



Advertising and Sponsorship Policy: High Fat, Salt or Sugar Policy Guidance Note



This Guidance Note constitutes a formal addendum to the council's Advertising and Sponsorship Policy and should be read and applied in concert with that policy. It details further guidance relating to restrictions of High Fat, Salt or Sugar (HFSS) products and requirements for advertising or sponsorship approvals.

1 General Principles

1.1 The UK Nutrient Profiling Model (NPM) is widely used and has been subject to rigorous scientific scrutiny, extensive consultation, and review. Furthermore, the scoring system it uses balances the contribution made by beneficial nutrients that are particularly important in children's¹ diets with components in the food that children should eat less of. It has therefore been concluded that the NPM model is the best way of identifying food that contributes to child obesity. Such food and drink is not only purchased directly by children but is bought for them by others.

1.2 Guidance on how to identify whether a product is considered HFSS under the NPM is available [here](#).

1.3 The outcome of any reviews or revisions of the NPM will be taken into consideration in applying our policy.

2 Exceptions

2.1 There are no exceptions to the policy offered on council-owned advertising sites. Bristol City Council understands there may be some limited unintended consequences of applying this policy, but has concluded that these consequences do not justify the public expenditure required to establish, run and monitor a general exceptions process.

2.2 The only circumstance in which an exception will be considered is within the footprint of an event operating on council-owned land, where the application of the policy would make the event unviable or logistically unfeasible to run; for example directional signage to stalls at a food and drink festival. Per section 5.6 of the Advertising and Sponsorship Policy, any advertising required during an event should be within the boundaries of the event space and form part of the hire agreement. Any potential deviation from HFSS restrictions for a specific event should be considered as part of this process, referred to the Head of External Communications and Consultation for decision, and made explicit in the hire agreement. Any exceptions are granted at the council's sole discretion on the basis of professional judgement.

¹ Child/Children means a person/s below the age of 18. This is in line with the Convention on the

Rights of the Child's definition: www.unicef.org/child-rights-convention/convention-text

2.3 In the event of a dispute on any exception application for an event, a final and binding decision will be made by the Director: Policy, Strategy and Partnerships under delegated powers.

3 Content featuring only non-HFSS products

3.1 These would normally be approved but would still need to comply with other sections of the Council's Advertising and Sponsorship Policy.

4 Content featuring only HFSS products

4.1 Where proposed content features only food and/or drink which is rated HFSS, such copy would be rejected, unless a practical exception has been agreed by the council as per paragraph 2.2 of this document.

4.2 It is therefore recommended that, before committing to advertising production or sponsorship agreements, advertisers and/or sponsors should discuss their eligibility with the council or its agents.

5 Content where there is a range of food/drink featured, some of which is HFSS

5.1 The advertising or promotion of HFSS products is unacceptable under the policy, so a range or meal could not feature them (e.g. fish, chips and peas could only be advertised if all products were non-HFSS). This would also apply to any meal settings being shown, including those for restaurants, aggregator platforms and delivery services.

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

6 Content where no food or drink is featured directly but the advertisement is from or features a food and/or drink brand

6.1 This may include:

- advertisements where the brand's logo is included but no products, such as a brand values campaign,
- directional signage to a store, app or website,
- promotional advertising which is price-led but features no products such as '50% off everything' or similar,
- advertising about a business or its performance, and/or
- content such as slides delivered by a sponsor at an event sponsored by a food or drink brand.

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

6.3 Where advertisers and/or sponsors are uncertain about the classification of proposed copy under these guidelines, they should discuss this with the council or its agents.

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

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

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

8 Advertisements or other content where food and drink is referenced in text, through graphical representations or other visual representation

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

9 Indirect promotion of HFSS food and/or drink

9.1 Where a product is non-HFSS but falls within a category covered by PHE's recommendations for sugar or calorie reduction, the product should always carry a prominent product descriptor to help differentiate it from non-compliant products (e.g. where an advertisement features a non-HFSS pizza or burger, the image should be accompanied by prominent text that names the specific product and retailer).

9.2 Children should not usually be shown in advertisements for products which are compliant in a category which is covered by PHE's recommendations for sugar or calorie reduction.

10 Portion sizes

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

10.2 If advertisers, sponsors and/or agencies are unsure about how to interpret this, or any other aspect of these guidelines, they are encouraged to get in touch with the council or its agents and work together on a solution to avoid submitted copy requiring changes or being rejected.

- medicines, medical devices, health-related products and beauty products;
- weight control and slimming;

- financial products;
- gambling;
- lotteries;
- alcohol;
- tobacco, rolling papers and filters;
- electronic cigarettes; and
- specific guidance when featuring or addressing children.

