.

For the reasons given above, and in the response to the draft strategy from the Advertising Association, we do not believe that an advertising ban should take place. The advertising of HFSS food and drinks to children is already well-regulated, including across the TfL estate. Further restrictions are unnecessary. Seeking to ban the advertising of "not healthy" or "unhealthy" foods by reference to the NPM would result in the banning of ads for products which, although they might be classified as HFSS, are not necessarily "unhealthy" and may form part of a balanced diet. Further, with the priority being to protect children from obesity, such a ban would 'throw the baby out with the bathwater' by preventing ads for products of interest to adults (and the TfL estate, we expect, advertises predominantly to adults anyway).

However, neither do we believe that the Mayor should do nothing. Not only is the UK's advertising regulatory system one of the strictest and most respected in the world, but our advertising agencies are also celebrated as among the best in the world. They are, of course, skilled ad creators, and they are also skilled problem-solvers. The draft strategy gives numerous examples of how the Mayor will work with other organisations to achieve his aims. We propose that he includes the UK's ad agencies in his efforts to enable every Londoner to have access to healthy, affordable, culturally-appropriate good food.



Just Eat's response to the Mayor of London's draft London Food Strategy

July 2018

About Just Eat:

Just Eat plc operates a leading global marketplace for takeaway food delivery. Headquartered in London, we use proprietary technology to offer a quick and efficient digital ordering service for 22.8 million customers and 87,500 restaurant partners across the UK, Australia & New Zealand, Canada, Denmark, France, Ireland, Italy, Mexico, Norway, Spain, Switzerland and Brazil. We provide the platform and tools to help independent restaurants move online and reach a significantly broader customer base, as well as creating a community that champions customers, restaurants and the vibrant takeaway sector.

Because we have scale and work with more restaurants than anyone else – 28,900 in the UK, of which 5,400 are in London - we're able to provide access to affinity deals from a range of suppliers (from Booker to Global Payments and Make It Cheaper) and introduce the very best innovations which aim to inform, educate and inspire our restaurant partners while reducing costs, saving time, increasing profits and operating more efficiently. One example is our partnership with Eskuta, through which we have offered our restaurant partners a 45% discount on electric scooters for food deliveries.

Just Eat is a marketplace, not a food manufacturer or retailer. We don't own or franchise our restaurants and we cannot control the ways in which they choose to run their businesses. For many of our restaurant partners, the orders they receive from Just Eat supplement orders they receive directly. Our partners are extremely diverse, offering a range of over 100 cuisine types - from grilled chicken, vegan and vegetarian options to traditional curries, sushi or pizza – and with sales ranging from under £100k pa to double digit millions. Many also offer healthy menu options and smaller portion sizes, so customers can make the choices which are right for them.

Just Eat's target customers are aged 18-34. We do not target under 18s across any of our online marketing channels, and we use a whitelist-only approach to ensure our advertising only appears on sites as relevant as possible to our intended audience.

While we have limited control over the menu choices and broader behaviour of our partners, we are committed to using our scale and influence to help restaurant partners continue to improve the breadth of their food offering and the choices available to customers. We have provided further detail on this later in our submission.

Just Eat is also a founding member of the British Takeaway Campaign which champions the thousands of small businesses involved in the takeaway sector and celebrates the sector's diversity, culinary heritage and economic contribution to the UK. Other members include the

British Kebab Awards, the National Federation of Fish Friers, SeeWoo, UKHospitality, and the Foodservice Packaging Association.

As a whole, the sector has created 41,000 new jobs since 2009 with over 230,000 jobs in total – more than telecoms and advertising. It is expected to create 30,000 new jobs by 2021¹. In London alone, £1.4 billion was spent on takeaways in 2016, with the sector supporting over 23,000 jobs, and boosting London's economy by almost £700 million².

Overview of submission:

We welcome the opportunity to respond to the draft strategy. We have recently met with members of the Mayor's team and the Transport for London team and are keen to work with them as the final strategy is developed. We have commented on the relevant proposals below, with our response focused on the proposed ban of advertising food and drink products high in fat, salt and sugar (HFSS) throughout the Transport for London estate.

The draft strategy is comprehensive and ambitious, and Just Eat shares the Mayor's determination to make sure a range of good food options are available to all Londoners. While we support the broad goals of the draft strategy, we have concerns about specific proposals contained within it due to the practicalities of implementing them. It is important to stress that obesity is a complex issue which needs to be tackled through a whole-system approach, not through single policy interventions.

Q3: What are your views on the proposed ban of advertising of food and drink that is not healthy across the Transport for London estate?

We fully support efforts by both national and local government to tackle obesity across the UK but would caution against introducing isolated policy interventions. In our view, a whole-system approach is needed to successfully tackle obesity in the UK – it is not just a question of restricting advertising of products that are deemed unhealthy.

Responsible approach to advertising

Just Eat is a marketplace, not a food manufacturer or retailer. We advertise a website and app and not food products. The wording of the proposal relating to advertising does not make it clear whether Just Eat would be impacted by the proposed ban or not.

Nevertheless, as a leading UK tech business which is listed on the FTSE 100, we take a responsible approach to advertising and marketing. While our advertising focuses on promoting our app and website rather than any specific food products, in the instances where food is

¹ Takeaway Economy report 2017, data analysis by CEBR - Centre for Economics & Business Research - on behalf of the British Takeaway Campaign

² Research carried out for the BTC by economic consultancy the Centre for Economics and Business Research, 2016

featured in our TV sponsorship and advertising, we ensure that we showcase the full range of food options available on Just Eat.

Our advertising reflects the varied range of cuisine types available on our platform. For example, the creative for our latest London Underground campaign is themed around customer reviews received by restaurants, thanking the chefs that have cooked the dishes rather than showing any particular types of food. In terms of digital advertising, we use demographic targeting which is designed, wherever possible, to exclude any user under the age of 18. We also do not buy outdoor advertising which is within 300m of a school.

Variety of recipes used by our restaurant partners

The proposal included within the Mayor's draft strategy proposes banning advertisements for food and drink products that are "unhealthy". We have concerns about the practicalities of this proposal, given the wide-ranging recipes used across our restaurant partners. Unlike food and drink brands, online marketplaces do not have standardised formulations and our intention is always to give a flavour of the types of foods that may be available to order on Just Eat rather than promoting specific individual products.

Many of our smaller restaurants partners do not have the resource to invest in independent testing to calculate the nutritional information of each of their dishes – and therefore whether their meals would be deemed healthy or unhealthy according to the UK Government's Nutrient Profiling Model. We would therefore welcome further guidance from the Mayor on whether and how he would support small, independent businesses to calculate the nutritional information of the products they sell and how an online marketplace like Just Eat could then show these dishes in an appropriate way in its advertising.

The British Takeaway Campaign has long been calling for the UK Government to provide assistance to smaller takeaway businesses by providing an online calorie calculator through which they could provide nutritional information of their dishes. The Mayor's support in driving this forward would be greatly welcomed.

Opening up choice and variety through our platform

It is important to stress that the takeaway sector is already making significant progress and responding to a shift to more health-conscious appetites, with restaurants now offering a greater range of menu options in response. 96 % of takeaway restaurants now offer vegetarian options, whilst almost two-thirds (65%) offer low fat options and 59% offer low salt options. A further 73% offer small portion sizes³.

³ Takeaway Economy report 2017, data analysis by CEBR - Centre for Economics & Business Research - on behalf of the British Takeaway Campaign

On our platform, Just Eat has seen a substantial increase in vegan, vegetarian and healthier options ordered in the last twelve months, reflecting an increase in popularity for these cuisines among our users.

Just Eat recognises that we can use our scale and influence to help restaurant partners continue to improve the breadth of their food offering and encourage customers towards healthier choices. Because of the fragmented nature of the takeaway market – with its large number of small, independent restaurants, we are focusing our work on discovering practical, real-world and evidence-based interventions to help encourage healthy choices.

For example, we are working with Shift (a charity which designs products to address social problems) and the Better Fast Food Network to better understand measures that we can deploy, where possible using our technology, to help takeaways reduce calories and portion sizes and encourage the take-up of healthier menu items. These include: moving healthier options higher up in online menus, developing smaller packaging products and incentivising the purchase of healthier ingredients via our wholesale partners. In addition, we actively promote the Healthier Catering Commitment to our restaurant partners via our Partner marketing channels and have organised roadshows for our restaurant partners across the country where nutritionists give talks on how simple changes to takeaway menus can make a big difference to nutritional values of some of the nation's favourite dishes.

Collaborating with others on an industry-wide commitment

Just Eat has also been involved in industry discussions with other online marketplaces and food companies to discuss further steps the industry could take to demonstrate our willingness to tackle this issue in a practical and meaningful way. Together, Just Eat and Deliveroo have agreed to the following commitments:

Following consultation with the Mayor, we will include a line across all our out of home and print advertising across all of London which encourages eating a balanced diet. For example, this could be something like 'Enjoy this food as part of a healthy, balanced diet' and could include the Mayor of London logo.

We do not and will not target children with our advertising, either online or outdoors. We will enhance this commitment by **voluntarily banning advertising HFSS foods within 200m of any primary or secondary school in London.**

Working with TfL and their data, **we will discuss with them how we could use digital boards on the tube to switch advertising at certain times of day to reduce the number of HFSS ads seen by school children.** The innovative digital advertising boards on the Elizabeth Line will mean that, across this entire line, we will be able to flex our ads depending on the time of day.

We will seek to work with the Mayor and his team on the revision of the Healthy Catering Commitment. Pending our engagement and its publication at the end of this year, **we will actively work together to publicise this commitment and reach an agreed goal of restaurants to sign up.**

Conclusion

We are always looking for new ways to inspire restaurant partners and incentivise healthier choices using our platform, in ways that also support them to grow their business, and we would welcome further discussions with the Mayor and his team on ways in which to do this in London.

Type of organisation

Business

Name of organisation

PepsiCo UK

Are the six priority areas (set out above) the right ones?

Yes

If no, please tell us why:**Are there other priorities that should be considered?**

Yes

If yes, please tell us what they are:

Rather than adding other priorities, we have concerns over the definitions used in the proposal. Within 'healthy and nutritious food' there is a reference that food should reduce 'unnecessary additives'. Additives are added to food in small quantities to perform a necessary technological function. For example, additives can act as antioxidants and preservatives to prevent spoilage and keep food safe. Far from being unnecessary they can therefore help to ensure a safe and secure food chain, and reduce food waste.

We are concerned by the use of the term "unhealthy" throughout the consultation. The document states that healthy is as defined "under the Food Standards Agency Nutrient Profiling Model". However, this model is to define products as high fat, salt and sugar (HFSS), not as "unhealthy". We therefore do not believe the Nutrient Profiling Model is the appropriate mechanism for determining whether food and drink products are "unhealthy". The scope of the model clearly includes products which have a role to play in a balanced diet. This is more pertinent while the model is being reviewed, insofar as it is currently unclear which further products would be classified as HFSS under the new model.

Ultimately, consumers need clear and concise information. Using this approach there may be products which pass the Nutrient Profile Model that consumers might assume to be "unhealthy", and conversely there will be products which are included in Government advice to include in the five-a-day which would fail the Nutrient Profile Model and not be able to be advertised.

Are the most effective actions the Mayor, external stakeholders and individuals can take set out?

No

If no, please tell us why:

No comment

Are there other actions that should be included?

No

If yes, please tell us what they are:

No comment

Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network?

No

Please tell us why:

Obesity is undoubtedly a major challenge facing our society, but it is a complex issue without a single, simple solution. The UK already operates one of the strictest advertising regulatory regimes in the world, with a strong track-record of enforcement and compliance. We believe that adding a ban on advertising HFSS products on the Transport for London (TfL) estate would be disproportionate and have unintended consequences. Significantly, evidence suggests it would not be the most effective way to tackle obesity.

Lack of empirical evidence in support of a ban:

- Studies by the McKinsey Global Institute (2014) and on behalf of OFCOM (Livingstone 2004) suggest that advertising bans in themselves are unlikely to deliver better outcomes on obesity at the scale required to make a sustainable impact. McKinsey ranked media restrictions 12th out of 16 possible interventions in terms of their effectiveness in reducing obesity levels in a cost-effective way, stating that there is "limited evidence for behaviour change". The report also warned that an undue focus on individual interventions could risk reducing the overall effectiveness of such programmes, supporting the need for holistic solutions as outlined in response to the earlier question on priority areas for the London Food Strategy.
- PHE data drawn from the Calorie reduction report 2018 also shows only 6% of people believe less advertising would help them consume fewer calories (PHE 2018).
- While TV is not directly implicated in the draft proposal's scope, it is also worth noting the numerous studies that highlight the comparatively low impact that such mass media, and thereby any restrictions placed upon it, can have on dietary habits. A study conducted on behalf of OFCOM found that exposure to TV ads accounted for only 2% of the variation in children's food choice, and cited TV advertising's "modest" impact on children's food preferences (Livingstone, 2004).

Key concerns:

- We don't believe the Amsterdam metro system case study is currently appropriate to justify a ban. Obesity reduction data covers the period between 2012 to 2015, three years before the metro advertising intervention was introduced (1 January 2018). The approach taken in Amsterdam and the results to date consists of a wide range of interventions, including intensive work with at risk families, help during the first 1000 days of life and increased access to physical activity. We believe it is one of many approaches that the Mayor's recently formed Childhood Obesity Taskforce should consider in its entirety, however it is misleading to imply that obesity reduction rates can be related to advertising bans on the metro.
- Advertising is a tool that allows us to communicate product benefits and innovations. It can encourage consumers to consider products which they previously did not know, including non-HFSS product alternatives and products which have been reformulated. We're concerned by the potential restriction of non-HFSS products that happen to share branding or imagery with HFSS products under an umbrella brand (such as no-sugar colas). By preventing advertising of non-HFSS products that fall into this category, the proposals have the potential to be counterproductive by discouraging trial and uptake of healthier alternatives.

Key asks:

- As the review of the Nutrient Profiling Model is ongoing, it would seem a premature move to introduce additional restrictions on any advertising media until a thorough impact assessment on the wider effect of the final model has been undertaken to properly inform this policy. We believe the current regulations are proportionate and based on evidence, and we do not believe changes will have a meaningful impact on obesity rates. In any case, were pure fruit juice and smoothies to be reclassified as HFSS within the revised Model, we do not believe they should be included in the proposed ban outlined in this consultation.
- We urge for consideration to be given to the current Broadcast Committee of Advertising Practice (BCAP) evidence review of HFSS TV advertising and children. BCAP will evaluate the latest evidence and publish its analysis in the autumn. We believe the Mayor should duly consider both this review along with the CAP review prior to evaluating next steps following this consultation.

PepsiCo UK's responsible approach to advertising, marketing and labelling

Since 2007, a decade ahead of others in the industry, PepsiCo voluntarily applied the strict OFCOM rules on broadcast advertising of HFSS products to children across all media. We also haven't marketed any HFSS products directly to children under 16 across all channels, from broadcast to digital. In 2013 we voluntarily signed up to adopting front of pack traffic light labelling across all PepsiCo brands in the UK. Below are some brand examples of our approach:

Pepsi Beverages has for 12 years now had a commitment to only advertise no sugar drinks and to focus commercial plans on no sugar/zero calorie options. Approximately 75% of Pepsi grocery retail sales are now in no-sugar Pepsi MAX and Diet Pepsi.

Walkers crisps and snacks - While replicating the taste of our core products is not easy, we are actively driving the mix through our Better for You (BFY) agenda. For example, in 2017 we have refreshed our Oven Baked brand with 50% less fat than standard potato crisps, offering a wider range of flavours encouraging consumers to switch to tasty healthier choices. In relative net revenue terms we spend 20% more on BFY Advertising and Marketing than on the rest of our Walkers portfolio. We are also working with Tesco on their ambition to be the UK's healthiest retailer for savoury snacks. Together we're identifying barriers to consumers making healthier choices and addressing these within the layout of our products in store.

Tropicana juice has been leading the sector on responsible advertising around portion sizes and nutrition information – more recently through our 'Little Glass' advertising campaign. In March 2016 we took the lead recognising the misconception about the goodness of juice amidst a very one-sided sugar debate. We invested in an Above the Line campaign to educate on how just a 'Little Glass' of a 150ml portion gives you 60% of the recommended daily amount of Vitamin C as well as counting as one portion of the five a day.

What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?

Included below is an explanation of our organisation.

About PepsiCo

PepsiCo is a leading global food & beverage company with a broad portfolio of brands including household names such as Pepsi, Walkers, Tropicana and Quaker Oats. PepsiCo is

listed on the Nasdaq with global Headquarters in Purchase, New York, USA. In the UK, PepsiCo has approximately 4,300 employees. A distinct UK Business Unit manufactures and markets a portfolio of brands including Walkers Crisps, Tropicana Juice and Quaker Oats, while our carbonated beverage brands are manufactured on our behalf in the UK by Britvic plc. The global PepsiCo Inc. group of companies supplies beverage concentrate to Britvic, who converts the concentrate, packages and then distributes finished product.

Performance with Purpose

Performance with Purpose (PwP) is the guiding principle of everything we do at PepsiCo. Companies have always operated with a license from society, and it is our firm belief that successful companies of the 21st century must earn that license by aligning the needs of their business with the needs of the world around them. So we recognise the role we have to play in tackling obesity and have a strong track record of taking voluntary action to transform our portfolio. We have proactively taken action in a number of areas: the product itself – through reformulation and innovation; its availability; shifting consumer behaviour – encouraging consumers towards low calorie choices and not least, advertising and marketing responsibly. While not specific to London per se, the capital reaps the benefits of our UK wide approach.

We've supported Magic Breakfast for almost a decade – it's a charity that provides over half a million British children with breakfast. Magic Breakfast has 180 partner schools in Greater London, providing healthy breakfasts to over 12,000 children every school day. Over the course of an academic year, more than 72,500 bowls of Quaker Oats porridge and 561,600 glasses of Tropicana juice were enjoyed by children in Magic Breakfast's partner schools in Greater London.

We have also been active members of industry and cross-societal initiatives aimed at driving behaviour change by consumers, product reformulation and better information about our products. These include Change4Life, the Department of Health Responsibility Deal and working within the Food and Drink Federation, the Advertising Association and the British Soft Drinks Association to promote a progressive approach.

Specifically on 'good food for the environment' – PepsiCo UK is proud to be a founding signatory of the UK Plastics Pact and globally we have set ourselves the ambitious goal of making our packaging 100% recyclable, compostable or biodegradable by 2025.

How could you or your organisation support the Mayor to achieve good food for London and support the final strategy?

On our part, we remain committed to encouraging a healthier relationship between our consumers and food. We continue to invest in healthier products – in fact, we've doubled our global R & D spending in the past five years in this area. This will translate into more commercial activity in this area but it needs to be at a pace that takes consumers with us and does not compromise on taste since that is the route to sustainable results. We would be happy to meet with Officials to discuss this further should this be welcome.

[Contact Head of External Affairs, UK & ROI Lucy Gilchrist lucy.gilchrist@pepsico.com]

Is the strategy inclusive and does it consider the needs and priorities of all Londoners?

No

If no, please tell us why

No comment

[REDACTED]

From: [REDACTED]
Sent: 05 June 2019 15:15
To: [REDACTED]
Subject: Royal Society for Public Health response

From: [REDACTED] [\[REDACTED\]@sustainweb.org](mailto:[REDACTED]@sustainweb.org)
Sent: 14 May 2018 17:27
To: london food <londonfood@london.gov.uk>; [REDACTED]
[REDACTED]

Subject: RSPH backs Mayor of London Sadiq Khan's call for a ban on junk food advertising across the Transport for London network

Dear [REDACTED]

A colleague at Royal Society for Public Health (RSPH) has asked me to pass on the following support to the Mayor of London's team, backing Sadiq Khan's consultation proposal for a ban on junk food advertising across the Transport for London network.

"With 40% of children in London either overweight or obese, tightening regulations around junk food advertising marks a welcome step in the right direction. Bold measures such as this are vital in protecting our children from the marketing tactics of the food industry, yet in order to effectively tackle the obesity epidemic we face as a nation, government action is needed across the entire country."

Shirley Cramer CBE, chief executive of the Royal Society for Public Health

For your information, Royal Society for Public Health is a broad-based membership group, with 60,000 members, working on the social determinants of health. Members are broad-ranging – medical and public health professionals, dietitians, environmental health professionals, nursing, food hygiene, health promotion, health protection and dentistry. As part of the many benefits of RSPH membership, they run special interest groups to cater for specific areas of interest within public health. Current groups focus on health, water, health and wellbeing and food.

Best wishes,

[REDACTED]

[REDACTED]

Sustain: the alliance for better food and farming
Development House, 56-64 Leonard Street,
London EC2A 4LT


sustain
the alliance for better food and farming

[REDACTED]; Web: www.sustainweb.org



The Met Building, 22 Percy Street, London W1T 2BU

PRIMESIGHT'S RESPONSE TO MAYOR OF LONDON'S PROPOSED BAN ON FOOD AND DRINK ADVERTISING ACROSS THE TRANSPORT FOR LONDON ESTATE

BY EMAIL TO- LONDONFOOD@LONDON.GOV.UK

1. EXECUTIVE SUMMARY

- 1.1 Primesight is a leading Out of Home (OOH) Media operator, managing over [REDACTED] advertising sites in the £1 billion UK advertising market. Primesight's gross revenue forecast for 2018 is [REDACTED] million. Primesight employs 180 staff across our London, Manchester and Glasgow offices and in addition to our contract with TfL we manage advertising contracts for Network Rail, London Gatwick Airport, Manchester Airport Group, London Luton Airport, Digital Cinema Media and in 2017 entered a joint venture with Intersection and partnered with BT to launch InLink. InLink's offer incredible benefits to advertisers and the public alike including free ultra fast wifi and offering free UK calling and web searching.
- 1.2 Primesight supports and welcomes action on childhood obesity and believes that the Out of Home ('OOH') industry has a positive role to play in delivering the kind of behavioural change that is needed to tackle the problem of childhood obesity.
- 1.3 The consultation is a welcome first step but a lot more work is needed as the proposed total ban on the TfL estate of all advertising for food and drink that is high in fat or salt or sugar ("HFSS") and the ban on "brand only" advertising by all food and drink companies, are disproportionate, unclear and unworkable measures that will not achieve the Mayor's legitimate objective.
 - (a) One very likely consequence is that HFSS advertising spend will simply be diverted to other forms of media such as social media and free newspapers, where children's exposure to the advertising would be higher.
 - (b) [REDACTED]
 - (c) Should this approach be adopted across other environments such as Network Rail's estate this would have a [REDACTED] reduction in Primesight's annual revenues resulting in a reduction of [REDACTED] million per annum.
 - (d) Revenue loss of this magnitude would undermine our ability to commit to current levels of funding to investments in community services such as free 1gb wifi within our InLink units and free calling. In addition to this significant adverse impact on the public interest, there would also be knock-on consequences such as job losses and investment in local communities.
 - (e) A reduction in sites would also see a reduction in business rates that ensure OOH advertising sites make an ongoing financial contribution to the local area.
 - (f) As drafted, the measures lack sufficient clarity and would be very complex and difficult to implement in practice, for both our members and their customers.

- 1.4 A total ban should not be the only option under consideration. There are a range of alternative, more effective, options open to the Mayor that have not been canvassed in this consultation. They should be subject to further, evidence-based assessment, consultation and development. That work is essential to achieving a set of proposals that are legally and practically robust and based on evidence of their impacts — positive and negative.

2. **BUILDING ON EXISTING MEASURES TO TACKLE OBESITY**

- 2.1 Primesight and the OOH industry already make positive contributions to combatting childhood obesity as well as many other related good causes, including public health education.
- 2.2 As you will already know, the current UK rules for advertising of HFSS are among the strictest in the world. From 1 July 2017, HFSS advertisements became subject to the Committee of Advertising Practice ("**CAP**") media placement restrictions, as set out in the CAP Code, and must not be directed at people under 16 through the selection of media or the context in which they appear.
- 2.3 The CAP advises advertisers that it usually considers OOH advertising to be directed at the general population, not at people under 16. However, working with Public Health England ("**PHE**"), Outsmart voluntarily took steps (in July 2017) to restrict OOH marketing of HFSS products in areas most likely to be seen by children, by preventing HFSS advertising being placed on static OOH sites within 100 metres of school boundaries (the "**Schools Exclusion**"). The industry takes its social responsibilities very seriously, and we have an outstanding record of compliance with all regulatory standards.
- 2.4 As recognised by the CAP, the Schools Exclusion is not an explicit requirement under the CAP Code. The measure has now been in place for a year and we consider that it is too early to take an evidence based decision about whether further measures are needed to reduce children's exposure to HFSS OOH advertising.
- 2.5 A significant amount of investment in terms of time and software were undertaken voluntarily by the industry to put the Schools Exclusion in place. The initiative applies in relation to all schools across the UK. In Greater London alone, it resulted in HFSS advertising being removed from over 10,000 OOH advertising sites, (14%) of all sites.
- 2.6 We took this step, going beyond our existing regulatory requirements, because we considered it to be a targeted and proportionate response that removed HFSS advertising in particular areas where children are most likely to be exposed to it, and when they are most likely to make choices around meal times.
- 2.7 We recognise that our industry has a part to play in tackling childhood obesity and welcome the opportunity to identify and discuss similarly targeted measures as part of this consultation process.

3. **THE CHALLENGE OF CHILDHOOD OBESITY AND THE NEED FOR PROPORTIONATE AND EVIDENCE-BASED POLICY RESPONSES**

- 3.1 The Mayor's Food Strategy Paper sets out the Mayor's objective to use every means at his disposal to help tackle child obesity and states that one method to achieve this aim is to stop children and young people being exposed to advertisements for unhealthy products. Obesity is one of the most pressing public policy challenges that the UK is facing today. We consider therefore that this consultation presents the Mayor with an opportunity to lead the way by developing a targeted and evidence based approach to reducing exposure of

children to HFSS advertising, allowing that model to be replicated widely at both local and national levels.

3.2 The Paper presents a binary choice to consultees between:

- (a) a wholesale ban on all advertising connected to HFSS food and drink product across the entire TfL estate; or
- (b) doing nothing at all.

We do not agree with that binary choice and urge the Mayor to consider a wider range of options that would be more effective and proportionate in delivering the objective of reduced obesity.

3.3 Whilst we consider that that there may be merit in further developing the rules around HFSS advertising, proposals for measures that would restrict the ability of businesses and consumers to communicate with each other and would have a substantial commercial impact will only be justified if they are, when put in context of existing and other possible measures:

- (a) supported by evidence of effectiveness;
- (b) proportionate, in that they are targeted to achieve the specific legitimate objective identified and minimise adverse or unintended consequences;
- (c) clear in their scope and application; and
- (d) workable in practice.

4. **ALTERNATIVE OPTIONS FOR MORE TARGETED AND PROPORTIONATE SOLUTIONS**

4.1 Primesight is keen to work with the Mayor's office and all relevant stakeholders to develop proposals that are more targeted at the issue of childhood obesity so that the Mayor's objectives can be achieved without as great an adverse impact as the comprehensive ban currently proposed. We want to work with you to assess the evidence of the effectiveness and impact of a number of ideas so they can be developed further.

4.2 Primesight would be willing to support the issue of childhood obesity through utilisation of its wider media estate. The more consistently the initiatives are applied across OOH estate, as well as on other media, the more likely they are to be effective. Where targeted and proportionate measures are introduced, we would be willing to discuss their wider application beyond London's transport network.

4.3 The options set out below would require proper consultation and further development but we have included them here as potential alternative options that could be explored in partnership with the industry.

- (a) The use of unsold OOH inventory on the TfL estate to allow TfL to promote healthy eating and lifestyle messages, such as promoting the use of stairs rather than escalators or campaigns such as the "Daily Mile Campaign (see Appendix 1). We note that this accords with one of the key recommendations in a report written by Lord Darzi, Chair of the London Health Commission and evidence given by the Food Foundation to the Health and Social Care Select Committee. The use of healthy living campaigns is an important pillar of Amsterdam's successful strategy.

- (b) A requirement for a proportion of each HFSS advertisement to be dedicated to promoting healthy lifestyle and/or nutritional information. This could take the form of "traffic light" labelling or a 'Food Aware' Compliance Notice such as "Be Treatwise"¹, with direction to online nutritional information, similar to the "DrinkAware" and "BeGambleAware" notices on alcohol and gambling advertising. This would take industry best practice in other sectors and apply it to food and drink.
 - (c) A voluntary initiative, applied either by advertisers or the OOH sector, providing for a levy, imposed in direct proportion to spending by HFSS advertisers. The income generated could be reinvested into the promotion of healthy food messaging. Such a model would require a light touch in terms of management time and cost for the GLA/TfL and could be adopted more widely in other parts of the country.
 - (d) The extension of the school exclusion of HFSS advertising from 100 metres, increasing the number of OOH sites in greater London that are HFSS-free from 10,228 (14% of OOH sites). Additionally, other sites more likely to be seen by children (such as those around theme parks, leisure centres etc.) could be made HFSS free.
 - (e) The use of restrictions that focus on the nature of advertising rather than the underlying product alone. For example, restrictions could be targeted at particularly harmful forms of marketing, such as aggressive price promotions of fast food, building on progress already made by restrictions on advertising expressly targeted at children.
 - (f) The use of digital OOH sites to ensure that, where technologically feasible, HFSS ads are not shown at times when children are most likely to use TfL services (e.g. around school opening and closing times). We consider that, in relation to OOH advertising, there is ample data (e.g. on the times at which children are more likely to travel) to enable effective targeting of HFSS advertising restrictions at digital OOH sites.
- 4.4 Given that obesity rates among young people vary significantly across the UK and as the Food Strategy Paper rightly points out, increased rates correlate strongly with areas with increased social deprivation, the targeted use of OOH advertising to promote positive health and lifestyle messaging, (e.g. the use of OOH sites in more socially deprived areas that are vulnerable to childhood obesity) could be particularly effective in meeting the London Food Strategy's aims. We are aware that TfL has access to data on the use of its services that would assist in the implementation of a targeted approach. An example could be to have no HFSS advertising in the top 10 stations used by children or to exclude central London stations (where usage by children is very low) from any restrictions.
- 4.5 Primesight continually support industry initiatives that encourage positive behavioural change to the benefit of Londoners such as the partnership with Missing People.
- (a) Since 2012, Missing People, a UK charity dedicated to bringing missing children and adults back together with their families has been supported by Outsmart. Missing People advertising was run on digital OOH sites across 15 different media owners (representing 95% of all OOH revenue). In its first year, the campaign delivered 4.9M transmissions across 4,000+ panels equal to £10M+ of media value. Inbound contacts with the charity increased by an astounding 226%, from 2940
-

emails and SMS being received by the charity in 2009 (prior to OOH's involvement), to 9596 being received by the end of 2013 as a result of the campaign.

5. **ONGOING ENGAGEMENT**

Primesight supports the Mayor's goal of reducing childhood obesity and we believe that the OOH sector has a part to play in further action towards this goal. This is why we are keen to engage positively with you while your policy is still at a formative stage, in coordination with other stakeholders.

We would welcome the opportunity to meet with you to discuss our ideas for the development of effective solutions to further the important objectives and priorities set by the Mayor's London Food Strategy. We will participate fully in any further consultation on developed proposals so that robust measures can be put in place.

Please direct any correspondence about the contents of this response to myself – contact details below

Post:


CEO
Primesight
The Met Building
22 Percy Street
London W1T 2BU

Email:





McDonald's response to the draft London Food Strategy

A partner to the Mayor of London

5 JULY 2018



Contents

| | |
|--|-----------|
| Working in partnership..... | 2 |
| 2. GOOD FOOD SHOPPING AND EATING OUT | 4 |
| Using our scale for good across the TFL estate | 11 |
| 4. GOOD FOOD FOR MATERNITY, EARLY YEARS, EDUCATION & HEALTH | 16 |
| 6. GOOD FOOD FOR THE ENVIRONMENT..... | 18 |
| Responding to the consultation questions | 19 |
| Appendix | 24 |



Working in partnership

McDonald's UK & Ireland welcomes the opportunity to respond to the Draft London Food Strategy.

You have set out a bold ambition to tackle childhood obesity. We share this goal, and we are keen to work in partnership with the Mayor of London, the GLA and London councils to ensure that the capital meets it. A business of our scale and breadth has a responsibility to use its reach for good and we are uniquely placed to drive good food choices in London.

London is a great city and we are proud of the role we have played in the capital since 1974 when we opened our first UK restaurant in Woolwich. There are now 183 McDonald's restaurants in London, many of which are owned and run by franchisees who put the interest of their customers at the heart of their operations. In total, our restaurants contribute £540 million in revenue to the city's economy.

We invest in our people, our restaurants and our supply chain. We have helped to improve Londoners' experience on the high street and provided support in tackling wider community issues. Whether its issues such as the environment or congestion, we've never shied away from the big challenges and work hard to ensure we make a positive impact in the communities we serve. In addition, alongside our franchisees and the FA we have invested in our communities. Since 2014, in London, more than 1,000 people have attended our Community Football Days and we have distributed 3,328 kits to accredited teams in the capital. Of the 171 McDonald's restaurants within the M25, approximately 88 are twinned with, and actively supporting a local football club.

At McDonald's we believe that customers are in control of what and when they choose to eat. When it comes to our food, our purpose is make it easier for customers to balance taste, health and value. Our customers are at the heart of every choice we make. They are increasingly health conscious and thoughtful about what they, and their families, eat.

That's why our focus has always been on providing information and choice, and reformulating our menu where possible. We were the first restaurant company to include nutritional information on our menu boards. Following our multi-million pound investment in new self-ordering kiosks, we are successfully trialling "nudge" initiatives to help encourage good food choices. We do not advertise HFSS products to children and there is no McDonald's advertising within 200m of a school.

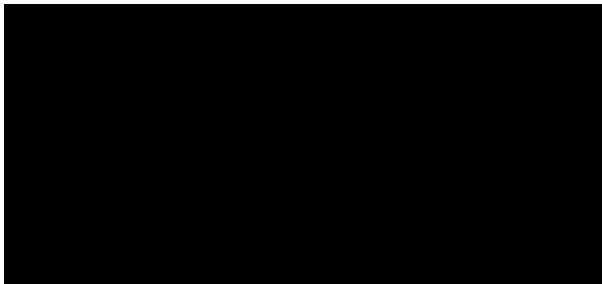
We also have a strong track record of improving our menu range and are determined to continue this work in the months and years ahead. Today, nearly 90% of our menu is under 500 calories and we removed 798 tonnes of saturated fat, 713 tonnes of sugar and 412 tonnes of salt from our menu over the past ten years. We also recently launched our new 'Meals Under' 400kcal and 600kcal bundles in partnership with Public Health England's 'One You' campaign, which has driven real change such as a 51% uptake in side salads. In addition, 72% of our Happy Meal menu is non-HFSS – and we are determined to go further.



These initiatives provide just a snapshot of our action and ambition to help tackle obesity.

We want to work with you and play our role to help reduce childhood obesity across the capital. As part of this, we would welcome the opportunity to either support or be part of the Childhood Obesity Taskforce for London. And we would welcome the opportunity to discuss how, together, we can build on our strengths as a business to help Londoners continue to make good food choices for themselves and their families.

Our response sets out further detail about the progress we have made and the role we are playing in London, as well as setting out how we would like to work with you to help Londoners to make good food choices for themselves and their families.



Chief Executive, UK & Ireland



2. GOOD FOOD SHOPPING AND EATING OUT

SUPPORTING GOOD FOOD IN LONDON

McDonald's UK & Ireland and our franchisees have a shared ambition to provide good food in the capital and an important role to play in supporting the Mayor's agenda. This isn't new to us and we are proud to already be selling good food in the capital while also providing customers the information they need to make informed food choices.

With 183 restaurants in London, we do this through a variety of ways, primarily through the quality of our ingredients but also by working and supporting the work of other organisations where appropriate.

We have a strong track record and have had a nutrition and reformulation strategy in place for over 15 years. A key part of our approach has been focused on sourcing quality ingredients. When it comes to our customers, our strategy is founded on three core principles: choice, information and reformulation.

In essence, our wide ranging menu is designed to suit what our customers want, whatever it is they are looking for. We are committed to helping them make an informed choice about what they eat and drink.

Our ultimate goal however is to make it easier for people to balance taste, health and value. We have worked hard to earn the trust of our customers by providing great tasting, freshly prepared, quality food at an affordable price.

CHOICE: PROVIDING A RANGE OF OPTIONS AND HELPING TO PROMOTE HEALTHIER FOOD CHOICES

At McDonald's we believe that customers are in control of what and when they choose to eat. We work hard to offer delicious choices for any occasion from special treats to the everyday, to make it easier for customers to balance taste, health and value.

We are also firm believers that McDonald's meals can be enjoyed as part of a balanced diet and that there is something on the menu for everyone.

As part of our commitment to offering choice, McDonald's:

- The **majority of our menu (54%) is non-HFSS** – ensuring our menu is suitable for anyone, whether looking for an everyday meal or a treat
- **72% of our Happy Meals are non-HFSS** and we recently launched a new grilled chicken wrap following consultation with Mumsnet
- Provides customers with the choice of **swapping items** such as their hash browns for fruit bag at breakfast or their fries for a salad at lunch or dinner
- Allows customers to **customise individual items**, adding or removing ingredients as they wish
- **Salads** were introduced to the menu in 2004
- We recently launched a new **mini-McFlurry** and **reduced the size of the regular McFlurry**



Non-HFSS food products available at McDonald's

Many are surprised to learn that the majority of menu items on offer at McDonald's are in fact classified as non-HFSS. Such products include:

- McChicken Sandwich
- Chicken McNuggets
- Fillet O Fish
- Chicken Legend
- Hamburger
- Vegetable and Spicy Vegetable Deluxe Burgers
- All salads
- Big Chicken Wraps (*excluding the Hot Peri Peri Crispy Chicken Wrap)
- Happy Meals (*excluding the cheeseburger which we voluntarily do not advertise)
- Small, medium and large fries
- Egg & Cheese McMuffin
- Breakfast Wrap w/ Tomato Ketchup
- Plain Bagel
- Porridge oats

All of our coffee and smoothies are also classified as non-HFSS. It is also worth noting that 72% of Happy Meals sold are non-HFSS.

'Meals Under' 400 and 600 calorie bundles

The launch of our new 'Meals Under' 400 and 600 calorie bundles in December 2017, was yet another example of how we are providing choice.

Working in partnership with Public Health England's 'One You' campaign, the bundles are displayed clearly on our kiosks. They bring together a main menu item, a drink and a side for breakfast, lunch or dinner. All achieve amber and green on the Food Standards Agency traffic light system for fat, saturated fat, salt and sugar.

Since launching the new bundles, have seen a real impact with purchases of side salads increasing by 51% and a 24% uptake of our Vegetarian Deluxe burger. In total, there are over 400 Meals Under bundle options that customers can choose from. Some images of the bundles are included in the appendix below.

We welcome the support we have received from Public Health England for the work we are doing in this area.

"If someone had said to me a couple of years ago that McDonald's would be embracing calorie reduction, I would not have believed it."

Duncan Selbie
Chief Executive, Public Health England
6 March 2018 – Financial Times



New grilled chicken wrap added to the Happy Meal menu thanks to Mumsnet

In June 2018, we were delighted to add a new item to the iconic Happy Meal menu following six months of collaboration and product development with Mumsnet, the UK's biggest parenting network.

Over 1,000 Mumsnet users were surveyed with nearly 8 in 10 (78%) wanting to see grilled chicken on the Happy Meal menu. This followed a discussion on the site in 2017 when parents said they would like to see greater choice on the Happy Meal menu, including the potential for a non-fried option. To make this a reality, we invited Mumsnet users to meet with our menu development chefs and to take part in focus groups and taste-testing sessions to perfect the grilled chicken wrap which is now available across all of our UK and Irish restaurants.

“The majority of Mumsnet users that we surveyed said they wanted grilled chicken and the opportunity give their children a range of choices in what they eat, and that's exactly what McDonald's has delivered. We're thrilled to see a new product on the McDonald's Happy Meal menu that Mumsnet users have played a fundamental role in developing.”

Carrie Longton
Co-Founder, Mumsnet

NUDGING CUSTOMER BEHAVIOUR

As well as improving the nutritional quality of our menu, we continue to lead the way in helping our customers make informed choices by working with experts to make healthier choices more prominent. Our multi-million pound investment in our new kiosks is a prime example of how we can help 'nudge' customer behaviour.

For example, simply by changing the ordering of drinks visible on our touchscreen kiosks, we've seen more people changing to Coke Zero over Coca Cola. We are also seeing more of our customers choose a salad as a side or main, buy more bottles of water over a sugary drink and have seen a significant increase in the number of Fruit Bags being sold in Happy Meals.

Since introducing our digital ordering screens in restaurants and reviewing how we present our menu to our customers, we've seen a 76% growth in salad purchases, 1.3m bottles of water purchased instead of a sugary drink and 1.4m growth in Fruit Bags bought with a Happy Meal.

We are keen to understand how we can do more and would welcome further conversations with the Mayor's team to understand how we might use these techniques to help Londoners to make good, informed food choices.



INFORMATION: BEING OPEN AND TRANSPARENT ABOUT OUR MENU AND INGREDIENTS

Nutritional information

McDonald's has been providing nutritional information for over 30 years and will always be transparent about our supply chain. We were the first restaurant company in the UK to display nutritional information on our menu boards

Today, nutritional information is clearly displayed across all channels. Under each item before people order on our digital screens in restaurants, as well as at home on our website and click & collect app.

In addition, we provide a wide range of information on our UK website, www.mcdonalds.com/gb/en-gb.html. This includes a 'Good to Know' section providing everything our customers might want to know about our food and a calorie calculator so that they can assess the calorie content of what they might choose to eat and drink.

As we continue to invest in technology across our business there will be further opportunities to ensure consumers have easy access to the information they need to make good food choices for themselves and their families. We would be happy to discuss opportunities and progress in this area in more detail.

Quality ingredients, sourced responsibly

We want our customers to be assured about what they are consuming and are always transparent about both our ingredients and the way we source them. The 'Good to Know' section on our website provides a range of information about where our food is sourced from.

We are a major supporter of the British and Irish beef industry. For example, in 2017, we sourced from over 23,000 British and Irish farmers, over 20,000 of which supply all of the beef we use in our UK and Ireland restaurants. We work closely with our suppliers and would be willing to consider sharing any additional information that might be beneficial to the Mayor's team.



A brief overview of the quality of some of our ingredients is included in the table below:

| INGREDIENT | SUMMARY |
|----------------|---|
| BEEF | <ul style="list-style-type: none">Our beef burgers are 100% beef, from whole cuts of forequarter or flank and all of the beef we use comes from farms accredited by a nationally recognised farm assurance scheme, Red Tractor. |
| PORK | <ul style="list-style-type: none">All the pork used across our entire menu is sourced from British, RSPCA Assured Scheme farms.In 2013, we became the first high street restaurant company that switched to using only RSPCA Assured pork across our entire UK menu.RSPCA Assured Schemes farm must have bright, airy environments, bedded pens and plenty of space for pigs to move around. |
| CHICKEN | <ul style="list-style-type: none">Chicken breast is the only chicken meat we use across our entire chicken range.Our suppliers have integrated supply chains to safeguard all aspects of our chicken farming standards including animal health and welfare. |
| EGGS | <ul style="list-style-type: none">All our eggs across our entire menu are free-range, are RSPCA assured and are sourced from British & Irish farms. This has been the case for the past 20 years.To date over half a million trees have been planted on ranges as part of the McDonald's range enrichment programme. |
| MILK | <ul style="list-style-type: none">All of our milk we use for our teas, coffees, porridge and Happy Meal milk bottles is sourced from UK farms and is organic semi-skimmed milk.In 2017, McDonald's achieved the Compassion in World Farming Good Cow Commendation for organic milk. |
| POTATO | <ul style="list-style-type: none">We use 100% British potatoes to make our famous French Fries.In 2017, all of the potatoes we used were sourced from British farms over 7,000 hectares of farmland was used to grow potatoes for our French Fries, Hash Browns and Potato Rosti. |
| OIL | <ul style="list-style-type: none">Our cooking oil is a blend of high oleic sunflower seed, sunflower seed, high oleic rapeseed and rapeseed oil.All of our high oleic rapeseed and all of our rapeseed was sourced from the UK during 2017.Our entire UK delivery fleet runs on biodiesel. 99% of our cooking oil is recycled and converted into biodiesel which is then used to help fuel our delivery fleet. This has saved over 6,900 tonnes of CO2e emissions against using ultra low sulphur diesel. |



REFORMULATION: WORKING HARD TO IMPROVE OUR INGREDIENTS WHERE POSSIBLE

We are proud of the work we have done and believe most people would be surprised at the progress we have made

We have worked hard over many years and invested significant resources in reformulating our menu and bringing new products to market. As a result of the nutrition strategy we have had in place for over 15 years, we have reformulated over 200 ingredients and invested heavily to broaden our menu so that we can offer a significant choice – whether you want a treat or an everyday item.

Our approach has resulted in:

- More than half of core food & drink menu being defined as non-HFSS (54%)
- 89% of our core food and drink menu now contains less than 500 kcals
- Supersize options were removed from the menu in 2004
- 72% of the Happy Meal menus are classified as not high in fat, salt or sugar according to the Government's nutrient profile model
- Since October 2015, 50% of the options on the drinks fountain have been no added sugar (Diet Coke, Coke Zero and Sprite Z)
- Recent years have seen the introduction of new items, offering more choice that has included porridge, salads, grilled chicken wraps, carrot bags, fruit bags including apple and grape, pineapple sticks, and melon chunks, as well as orange juice, mineral water and organic semi-skimmed milk
- Customers can swap fries for fruit bags, carrot bags or shake salad on the main menu, or the hash brown for a fruit bag or carrot bag on the breakfast menu, at no additional cost – we were the first high street restaurant to offer fruit bags and carrot bags.
- In 2014, McDonald's introduced "Free Fruit Fridays" resulting in 3.7 million portions of fruit being handed out. Discounted fruit is now available with every Happy Meal.
- In December 2017 we launched our new 'Meals Under' 400kcals and 600 kcals bundles in partnership with Public Health England's 'One You' campaign.

We have adopted a staged approach with some of our products now on their second and third phase of reformulation and we are actively considering what more we can do across our menu. However, it is of critical importance that reformulation is focused on the needs of the customer. Reformulating products that fail on taste, fail to help consumers make better choices. With advances in technology, ingredients and consumer opinion, in the last 15 years, a significant number of our products have undergone reformulation.

In addition, and as set out in this submission, we have gone a long way to ensuring our customers have the information they need to make the right choices for themselves and their families.



A DESIRE TO WORK WITH THE HEALTHIER CATERING COMMITMENT TEAM & CHILDHOOD OBESITY TASKFORCE

McDonald's awaits with interest the outcome of the review into the Healthier Catering Commitment. As it stands, we meet and exceed the initial criteria and would be keen to explore further how we can support this initiative as its ambition and scope grows.

Similarly, given our track record and the expertise, experience and data we and our suppliers could provide, we would welcome the opportunity to work with or as part of the London Childhood Obesity Taskforce.

As a responsible business, we share the goals and policy ambitions of the Mayor to reduce childhood obesity and believe our experience and expertise could significantly help.

OFFERING FREE DRINKING WATER

McDonald's welcomes the Mayor's efforts to make free drinking water widely available across the capital and to encourage Londoners to use reusable water bottles.

We are proud to have provided water to our customers on demand for many years, primarily in a courtesy cup. Following feedback from our crew and customers, earlier this year we issued new guidance to all restaurants in the UK and Ireland so that everyone understands that our customers may request tap water in a bottle of their own as long as it is clean and fits under our filtered water taps behind the counter.



Using our scale for good across the TFL estate

ADVERTISING & MARKETING

We understand the power of advertising and marketing to influence behaviour. This is why we have set the standards in our industry on how to responsibly deploy their skill – and also why we are keen to discuss how we can use our marketing skill to help the Mayor achieve his objectives.

We recognise that in London, and across the country, childhood obesity needs to be addressed. This is why we never market products classified as high in fat, salt or sugar to children in any media channel, at any time of the day. We are committed to ensuring that our marketing is always responsible as well as informative.

McDonald's takes its responsibilities extremely seriously and we are committed to ensuring our advertising and marketing is used as a positive influence to help our customers make informed choices about what they are consuming. We always go beyond the UK's stringent regulations on marketing to children and use our marketing to help families understand more about the range of food options we offer. For example, when advertising a Happy Meal, we only ever do so with items such as carrot bags, a fruit bag, milk or water to ensure we are not marketing HFSS food to children. We have done this voluntarily since 2007.

We also go beyond the industry standard of not advertising within 100m of schools by extending our own voluntary restriction to 200m. It is also worth noting that since the launch of McDelivery, we prohibit delivery to schools which is not the case for all food companies.

As referenced throughout our submission, McDonald's is keen to play an active part in supporting the Mayor's agenda and is ready to work in partnership with relevant officials and groups. As a consumer driven business, we invest heavily in understanding the lives of our customers, especially families, and the role that food and drink plays for them. We have already offered the use of our data confidentially to the London Childhood Obesity Taskforce and would be willing to work collaboratively with or as a member of the Taskforce.

However, we believe that there is more that we can do to promote good food choices in London and would be keen to discuss how we can use our brand and marketing skill to help Londoners' make even better choices.



McDONALD'S ADVERTISING

Taking a responsible approach to our advertising and marketing

At McDonald's, we take our responsibilities extremely seriously and are committed to ensuring our approach not only complies fully with the regulations, but also meets the expectations of our customers.

McDonald's has always held itself to a high account in the application of HFSS regulation. We have always applied CAP/BCAP rules across all media channels and self-regulated ahead of last year's harmonisation of the codes of practice to ensure we always avoid targeting under-16's online, in press and on radio. As a business we do not target children online with any advertising.

Our approach ensures:

- We ensure any marketing reaching children under 16 always includes fruit or vegetables and drinks with only naturally occurring or no added sugar
- We don't actively target u16's with any advertising online
- We index our radio, press and cinema to avoid targeting U16's
- We demo target digital and age gate advertising to avoid U16's
- We restrict our out-of-home advertising to avoid being within 200m of schools – double the industry standard
- We age gate our social media channels and the McDonald's app to 16+

We regularly review how our adverts are received and are committed to ensuring we meet the high standards expected of us.

RESTRICTING HFSS ADVERTISING TO CHILDREN

The consultation includes important proposals to reduce children's exposure to adverts for HFSS products.

We agree with this ambition and are already working to support this goal in the ways outlined above. McDonald's has invested significant resources in reformulating our menu and bringing new products to the market. The majority of our menu items (54%) are classified as non-HFSS and 89% of our core food and drink menu is under 500 calories. 72% of our Happy Meal menu is non-HFSS. We have made these changes to ensure our customers are able to make the right choices for themselves and their families – whether they want an 'everyday' meal, or a treat.

We stand ready to work with the Mayor and TFL to understand how we can draw on our marketing ability and scale to do more to drive good food choices.

Because we understand that not all businesses act to meet the same standards, we agree there should be regulation and welcome the fact that Britain already has some of the strongest regulations in the world.

However, regulating marketing in the wrong way risks exacerbating the prevalence of low-cost, unhealthy food across London. It would have the unintended consequence of reducing the visibility of choice and restricting the information customers need to make the right choices for themselves and their families.



In addition, restricting marketing in the wrong way will remove a key competitive lever and force business to consider changes to the price and quality of their food as the only remaining differentiators in the market. This is not something McDonald's would consider but others might.

The underlying risk is of inadvertently increasing the obesogenic environment. The focus therefore should be on regulating marketing in a way which increases information, nudges consumers towards good food choices and encourages reformulation.

As a result, we would welcome clarification about how the Mayor proposes to define a 'junk food' brand. At the same time, we would like to offer our support in developing an evidence base which will help inform policy to fundamentally address the drivers of childhood obesity and ensure its decline.

A SUGGESTED APPROACH TO EFFECTIVE MARKETING REGULATION

In order to ensure regulation is effective and consistent across all channels, we would strongly encourage the Mayor of London to adopt the Advertising Standards Authority (ASA) definition and guidance when identifying brand advertising that has an effect on promoting an HFSS product.

We believe this approach has already demonstrated its effectiveness in helping to increase information, nudge consumers towards good food choices and encourage reformulation.

The ASA's guidance is clear when it comes to company branding in relation to HFSS advertising, stating:

*"Company brands usually have broader identities than being synonymous with individual products. However, they are often **"synonymous with"** a range or ranges of products they manufacture or sell. If the range or ranges are mainly HFSS, the guidance allows for the advertiser to demonstrate to the ASA that they have sufficient identity beyond the provision of HFSS products; for example, by demonstrating a very close association with the provision of non-HFSS products or goods and services other than food and soft drink."*

<https://www.asa.org.uk/news/updated-hfss-brand-guidance-for-broadcast.html>

In addition, the ASA provides clear guidance on identifying brand advertising that has the effect of promoting an HFSS product. The ASA's guidance states:

"In assessing whether the brand is synonymous with an identity other than the provision of HFSS products, the ASA will take account of factors such as, the provision of non-HFSS products; provision of goods and services other than food and soft drink products; or association with significant initiatives relating to education, sport, community etc."

<https://www.asa.org.uk/resource/hfss-product-ads-and-brand-ads-identification.html>



Further details about the ASA's guidance can be found on their website and by following the links below:

- HFSS overview
<https://www.asa.org.uk/advice-online/food-hfss-overview.html>
- HFSS Product and Brand advertising
<https://www.asa.org.uk/advice-online/food-hfss-product-and-brand-advertising.html>
- HFSS media placement
<https://www.asa.org.uk/advice-online/food-hfss-media-placement.html>
- Guidance on identifying brand advertising that has the effect of promoting an HFSS product
<https://www.asa.org.uk/resource/hfss-product-ads-and-brand-ads-identification.html>
- Updated HFSS brand guidance for broadcast
<https://www.asa.org.uk/news/updated-hfss-brand-guidance-for-broadcast.html>

UTILISING THE POWER OF THE BRAND TO HELP LONDONERS MAKE BETTER INFORMED CHOICES

As outlined above, McDonald's has a clear strategy founded on information, choice and reformulation. Our advertising and marketing plays a critical role in how we can give customers the information they need to make informed choices as well as reassuring them about the quality of our ingredients and where they are sourced from.

For example, our 'Good to Know' advertising campaign is focused solely on addressing myths about the quality of our food. Further details about our ingredients are included on page 6 above and are the basis on which such campaigns are based on. The 'Good to Know' section on our website is also a valuable tool for anybody wanting to know more about how we source our produce.

Consequently, we are concerned about the impact of restricting a brand's ability to advertise. We would welcome the opportunity to discuss with the Mayor and TFL how we can use our advertising across the TFL estate to help Londoners make better informed choices about what they eat and drink.

On the specific issue of directional advertising, the business and our franchisees use this method to help tourists and visitors in London to understand where our restaurants are located.

As part of our efforts to help inform customers, we would be interested in discussing how we might use our current directional advertising portfolio to encourage Londoners to eat a balanced diet as well as using this space to promote our non-HFSS products and 'Meals Under' 400 and 600 calorie bundles. In particular, we would be very interested in understanding in detail the Mayor's particular objections and concerns to the use of directional advertising so that we can consider how we best address them.



POTENTIAL UNINTENDED CONSEQUENCES OF RESTRICTING FOOD AND DRINK ADVERTISING ACROSS THE TFL ESTATE

We are concerned that one of the unintended consequences of such a policy would be that not all brands and/or services are captured if a “junk food brand” is not clearly defined. For example, would delivery platforms be classified as a junk food brand? Similarly, would a supermarket, high street restaurant or even corner shop be classified as a junk food brand on the basis that they too provide a range of HFSS products?

By restricting a brand's ability to advertise responsibly, you may inadvertently direct and encourage Londoners towards establishments that provide little to no nutritional information and lack a ‘healthier’ range of choices.

We would like to work with the Mayor and his team to help understand the right way of driving change to help tackle childhood obesity by ensuring that our advertising and marketing helps to increase information and transparency, nudges customers towards good food choices, drives reformulation and widens menu choice. We absolutely support the desired outcomes and would welcome the opportunity to discuss the method in which they can be achieved. We strongly believe that using the power of advertising and marketing can be one of the solutions.



4. GOOD FOOD FOR MATERNITY, EARLY YEARS, EDUCATION & HEALTH

WELCOMING THE LONDON CHILDHOOD OBESITY TASK FORCE

We support the Mayor's decision to convene a Childhood Obesity Task Force for London and would welcome the opportunity to work with or as part of the Task Force.

As a consumer driven business, we invest heavily in understanding the lives of our customers and the role that food and drink plays for them. We would be delighted to support the work of the Task Force and would be happy to, confidentially, share some of our consumer research and consider where further investment would be helpful. We have a common goal in common goal in improving the health and wellbeing of the next generation and want to work in partnership with the Mayor in understanding the complex factors. We would certainly welcome and support any further proposals for a London wide study of the causes of obesity.

We have contacted the recently appointed Chair, Paul Lindley, to discuss this further and look forward to meeting with him and his team in due course.

SCHOOL PROXIMITY PLANNING POLICY

The Mayor is right to identify that childhood obesity is a complex issue that requires dedicated resource so that we can all better understand these issues in more depth. Most importantly, this will help address the underlying problems. That is why we support the creation of the Childhood Obesity Task Force and would welcome the opportunity to work together.

As set out in our response to the draft London Plan, we are concerned about the Mayor's, and other public authorities, rush to implement a 400m school proximity restriction. While well-intentioned, we believe it to be a sweeping policy that is imprecise, unproven and one that could potentially be having perverse impacts.

It is clearly aimed at less responsible businesses than McDonald's – those which pay little regard to promoting healthy or more balanced options – but it would still capture our restaurants as well. This would then reduce the positive impacts McDonald's brings to local communities – jobs and career development, vibrant high streets and community investment – and act as a disincentive to other A5 premises adopting healthier menu options.

We also believe that this policy is currently unproven and the Mayor should not rush to adopt a London-wide school proximity policy before its impacts have been fully investigated.

A review of publicly available public health data shows that, where they have been introduced, school proximity policies have not delivered noticeable improvements to childhood obesity rates.

For example, looking at Public Health England data for the London Borough of Waltham Forest (which was one of the first to introduce a proximity policy in 2008), there has been no discernible impact on childhood obesity rates – with these actually worsening in recent years. There is a risk that the policy is actually having unintended consequences – pushing young people to buy more sugary snacks from supermarkets as opposed to from takeaways. We believe this warrants investigating and are keen to partner with a number of local authorities to fund a study into young people's snack choices and to determine the best measures to effectively intervene to reduce childhood obesity.



We also recognise that part of the original intent behind the policy was to reduce the number of hot food takeaway premises in urban and suburban centres. We believe this is too sweeping. Unlike many other A5 premises, McDonald's is a major local employer and one of the few global businesses that continues to anchor itself in urban and suburban town centres. We take our responsibilities to litter, anti-social behaviour, noise and hygiene very seriously and believe our presence on a high street contributes to the vibrancy and vitality of London's town centres.

Ultimately school proximity policies duck the big challenge and just try to push perceived problem restaurants away from schools. The more challenging – but ultimately more effective – goal should be to improve those examples of bad takeaways by helping them to promote healthier options and explore reformulation to reduce unwanted salt and sugar. Nobody has been as successful at this as McDonald's and we would be delighted to share our experiences to help other takeaways achieve our standards.

Consequently, McDonald's would welcome and support proposals for a London wide study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response.

Our full submission to the draft London Plan contains greater detail about our concerns in relation to this particular policy. It also includes how we would propose moving forward including how the criteria might be widened to ensure appropriate consideration is given to a broader range of areas including:

- a) The range of food and drink options on offer, including the nutritional content of the food;
- b) The extent of nutritional information made available to potential customers;
- c) The food provenance, quality and cooking methods used;
- d) The extent to which the proposals supports healthy living;
- e) The content and likely effect of any measures proposed to mitigate health impacts or otherwise support healthy living; and
- f) Any other impacts of the proposals which may have an effect on health and wellbeing, including

WORKING TO PROMOTE THE HEALTHIER CATERING COMMITMENT

We are actively considering how we can support the Healthier Catering Commitment. As it stands, we meet and exceed all of the mandatory requirements in order to sign-up.

However, we understand that the commitment is currently under review with a second tier soon to be introduced to help encourage larger businesses, including our own, to go further in promoting healthier options.

We await with interest further details about the requirements of "Tier 2". Following initial discussions with officials responsible for the commitment, we are hopeful that we will be able to work together in future and look forward to discussion how we might get involved in due course.



6. GOOD FOOD FOR THE ENVIRONMENT

REDUCING AND RECYCLING OUR FOOD WASTE

McDonald's wants the best for the environment and we are constantly challenging ourselves to find ways in which we can use our scale and our people, to influence and drive change. By rethinking, reducing and recycling, we're minimising the impact we have on the environment.

This is particularly the case when it comes to thinking about how we reduce and reuse our food waste. In the UK, food waste from our restaurants is taken to an anaerobic digestion plant which makes renewable energy. Microorganisms break down the food, turning it into bio-fertilizer for farmers, and biogas for the national grid and dairy businesses, where heat is used to pasteurize the milk and power the packing lines. In 2017, we collected 1149 tonnes of food waste, including egg shells and coffee grounds, from our kitchens and sent to anaerobic digestion.

We have also worked closely with our delivery partners to ensure that we minimise waste. For example, our entire UK delivery fleet runs on biodiesel with almost half of that biodiesel coming from our used cooking oil. We collected over 3.8 million litres of used cooking oil in 2017 and this converted to 3.4 million litres of biodiesel. This biodiesel represents 10.72 million km's of deliveries (approximately 40% of all deliveries) and saved approximately 6,912 tonnes of CO2e emissions per year against using ultra low sulphur diesel.

RETIMING OUR FOOD DELIVERIES TO SUPPORT A MORE EFFICIENT FOOD TRANSPORT NETWORK

As part of our ongoing efforts to be smarter with our deliveries, we're extremely proud of our award winning delivery partners, Martin Brower. With their help, the trucks that deliver our food and packaging also take away our used cooking oil, cardboard and kitchen food waste. It makes sense and saves us 5,000 trips a year in total.

In London, Martin Brower has worked closely with Transport for London (TFL) as part of their work to reduce deliveries and to help congestion enhance air quality in London. Martin Brower has been praised by TFL for being able to retime 1,000 deliveries per year to six central London McDonald's sites including Leicester Square.



Responding to the consultation questions

The six priority areas set out in the draft London Food Strategy:

1. Good food at home
2. Good food shopping and eating out
3. Good food in public institutions and community settings
4. Good food for maternity, early years, education and health
5. Good food growing, community gardens and urban farming
6. Good food for the environment

Consultation response

| Question | McDonald's response |
|--|---|
| Are the six priority areas (set out above) the right ones? | Yes, we do believe the six priority areas are the right ones. We believe they should be measured moving forward so that we can understand the full impact of each. |
| Are there other priorities that should be considered? | At this stage no. However, we would welcome and support any further proposals for a London wide study of the causes of obesity. This would perhaps best be directed through the Childhood Obesity Task Force for London and we would be willing to discuss how we might support this in more detail with the recently appointed chair, Paul Lindley. We would also encourage there to be alignment with the Government's recently published Chapter II of the Childhood Obesity Strategy. |
| Are the most effective actions the Mayor, external stakeholders and individuals can take set out? | <p>McDonald's shares many of the policy aspirations of the Mayor. We strongly believe that our scale can help make a positive impact on a range of London-wide issues, but particularly in relation to the health and wellbeing of Londoners.</p> <p>We would welcome the opportunity to discuss what greater role we can play in areas such as the Childhood Obesity Task Force for London and the Healthier Catering Commitment.</p> <p>On the specific issue of directional advertising, the business and our franchisees use this method to help tourists and visitors in London to understand where our restaurants are located. What's more, the vast majority of our directional advertising is in Central London. As part of our efforts to help inform customers, we would be interested in discussing how we might use our current directional advertising portfolio to encourage Londoners to eat a balanced diet as well as using this space to promote our non-HFSS products and 'Meals Under' 400 and 600 calorie bundles. In particular, we would be very interested in understanding in detail the Mayor's particular objections and concerns to the use of directional advertising so that we can consider how we best address them.</p> <p>What's more, in order to ensure regulation is consistent across all advertising and marketing channels, we would strongly encourage the Mayor of London to adopt the Advertising Standards Authority (ASA) definition and guidance when identifying brand advertising that has an effect on promoting an HFSS product.</p> <p>We would be keen to work with the Mayor and his officials as well as TFL to identify some practical solutions that everyone can support.</p> |



| | |
|--|---|
| Are there other actions that should be included? | <p>We believe that further actions should only be considered on the basis of evidence. As such, we would support any proposals for a London wide study of the causes of obesity. As part of this, if the Mayor is using Amsterdam as the model, it is important that the relative impact of the various measures introduced there are fully understood and are measured individually.</p> |
| Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | <p>McDonald's welcomes the Mayor's bold ambition to tackle childhood obesity. We share this goal, and we are keen to work in partnership with the Mayor, the GLA and London councils to ensure the capital meets it. A business of our scale and breadth has a responsibility to use its reach for good and we are uniquely placed to drive good food choices in London.</p> <p>The consultation includes important proposals to reduce children's exposure to adverts for HFSS products and we are already working to support this goal. For example, we don't advertise within 200m of any school, we don't deliver to schools, we do not target children online with any advertising and we have always applied the CAP/BCAP rules across all media channels and voluntarily go further.</p> <p>McDonald's has invested significant resources in reformulating our menu and bringing new products to the market. The reality is that the majority of our menu items (54%) are classified as non-HFSS and 89% of our core food and drink menu is under 500 calories. We would therefore welcome clarification on how the Mayor proposes defining a "junk food brand" and brand advertising that has the effect of promoting an HFSS product.</p> <p>We would like to work with the Mayor and TFL to understand how we can draw on our marketing ability and scale to do more to drive good food choices. As we consider what more we might be able to do, we would welcome the opportunity to explore what more we can do in partnership.</p> <p>In essence, we understand the need for regulation and welcome the fact that Britain has some of the strongest regulations in the world. We appreciate that not all businesses behave like McDonald's or have the stringent processes in place as we do.</p> <p>However, regulating marketing to address the prevalence of low-cost, unhealthy food across London will not change this. In fact, only regulating marketing would have the unintended consequence of reducing the visibility of choice and restricting the information customers need to make the right choices for themselves and their families.</p> <p>In addition, restricting marketing in the wrong way will remove a key competitive lever and force business to consider changes to the price and quality of their food as the only remaining differentiators in the market. While McDonald's would never do this, there is the potential that others would consider this.</p> <p>The underlying risk is of inadvertently increasing the obesogenic environment. The focus therefore should be on regulating marketing in a way which increases information and transparency, nudges consumers towards good food choices and encourages reformulation.</p> |



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| | <p>As it stands, we do not agree with the initial proposal but would like to discuss with the Mayor what we can do in partnership to help meet the goals set out in the draft London Food Strategy.</p> |
| <p>What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?</p> | <p>At McDonald's we believe that customers are in control of what and when they choose to eat. When it comes to our food, our purpose is make it easier for customers to balance taste, health and value. Our customers are at the heart of every choice we make. They are increasingly health conscious and thoughtful about what they, and their families, eat. That is why we have continuously invested in improving our ingredients and enhancing our menu to help them and will continue to do so.</p> <p>McDonald's has a shared ambition to provide good food in the capital and an important role to play in supporting good food in London. With 183 restaurants in London, we do this through a variety of ways, primarily through the quality of our ingredients but also by working and supporting the work of other organisations where appropriate.</p> <p>We have a strong track record and have had a nutrition and reformulation strategy in place for over 15 years. Our strategy is founded on three core principles: choice, information and reformulation.</p> <p>In essence, our wide ranging menu is designed to suit what our customers want, whatever it is they are looking for. We are committed to helping them make an informed choice about what they eat and drink.</p> <p>Our ultimate goal however is to make it easier for people to balance taste, health and value. We have worked hard to earn the trust of our customers by providing great tasting, freshly prepared, quality food at an affordable price. Our work includes:</p> <p>Choice</p> <ul style="list-style-type: none">▪ Providing a variety of options from hamburgers and salads that customers can customise and swap products such as fries and hash browns for side salads and fruit bags▪ Launching our 'Meals Under' 400 and 600 calorie bundles in partnership with Public Health England's (PHE) 'One You' campaign <p>Information</p> <ul style="list-style-type: none">▪ Providing nutritional information across all available channels including on our new self-ordering kiosks and, most importantly, at the point of purchase▪ We want our customers to be assured about what they are consuming and are always transparent about both our ingredients and where they are sourced from and we strive to achieve quality. The 'Good to Know' section on our website provides a range of information about our ingredients and where our food is sourced from.▪ Providing access to a 'Calorie Calculator' on our UK corporate website▪ Making healthier choices more prominent across all available channels and especially through our new self-ordering kiosks. Since introducing our digital ordering screens in restaurants and reviewing how we present our menu to our customers, we've seen a 76% growth in salad purchases, 1.3m bottles of water purchased. |



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| | <p>Reformulation</p> <p>We have worked hard over many years and invested significant resources in reformulating our menu and bringing new products to market. As a result of the nutrition strategy we have had in place for over 15 years, our approach has resulted in:</p> <ul style="list-style-type: none">▪ More than half of core food & drink menu being defined as non-HFSS (54%)▪ 89% of our core food and drink menu now contains less than 500 kcals▪ Supersize options were removed from the menu in 2004▪ 72% of the Happy Meal menus are classified as not high in fat, salt or sugar according to the Government's nutrient profile model▪ Since October 2015, 50% of the options on the drinks fountain have been no added sugar (Diet Coke, Coke Zero and Sprite Z)▪ Recent years have seen the introduction of new items, offering more choice that has included porridge, salads, grilled chicken wraps, carrot bags, fruit bags including apple and grape, pineapple sticks, and melon chunks, as well as orange juice, mineral water and organic semi-skimmed milk▪ Customers can swap fries for fruit bags, carrot bags or shake salad on the main menu, or the hash brown for a fruit bag or carrot bags on the breakfast menu, at no additional cost – we were the first high street restaurant to offer fruit bags and carrot bags.▪ In 2014, McDonald's introduced "Free Fruit Fridays" resulting in 3.7 million portions of fruit being handed out. Discounted fruit is now available with every Happy Meal.▪ In December 2017 we launched our new 'Meals Under' 400kcals and 600 kcals bundles in partnership with Public Health England's 'One You' campaign. |
| <p>How could you or your organisation support the Mayor to achieve good food for London and support the final strategy?</p> | <p>McDonald's has played a proud part in London's history since 1974 when we opened our first UK restaurant in Woolwich, and our UK headquarters in Hampstead in the same year (relocating to Finchley in 1978). Nearly half a century later there are 183 McDonald's restaurants in London, directly employing over 15,000 people, and contributing £540 million in revenue to the city's economy.</p> <p>As the city has grown and changed, so have we. Our continued growth and success in the UK is inextricably linked to London's. Our longevity as a London business means we share many of the policy aspirations of the Mayor and our scale can help make a positive impact on a range of London-wide issues, from access to sport to waste reduction.</p> <p>In relation to the draft London Food Strategy, we believe we can support the Mayor by:</p> <ol style="list-style-type: none">1. Supporting (both financially and through offering our expertise) any proposals for a London wide study of the causes of obesity2. Working directly with and/or as part of the Childhood Obesity Task Force for London including sharing, confidentially, some of consumer research3. Considering how we can support and sign-up to the Healthier Catering Commitment once further details about "Tier 2" have been published4. Working with the Mayor to assess how we might use our existing directional advertising space to help promote health and wellbeing5. To reassert our commitment to information, choice and reformulation |

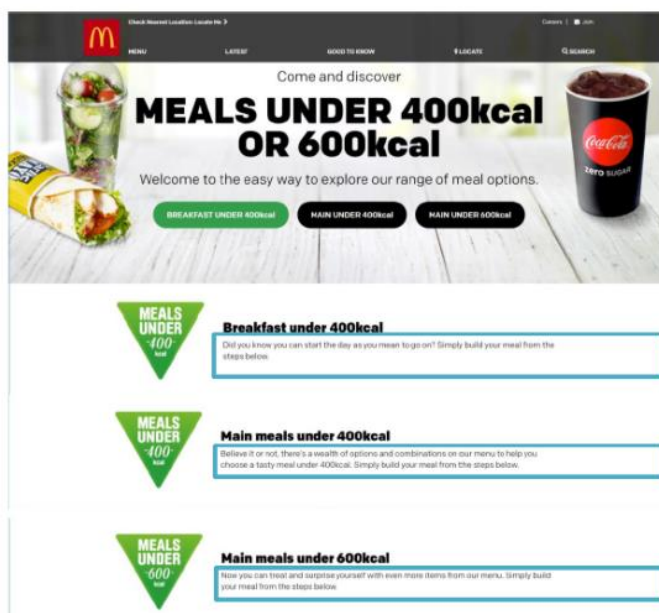


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| Is the strategy inclusive and does it consider the needs and priorities of all Londoners? | McDonald's welcomes the publication of the draft London Food Strategy and share many of the policy aspirations of the Mayor. We strongly believe that by working with us, the Mayor would be working alongside a company that proudly employs and serves Londoners from all backgrounds, age groups and across the whole capital. We look forward to working in partnership with the Mayor and his team moving forward. |
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Appendix

Appendix I: Meals Under 400 and 600 calorie bundle images





Appendix II: Supporting Community Football across London

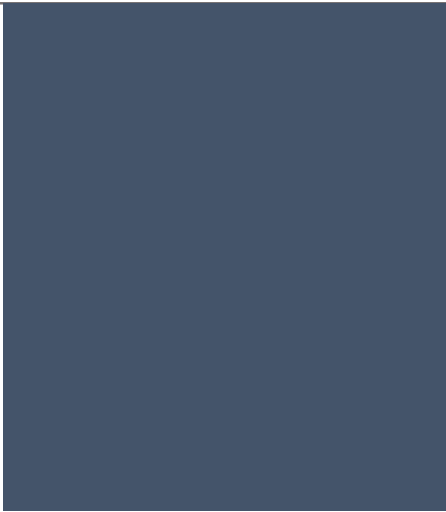
Over the past 15 years, McDonald's has been proud partners with the four UK football associations: The English Football Association; The Scottish Football Association; The Football Association of Wales; and The Irish Football Association.

This partnership has seen us support over one million players and volunteers.

In London since 2014, more than 1,000 people have attended our Community Football Days and we have distributed 3,328 kits to accredited teams in the Capital. Of the 171 McDonald's restaurants within the M25, approximately 88 are twinned and actively supporting a local football club.

We do this work because increasing standards will ultimately create a better experience for young footballers, leading to increased participation and retention of children and young people in sport.

Our Community Football programme helps to increase participation at all levels. We remain absolutely committed to it and are in the final stages of planning our programme for future years.



A response to the draft London Food Strategy

by Kentucky Fried Chicken
(Great Britain) Limited

5 July 2018

Contents

| | |
|---|----|
| Letter from Paula Mackenzie | 2 |
| Executive summary | 3 |
| Our responsibility and commitment to a healthy food environment in London | 3 |
| Alternative proposals to an advertising ban on TfL sites..... | 3 |
| Current Practices..... | 4 |
| New commitments..... | 4 |
| Introduction | 5 |
| Unintended consequences of advertising restrictions on TfL | 6 |
| Some alternative measures to the proposed advertising ban..... | 7 |
| KFC is a responsible advertiser | 7 |
| KFC as a responsible operator - Our response to the broader draft London Food Strategy..... | 10 |
| Eat well at home | 10 |
| Good food shopping and eating out – A healthier environment..... | 10 |
| Nutrition Promise..... | 10 |
| Healthy Catering Commitment | 11 |
| Food for everyone..... | 12 |
| Good food for maternity, early years, education and health – Supporting healthier habits..... | 12 |
| A5 licenses and schools..... | 13 |
| Good food for the environment – making the food system work better..... | 14 |
| Keeping in touch | 16 |
| Annex: Advertising mock ups..... | 17 |

5 July 2018

Letter from [REDACTED]

5 July 2018

Dear Mayor,

This submission covers our response to elements of the Draft London Food Strategy which impacts our sector and our business specifically. However, I wanted to say a few personal words at the start of this document. [REDACTED]

[REDACTED] as well as something that we care about passionately as a business.

Firstly: London matters to KFC. We have 197 restaurants, across 17 franchisees, and employ more than 5,000 people here. We've been part of this great city for 50 years, having opened our first London KFC in Wimbledon in 1968. We want to continue to be part of this city's economic success and development, and part of the lives of Londoners.

But that doesn't mean that we should ignore our very real responsibility to work with City Hall, our colleagues and competitors in the food business, schools and local communities to find a way to successfully tackle the food issues that London is facing.

That is why we are proposing to work with you to be part of a holistic approach, and we are willing to put forward both our time to discuss these issues with you and our resources to help make this work. We are also working towards a 20% reduction in calories per serving by 2025. This all forms part of a range of commitments we outline in this document.

Finally, I am aware that we are not perfect. But what critics often do not see is the positive impact that KFC has in the communities it operates in. What I am proudest of is how we train and develop young people. Put simply, this is something we excel at. From our apprenticeships to our degree programme, we provide a route to further and higher education for those who haven't necessarily taken the academic route via school. Particularly for those for whom university is not an option financially. We have restaurant managers in their mid-twenties who started as team members, who are running restaurants with a million-pound turnover and 50 employees. We teach hard work, grit, team work, and leadership skills. Whether people stay for a long career with us, or move on to other employment, we always want them to leave with more skills, and more confidence, than when they joined.

From the local economic boost that comes from a new restaurant, to the local charities that are supported through the food we donate, from the jobs we create, to the vibrancy we contribute to, there is a raft of positive things that KFC brings to a community.

We want to keep making that contribution to London, growing in the right way, in the right places, and being part of London's food culture. We would welcome a meeting with you and your team to discuss our ideas and suggestions.

Yours sincerely,

[REDACTED]
General Manager, Kentucky Fried Chicken (Great Britain) Limited

Executive summary

Our responsibility and commitment to a healthy food environment in London

- KFC are committed to a bold calorie reduction program to reduce the number of calories per serving by 20% by 2025.
- KFC are committed to responsible advertising. We do not and will never target children in any advertising.
- KFC is a signatory of Courtauld 2025, a voluntary commitment to increase the sustainability of our food and packaging and reduce waste by 20% by 2025.
- The hot food industry and KFC can offer a positive economic contribution to communities through job creation, training and development opportunities and investment.
- KFC engages with social issues associated with poverty and a lack of nutritious meals for the most vulnerable. We aim to have donated over 500,000 meals by the end of 2018.
- KFC are proud to have signed the Keep Britain Tidy Litter Prevention Commitment, being one of the first organisations in the UK to sign and commit.

Alternative proposals to an advertising ban on TfL sites

As an alternative to a ban on advertising of certain foods and brands on TfL sites we have five suggestions that could have a greater impact on tackling the issues associated with obesity in London through marketing and advertising, without TfL losing advertising revenue.

If one or a combination of these proposals were to be adopted across the industry they could contribute to the delivery of the objectives of the London Food Strategy. These are proposed for implementation on TfL sites with a view to review in partnership with the Mayor of London and consider roll out across all advertising in London:

1. Healthy meal accompaniment alternatives to be shown (for example showing a portion of fruit or vegetable instead of fries in a meal).
2. Limiting or banning any advertising that targets children.
3. Using language on advertising to educate and inform consumers about healthy eating and/or balanced choice
4. Quote the calories or calories per serving of the meal shown in advertising.
5. Setting up a "Schools Pact", developed in partnership, to promoted healthier choices for children.

Current Practices

KFC are committed to continuing the policies and practices listed below. If these practices were adopted across the industry they could contribute to the delivery of the objectives of the London Food Strategy:

Children

1. Never targeting children with any advertising.
2. Never designing advertising campaigns to be appealing to children.
3. Never advertising a children's meal outside of restaurant across any channel.
4. Never creating "pester power" through the inclusion of toys or marketing links within any children's meal.
5. Always showing a gatekeeper within any advertising that includes children.

Nutrition

6. Never adding salt to our fries in restaurant, sachets are provided for customer choice.
7. Always having an under 600 kcal offer available on menu.
8. Always ensuring nutritional information is visible at point of order in restaurant.
9. Always having balanced choice available in meal options (e.g. vegetables as an alternative to fries, water as an alternative to soft drinks)

New commitments

KFC commit to achieving the following forward looking policies, practices and ambitions. If these practices were adopted across the industry they could contribute to the delivery of the objectives of the London Food Strategy:

1. Never including cartoon characters on meals created for children (2018)
2. Never launching higher calorie carbonated soft drinks. All new carbonated soft drinks will be low or zero calorie (2018)
3. Never advertising within 200m of a School (2019)
4. Signing up to the Healthy Catering Commitment (pending review of anticipated update)
5. Reducing average calories per serving by 20% (2025)

5 July 2018

Introduction

This document is KFC UKI's response to the draft London Food Strategy. We have first addressed the proposed ban on HFSS advertising on the TfL estate. We do not believe that it is simply a case of prohibiting the appearance of certain food items in advertising or not and that a detailed discussion of your aims and how to put them into action could identify some alternative measures which use the power of advertising for good, to effect real change in consumer behaviour and improve the health of Londoners. Secondly, we have addressed some of the broader aspects of the draft London Food Strategy and described how our business has successfully met some of the challenges that the Strategy identifies. We would be delighted to contribute to the debate on London's food and would welcome a meeting with you to discuss these issues further.

We have also responded to the recent draft London Plan where it addresses the issue of hot food takeaways and schools. A summary of our views on that topic is also included in the document below.

Unintended consequences of advertising restrictions on TfL

The proposed ban could have some unintended consequences.

Funds to support London's transport network would be lost

One of the reasons that KFC buys advertising space on public estates such as TfL is that the funds raised are ploughed back into infrastructure and services that support our local communities. Since 2015, [REDACTED]

Some surprising food items would be banned and some would still be allowed

Despite what consumers might expect, under the current proposals, some food items with calorie counts that exceed Public Health England's recommendations could still be allowed. While some food items that would appear to be 'healthy' would be banned. The HFSS points system is complex and can give some surprising results when defining healthy and unhealthy food. We would be happy to talk you through some specific example in more detail. There could also be an opportunity to distinguish between meals and single food items and main meal items and snacks/discretionary calories.

An opportunity to show Londoner's how to eat more healthily would be lost

Advertisers leaving TfL would not be engaging with the spirit of this initiative, to create healthier advertising in London. Alternative measures could use the power of advertising for good and effect behaviour change amongst consumers. This opportunity would be lost.

The power of technology would not be harnessed

When the Elizabeth Line launches at the end of this year, it will be the first fully digital advertising space on the TfL network. The flexibility of this technology could be harnessed to support healthy eating and, as above, should not be a lost opportunity.

Some alternative measures to the proposed advertising ban

In this section, we aim to show how some alternative measures could be more effective than the current proposals in making London's food environment healthier. Advertisers leaving TfL would not be engaging with the spirit of this initiative, to create healthier advertising in London. Alternative measures could use the power of advertising for good and effect behaviour change amongst consumers. We do not want this opportunity to be lost.

KFC is a responsible advertiser

Firstly, we have long recognised the importance of responsible advertising and the impact it can have on the food choices children make. Our proposals for alternative measures are made in this context.

We do not and never will target children in our advertising, no matter the product or the media channel. We do not seek to generate pester potential in our products and therefore do not include toys in our children's meals and will be removing any cartoon characters/images from children's meal packaging this year.

We have therefore already delivered on the following:

- KFC have a policy of not purchasing advertising space within 100m of a school
- In accordance with OFCOM HFSS restrictions we do not place ads in programming with a high proportion of children viewing. We adhere to regulations regarding cinema advertising and do not appear in any film where 25%+ of the audience is under 16. When delivering digital display advertising and native digital content in digital we apply a 16+ filter to ensure we only reach an audience over 16 years of age.
- Whilst we are keen to appeal to as wide a customer segment as possible, we do appreciate that our products need to be eaten as part of a wider balanced diet. To support this, we do not advertise directly to children through any media. We do offer a children's meal which is nutritionally balanced to offer an option for families with younger children who eat with us.
- We will never show a child without a gatekeeper present.
- We do not offer toys or marketing links in any children's meal so as not to drive pester power and we do not externally advertise these products.
- We do not develop advertising campaigns which appeal to children. For example advertising containing simple or slapstick humour or cartoon characters.

As part of our promise to continuously review and update our advertising practices we are committed to the following:

- Extending the radius of the out of home advertising restriction surrounding schools from 100m to 200m (2019).
- Removing all cartoon characters/images from children's meals packaging (2018).

5 July 2018

We recognise the impact advertising can have on the food choices that people in London make and are committed to a high standard of responsible advertising practices. We understand that there are opportunities for the industry to go further in this field and would therefore propose the following as alternatives to a ban of advertising HFSS products and HFSS brands on TfL sites:

1: All food and hospitality brands that advertise on TfL sites to be a signatory to a Healthy Catering Commitment (HCC) for London restaurants.

KFC would be willing to continue working with HCC to bring best practices to improve the standards across the industry, especially in our expertise in oil management.

2: Healthy alternatives to be shown on TfL sites (for example showing a portion of fruit or vegetable instead of fries in a meal).

KFC would be willing to launch a series of tests to measure the effectiveness of healthier alternatives in advertising and share these results with stakeholders and the wider industry. (See appendix 1)

3: Banning any advertising that targets children on TfL sites in London.

KFC are committed to never targeting children in advertising and would be willing to share any relevant insight to support the industry in delivering this commitment

4: Using language on TfL advertising to educate and inform consumers about healthy eating and/or balanced choice

KFC would be willing to take a leadership position within the industry in creating impactful messaging on advertising to inform consumers about healthy eating or direct them to existing educational material (e.g. Change4Life). It may also be necessary to create new educational material specific to the Quick Service Restaurant industry.

5: All TfL advertising to specifically quote the calories or calories per serving of the meal shown.

KFC are already committed to nutritional transparency in restaurants and online to allow customers to make informed choices. Extending this to out of home advertising on TfL sites would create an opportunity to inform and educate customers.

7: School Pact

As part of this we would like to propose working with you, local schools and communities to devise and test a 'schools' pact', such that for every new KFC opening near a school within the M25, a range of health supportive measures are adopted. This is something that we could investigate and develop in partnership with you, and then test in London boroughs, with the idea that the successful model could be applied to the wider food on-the-go sector. Such measures could include:

5 July 2018

- Revised advertising policies for within the store and local community
- Specific nutritional commitments with regards to products available in those restaurants to children and at certain times of day
- Community projects to encourage physical activity (for example funding the set-up of Daily Mile tracks in school playgrounds)
- Working with local schools on policies around serving children in uniform

KFC as a responsible operator - Our response to the broader draft London Food Strategy

Eat well at home

We recognise the importance of the issues surrounding eating well at home and the contribution that poverty and inequality has to this issue. We believe that KFC and the hot food takeaway industry can bring a positive impact to the local communities because of the employment, training and wider economic benefits that we bring.

The hot food takeaway sector is a key employer of young people. For example, at KFC we (including our franchisee partners) employ over 5,000 people across London, around 65% of which are young adults. We offer flexible working patterns and provide training and development opportunities that are valuable to our employee's futures, including apprenticeship programmes and even a business management degree.

In London we currently have 31 apprentices (Level 2 and Level 3 apprenticeships). We also have seven students working in our business and earning a Business Management degree at De Montfort University. We have employees who have completed the degree programme who are taking huge roles in some of our franchisees. They have all worked in London during their education and have grown their careers as a result.

We were certified as Britain's top employer in 2012, 2013, 2014, 2015 & 2016 becoming the first company to win the award for five consecutive years running.

We typically open 10 new restaurants in London each year, equating to investment of approximately £5-10m, creating over 300 additional jobs at KFC and 300 tradesperson jobs. Many hot food takeaways are independent or run by local franchisees and so support a thriving and diverse environment for local businesses, for example, c. 90% of our 910 restaurants are owned by independent business owners.

We recognise our responsibility to drive positive impacts in the communities that we are proud to be a part of. To that end, in May 2014, we created our Food Donation Scheme to donate unsold chicken from our restaurants to local charities. Our first trial store was in Brixton and this is now live in over 500 restaurants in the UK and Ireland. We have donated over 170,000 meals to date with a bold goal to donate over 500,000 by the end of this year.

Good food shopping and eating out – A healthier environment

Nutrition Promise

As part of KFC's commitment to taking proactive measures towards improving nutrition, we have delivered on the following:

- We were the first in our sector to sign up to the Department of Health (DoH) Responsibility Deal on kcals in 2011

5 July 2018

- Healthier choices including <500 calorie salad and <500 calorie rice box were introduced in 2003 and 2015 respectively
- We have been 100% artificial Trans Fat free since 2007
- We have removed palm oil across our range, starting with frying oil in 2011 to the removal of it as an ingredient across the entire KFC branded offering in 2015.
- Our range of low and zero calorie beverages has been extended across all restaurants and we have trialled the introduction of Sparkling Water
- Trials of healthier non-fried products, including Brazer in 2011, BBQ Rancher in 2012 and Pulled Chicken in 2015 have been delivered
- A national trial of healthier, reduced-fat, thicker cut fries is underway
- We make it as easy as possible for our customers to find the nutritional and allergen information that they need

We understand more action is required to address national health issues, which is why we are working towards a 20% reduction in calories per serving by 2025. This will be delivered through working towards a series of ambitious initiatives:

- We will trial a series of initiatives to make the healthier choice the easy choice. Working with a series of partners, we will trial a behavioural change programme to 'nudge' KFC fans towards lighter choices. This will include a series of trials focused on raising awareness and understanding of nutritional information and pricing, and encouraging customers to switch to healthier sides as an alternative to fries and choose low or zero calorie drinks
- Working with our beverage supplier PepsiCo to move to 100% sugar-free carbonated soft drinks across all our 910 restaurants
- Launching healthier fries
- Reducing the number of portions of fries sold as a side by offering three 5-a-day vegetable side alternatives
- Non-fried chicken alternatives
- Introducing a vegetarian offering
- Expanding the < 600 calorie range to make it easier for our consumers to follow Public Health England Advice
- Ongoing product reformulation to the core menu from sugar and salt reduction programmes
- Introduce a pricing structure to encourage sales of healthier choice options
- Improved labelling in restaurants, with easier access to nutrition information and clear communication about the number of portions included in a meal

Healthy Catering Commitment

We recognise the positive impact that initiatives like the Healthy Catering Commitment (HCC) can have on policies and procedures in restaurants and hot food takeaways.

We are committed to engaging as the HCC is developed to be even more relevant to large branded restaurants and takeaways and are actively engaged in this process. We have already met with representatives from the Healthy Catering Commitment to go through specific details of our cooking processes. For example, sharing best practices over the benefits of oil filtration vs skimming oil.

5 July 2018

We would also like to offer our scale and expertise in helping to roll out the HCC to the many independent restaurants in London, perhaps by using our staff training and communications expertise and resources.

Food for everyone

KFC prides itself on catering to all Londoners. As part of our commitment to being accessible to all in London we have over 50 restaurants in London that provide a Halal offering. We work closely with the Halal Food Authority (HFA) who certify these restaurants, in addition to our processes throughout the supply chain. These restaurants are certified by the HFA and adhere to stringent standards in how they operate, all the way through the supply chain to the ingredients sourced. We first trialled a Halal offering in 8 London restaurants in 2009 and are proud to continue to cater to the diverse needs of this community and many others.

Our chicken on the bone is British, delivered fresh and hand-breaded daily in our restaurants by our training cooks. Many of our meals are served with a choice of vegetable side (like beans or corn), which are also available as an alternative to fries in all meal options.

Good food for maternity, early years, education and health – Supporting healthier habits

We recognise the need to engage in education and early years exposure to food experiences that can serve to support healthier habits.

KFC are firmly behind implementing bold targets to reduce calories per serving through all existing restaurants – indeed, our recently announced target of achieving a 20% reduction in calories per serve this by 2025 would be over 13x more effective in removing calories from the nations diet improving diets versus blocking new restaurant development in London.

As stated above, we do not and never will target children in our advertising, no matter the product or the media channel. We do not seek to generate pester potential in our products and therefore do not include toys in our children's meals and will be removing any cartoon characters/images from children's meal packaging this year.

A5 licenses and schools

The London Food strategy states it is the Mayor's plan to "Implement new policies such as the restriction on new hot food takeaways from being permitted to open within 400 metres of an existing or proposed primary or secondary school, as included within the draft London Plan¹, to help reduce child obesity".

We fully appreciate the intent of the policy and believe we can play an important industry leadership role in shaping and executing a number of initiatives to address childhood obesity. However, we would like to highlight six concerns where there may be unintended consequences as a result of this proposal:

1. The 400m broad zone and the inclusion of primary schools represents an effective ban on all new A5 uses due to the sheer number of schools in a broad geographical spread, particularly in zones 1-3. With 2,500 primary schools and 800 secondary schools in London, the inclusion of the former allows no flexibility for local authorities. Reducing the zone to a more pragmatic distance of 250m (still "out of sight" of the school), and removing primary schools where children are not able to go to such restaurants on their own accord, would allow some flexibility whilst still limiting new A5 licenses.
2. The definition of A5 (hot food consumed off the premises) is not uniformly applied to all food retailers. There are many restaurants trading off non A5 uses, yet selling hot food or food deemed as calorific- e.g. hot sausage rolls and pasties, sub-type hot sandwiches, operating on A1 retail use; calorific cheese toasties, cakes and lattes sold in coffee shops mostly operating off A1 consent, some on A3. Moreover, many of the unhealthy snacks consumed after school and favoured due to the lower price point, are at newsagents, trading off A1 retail use! Therefore, the proposed policy may not be as effective as hoped. We believe all such food retailers (regardless of technical use class) should sign up to a scheme such as the healthy catering commitment, and that this alone may restrict vast numbers of "traditional" A5 (and other) users from opening in their current form.
3. Hot food can be healthy too — the definition of A5 is simply hot food consumed off premises, with no reference to nutritional content. A broad ban on A5 could hamper innovation in the "healthy food on the go" space, and restrict such innovative retailers like Leon and Itsu, that have helped develop the 'healthy food to go' marketplace and should be trading from A5 licenses. The ban would not differentiate between healthy and unhealthy hot food. Should we not look at a two-tier approach to permit A5 development where that retailer has signed up to the Healthy Catering Commitment?
4. A3 (casual dining) restaurant operators delivering e.g. via aggregators such as Just Eat/Uber Eats/Deliveroo) from their (outlets will soon require A5 licenses. The proposed ban could stall the rise of the convenience economy and curtail how delivery has helped struggling restaurants bolster sales in tough economic conditions, leading to more closures.
5. Many A5 units are too small for larger seated A3 uses and many could therefore end up as A4 (alcohol) uses. Planners may need to achieve a balance between different use classes to not over compensate for reduced A5 use with increased A4 consents (potentially leading to street crime and antisocial behaviour).

6. As A5 supply gets reduced, the rents and premiums attached to existing A5 could increase and spill over onto the high street landscape and lead to more empty shops. Finding a balance between allowing some expansion for responsible A5 retailers could reduce the likelihood of them needing to pay ultra-high rents for existing A5 uses to expand their businesses, so reducing the risk of furthering the demise of the high street.

In summary, KFC supports a zonal policy but one that would be based on school pupils that make independent decisions after school. We propose a zonal restriction as follows:

- secondary schools only
- a reduced practical zonal 'out of sight' distance of 250m
- We would propose the Healthier Catering Commitment as a qualifier for all A5 & A1 & A3 licenses where food is present.
- We suggest a Schools Pact is set up with industry peers to define best practise in operating food locations in proximity to the nearest school. such that for every new KFC opening near a school within the M25, a range of health supportive measures are adopted. This is something that we could investigate and develop in partnership with you, and then test in London boroughs, with the idea that the successful model could be applied to the wider food on-the-go sector. Such measures could include:
 - Revised advertising policies for within the store and local community
 - Specific nutritional commitments with regards to product available in those restaurants to children and at certain times of day
 - Community projects to encourage physical activity
 - Working with local schools on policies around serving children in uniform

Good food for the environment – making the food system work better

As a responsible business, we recognise the impact that the food industry has on the wider environment and are committed to engaging in this space to be part of positive change and minimise the carbon footprint of our restaurants. KFC is a founding signatory of Courtauld 2025 which is an ambitious voluntary commitment to make food and drink production and consumption more sustainable. As part of this commitment we aim to reduce waste generated in our restaurants by 20% by 2025. We are also committed to reducing the amount of consumer packaging and increasing recycling. To this end, we're looking to roll out waste segregation in our restaurants to help our customers dispose of their rubbish responsibly.

In addition, we are committed to the reduction of single use plastics and will be trialling a series of initiatives in 2018 to reduce and remove plastic straws from our restaurants, including a test of complete removal of plastic straws.

We recognise the impact of litter on local communities and have a clear responsibility to minimise litter in and around our restaurants. Each and every restaurant has a litter-picking programme and we work with local and national partners to prevent and manage litter. At a national level, we are proud to have signed the Keep Britain Tidy Litter Prevention Commitment, being one of the first organisations in the UK to sign and commit to this. KFC was also one of the corporate sponsors of

¹ Clause E9 of the draft London Plan proposing to restrict A5 hot food takeaways within 400m walking distance of a school.

5 July 2018

Keep Britain Tidy's Great British Spring Clean earlier this year, re-affirming our commitment to litter prevention.

We are continuously working to minimise food waste and in May 2014, we created our Food Donation Scheme to donate unsold chicken from our restaurants to local charities (outlined in Section 1). By the end of this year we aim to have donated over 500,000 meals.

All our chicken is certified by Red Tractor meaning our suppliers' farms have to meet 150 checks and standards.

5 July 2018

Keeping in touch

If you would like any more information or to organise a meeting to discuss the commitments and ideas in this document, please contact:

[REDACTED]
Innovation Director
KFC UKI

[REDACTED]
[REDACTED]

5 July 2018

Annex: Advertising mock ups

Below is a “mock-up” of a piece typical KFC meal advertisement today and a “mock up” of KFC meal advertisement incorporating some of the alternative solutions outlined. The design and language are purely for illustrative purposes, we would welcome the opportunity to discuss the specific execution for input.

“Today”



“Alternative Solution”



5 July 2018

“Alternative Solution” annotated



Water shown as an alternative to a carbonated soft drink

A calorie communication visible

Corn replaces fries as the side option

Educational message relating to nutritional responsibility

OUTSMART

CONSULTATION RESPONSE TO MAYOR OF LONDON'S PROPOSED BAN ON FOOD AND DRINK ADVERTISING ACROSS THE TRANSPORT FOR LONDON ESTATE

By email to:

londonfood@london.gov.uk

1. EXECUTIVE SUMMARY

- 1.1 The out-of-home advertising industry that we represent welcomes action on childhood obesity. We recognise the seriousness and urgency of the issue and support the Mayor's commitment to addressing it. We also believe the industry has a positive role to play in delivering the kind of behavioural change that is needed to tackle the problem of childhood obesity.
- 1.2 We consider the consultation to be a welcome first step in that direction. However, more work is needed: as drafted, the proposed total ban on the TfL estate of all advertising for food and drink that is high in fat or salt or sugar ("**HFSS**") and the ban on "brand only" advertising by all food and drink companies, are disproportionate, unclear and unworkable measures that will not achieve the Mayor's legitimate objective.
 - (a) The bans would have a number of unintended, adverse consequences, such as diverting HFSS advertising spend to other forms of media, where children's exposure to the advertising could — perversely — be higher.
 - (b) There would be a severe impact on our members' business, as the affected outdoor advertising space could not simply be resold for alternative products. The likely reduction in revenue for the industry would be £375m over the next 5 years. This would (i) undermine our ability to invest in targeted measures to reduce childhood exposure to advertising and (ii) reduce our ability to commit current levels of funding to investments such as the installation of bus shelters and the provision of free WIFI. In addition to this significant adverse impact on the public interest, there would also be knock-on consequences for jobs and investment in local communities in London.
 - (c) As drafted, the measures lack sufficient clarity and would be very complex and difficult to implement in practice, for both our members and their customers.
- 1.3 A total ban should not be the only option under consideration. There are a range of alternative, more effective, options open to the Mayor that have not been canvassed in this consultation. They should be subject to further, evidence-based assessment, consultation and development. That work is essential to achieving a set of proposals that are legally and practically robust and based on evidence of their impacts — positive and negative.
- 1.4 There is now an opportunity for the industry, in partnership with the Mayor, to develop and deliver a wider reaching and high impact healthy living campaign that harnesses the power of outdoor advertising to improve public education and awareness of nutrition and exercise. This would provide lasting behavioural change that is key to tackling the root causes of obesity across London, and allow the Mayor to deliver one of Lord Darzi's key

recommendations.¹ It is also consistent with research² and the experience of public health interventions elsewhere in the world³, that demonstrate the need to take a holistic approach, including, for example, directly addressing the strong link between public education and childhood obesity. We stand ready to seize that opportunity by working together to identify and assess workable and effective options and to implement them appropriately. We invite the Mayor to take this work forward in collaboration.

2. **BACKGROUND**

- 2.1 Outsmart is the UK trade body for the Out of Home ("**OOH**") advertising industry. Our members include the biggest sellers of OOH advertising in the UK: Clear Channel UK, Exterior Media, JCDcaux, Ocean Outdoor, Outdoor Plus and Primesight.
- 2.2 As outlined in our letter, dated 4th June 2018, we welcome this consultation as an initial formative stage in your policy-making process. It is a crucial opportunity to elicit evidence and ideas from various stakeholders to inform the next steps in a robust process of consultation and policy design on a package of detailed proposals.
- 2.3 However, it is alone not sufficient to be a sound basis for a final policy decision. That will require a further opportunity for the Mayor to consider, and consultees to respond intelligently to, particulars on proposals for design and implementation and evidence-based reasons for the proposals made.
- 2.4 We are confident that, by working together with stakeholders in the coming months, the Mayor can identify and implement measures that will allow London to lead the way in tackling this issue. For our part, we hope to work with the Mayor further to assess the evidence of the effectiveness and impact of a range of different options for intervention.

3. **BUILDING ON EXISTING MEASURES TO TACKLE OBESITY**

- 3.1 Our members already make positive contributions to combatting childhood obesity as well as many other related good causes, including public health education.
- 3.2 As you will already know, the current UK rules for advertising of HFSS are among the strictest in the world. From 1 July 2017, HFSS advertisements became subject to the Committee of Advertising Practice ("**CAP**") media placement restrictions, as set out in the CAP Code, and must not be directed at people under 16 through the selection of media or the context in which they appear.
- 3.3 The CAP advises advertisers that it usually considers OOH advertising to be directed at the general population, not at people under 16. However, working with Public Health England ("**PHE**"), Outsmart voluntarily took steps (in July 2017) to restrict OOH marketing of HFSS products in areas most likely to be seen by children, by preventing HFSS advertising being placed on static OOH sites within 100 metres of school boundaries (the "**Schools Exclusion**"). The industry takes its social responsibilities very seriously, and we have an outstanding record of compliance with all regulatory standards.
- 3.4 As recognised by the CAP, the Schools Exclusion is not an explicit requirement under the CAP Code. The measure has now been in place for a year and we consider that it is too early to take an evidence based decision about whether further measures are needed to reduce children's exposure to HFSS OOH advertising.

¹ https://www.london.gov.uk/sites/default/files/better_health_for_london.pdf (see page 27)

² E.g. https://www.mckinsey.com/~/media/McKinsey/Business%20Functions/Economic%20Studies%20TEMP/Our%20Insights/How%20the%20world%20could%20better%20fight%20obesity/MGI_Overcoming_obesity_Full_report.ashx

³ Such as the public health campaign in Amsterdam, referenced in the Mayor's Food Strategy Paper.

- 3.5 A significant amount of investment in terms of time and software were undertaken voluntarily by the industry to put the Schools Exclusion in place. The initiative applies in relation to all schools across the UK. In Greater London alone, it resulted in HFSS advertising being removed from over 10,000 OOH advertising sites, 14% of all sites.
- 3.6 We took this step, going beyond our existing regulatory requirements, because we considered it to be a targeted and proportionate response that removed HFSS advertising in particular areas where children are most likely to be exposed to it, and when they are most likely to make choices around meal times.
- 3.7 We recognise that our industry has a part to play in tackling childhood obesity and welcome the opportunity to identify and discuss similarly targeted measures as part of this consultation process.

4. **THE CHALLENGE OF CHILDHOOD OBESITY AND THE NEED FOR PROPORTIONATE AND EVIDENCE-BASED POLICY RESPONSES**

- 4.1 The Mayor's Food Strategy Paper sets out the Mayor's objective to use every means at his disposal to help tackle child obesity and states that one method to achieve this aim is to stop children and young people being exposed to advertisements for unhealthy products. Obesity is one of the most pressing public policy challenges that the UK is facing today. We consider therefore that this consultation presents the Mayor with an opportunity to lead the way by developing a targeted and evidence based approach to reducing exposure of children to HFSS advertising, allowing that model to be replicated widely at both local and national levels.

- 4.2 The Paper presents a binary choice to consultees between:

- (a) a wholesale ban on all advertising connected to HFSS food and drink product across the entire TfL estate; or
- (b) doing nothing at all.

We do not agree with that binary choice and urge the Mayor to consider a wider range of options that would be more effective and proportionate in delivering the objective of reduced obesity.

- 4.3 Whilst we consider that there may be merit in further developing the rules around HFSS advertising, proposals for measures that would restrict the ability of businesses and consumers to communicate with each other and would have a substantial commercial impact will only be justified if they are, when put in context of existing and other possible measures:

- (a) supported by evidence of effectiveness;
- (b) proportionate, in that they are targeted to achieve the specific legitimate objective identified and minimise adverse or unintended consequences;
- (c) clear in their scope and application; and
- (d) workable in practice.

We address each of these points in turn below for the Mayor's proposed ban, before turning to potential alternative options that could deliver results effectively.

Evidence-based

- 4.4 There is insufficient evidence demonstrating the efficacy of a wholesale ban, for such a ban to be justified as a proportionate means of reducing childhood obesity, at least without considering other options which are likely to have less of an adverse impact on the commercial interests of our members, advertisers and others. To our knowledge, there has been no impact assessment or piloting that would allow the proposals to be informed by a thorough understanding of their potential effectiveness or the adverse impact they may have on businesses and the wider public interest. One of our members, JCDecaux, is currently in discussion with Lewisham Borough Council with regard to the possible implementation of a pilot scheme in the Borough of measures designed to tackle childhood obesity. The data obtained from this trial would inform the policy choices made by the Council. We consider this approach to be essential to ensuring that the effectiveness and adverse impact of different measures are properly understood before the introduction of any permanent intervention.
- 4.5 We do not consider that a ban relating to the TfL estate is likely to be effective in significantly reducing the exposure of children to HFSS advertising.
- (a) Only a small proportion of the users of TfL services are under 16. The National Travel Survey (conducted by the Office of National Statistics) shows that trips in England to and from school per child (aged 5-16 years) per year, using local bus services, fell from 16% in 2010 to 12% in 2016 across England. Estimates of the proportion of children that use the London Underground to travel to and from school range from 1-3%. Therefore, schoolchildren would make up a very small proportion of the people impacted by a ban of HFSS across the entire TfL estate.
 - (b) Most advertisers would likely redistribute marketing budgets to other forms of media that may increase children's exposure to inappropriate marketing content. This is particularly true of online channels. It is well-known that advertising revenues for social media sites are growing rapidly while they have remained static for the OOH sector for a number of years⁴. The usage of social media and online video content via mobile phones accounts for a huge proportion of the exposure of children to advertising. Ofcom reports that 74% of 12-15 year olds have a profile on a social media or a messaging site or app.⁵ Online advertising of HFSS cannot be targeted at children under the CAP Code.
 - (c) The risk of unintended consequences also applies to print advertising. Children using TfL services would still be potentially exposed to HFSS advertising, including promotional discount vouchers for fast food in newspapers available at stations, such as the Metro and Evening Standard.
 - (d) To be clear, we are not criticising other advertising channels. All advertising channels are appropriately regulated. We are merely seeking equity in regulation across the media mix in the reduction of Childhood Obesity.
- 4.6 While advertising is effective, it is just one of many factors driving sales of food and drink products. An independent 2014 report from McKinsey ranked media restrictions as one of the least effective of a range of possible interventions to reduce childhood obesity.⁶ Portion control, reformulation and education by schools and parents were all found to be significantly more effective.

⁴ See p.10 of the [House of Lord's Report: UK Advertising in a Digital Age](#)

⁵ https://www.ofcom.org.uk/_data/assets/pdf_file/0020/108182/children-parents-media-use-attitudes-2017.pdf

⁶ E.g. https://www.mckinsey.com/~media/McKinsey/Business%20Functions/Economic%20Studies%20TEMP/Our%20Insights/How%20the%20world%20could%20better%20fight%20obesity/MGI_Overcoming_obesity_Full_report.ashx

- 4.7 Even if there were no displacement of adverts to other channels, advertising restrictions are likely to be effective only when they are introduced in co-ordination with a package of other measures and not in isolation. For example, the Amsterdam Metro ban that is referenced in the Food Strategy Paper was introduced, as part of a "whole measures approach", alongside other initiatives such as investment in education campaigns, dietary advice and exercise and sporting activities. The Amsterdam Metro advertising ban came into force in January 2018 and the data on obesity rates which showed a 12% reduction in childhood obesity refer to a 2012 – 2015 period⁷. The reduction cannot therefore be attributed to the advertising restrictions. A study by the Obesity Policy Research Unit points out that the Amsterdam approach requires further analysis and piloting before application to UK cities. It would not be helpful to simply implement a series of actions drawn from individual elements of the programme.⁸
- 4.8 Bans in isolation do not work well and an outright ban is not the only option that the Mayor has to use advertising to combat childhood obesity. A more proportionate and more effective solution would involve harnessing the power of advertising to deliver behavioural change by promoting healthy eating and lifestyle choices, i.e. behaviour that will reduce childhood obesity. This is something that our members are well placed to assist with because it is our area of expertise (see paragraph 5.5 below).
- 4.9 It is also critical that measures are not prematurely rushed into force by the Mayor's Office before all relevant evidence has been taken into account. For example, for the purposes of the proposed ban, "unhealthy food and drink" will be any HFSS product, as defined by the Nutrient Profiling Model ("**NPM**"), developed by the Department for Health and Social Care ("**DHSC**") and the Food Standards Authority. This definition covers a broad range of food and drink, including but by no means limited to, "fast food". The NPM is currently subject to an ongoing consultation as Public Health England ("**PHE**") has been asked by DHSC to review the NPM and bring it in line with current UK dietary recommendations.
- 4.10 A new NPM is expected in 2019 and the definition of HFSS is expected to change. The effectiveness and impact of measures that are reliant on the NPM can only be properly developed after the results of PHE's review have been taken into account. If the definition of HFSS broadens, the impact of a wholesale ban may be considerably more severe.
- 4.11 DHSC has announced its own plan for tackling childhood obesity which outlines a number of proposed measures. The Government has committed to carrying out a full consultation on these proposals by the end of this year. The Mayor must take into account all relevant evidence from that process and any measures introduced in relation to the TfL estate must complement nationwide initiatives introduced by the Government to ensure consistency and minimise the impact on industry.

Proportionate

- 4.12 A wholesale ban on the advertising of products that are HFSS (as defined by the current NPM model), would reduce the OOH sector's annual advertising revenue by 10-15%. For London, the region attracting the highest share of OOH sector advertising revenue (45% share or £515m), the impact of banning HFSS would be as much as around a £75m reduction in annual revenue. Our members' contracts tend to run for 5-10 years and therefore, over this period, the impact on revenue could be £375m-£750m.⁹ This figure does not account for the further impact on revenue that would result from downward pressure on

⁷ <https://www.bmj.com/content/361/bmj.k2534>

⁸ <https://www.ucl.ac.uk/obesity-policy-research-unit/sites/obesity-policy-research-unit/files/what-learned-from-amsterdam-healthy-weight-programme-inform-policy-response-obesity-england.pdf>

⁹ This estimate is based on a number of assumptions and on the level of detail provided in the consultation papers regarding the proposed measures.

our members' pricing brought about by the fall in demand for their services. The figure also excludes the very significant potential impact of a "brand-only" ban that applies to all food and drink companies, as described in the consultation papers. As explained at paragraph 4.25 below, the scope of the brand-only ban is very unclear and we are therefore unable to properly assess its impact on revenue. Our members will explain the impact on each of their individual businesses in their individual consultation responses.

- 4.13 Based on our analysis of demand for OOH advertising in London, we consider it to be very unlikely that the sites currently used by HFSS advertisers would simply be replaced by other forms of advertisement, as the majority of our members have unsold and unused inventory at any one time. We also consider that there would be a knock-on effect on revenues for TfL and local authorities. There would be a significant reduction in TfL's revenue from advertising on its estate.
- 4.14 The significant loss of revenue for our members would inevitably result in cost saving measures, including a reduction in investment in, and the renewal of, public infrastructure, and job losses for London.
- 4.15 The OOH sector also employs approximately 4500 people in the UK and a proportion of these jobs would be put at risk as a result of a wholesale ban.
- 4.16 There would be a reduction in the revenue available for the investments made by our members that go to improving London's public services and economy by:
 - (a) supporting local job creation and investment through the installation, maintenance and cleaning of street furniture;
 - (b) renewing tens of thousands of bus shelters nationally;
 - (c) providing live bus timetable information at bus shelters – via NFC & Bluetooth tech;
 - (d) unlocking public funds for other projects by reducing the need for governments to invest in street clutter reduction and giving back valuable pavement space through renewal projects; and
 - (e) paying business rates that ensure OOH advertising sites make an ongoing financial contribution to the local area.
- 4.17 Further, our members have used revenue to implement a number of measures that benefit local communities including:
 - (a) providing access to free maps/wayfinding information, free emergency and charity calls (services that are accessible to all users, regardless of physical or technological capabilities);
 - (b) providing free WIFI and thereby assisting in reducing economic and social inequalities associated with the digital revolution; and
 - (c) displaying on street furniture council, community, and other local content (our kiosk sites display 1,000 hours of Council content per year to promote local initiatives, news, and events – acting as a community notice board); and
 - (d) funding other charitable projects (one member alone has spent £800,000 on community tree planting projects over the past 2 years, largely in London, and donated free media space to 30-40 charities worth in excess of £20m and totalling more than 10% of available advertising inventory).

- 4.18 Our members are clear that the impact of a comprehensive ban will prevent them from being able to commit in the future to many of the above investments that are currently included in their contracts and have significant benefits for Londoners. We consider that, as a result, a blunt wholesale ban would have a net detriment to the public interest.
- 4.19 The brands that invest in advertising space on the TfL estate themselves make a valuable contribution to London's thriving economy. While it is difficult to quantify the impact that OOH advertising has on London's high street and night time economy, we think it is important that businesses and consumers are allowed to communicate with each other. Taking account of the risk of public harm, we believe that the right solution is to strike a balance between the aims of reducing exposure of children to HFSS advertising and allowing for adult consumers to make informed choices about the products they wish to buy.
- 4.20 We note that other HFSS advertising restrictions, such as the Amsterdam Metro ban, Ofcom broadcasting restrictions on television advertising and restrictions on non-broadcast advertising in the CAP Code, all restrict advertising that is aimed at or more likely to be seen by children, either because of its nature, location or the time at which is shown.
- 4.21 Given the severe impact a wholesale ban would have on our members, their customers and commercial freedom of speech as well as the knock-on adverse effects on the wider public interest, thorough consideration of alternative solutions that are targeted at the specific aim of reducing the exposure of children to HFSS marketing is required.

Clear

- 4.22 The parameters of the proposed ban are unclear and, as currently described in the Food Strategy Paper and the two-page proposal paper ("**Proposal Paper**"), could be very wide in scope. It is not possible for Outsmart, or other stakeholders, to meaningfully respond to the consultation without a greater level of detail on the intent, basis and scope of the ban.
- 4.23 Further, if there is no clear methodology for advertisers to be able to determine whether or not an advertisement is compliant, they will simply see the OOH medium as too complicated and difficult and may decide to use other advertising media, rather than trying to comply. This outcome is most likely in the case of SMEs and food and drink start-ups as they will not have the resources of large companies to be able to conform to difficult rules.
- 4.24 In relation to the brand only advertising ban, it is not clear whether this ban is proposed to cover all food and drink companies, any food and drink company that sells one or more HFSS products or only food and drink companies that sell predominantly HFSS products.
- 4.25 As described in the Food Strategy Paper and Proposal Paper, the ban appears to cover all food and drink companies. This is unjustifiably broad as it would cover brand-only advertising by a vast range of companies such as supermarkets, food delivery providers, restaurants, coffee shops and e-commerce brands, including the likes of trusted high street brands such as Marks & Spencer Food and Pret a Manger. It would also inevitably cover companies with product ranges that are largely or even completely free from HFSS food and drink. We cannot therefore understand how it would meet its intended objective. In fact, the ban would have the perverse result of covering companies that are actively promoting the consumption of healthier food.
- 4.26 We consider that, if a brand-only ban is to be introduced, there should be a well-defined test for determining which advertisers are covered by it. The CAP Code prohibits brand advertising that has the effect of promoting a HFSS product but this applies only to the use of brands or branding that is synonymous with a specific HFSS product. We think that, in line with our position on the need for evidence based and proportionate policy, the

definitions that underpin any restrictions need to be tightly drawn and focused on the highest risk products.

- 4.27 We are unable to assess fully the impact the ban would have without further clarity and unless greater detail is given to stakeholders, they cannot help to develop a policy which strikes the correct balance between competing interests.

Workable

- 4.28 Restrictions cannot be brought into force without proper consultation on how they would be implemented and enforced in practice. This is not addressed in the current consultation.
- 4.29 We have a number of serious concerns with regard to the implementation of any proposed restrictions and can foresee a number of challenges that must be resolved before a decision can be made on the adoption of any measures.
- 4.30 To the extent that any advertising restrictions on HFSS food and drink are introduced on the TfL estate, our members cannot be made responsible for ensuring compliance.
- 4.31 Our members are media owners and do not employ nutritional experts. On that basis, it would be inappropriate for them to make assessments as to whether advertisements for particular food and drink products are covered by any restriction introduced by the Mayor's Office.
- 4.32 Moreover, media campaigns are planned months in advance and most of our members have ongoing (in many cases, multi-year) contractual commitments with advertisers who are likely to be caught by the proposed ban. The proposals must ensure that our members' existing property rights remain protected following the adoption of any intervention. The proposals do not appear to envisage any transitional arrangements that would allow for existing contractual commitments to be met without risking non-compliance. Transitional arrangements would be a vital part of the implementation of any new measures and would need to be devised in conjunction with industry.
- 4.33 Practical and effective arrangements for transition and implementation cannot simply be devised by the Mayor's Office alone and require significant stakeholder input over the coming months. We are happy to work with the Mayor to find constructive solutions to these challenges.
- 4.34 We urge further stakeholder engagement on practical considerations to ensure that any measures are practicable and unintended consequences are minimised.

5. ALTERNATIVE OPTIONS FOR MORE TARGETED AND PROPORTIONATE SOLUTIONS

- 5.1 The OOH sector is keen to work with the Mayor's office and all relevant stakeholders to develop proposals that are more targeted at the issue of childhood obesity so that the Mayor's objectives can be achieved without as great an adverse impact as the comprehensive ban currently proposed. We want to work with you to assess the evidence of the effectiveness and impact of a number of ideas so they can be developed further.
- 5.2 While the TfL estate is significant in London OOH, the OOH industry advertises on other private estate which could also potentially be used to promote these sorts of initiatives. The more consistently the initiatives are applied across OOH estate, as well as on other media, the more likely they are to be effective. Where targeted and proportionate measures are introduced, we would be willing to discuss their wider application beyond London's transport network.

5.3 The options set out below would require proper consultation and further development but we have included them here as potential alternative options that could be explored in partnership with the industry.

- (a) The use of unsold OOH inventory on the TfL estate to allow TfL to promote healthy eating and lifestyle messages, such as promoting the use of stairs rather than escalators or campaigns such as the "Daily Mile Campaign" (see Appendix 1). We note that this accords with one of the key recommendations in a report written by Lord Darzi, Chair of the London Health Commission, and evidence given by the Food Foundation to the Health and Social Care Select Committee. The use of healthy living campaigns is also an important pillar of Amsterdam's successful strategy.
- (b) A requirement for a proportion of each HFSS advertisement to be dedicated to promoting healthy lifestyle and/or nutritional information. This could take the form of "traffic light" labelling or a 'Food Aware' Compliance Notice such as "Be Treatwise"¹⁰, with direction to online nutritional information, similar to the "DrinkAware" and "BeGambleAware" notices on alcohol and gambling advertising. This would take industry best practice in other sectors and apply it to food and drink.
- (c) A voluntary initiative, applied either by advertisers or the OOH sector, providing for a levy, imposed in direct proportion to spending by HFSS advertisers. The income generated could be reinvested into the promotion of healthy food messaging. Such a model would require a light touch in terms of management time and cost for the GLA/TfL and could be adopted more widely in other parts of the country.
- (d) A reasonable and proportionate extension of the school exclusion of HFSS advertising from 100 metres, increasing the number of OOH sites in greater London that are HFSS-free from 10,228 (14% of OOH sites). Additionally, other sites more likely to be seen by children (such as those around theme parks, leisure centres etc.) could be made HFSS free.
- (e) The use of restrictions that focus on the nature of advertising rather than the underlying product alone. For example, restrictions could be targeted at particularly harmful forms of marketing, such as aggressive price promotions of fast food, building on progress already made by restrictions on advertising expressly targeted at children.
- (f) The use of digital out of home sites (which account for 50% of total OOH sector advertising revenue) to ensure that, where technologically feasible, HFSS ads are not shown at times when children are most likely to use TfL services (e.g. around school opening and closing times). We consider that, in relation to OOH advertising, there is ample data (e.g. on the times at which children are more likely to travel) to enable effective targeting of HFSS advertising restrictions at digital OOH sites.

5.4 Given that obesity rates among young people vary significantly across the UK and as the Food Strategy Paper rightly points out, increased rates correlate strongly with areas with increased social deprivation, the targeted use of OOH advertising to promote positive health and lifestyle messaging, (e.g. the use of OOH sites in more socially deprived areas that are vulnerable to childhood obesity) could be particularly effective in meeting the London Food Strategy's aims. We are aware that TfL has access to data on the use of its services that would assist in the implementation of a targeted approach. An example could be to have

¹⁰ <https://betreatwise.net/>

no HFSS advertising in the top 10 stations used by children or to exclude central London stations (where usage by children is very low) from any restrictions.

5.5 There is precedent for the creative use of our members' OOH inventory to promote public health messaging and encourage positive behavioural change to the benefit of Londoners. We set out some examples below.

- (a) As part of the television programme "Britain's Fat Fight", the chef Hugh Fearnley-Whittingstall used posters and stickers to prompt users of the Newcastle-upon-Tyne Metro system to take the stairs to the station exit rather than using the escalator. The results showed a 35% increase in people using the stairs during peak travel times.
- (b) One of our members worked with PHE to promote the Change4Life campaign, using digital screens to change eating habits through targeted, contextual advertising (see Appendix 2). The member was able to incorporate sales data at store level to display relevant advertising during periods of peak sales for certain products. At times of peaks sales of sugary products, warnings about health risks and messages encouraging low sugar alternatives were displayed. During the campaign, there was a 4% reduction in the sales of sugary cereals and 5% increase in the sales of diet soft drinks.
- (c) Since 2012, Missing People, a UK charity dedicated to bringing missing children and adults back together with their families has been supported by Outsmart. Missing People advertising was run on digital OOH sites across 15 different media owners (who together represent 95% of all OOH revenue). In its first year, the campaign delivered 4.9M transmissions across 4,000+ panels equal to £10M+ of media value. Inbound contacts with the charity increased by an astounding 226%, from 2940 emails and SMS being received by the charity in 2009 (prior to Outsmart's involvement), to 9596 being received by the end of 2013 as a result of the campaign.

6. ONGOING ENGAGEMENT

Our members support the Mayor's goal of reducing childhood obesity and we believe that the OOH sector has a part to play in further action towards this goal. This is why we are keen to engage positively with you while your policy is still at a formative stage, in coordination with other stakeholders.

We would welcome the opportunity to meet with you to discuss our ideas for the development of effective solutions to further the important objectives and priorities set by the Mayor's London Food Strategy. We will participate fully in any further consultation on developed proposals so that robust measures can be put in place.

Please direct any correspondence about the contents of this response to Outsmart Out of Home Ltd, for the attention of [REDACTED], at the following address:

Post:

Outsmart
3rd Floor
33 Golden Square
London
W1F 9JT

Email:

[REDACTED]



Annex 1



Founder of
The Daily Mile,
Elaine Wyllie

Join the movement

What is The Daily Mile?

The aim of The Daily Mile is to improve the physical, social, emotional and mental health, and wellbeing of our children – regardless of age, ability or personal circumstances.

It is a profoundly simple but effective concept, which any school can implement completely free of charge and without the need for staff training. Its impact can be transformational – improving not only the children's fitness, but also their attainment, mood, behaviour and general wellbeing. The Daily Mile is not sport or PE, but health and wellbeing through daily physical activity.

Children are encouraged to jog or run outside for 15 minutes every day at a time of their teacher's choosing. In this time, most children will average a mile or more distance – and so, The Daily Mile is born!

To find out more, visit www.thedailymile.org



Why The Daily Mile?



It's fun!



It's 100% inclusive
– every child.



The weather is a
benefit, not a barrier.



No track required.



It's simple.



Children run and jog
at their own pace.



No kit, equipment
or set-up required.



It's safe – children
do The Daily Mile
in school.



Teachers decide when
their class should do
their Daily Mile.



It only takes
15 minutes!



Join The Daily Mile movement at www.thedailymile.org

[/thedailymile.uk](https://www.facebook.com/thedailymile.uk) [@_thedailymile](https://twitter.com/_thedailymile)

Seasonal Best
Working with local farmers to bring you a wide range of seasonal, locally sourced produce
Every little helps

Annex 2

See the sugar lurking inside

cola
2L

change 4 life

JCDecaux

TESCO SMARTSCREEN

Type of organisation

Advertising body/organisation

Name of organisation

Talon Outdoor

Are the six priority areas (set out above) the right ones?

Yes

If no, please tell us why:**Are there other priorities that should be considered?**

No

If yes, please tell us what they are:**Are the most effective actions the Mayor, external stakeholders and individuals can take set out?**

No

If no, please tell us why:

No – we do not believe that a blanket ban on advertising food & drink that isn't healthy across Transport for London estate is sensible or relevant to the problems identified.

Are there other actions that should be included?

Yes

If yes, please tell us what they are:

see below

Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network?

No

Please tell us why:

No. We believe a blanket ban to be too broad and that a targeted approach is required.

The advantages of applying a targeted and evidence-based approach to reducing U16 exposure to HFSS messaging are as follows:

- o Allows the continued use of the medium by food manufacturers in a regulated manner
- o Reduces the pressure for legal testing of the regulation – especially regarding brand prohibitions
- o Allows the TfL model to be more readily adopted nationally
- o Reasonably minimises the impact on advertising revenue to TfL.

The blanket ban on HFSS advertising across the regulated OOH medium could arguably encourage manufacturers and retailers to pursue unregulated forms of promotion – point of

sale positioning, price promotion, shop facias, shop window decals and of course on-line and mobile advertising, which can also be consumed on the TfL estate or in proximity to schools.

A self-regulated market can more flexibly adopt a tariff or donation model in direct proportion to advertiser spend - this can be reinvested in healthy food messaging by the Mayor's Office, either as advertising space within any live campaign or as 'credit' to be used to purchase OOH media space as planned by the GLA.

- o The management of this could be conducted by the GLA, TfL or by the major media vendors operating on TfL property. The advantage of the latter option is that the model can more readily be adopted in other parts of the country and requires a light touch in terms of management time and cost to the GLA/TfL.

A self-regulated market can more readily adopt a standard proportion of ad copy to carry a 'Food Aware' Compliance Notice to run on all HFSS advertising, similar to the DrinkAware and BeGambleAware notices on alcohol and gambling advertising. The messaging could call out the need for a balanced diet, direction to further information online, or other appropriate messaging from the Mayor's office. Again, this self-regulated approach would allow the TfL model to be more readily adopted across London and the industry nationally.

Importantly, this approach would also ensure that a sensible approach was adopted in order to fairly consider brands that would fall under the HFSS category but that wouldn't necessarily be associated with an unhealthy diet (e.g. Honey). A blanket ban would result in a restrictive policy, which doesn't allow for common sense or exceptions to the rule.

Talon represents a number of advertisers who could be adversely affected by this blanket ban including McDonalds, Sainsbury's, Waitrose, Coop, Pepsi Co, McCain. We estimate £20m+ in revenue for TfL could be at risk.

A blanket ban on OOH formats is unfairly restrictive whilst ignoring the Metro and Evening Standard cover wraps (plus mobile ads where 4G or WiFi allows) that can still accept HFSS ads and be very visible on the TfL estate.

We believe that an outright HFSS advertising ban across the TfL Outdoor advertising estate would be disproportionate in relation to other media or areas of the UK.

- o We believe that to address this multi-layered, societal issue, a partnership solution that builds on existing self-regulatory practises would deliver substantially better long-term outcomes. It would allow the focussing on key community locations and investment in more valuable initiatives such as increasing access to quality food, food education choices and promoting other healthy lifestyle options.

- o Such an approach could also act as a model to be extended beyond the TfL estate across Greater London – or, indeed, the country – as a whole.

Obesity rates are more closely related to broader societal challenges such as deprivation and exposure to under-regulated fast food outlets than exposure to OOH advertising:

- o "There is a clear link between deprivation and the number of takeaways in an area, with the poorest areas of the country having far more takeaways than the richest areas... children living in the most deprived areas of London are twice as likely to be overweight and obese. For example, Barking and Dagenham has the highest level of overweight or obese Year Six children (44 per cent)" – Draft London Food Strategy

- o OOH advertising in London delivers disproportionately against upscale audiences and in upscale areas – even more so in the Rail and LU environments. Mandating a levy or value

commitment from advertisers as a proportion of OOH would allow redeployment of positive food messaging into the areas where it may have the greatest effect.

Of all policy interventions available, studies show media restrictions are among the least effective. Other interventions such as education are far more so.

We think that existing interventions, particularly the exclusion zone, need to be given a chance to be effective and should be properly evaluated before further action is taken.

Should further action be necessary, we think this should be targeted, effective and subject of proper consultation with the industry.

It is critical that the ban does not unintentionally catch brands that do not participate in egregious advertising of HFSS products, but offer people an attractive menu as part of a balanced lifestyle.

What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?

The UK OOH industry self regulates for HFSS products and follows the Nutrient Profiling Model for defining HFSS products. All roadside advertising panels / sites within 100m of a pre-school, primary or secondary school boundary are excluded from HFSS campaigns. Since Talon was formed in 2013 we have been operating an increased 200m exclusion zone for our clients (including McDonalds, Sainsbury's, McCains and Pepsi-Co) and including transport locations such as shopping mall, rail and underground stations. Talon along with others in the industry have invested in improved boundary mapping data and software to ensure accurate enforcement of this self-regulation.

More sophisticated techniques for minimising exposure to U18 audiences could include:

- Using the flexibility of digital OOH to only display HFSS ads during times when U18 audiences are low (eg school hours, post 9pm etc)
- Use Oyster / contactless data to identify stations, times and bus routes that have high/low exposure to U18 audience and avoid/concentrate activity accordingly.

Within our own organisation Talon has made education and training our staff about healthy eating a key part of our staff wellbeing investment.

How could you or your organisation support the Mayor to achieve good food for London and support the final strategy?

Talon support Outsmart's position that further discussion is needed between the Mayor and the out of home advertising industry to come to a shared and effective strategy for tackling the obesity challenge.

This is an issue that we are committed to as a company, and we are willing to lend our support to proposals if they are well designed and proportionate. We would welcome an ongoing dialogue on this.

Is the strategy inclusive and does it consider the needs and priorities of all Londoners?

Yes

If no, please tell us why

| Name of organisation | Question | Response |
|---------------------------------------|--|---|
| CADA Design | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| CADA Design | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | Advertising has a huge behavioural impact on us, and children are particularly susceptible. Advertisements are designed to nudge us toward spending money, and when public transport in London is free for children, they should not be forced to see unhealthy food choices. |
| Made In Hackney | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Fruit Magpie | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Fruit Magpie | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | If it improves healthy food choices this can only do good |
| Global Aquaculture Alliance | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Global Aquaculture Alliance | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | Eating unhealthy food should not appear as mainstream |
| Karma - Good Food Shouldn't Be Wasted | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Beautiful Ornate Pieces Ltd | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |

| | | |
|--|--|--|
| Beautiful Ornate Pieces Ltd | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | If the only option is something unhealthy, fast and cheap then that's all they have as an option. If you are provided with an alternative then it makes your choice even more better |
| hep. istanbul vienna | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Be Enriched | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Be Enriched | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | There is a strong correlation between the prevalence of food advertisements directed at children and their subsequent food preferences and choices. Research suggests that while unhealthy food advertisements don't necessarily directly result in childhood obesity, they may increase the likelihood of obesity as a result of poor food choices influenced by misleading and often manipulative advertising. Children and adolescents often turn to media and advertisements for guidance, and when the goal of the advertising is purely monetary rather than to promote the health and well-being of our youth, then a higher intervention is necessary. |
| Sustainable Food Cities Partnership Aberdeen | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Covent Garden Market Authority | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Covent Garden Market Authority | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | The ban shows leadership by the GLA and sends a clear message about supporting good food in London |

| | | |
|--------------------------------|--|---|
| Groundwork london | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| FoodCycle | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| FoodCycle | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | But this should also include alcohol. Alcohol is very unhealthy and destroys lives, especially those who may be in poverty, lonely or food insecure. |
| Compassion in World Farming | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Maida Hill Place | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Maida Hill Place | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | We work in an area of deprivation; Type 2 diabetes, obesity, coronary heart disease and poor dental health are rife. Poverty is at the heart of this - education around healthy eating is crucial. We think a ban on unhealthy food is a good idea but also think more needs to be done about healthy alternatives which are also affordable. |
| London Farmers Markets | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| London Farmers Markets | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | Parents need help to introduce children to healthier preference and eating habits. This builds on, and goes further than, existing precedents in other European cities, such as Amsterdam, where since 1 January 2018, no junk food ads likely to appeal to children or teenagers are allowed to appear anywhere on the municipal subway system |

| | | |
|---------------------------|--|--|
| Alexandra Rose Charity | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Alexandra Rose Charity | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | Our environment is saturated with messaging that is targeted at influencing the way that we consume. We need to do something bold to change the obesogenic environment and we think that this is an idea worth trying. |
| Borough Market | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Borough Market | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | We strongly welcome this policy, however note that it excludes advertising brand names where product is not displayed. We strongly recommend that the Mayor considers banning advertisements showing just a brand name, where that brand name is synonymous with food and drink that isn't healthy. It is our position for example, that the McDonalds logo is so associated with Burgers and Fries that the imagery of the burger is ancillary. |
| Jamie Oliver Limited | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |

| | | |
|-------------------------|--|---|
| Jamie Oliver | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | <p>Yes! It's a fantastic, world-leading and evidence-based move that signals the mayor is putting child health first. The world's biggest poster advertising estate on the planet will now be a force for good for the 30 million journeys a day that it serves.</p> <p>The evidence is clear: there is a link between food promotion and children's food preferences, what they buy and what they eat. Advertising also influences how much children eat, and can lead to them 'pestering' parents to buy unhealthy products. Public Health England concluded in its review that "marketing is effective in influencing the purchase and consumption of high sugar foods".</p> <p>In recognition of this strong body of evidence, Amsterdam has taken steps to ban the advertising of less healthy foods from events they subsidise, municipal sports locations and subway station billboards. This was another of the measures that resulted in a 12% drop in the number of overweight and obese children in Amsterdam.</p> <p>Transport for London has one of the world's most valuable advertising estates. Just as TfL kick-started the fight against tobacco ads 30 years ago, the mayor has now done the same with junk food. It's brilliant that this ban includes brand and directional advertising, too. Do we really need all London schoolchildren to know how far away they are from the Golden Arches at all times of the day? And for kids exiting tube stations to be immediately nudged into going to the McDonald's down the road before they've even had a chance to make a choice about what they actually want to eat? This is a big stride forward for public health that generations</p> |
| Limited Food Foundation | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |

| | | |
|--------------------------------|--|--|
| Food Foundation | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | The Food Foundation fully supports this proposal for the reasons outlined above. There will need to be careful work done on the scope of the ban. While the banning of adverts of specific foods which are high in fat, sugar and or salt is clear, it is not clear how the banning of brand only adverts will operate in practice. Specific thought will need to be given as to how e.g. McDonald's salad would be handled or how a judgement would be made about whether a brand rather than a product were unhealthy (e.g. McDonald's versus Tesco). Specific consideration will need to be given to directional advertising. |
| Hackney Food Partnership (HFP) | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |

| | | |
|-------------------|--|--|
| Hackney Food | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | <ul style="list-style-type: none"> •HFP strongly supports the proposed ban on junk food advertising on TfL property. It would be an important and ambitious step to tackle the power that the food industry has on influencing the high consumption of unhealthy food and drink. •HFP believes that a high proportion of Hackney residents are likely to support the ban too, as demonstrated in the results of a Sugar Smart residents survey last October in which 69% supported action “to restrict the advertising and promotion of food and drink high in sugar”. •Evidence shows that junk food advertising increases the consumption of unhealthy food and drink and that its influence starts at a very early age. Therefore the ban could help create a healthier food culture and encourage the food industry to both increase advertising of healthier food and reformulate unhealthy food, as demonstrated by the recent sugar levy. Such bold action also has the potential to set an example to other cities and national government in the UK and abroad to take action, particularly if the learning and impact is shared. •Our experience of working with children in Hackney is that once they have an understanding of the power of the food industry and advertising on food choice they favour such actions (see also priority area 4). Students from four secondary schools and the Mayor of Hackney recently voted in favour of the proposed advertising ban at a youth debate organised by Sugar Smart Hackney (see also separate submission document from Sugar Smart Hackney). Participating schools both recognised the impact of advertising of unhealthy food and drink on childhood obesity and thought it the government’s duty to protect public health. The Mayor of Hackney commented “we feel that urgent action is needed and that certain food and drink companies will not change by |
| Partnership (HFP) | network) | |
| FareShare UK | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |
| Flavour School | 5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network? | Yes |

| | | |
|----------------|--|--|
| Flavour School | 5b. Please tell us why (you agree or disagree with the proposed ban of advertising food and drink that isn't healthy* across the Transport for London network) | Junk food is so pervasive that chipping away at its all out assault on the senses, especially of children, is essential. |
|----------------|--|--|