

January 2010

## **Cancer Research UK response to the consultation on product placement on television**

Cancer Research UK<sup>1</sup> is the world's largest independent organisation dedicated to cancer research; in 2008/2009 our total spend on cancer research activity was £355 million. Our vision is that 'Together we will beat cancer'. We carry out world-class research to improve our understanding of cancer and to find out how to prevent, diagnose and treat different types of the disease. Cancer Research UK welcomes the opportunity to respond to this consultation on the future regulation of product placement on television.

Cancer Research UK does not have any general views about product placement on television. However, as a health charity, Cancer Research UK has serious concerns about the product placement of smoking accessories, alcohol and high fat, sugar or salt (HFSS) foods and our response to the consultation addresses these three areas only.

Smoking, obesity and alcohol are the three most important modifiable risk factors for cancer. Tobacco remains the single largest preventable cause of cancer in England, accountable for over a quarter of all cancer deaths in the UK.<sup>2</sup> Smoking is a factor in 90% of oral and lung cancers and increases a person's risk of a range of other cancers including stomach, pancreas, cervix, kidney, liver and bladder.<sup>3</sup> Being overweight or obese increases the risk of breast cancer in women who have been through the menopause, as well as cancers of the bowel, womb, oesophagus, pancreas, gallbladder and kidney.<sup>4</sup> Finally, research consistently shows that the more alcohol an individual consumes, the more they are increasing their risk of a range of cancers including oral, pharyngeal, oesophageal, laryngeal, breast, liver and bowel.<sup>5</sup> Although more research is needed in order to determine how the pattern of drinking affects an individual's risk, it is clear that the less an individual drinks, the more they reduce their risk of cancer.

### **Should television placement of smoking accessories such as cigarette papers and pipes be prohibited?**

Cancer Research UK is pleased to note that the placement of tobacco products is prohibited by the Audiovisual Media Services (AVMS) Directive and that the proposed legislation would place this prohibition into UK law.

Cancer Research UK strongly believes that the proposed legislation should be extended to prohibit the product placement of smoking accessories as well as cigarettes and tobacco products. Cancer Research UK believes that any advertising or promotion of smoking accessories, including product placement on TV, should be prohibited. The promotion of such products is an endorsement of smoking and can lead indirectly to increased consumption of tobacco. The proportion of smokers using hand rolled tobacco has risen in recent years and therefore the promotion of cigarette papers is particularly worrying. In addition, many manufacturers of smoking accessories have commercial

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<sup>1</sup> Registered charity no. 1089464.

<sup>2</sup> NHS (2008). Statistics on Smoking: England, 2008.

<http://www.ic.nhs.uk/webfiles/publications/Smoking%20bulletin/Smoking%202008/Statistics%20on%20Smoking%202008%20final%20format%20v9.pdf>

<sup>3</sup> Cancer Research UK. Tobacco, smoking and cancer: the evidence.

<http://info.cancerresearchuk.org/healthyliving/smokingandtobacco/howdoweknow/#source2>

<sup>4</sup> World Cancer Research Fund / American Institute for Cancer Research. Food, Nutrition, Physical Activity, and the Prevention of Cancer: a Global Perspective. Washington DC: AICR, 2007.

<sup>5</sup> Cancer Research UK. Alcohol and cancer.

<http://info.cancerresearchuk.org/healthyliving/alcohol/index.htm>

links to tobacco companies and it is likely that the tobacco industry will seek to exploit any exemption by promoting tobacco products through the associated brands. The marketing of tobacco accessories are also increasingly targeted, directly or indirectly, at young people and try to create a positive image of tobacco products and smoking.<sup>6</sup>

**Should television placement of alcohol, HFSS foods or gambling be subject to an outright prohibition; or, if not prohibited, should it be subject to restrictions of some kind?**

Cancer Research UK is not persuaded that children will be protected from food and drink advertising by the safeguards (over and above the requirements of the AVMS Directive) in the proposed legislation and as such we would recommend that the product placement of alcohol and HFSS foods be prohibited. At the very minimum, product placement of these products should be prohibited from those programmes before the 9pm watershed.

Alcohol consumption in the UK has increased by 19% in the last thirty years.<sup>7</sup> This is a particularly worrying trend, as a large body of evidence shows that incidences of alcohol-related harm to health within the population are strongly linked to levels of drinking. It is therefore important that consumption levels of alcohol in the UK are reduced. Alcohol consumption by young people in the UK is a particular cause for concern - UK figures for alcohol consumption by young people are some of the highest in Europe.<sup>8</sup>

Increasingly, evidence suggests that children and young people are influenced by exposure to alcohol advertising and that there is an association between the promotion of alcohol and increased consumption and harm. (For further details I refer you to Alcohol Concern's response to this consultation).

Similarly, it is accepted that advertising does affect children's food preferences, the food and drink that they purchase and their consumption patterns. In the UK, as elsewhere in the world, there is widespread concern about the increasing prevalence of diet-related ill health, including overweight and obesity among children. In England, almost a third (nearly 3 million) of children aged 2 to 15 are overweight or obese and approximately one sixth are obese (about 1.5 million).<sup>9</sup>

In February 2009, the World Cancer Research Fund published *Policy and Action for Cancer Prevention*, a global report that recommended governments should 'restrict advertising and marketing of "fast food" and other processed foods and sugary drinks to children, on television, in other media, and in supermarkets'. This recommendation was based on a systematic literature review that found evidence that targeting children with television advertising of sugary drinks, fast food and other convenience foods shapes the choices of children and their parents, and is probably a cause of overweight and obesity in childhood and then in later life. The report also found that restricting the marketing of unhealthy products is likely to be of most benefit to the most susceptible groups.

Cancer Research UK believes that neither the AVMS Directive on alcohol or audience indexing will be adequate to protect children from being exposed to alcohol and HFSS food advertising. Using an audience index to measure programmes which are *relatively* more popular with children than adults will not capture programmes such as early evening soaps, which are popular with large numbers of children, since these also attract a large adult audience. Similarly, the AVMS Directive on alcohol requires that the product placement of alcoholic drinks must not be aimed specifically at minors. This again means that product placement would be allowed in those programmes such as early evening soaps, which are popular with large numbers of children. Only a prohibition on

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<sup>6</sup> Hastings et al (2008) Point of Sale Display of Tobacco Products, The Centre for Tobacco Control Research, University of Stirling

<sup>7</sup> OECD (2009) Health Data (2009).

<sup>8</sup> European School Survey Project on Alcohol and Other Drugs (2007).

<sup>9</sup> Craig R., Mindell, J. (eds.) Health Survey for England 2006. Volume 1: Cardiovascular disease and risk factors in adults. London: The Information Centre for Health and Social Care, 2008.

product placement of alcohol and HFSS foods will protect children from exposure to this type of advertising.

**If it is not practicable to apply the detail of the BCAP Code rules on alcohol advertising to alcohol product placement, would the simple AVMS Directive rules that alcohol advertising must not be aimed specifically at minors and must not encourage immoderate consumption provide adequate safeguards?**

Cancer Research UK notes that the AVMS Directive requires that the product placement of alcoholic drinks must not be aimed specifically at minors and must not encourage immoderate consumption. However, we are concerned that this caveat will not be adequate to protect children from exposure to alcohol advertising and could contribute to the rising level of alcohol harm in the UK. It is widely acknowledged that children watch programmes, such as X-factor and Coronation Street, which are not specifically aimed at them. A significant number of children would therefore still be exposed to alcohol advertising.

Given this and the difficulties, acknowledged in the consultation, of implementing the BCAP Code rules on alcohol advertising to alcohol product placement, Cancer Research UK recommends that the product placement of alcohol be prohibited from UK television programmes.

We would be happy to provide any further information or detail as required. Please contact Helen Haggart, Policy Researcher at [Helen.Haggart@cancer.org.uk](mailto:Helen.Haggart@cancer.org.uk), or on 020 7061 8153.