



The Rt Hon Boris Johnson MP
Prime Minister
10 Downing Street
London
SW1A 2AA

20 November 2020

Dear Prime Minister,

Advertising ban public consultation

We are writing as the leading food and drink brands in Britain, along with the representative organisations the Food and Drink Federation, UK Hospitality, ISBA and the Advertising Association. Together we represent more than 800 food and drink manufacturers and 3,000 of the leading UK brands. The food and drink industry is the largest manufacturing sector in the UK, worth more than £28bn to the economy, employing almost 500,000 people, and with a significant presence in every constituency in the United Kingdom. It feeds households but also, very importantly, sustains a hospitality industry which in 2019 employed 3.2 million people, generated £133bn in turnover and delivered £43bn in tax receipts to the Treasury. The advertising industry supports a further million jobs and finances British culture, media content and sport valued at £10 billion a year.

The food and drink sector wholeheartedly supports the Government's public health policy objectives. We know we have a key part to play. Food and drink manufacturers will continue to reformulate their products and put healthier or smaller portioned products on the market. We are however greatly concerned by the timing of the recently launched public consultation proposing the option of a complete online advertising ban of a broad range of food and drink products; a disproportionate proposal with an impossibly short time period given for responses given the level of technical detail sought.

Food and drink manufacturers have played an indispensable part in feeding the nation during the Covid-19 crisis. We continue to work closely with the UK Government and devolved administrations to ensure that this continues. We are proud that the public has experienced little disruption despite the very real and difficult conditions that we have faced, often increasing production whilst operating Covid secure environments for the safety of our staff. The advertising and media industries, for their part, have played an instrumental role in supporting Government communications by sharing vital public health messaging with the public over the course of the pandemic.

We are also working intensively to minimise the inevitable disruption due to the end of EU transition period and the introduction of new trading provisions from the Northern Ireland protocol. Both of these by themselves are very significant undertakings and are both made more perilous by the current operational and financial impacts of the pandemic.

The sheer volume of critical work facing food companies in the next few weeks means that at this time we simply cannot give this consultation the resource it deserves and demands. Something will have to give. The timing of this consultation is frankly astonishing, especially as the Government's stated ambition is to introduce these proposed advertising restrictions at the end of 2022. There is no reason to introduce this consultation and demand submission responses with such haste while effectively limiting our opportunity to respond, especially before the end of December.

The UK Government is quite correctly committed to evidence-based policy making. However, the evidence base underpinning these proposals is lacking in both detail and efficacy. Additionally, there is still no agreed definition of which foods the Government is including in these proposals. They are so broad they even capture family favourites from chocolate to peanut butter to sausage rolls.

As some of the UK's leading advertisers, the food and drink industry agree that products high in fat, salt or sugar should not be targeted at children. Advertisers use sophisticated online tools, which they have demonstrated to government repeatedly, to aim their advertisements at adult audiences. Why has the Government chosen to disregard this evidence?

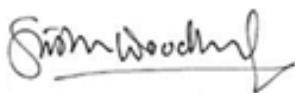
Consumers frequently visit brand websites or engage via social media to find out more about products, especially when new healthier items are launched that have been reformulated. We have been shocked that the proposed advertising restrictions will police how producers describe their products on their own websites and social media channels, despite previous assurances that the Government had no interest in doing this. Furthermore, these restrictions disproportionately impact SMEs, who make up 96% of our industry. Again, is it really the Government's intention that a local wedding cake business, for example, would not be able to share product details on its Instagram account in order to grow its sales?

We want to assure you of our desire to work in partnership and repeat our shared ambition to drive a step change in obesity rates. But as a matter of urgency we ask that an extension is given to the closing date of this consultation. We also ask for the opportunity to meet with you and the Number 10 health policy team once resource on both sides allows, to discuss alternative approaches that could be considered which would achieve the Government's aim of reducing child exposure to advertising, without imposing complete bans across the internet and other unnecessary restrictions.

Yours sincerely,



Ian Wright CBE
Chief Executive
Food and Drink Federation



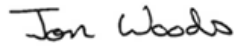
Stephen Woodford
Chief Executive
Advertising Association



Phil Smith
Director General
ISBA



Kate Nicholls
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UKHospitality



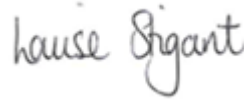
Jon Woods
FDF President



Nick Reade
Interim General Manager
Mars Wrigley UK



Sarah Arrowsmith
Chief Executive, Grocery
Associated British Foods plc



Louise Stigant
UK Managing Director
Mondelez International



Simon Litherland
CEO
Britvic plc



Jason Richards
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PepsiCo UK & Ireland



Karen Dear
Director of Operations
Craft Bakers Association



Jon Hughes
Managing Director UK & Ireland
Haribo plc



Ben Pearman
Managing Director
General Mills



David Murray
Managing Director UK & Ireland
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Philip Greenhalgh
Director
Grenade UK



Cameron Mackintosh
Managing Director
Princes Limited



Chris Silcock
Vice-President and Head
Kellogg's UK & Ireland



Mark Thorpe
Chief Executive
KP Snacks



Sebastian Munden
EVP & General Manager
Unilever plc

cc: Rt Hon George Eustice MP, Secretary of State for the Department for Environment, Food and Rural Affairs