

# UK government's 'Growing up in the online world' consultation - WCRF response

May 2026

World Cancer Research Fund (WCRF) examines how diet, weight and physical activity impact the risk of developing and surviving cancer. As part of an international network of charities, we have been funding life-saving research, influencing global public health policy and educating the public since 1982. While society continues searching for a cure, our prevention and survival work is helping people live longer, happier and healthier lives - free from the devastating effects of cancer.

As a cancer prevention charity, our response to this consultation focuses specifically on the harms, particularly cancer, that can arise from children's exposure to online marketing of junk food and alcohol. These are significant and under-appreciated risks within online environments, and there is a robust and growing evidence base demonstrating real harm to children and young people's health and development. As partners of the Institute for Alcohol Studies, Alcohol Focus Scotland, and Action on Smoking Health, we also endorse their responses to this consultation.

## Question 2

### **What are the harms or risks of social media use, and being online, for children?**

*Protecting children and young people from unhealthy product marketing is a human rights imperative*

Marketing of alcohol and junk food targeting children and young people is a violation of their rights enshrined in the United Nations Convention on the Rights of the Child (UNCRC)<sup>1</sup>. Broadly, the Convention states that children and young people have the right to grow up in a healthy environment, to be protected from being hurt, from receiving harmful information, and from any kind of exploitation. The UN Committee on the Rights of the Child has warned that the marketing of products such as cigarettes, alcohol, as well as food and drinks high in saturated fats, trans-fatty acids, sugar, salt or additives to children can have a long-term impact on their health, impacting their right to life, survival and development - as set out in Article 6<sup>2</sup>. To ensure that Article 6 is implemented, the Committee encourages preventative measures such as effective regulation and monitoring of advertising. Under the UNCRC, ratified by the UK in 1991, the UK Government also has a duty to uphold every child's right to the highest attainable standard of health as per Article 24. Protecting children and young people from alcohol marketing and that of foods high in fat, salt, and sugar (HFSS) is therefore a vital part of fulfilling that duty.

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<sup>1</sup> UNICEF (2016) *Convention on the Rights of the Child*. Available at: <https://www.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf>

<sup>2</sup> UN Committee on the Rights of the Child (2013) *General Comment No. 16 (2013) on State obligations regarding the impact of the business sector on children's rights, CRC/C/GC/16*. United Nations.

## *Unhealthy product marketing and cancer prevention*

Around 40% of cancers are preventable by addressing key modifiable risk factors including excess weight and alcohol consumption<sup>3</sup>. The prevalence of these risk factors is shaped by a range of factors, one of which is marketing<sup>4</sup>. The evidence base on how online marketing of unhealthy products drives consumption amongst children and young people - and the very high level of exposure to such advertising online - is robust and growing, as set out in this response. It is therefore important to recognise that the marketing of unhealthy products is a driver of preventable cancer, as well as many other diet related diseases, thereby constituting a harm and risk of social media use and being online for children and young people.

Overweight and obesity is a well-established risk factor for at least 13 cancer types<sup>5</sup>. It is the second largest modifiable risk factor after smoking, yet the leading cause of bowel, kidney, ovarian and liver cancer in the UK<sup>6</sup>. By 2043, overweight and obesity is projected to become the greatest preventable cause of cancer among UK women<sup>7</sup>. Childhood obesity is also a growing issue. The latest data shows that in England, 2 in 5 children leave primary school above a healthy weight, and 1 in 5 start school above a healthy weight<sup>8</sup>. This not only affects their immediate health and wellbeing but also has lasting consequences. Children living with overweight or obesity are five times more likely to develop serious, diet-related conditions in adulthood, including cancer<sup>9</sup>. WCRF's evidence clearly shows that consumption of sugar sweetened beverages, fast food, and other HFSS foods contributes to excess weight gain and must therefore be limited for cancer prevention<sup>10</sup>. Hence, the marketing of these products, which has been shown to drive consumption, is a core concern especially when it comes to children and young people. Similarly, alcohol is a well-established risk factor for 7 cancers<sup>11</sup>, with risks present even at

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<sup>3</sup> Fink, H., Langselius, O., Vignat, J. et al. (2026) 'Global and regional cancer burden attributable to modifiable risk factors to inform prevention', \*Nature Medicine\*. Available at: <https://doi.org/10.1038/s41591-026-04219-7>

<sup>4</sup> Saunders A, Critchlow N, Brown K, Brierley S, Webster G, Lister J, Kambona-Masika M, Neve K. (2025) *Digital influence: Young people's exposure to the marketing of cigarettes, vapes, unhealthy food/drink and alcohol*. Cancer Research UK. Available at: [https://assets.ctfassets.net/u7vsjnoopqo5/41Htu7YPi9quhnpFq57O4z/ce0abe4604a7c7ef01c3283bd1ad36c6/digital\\_influence\\_project\\_report.pdf](https://assets.ctfassets.net/u7vsjnoopqo5/41Htu7YPi9quhnpFq57O4z/ce0abe4604a7c7ef01c3283bd1ad36c6/digital_influence_project_report.pdf)

<sup>5</sup> World Cancer Research Fund/American Institute for Cancer Research (2018) *Diet, nutrition, physical activity and cancer: a global perspective. Continuous Update Project expert report 2018*. Available at: <https://www.dietandcancerreport.org>

<sup>6</sup> Brown, K.F., Rumgay, H., Dunlop, C. et al. The fraction of cancer attributable to modifiable risk factors in England, Wales, Scotland, Northern Ireland, and the United Kingdom in 2015. *Br J Cancer* 118, 1130–1141 (2018). doi: [10.1038/s41416-018-0029-6](https://doi.org/10.1038/s41416-018-0029-6)

<sup>7</sup> Cancer Research UK (2018) *When could overweight and obesity overtake smoking as the biggest cause of cancer in the UK?* Available at: [https://www.cancerresearchuk.org/sites/default/files/obesity\\_tobacco\\_cross\\_over\\_report\\_final.pdf?gl=1](https://www.cancerresearchuk.org/sites/default/files/obesity_tobacco_cross_over_report_final.pdf?gl=1)

<sup>8</sup> NHS Digital (2024) *National Child Measurement Programme, 2023–24 school year*. Available at: <https://digital.nhs.uk/data-and-information/publications/statistical/national-child-measurement-programme/2023-24-school-year>

<sup>9</sup> World Health Organization (2024) *Noncommunicable diseases: childhood overweight and obesity*. Available at: <https://www.who.int/news-room/questions-and-answers/item/noncommunicable-diseases-childhood-overweight-and-obesity>

<sup>10</sup> World Cancer Research Fund/American Institute for Cancer Research (2018) *Diet, nutrition, physical activity and cancer: a global perspective. Continuous Update Project expert report 2018*. Available at: <https://www.dietandcancerreport.org>

<sup>11</sup> World Cancer Research Fund/American Institute for Cancer Research (2018) *Alcoholic Drinks*. Available at: <https://www.wcrf.org/wp-content/uploads/2024/10/Alcoholic-Drinks.pdf>

low levels of consumption<sup>12</sup>, and public awareness remaining worryingly low<sup>13</sup>. Marketing of alcoholic beverages to children and young people has also been shown to increase uptake and consumption and is therefore a key concern.

It is important to note that there is a health inequalities angle to these issues. The prevalence of overweight and obesity, the second biggest cause of cancer in England, is highest in the most deprived areas - 71.5% are overweight whilst 35.9% have obesity<sup>14</sup>. Furthermore, rates are increasing faster in the most deprived groups in England but have levelled off among wealthier groups<sup>15</sup>. Evidence suggests that advertisements for unhealthy food are more concentrated in deprived areas<sup>16</sup>. Similar trends are observed with alcohol. People living in deprived areas are much more likely to experience an alcohol-related hospital admission or die of an alcohol-related cause<sup>17</sup>. Again, environments are a contributor to this, with studies suggesting that increased alcohol advertising may contribute to alcohol-related inequalities<sup>18</sup>.

Marketing of junk food and alcohol is not only an issue in physical environments, the digital sphere is a key space where children and young people are exposed to the marketing of unhealthy products which drive consumption and, by extension, cancer. Protecting children and young people from prolific and increasing exposure to such marketing online is therefore central to cancer prevention and the UK Government's prevention agenda more broadly.

### *Children and young people's exposure to online marketing of unhealthy products*

There is clear evidence that children are exposed to commercially driven content - such as adverts and marketing content for health harming products online. For example, recent research from Cancer Research UK<sup>19</sup> shows:

- Over a third (36%) reported seeing alcohol-related posts from businesses, and similar levels from influencers - with higher exposure among those who had drunk alcohol before.

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<sup>12</sup> Alcohol Change UK (2025) *Alcohol Harm Across the Drinking Spectrum*. Available at: <https://s3.eu-west-2.amazonaws.com/sr-acuk-craft/documents/Alcohol-harm-across-the-drinking-spectrum-2.pdf>

<sup>13</sup> Buykx P, Li J, Gavens L, Hooper L, Lovatt M, Gomes de Matos E, Meier P, Holmes J. Public awareness of the link between alcohol and cancer in England in 2015: a population-based survey. *BMC Public Health*. 2016 Nov 30;16(1):1194. doi: [10.1186/s12889-016-3855-6](https://doi.org/10.1186/s12889-016-3855-6)

<sup>14</sup> UK Government (2024). *Obesity Profile Short Statistical Commentary*. Available at: <https://www.gov.uk/government/statistics/update-to-the-obesity-profile-on-fingertips/obesity-profile-short-statistical-commentary-may-2024>

<sup>15</sup> UK Health Security Agency (2021) *Patterns and Trends in Excess Weight Among Adults in England*. Available at: <https://ukhsa.blog.gov.uk/2021/03/04/patterns-and-trends-in-excess-weight-among-adults-in-england/>

<sup>16</sup> Palmer, G., Green, M., Boyland, E. *et al*. A deep learning approach to identify unhealthy advertisements in street view images. *Sci Rep* 11, 4884 (2021). doi: [10.1038/s41598-021-84572-4](https://doi.org/10.1038/s41598-021-84572-4)

<sup>17</sup> Alcohol Change UK. "Alcohol and Inequalities." Available at: <https://alcoholchange.org.uk/policy/policy-insights/alcohol-and-inequalities>

<sup>18</sup> Institute of Alcohol Studies (2024) *Outdoor Alcohol Advertising by Area of Deprivation*. Available at: <https://www.ias.org.uk/report/outdoor-alcohol-advertising-by-area-of-deprivation/>

<sup>19</sup> Saunders A, Critchlow N, Brown K, Brierley S, Webster G, Lister J, Kambona-Masika M, Neve K. (2025) *Digital influence: Young people's exposure to the marketing of cigarettes, vapes, unhealthy food/drink and alcohol*. Cancer Research UK. Available at:

[https://assets.ctfassets.net/u7vsjnoopqo5/41Htu7YPi9quhnpFg57O4z/ce0abe4604a7c7ef01c3283bd1ad36c6/digital\\_influence\\_project\\_report.pdf](https://assets.ctfassets.net/u7vsjnoopqo5/41Htu7YPi9quhnpFg57O4z/ce0abe4604a7c7ef01c3283bd1ad36c6/digital_influence_project_report.pdf)

- More than half saw promotions for HFSS products, including through influencer marketing.
- 1 in 5 young people on social media reported seeing cigarette-related business posts, and 1 in 4 saw similar content from influencers.
- Almost 1 in 3 saw vape-related content from businesses, and nearly 4 in 10 from influencers - again, exposure was higher among those who had already vaped. Many of these posts failed to carry even the mandatory nicotine warning.

### *Evidence on online alcohol marketing and children and young people*

There is now a substantial body of longitudinal evidence establishing a causal relationship between exposure to alcohol marketing and alcohol use among young people. Systematic reviews and meta-analyses consistently show that marketing exposure accelerates the onset of drinking, increases drinking frequency, and shapes heavier consumption patterns in adolescence and early adulthood<sup>20,21,22</sup>. As the World Health Organization (WHO) has concluded, the relationship between exposure to alcohol marketing and underage drinking is causal, not merely correlational<sup>23</sup>.

A 2025 Lancet meta-analysis of 31 studies involving over 62,000 participants – 84% of whom were adolescents aged 11–17 - found that exposure specifically to digital alcohol marketing was associated with 75% greater odds of alcohol use, 80% greater odds of binge drinking, and 78% greater odds of susceptibility to alcohol initiation among never-users<sup>24</sup>. This is among the largest and most methodologically robust bodies of evidence yet assembled on this question.

Research from Australia indicates young people may be exposed to more than 20 alcohol advertisements per hour on social media<sup>25</sup>, while a New Zealand study found 71% of young people reported seeing alcohol marketing on platforms they regularly use<sup>26</sup>.

The recent 2025 evidence review by Public Health Scotland reinforces and contextualises this international evidence within a UK setting. Drawing on 65 studies across high-income countries, the review concludes with confidence that alcohol marketing is both pervasive and persuasive, with exposure occurring frequently across multiple channels – including online environments – and associated with increased consumption, intentions to drink, and

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<sup>20</sup> Anderson, P., De Bruijn, A., Angus, K., Gordon, R., & Hastings, G. (2009). Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies. *Alcohol & Alcoholism*, 44(3), 229-243.

<sup>21</sup> Jernigan, D., Noel, J., Landon, J., Thornton, N., & Lobstein, T. (2017). Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008. *Addiction*, 112, 7-20.

<sup>22</sup> Sargent, J. D., & Babor, T. F. (2020). The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs, Supplement*, (s19), 113-124.

<sup>23</sup> Digital marketing of alcohol: challenges and policy options for better health in the WHO European Region. Copenhagen: WHO Regional Office for Europe; 2021.

<sup>24</sup> Donaldson, S. I., Russell, A. M., La Capria, K., DeJesus, A., Wang, E., Fayad, J., & Allem, J. P. (2025). Association between exposure to digital alcohol marketing and alcohol use: a systematic review and meta-analysis. *The Lancet Public Health*, 10(11), e912-e922.

<sup>25</sup> Rutherford, B. N., Leung, J., Stjepanović, D., & Chan, G. C. (2024). Through the looking glass: an alcohol advertisement every 3 minutes. *Drug and Alcohol Review*, 43(6), 1426-1434.

<sup>26</sup> McCreanor, T., Moewaka Barnes, A., Goodwin, I., Carah, N., Young, J., Spicer, J., & Lyons, A. C. (2025). Alcohol marketing on social media: young people's exposure, engagement and alcohol-related behaviors. *Addiction Research & Theory*, 33(3), 161-171.

harmful drinking patterns, particularly among children and young people<sup>27</sup>. Importantly, the review also finds that voluntary industry self-regulation is ineffective, and that more comprehensive restrictions on marketing are likely to reduce exposure and consumption, with the strongest and most consistent benefits seen in younger populations<sup>28</sup>. This UK-relevant synthesis strengthens the case for robust statutory controls on digital alcohol marketing as part of efforts to protect children online.

The harms also extend beyond initiation. Early drinking onset is itself a strong predictor of hazardous drinking in adulthood<sup>29</sup>. Teenage drinkers report significantly more hazardous and disinhibitory behaviour per unit of alcohol than older drinkers, and the developing adolescent brain is particularly vulnerable to alcohol's neurotoxic effects. Research has also shown that those who drink more heavily are algorithmically targeted with more alcohol marketing, creating a reinforcing cycle of harm<sup>30</sup>.

Importantly, alcohol marketing does not need to target children and young people directly to cause harm. Exposure alone – through content primarily intended for adults – shapes attitudes and normalises drinking culture from a young age. As noted above, the WHO European Region frames protection from this exposure as a children's rights issue under the UNCRC<sup>31</sup>.

### *Evidence on online junk food marketing and children and young people*

A wealth of evidence shows there is a clear link between food advertising, and the food children eat<sup>32</sup>. Unhealthy food marketing in particular is linked with strong preference for these food products<sup>33</sup>, more snacking<sup>34</sup> and greater intake of junk food and lower intake of healthy food overall<sup>35</sup>. There is also significant academic consensus on the association. Policies to protect children and young people from the harmful impact of food marketing on diet are recommended as a 'World Health Organisation Best Buy'<sup>36</sup>. The only groups that downplay the link between advertising and obesity are those with vested interests such as

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<sup>27</sup> Public Health Scotland (2025), Rapid review of evidence about alcohol marketing and advertising Influences on consumer attitudes and behaviours, and the effects of regulation on those behaviours.

<sup>28</sup> Ibid

<sup>29</sup> Enstad, F., Evans-Whipp, T., Kjeldsen, A., Toumbourou, J. W., & von Soest, T. (2019). Predicting hazardous drinking in late adolescence/young adulthood from early and excessive adolescent drinking—a longitudinal cross-national study of Norwegian and Australian adolescents. *BMC public health*, 19(1), 790.

<sup>30</sup> Carah, N. (2017). Alcohol corporations and marketing in social media. In *Youth Drinking Cultures in a Digital World* (pp. 115-131). Routledge.

<sup>31</sup> Reducing the harm from alcohol by regulating cross-border alcohol marketing, advertising and promotion: a technical report. Geneva: World Health Organization; 2022.

<sup>32</sup> Public Health England (2015) *Sugar Reduction: the evidence for action*. Available at: <https://www.gov.uk/government/publications/sugar-reduction-from-evidence-into-action>

<sup>33</sup> Boyland EJ, Harrold JA, Kirkham TC, Corker C, Cuddy J, Evans D, Dovey TM, Lawton CL, Blundell JE, Halford JCG (2011). Food commercials increase preference for energy-dense foods, particularly in children who watch more television. *Pediatrics*, 128(1): e93-e100

<sup>34</sup> Boyland EJ, Nolan S, Kelly B, Tudur-Smith C, Jones A, Halford JCG, Robinson E (2016). Advertising as a cue to consume: a systematic review and meta-analysis of the effects of acute exposure to unhealthy food or non-alcoholic beverage advertising on intake in children and adults. *American Journal of Clinical Nutrition*, 103: 519-533.

<sup>35</sup> Thomas C, Hooper L, Petty R, Thomas F, Rosenberg G, Vohra J (2018). 10 years on: New evidence on TV marketing and junk food consumption amongst 11-19 year olds 10 years after broadcast regulations. Cancer Research UK, available from: [http://www.cancerresearchuk.org/sites/default/files/10\\_years\\_on\\_full\\_report.pdf](http://www.cancerresearchuk.org/sites/default/files/10_years_on_full_report.pdf)

<sup>36</sup> World Health Organization (2023) *More ways to save more lives for less money: World Health Assembly adopts more "best buys" to tackle noncommunicable diseases*. Available at: <https://www.who.int/news/item/26-05-2023-more-ways-to-save-more-lives-for-less-money---world-health-assembly-adopts-more-best-buys-to-tackle-noncommunicable-diseases>

the food and advertising industries. Yet still, food companies spend millions every year on a range of different marketing techniques to help keep unhealthy food and drink in the spotlight. Crucially, the evidence base covers the online environment with research demonstrating that children and young people's exposure to digital marketing of unhealthy foods, such as HFSS products, is associated with the use and consumption of these products<sup>37-38</sup>.

While it is difficult to establish the scale of HFSS marketing encountered by children and young people online, existing evidence suggests that it is widespread. For example, there is growing research indicating that followers of social media accounts of HFSS brands include millions of children and adolescents. Demographic data of Twitter and Instagram users in the US showed that an estimated 6.2 million adolescents followed 27 of the most highly advertised fast food, snack, and drink brands<sup>39</sup>. In the same setting, a cross-sectional survey of 1564 adolescents found that approximately one-half reported engaging with fast-food, snacks, candy and sugary drink brands<sup>40</sup>. In the UK, an innovative experimental study carried out among adolescents suggested that, when it comes to social engagement with brand content, adolescents are as susceptible to effects when ads originate from a company or brand, as they are when ads are shared by celebrities or their peer group<sup>41</sup>. As noted, precise estimates of children and adolescent engagement with the social media accounts of HFSS brands remain difficult to produce. This is because researchers often cannot access data held by the major food, marketing and social media companies on children and HFSS marketing. At the same time, these companies use sophisticated data analytics that allow them to target individual users, including children and young people, effectively<sup>42</sup>.

In the UK, junk food advertising restrictions came into force on the 5<sup>th</sup> January 2026 as part of the Government's efforts to protect children from the harmful effects of advertising, with a 9pm watershed ban of less healthy food advertising on TV and a complete ban online<sup>43</sup>. Yet analysis suggests the protections are wholly inadequate at protecting children and young people from junk food advertising online and on TV, as the public health sector has repeatedly warned<sup>44</sup>. One of the main weaknesses of the restrictions is that they include a brand exemption, which significantly undermines the policy in two key ways. First, it allows brands that are synonymous with HFSS foods to continue being advertised

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<sup>37</sup> Buchanan, L., Kelly, B., Yeatman, H., & Kariippanon, K. (2018). The Effects of Digital Marketing of Unhealthy Commodities on Young People: A Systematic Review. *Nutrients*, 10(2), 148.

<sup>38</sup> Baldwin, H., Freeman, B., & Kelly, B. (2018). Like and share: Associations between social media engagement and dietary choices in children. *Public Health Nutrition*, 21(17), 3210-3215. doi:10.1017/S1368980018001866

<sup>39</sup> Rummo, P.E., Cassidy, O., Wells, I., Coffino, J.A. and Bragg, M.A., 2020. Examining the Relationship between Youth-Targeted Food Marketing Expenditures and the Demographics of Social Media Followers. *International journal of environmental research and public health*, 17(5), p.1631.

<sup>40</sup> Fleming-Milici F, Harris JL. Adolescents' engagement with unhealthy food and beverage brands on social media. *Appetite*. 2020 Mar 1;146:104501.

<sup>41</sup> Murphy, G., Corcoran, C., Tatlow-Golden, M., Boyland, E. and Rooney, B., 2020. See, like, share, remember: Adolescents' responses to unhealthy-, healthy-and non-food advertising in social media. *International Journal of Environmental Research and Public Health*, 17(7), p.2181.

<sup>42</sup> Tatlow-Golden, M., Tracey, L., & Dolphin, L. (2016) *Who's Feeding the Kids Online? Digital food marketing to children in Ireland: Advertisers' tactics, children's exposure and parents' awareness*. Irish Heart Foundation. Available at: [https://irishheart.ie/wp-content/uploads/2020/07/web\\_whos\\_feeding\\_the\\_kids\\_online\\_report\\_2016.compressed.pdf](https://irishheart.ie/wp-content/uploads/2020/07/web_whos_feeding_the_kids_online_report_2016.compressed.pdf)

<sup>43</sup> UK Government (2022) *Restrictions on the advertising of less healthy food and drink on television programme services, on-demand programme services, and online services: Health and Care Act 2022, Schedule 18: Advertising of less healthy food and drink*

<sup>44</sup> Nesta (2026) *Mind the gaps: why restrictions on less healthy food and drink advertising fall short*. Available online: <https://www.nesta.org.uk/report/mind-the-gaps-food-advertising/>

e.g. Cadbury's. Second, the lack of brand restrictions enables companies to promote entire HFSS product ranges e.g. Cadbury's Dairy Milk, just not individual products. The nature of the exemption creates ambiguity, allowing advertisers to promote recognisable unhealthy products without showing them directly. This weakens the regulations' public health intent, shifting incentives away from the promotion of identifiable healthier products and towards exploiting brand structures and naming conventions to maintain visibility of less healthy options. Whilst the restrictions have not been in place for long, a material impact is being observed in that large brands have increasingly been investing in brand-based advertising<sup>45\_46\_47</sup>.

This is a concern. Evidence shows that brand-only advertising increases consumption of unhealthy foods and drinks and therefore contributes to child obesity. Pre-publication research conducted by the University of Liverpool and funded by the National Institute for Health and Care Research finds that compared to non-food advertising, brand-only food adverts from brands associated with unhealthy products (through multiple formats: audiovisual, visual only, audio only, static) increase snacking, lunch and more food overall<sup>48</sup>. Product adverts were more effective (increased intake by ~90 kcals) but brand adverts were also effective (increased intake by ~30 kcals)<sup>49</sup>. Therefore brand-only adverts by food and drink companies do not have a benign effect when it comes to child obesity. In fact, the association is so strong that it significantly increases calorie intake, with effects comparable to exposure to less healthy food and drink advertising.

## Question 51

**What should be considered when taking further action to support positive online spaces?**

### *Why digital environments are a particular concern*

Digital environments present a qualitatively different – and more dangerous – form of marketing exposure compared to traditional media, for several reasons:

- **Scale and ubiquity** - Children now encounter alcohol and HFSS marketing across every digital space they inhabit from social media feeds, video platforms, gaming environments, messaging apps, and live-streamed sporting events. In 2020, most UK children had their own mobile phone by age 7<sup>50</sup>. The internet is not an occasional media environment; it is a continuous, ambient presence in children and young people's lives.
- **Algorithmic personalisation and behavioural targeting** - Unlike broadcast

<sup>45</sup> Ride Shotgun (2022) *The HFSS ad ban: 6 ways brands can thrive*. Available at: <https://rideshotgun.co.uk/blog/how-brands-can-thrive-after-hfss-ad-ban/>

<sup>46</sup> The Social Element (2022) *What will the ban on HFSS advertising mean for your brand?* Available at: <https://thesocialelement.agency/hfss-legislation>

<sup>47</sup> Pier (2023) *HFSS: What's going on and how brands can prepare for it*. Available at: <https://www.pierweare.com/2023/07/18/hfss-whats-going-on-and-how-brands-can-prepare-for-it/>

<sup>48</sup> Pre-Publication: Boyland et al, This project was funded by the NIHR Policy Research Programme (NIHR203434). Available at: <https://www.theguardian.com/society/2025/may/11/children-eat-more-after-seeing-just-five-minutes-of-junk-food-ads-study-finds>

<sup>49</sup> Ibid

<sup>50</sup> The Guardian (2020) *Most children own mobile phone by age of seven, study finds*. Available at: <https://www.theguardian.com/society/2020/jan/30/most-children-own-mobile-phone-by-age-of-seven-study-finds>

advertising, digital platforms use sophisticated data analytics and real-time algorithmic processing to deliver highly personalised marketing. GPS location data, browsing history, social interactions and demographic profiling are combined to serve tailored alcohol advertisements to individual children – often while they are engaged in social activities – at moments of maximum psychological vulnerability<sup>51</sup>. This exploits children's developmental susceptibility in ways that traditional advertising cannot. This also applies to HFSS food marketing.

- **Influencer marketing and disguised advertising** - Alcohol and HFSS brands routinely pay social media influencers – often with large followings among young people – to promote products in ways indistinguishable from organic content. Research shows that influencers are effective in normalising alcohol consumption among minors, and that disclosure requirements are routinely ignored or circumvented<sup>52-53</sup>. Native advertising, user-generated content campaigns, branded gaming integrations, and augmented reality filters further obscure the commercial intent of marketing.
  - A specific and currently unregulated gap concerns **influencers who own their own alcohol brands**. Because promotion of a personally owned brand can be framed as authentic self-expression rather than paid advertising, existing disclosure requirements do not apply. A study of influencer accounts popular with young people aged 16–20 found that 4 of the 20 most frequently followed influencers had their own alcohol brands, and none disclosed promotion of those brands as advertising<sup>54</sup>. Guidance should explicitly close this loophole.
- **Normalisation through social identity** - Social media environments link alcohol marketing to identity construction, social belonging and peer culture – domains of particular psychological importance to adolescents<sup>55</sup>. User-generated content, sweepstakes and brand engagement campaigns transform children from passive recipients into active distributors of alcohol marketing, blurring the line between commercial promotion and authentic social interaction.
- **Cross-border nature of the harm** - Digital alcohol and HFSS marketing is inherently cross-border. Content produced by transnational alcohol and HFSS corporations are distributed via global platforms reaching children regardless of national restrictions<sup>56</sup>. This means domestic regulation alone is structurally insufficient to protect children from exposure.
- **Regulation fails to keep pace with advancements in advertising and technology** - The online advertising environment is evolving at a rapid pace with

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<sup>51</sup> Digital marketing of alcohol: challenges and policy options for better health in the WHO European Region. Copenhagen: WHO Regional Office for Europe; 2021.

<sup>52</sup> Hendriks, H., Wilmsen, D., Van Dalen, W., & Gebhardt, W. A. (2020). Picture me drinking: Alcohol-related posts by Instagram influencers popular among adolescents and young adults. *Frontiers in psychology*, 10, 2991.

<sup>53</sup> Digital marketing of alcohol: challenges and policy options for better health in the WHO European Region. Copenhagen: WHO Regional Office for Europe; 2021.

<sup>54</sup> Lyons, A. C., Goodwin, I., Young, J., & Burton-Wood, C. (2026). Evading regulation: young people's exposure to harmful commodity marketing in the social media feeds of their favourite influencers. *Health Promotion International*, 41(2), daag037.

<sup>55</sup> Atkinson, A. M., Ross-Houle, K. M., Begley, E., & Sumnall, H. (2017). An exploration of alcohol advertising on social networking sites: an analysis of content, interactions and young people's perspectives. *Addiction Research & Theory*, 25(2), 91-102.

<sup>56</sup> Reducing the harm from alcohol by regulating cross-border alcohol marketing, advertising and promotion: a technical report. Geneva: World Health Organization; 2022.

technological advancements allowing advertisers to market in new and innovative ways, which are not captured by existing regulations or even regulation currently under development.

Taken together, the evidence demonstrates that children and young people's online environments are saturated with alcohol and HFSS food marketing that is personalised, pervasive and causally linked to harm. Concerningly, there is currently a lack of coherence in how marketing of both HFSS products and alcohol is regulated online e.g. regulations to protect children from unhealthy food advertising online is based on a total ban of products ads as there is no way to reliably target children. Moreover, despite existing regulations, loopholes exist<sup>57</sup>.

### *Recommendations:*

- Exposure to alcohol and HFSS food advertising online should be treated as a children's online safety issue, not only a public health issue. Policy decisions around children's online safety should also consider exposure to commercially driven health harming content as an online harm.
- **Junk food advertising:** The current restrictions on HFSS food advertising, while necessary, are weak and do not address the pervasiveness of food marketing in the digital sphere effectively<sup>58</sup>. Firstly, they are based on the 2004 Nutrient Profile Model, which does not reflect the latest evidence on nutrition and is therefore enabling a lot of junk food products to evade restrictions. Secondly, the restrictions fail to address the harm of brand only advertising which, as shown above, also drives consumption of unhealthy food products. Thirdly, it fails to address the full breadth of digital marketing which encompasses marketing on social media platforms, websites, gaming platforms and direct push notifications from apps. Regulation needs to address all of these different areas as supported by existing research<sup>59</sup>.
- **Alcohol advertising:** Despite widespread legal requirements, age-verification on alcohol-related digital content remains largely ineffective. Research has demonstrated that the majority of alcohol brands fail to enforce age limits on social media platforms, and where tools exist, they are easily circumvented<sup>60-61</sup>. As such, age restrictions are unlikely to solve the issue of exposure to harmful product marketing and should not be used to absolve manufacturers of their responsibility to ensure children don't see marketing for alcohol or other health harming products.

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<sup>57</sup> Saunders A, Critchlow N, Brown K, Brierley S, Webster G, Lister J, Kambona-Masika M, Neve K. (2025) *Digital influence: Young people's exposure to the marketing of cigarettes, vapes, unhealthy food/drink and alcohol*. Cancer Research UK. Available at: [https://assets.ctfassets.net/u7vsjnoopqo5/41HtuYYPj9quhnpFg57O4z/ce0abe4604a7c7ef01c3283bd1ad36c6/digital\\_influence\\_project\\_report.pdf](https://assets.ctfassets.net/u7vsjnoopqo5/41HtuYYPj9quhnpFg57O4z/ce0abe4604a7c7ef01c3283bd1ad36c6/digital_influence_project_report.pdf)

<sup>58</sup> Boyland, Emma and Tatlow-Golden, Mimi (2017). *Exposure, Power and Impact of Food Marketing on Children: Evidence Supports Strong Restrictions*. European Journal of Risk and Regulation, 8 pp. 224–236.

<sup>59</sup> Ibid.

<sup>60</sup> Barry, A. E., Bates, A. M., Olusanya, O., Vinal, C. E., Martin, E., Peoples, J. E., ... & Montano, J. R. (2016). Alcohol marketing on Twitter and Instagram: Evidence of directly advertising to youth/adolescents. *Alcohol and alcoholism*, 51(4), 487–492.

<sup>61</sup> Kauppila, E. K., Lindeman, M., Svensson, J., Hellman, C. M. E., & Katainen, A. H. (2019). Alcohol marketing on social media sites in Finland and Sweden: A comparative audit study of brands' presence and content, and the impact of a legislative change.

The UK Government should instead improve age restrictions whilst also introducing stronger restrictions such as banning online ads for alcohol.

- **Regulation must keep pace with advancements in technology and advertising and be protected from industry influence** - The digital environment must be consistently monitored for new, innovative ways of reaching audiences, especially children, that can contribute to health harms and circumvent existing regulatory processes. For example, artificial intelligence may in future be used to advertise to children and young people in new ways that are not captured in current restrictions - underscoring the need for regulation to keep pace with advancements in technology and advertising. Persistent delays to advertising restrictions on health harming products further hinders regulation's ability to keep pace with the digital environment. There is strong evidence that delays are partly driven by industry influence<sup>62</sup>. It is therefore imperative that regulation to protect children and young people from the advertising of alcohol and HFSS foods is safeguarded from the influence of food, drink, and alcohol industries.

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<sup>62</sup> Institute of Alcohol Studies (2025). Now you see it, now you don't: How alcohol industry interference made marketing restrictions disappear from the 10 Year Health Plan in England. Available at: [now-you-see-it-now-you-dont](#)