FUELUS DON'T FOOLUS MANUFACTURERS



Sweet Deception - Are Food Giants Using Child-Appealing Tactics Responsibly?



BUSINESSES AND THE GOVERNMENT HOLD THE LEVERS OF CHANGE AND ΝΕΕΟ ΤΟ ΤΑΚΕ ACTION NOW IF THEY WANT TO **BEON THE RIGHT SIDE OF HISTORY**

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FOREWORDS

When I go to a shop with my little sister, she goes straight for the bright packaging, for products with characters and colours, and of course, they're the unhealthy products. It annoys me that companies use these tactics to attract children to buy their products and personify unhealthy products to make them more friendly and appealing. Cartoon characters on packaging correspond with adverts on TV and social media, so you see a friendly character on TV and then of course you want a product that has the same friendly character on the packaging.



I feel disappointed because products like Curiously Cinnamon, and Cheetos Ketchup are deliberately targeted towards kids, using us for profit. Big food companies use marketing tactics to distract us from the unhealthiness of their products, all while portraying their products as innocent and fun. It makes me ask - why is the health of children not prioritised over unhealthy products tactically targeting children?

Oli, 17

Vin, 15





When I was younger, I loved Marvel and Spiderman. Anything that had Marvel characters on it no matter what food product it was, I wanted it. I think it's because I enjoyed the films and therefore wanted to buy and collect it all. Companies use whatever is popular at a certain time to market their unhealthy products to kids. It's now affecting a new generation - I see it happening with my little sister with Paw Patrol and Bluey. Of course, my little sister asks my stepdad to buy the products, because she loves the character from the TV.



Seeing packaging like the M&M's angers me as I don't want to be drawn in by these characters, but they resonate! It's a clever tactic, which is why it makes me so angry. I work with young people and it brings me back to loving M&M's as a kid due to the big, funny-shaped characters. Outside the M&M's store in London, I saw a snaking line of kids desperate to see the characters in real life. I feel really disappointed in these companies. It is clear to see through the bright, bubbly slogans and cute animal characters. They are targeting children.

Reuben, 17

EXECUTIVE SUMMARY

Children growing up today have the odds stacked against them when it comes to health. By the time they start school, more than 1 in 5 (21.3%) already have a higher risk of developing food related illnesses and this rises to more than 1 in 3 (36.6%) by the time they leave primary school.¹ The causes are multifaceted, but a food environment flooded with unhealthy products and relentless marketing that even the youngest children cannot escape does not help.

Attractive and appealing food packaging is a key marketing tactic used by food businesses to influence what we buy and eat. Packaging has particular power when it comes to children, with the use of characters, fun images, bright colours and unusual names or shapes all effective strategies to appeal to children.²

We analysed the front-of-packs of food sold by the biggest global food companies operating in the UK³ to take a closer look at how many of their products that use child-appealing packaging are unhealthy (defined as products that are high in fat, sugar or salt and/or meet the criteria for a red front-of-pack label).

We identified 262 food products with child-appealing packaging - including crisps, cereals, ice cream and confectionery. 78% (204) were classed as unhealthy. These products featured a variety of child-appealing features with individual products often including more than one feature.

The most common tactic used was child-appealing visuals; such as bright colours, patterns and fun lettering. This technique was found on 80% (164/204) of the products that are also unhealthy.

Other key techniques used were unusually shaped or flavoured products; use of characters (such as a brand, licensed or other cartoon or character); and appeals to fun (e.g. the packaging appeals to the product being fun or funny, having fun while eating the product, being happy or enjoyment). Products that featured these techniques were more likely to be unhealthy.

75% (164/218) of products with child-appealing visuals were unhealthy.
78% (120/154) of unusually shaped and/or flavoured products were unhealthy.
67% (48/72) of products that included a character were unhealthy.
64% (44/69) of products with appeals to fun on pack were unhealthy.

Of the 10 businesses included in the analysis, we found that for seven of them - Ferrero, Kellogg's, Mars, Mondelez, Nestlé, PepsiCo and Unilever - the majority of their child-appealing products were unhealthy. However, the number of unhealthy child-appealing products varied significantly, ranging from 58 from Mondelez to just 10 from Unilever. We found one product from Kraft Heinz that met the unhealthy criteria and none from Danone. Products from The Coca-Cola Company were out of scope as the survey focused on packaged food.

RECOMMENDATIONS

Food businesses and the Government hold the levers of change and need to take action NOW if they want to be on the right side of history.

Please refer to our report 'Fuel us, don't fool us: How food giants rig the system against children's health (Manufacturers)' for our full set of recommendations for food businesses and the Government.

Actions for Food Businesses:

A

Remove child-appealing features from packaging of products that are high in fat, sugar or salt or would qualify for a red label on front-of-pack for any nutrient.

Actions for Government:

Bring in new regulations to restrict the use of child-appealing features on the packaging of unhealthy products (as part of a package of measures to protect children from unhealthy food and drink marketing).

7

NHS Digital. (2023). National Child Measurement Programme, England, 2022/23 School Year.
 Elliott C, Truman E. (2020). The Power of Packaging: A Scoping Review and Assessment of Child-Targeted Food Packaging. *Nutrients*.12(4):958.
 Based on 2022 Euromonitor data on value sales of packaged food and drinks.

INTRODUCTION

Bite Back is a youth activist movement challenging a food system that has been set up to fool us all; a food system that relies on the production and marketing of nutrient poor, ultra-processed food and drinks that are bad for our health and bad for planetary health.

In February 2024, Bite Back published an investigation of the 10 biggest global food and drink businesses operating in the UK with research from the University of Oxford.⁴ These are: Coca-Cola, Danone, Ferrero, Kellogg, Kraft Heinz, Mars, Mondelez, Nestlé, PepsiCo and Unilever. We found that the majority are reliant on selling unhealthy products in the UK, that they are dominating digital advertising spend in food categories such as chocolate, crisps and ice cream, and that voluntary action by businesses to make their products healthier has had mixed results.

Many of these businesses also have their own 'responsible marketing policies' (see page 11) and make claims about not targeting children with unhealthy food. Yet you only have to walk down a supermarket cereal, confectionery or crisp aisle to see a display of bright, fun, child-appealing packaging.

Attractive and appealing packaging of food and drink products is a core element of the marketing mix that directly influences our decisions to buy.⁵ It's a particularly effective tactic to target children with lots of research showing its power to influence

children's taste and product preferences.⁶ But across the world, the majority of food with child-appealing packaging tends to be nutrient poor.⁷ Other countries have taken action. In Chile and Mexico businesses have been banned from using child-appealing promotions on the packaging of foods classed as unhealthy.8,9

Currently, in the UK, there are no regulations to restrict child-appealing tactics like characters on junk food packaging, so businesses are not technically breaking any rules. This means businesses can say they don't 'target' children while plastering their junk food with cute cuddly characters. But how prevalent is the use of child-appealing features on products sold by some of the biggest, most successful food manufacturers operating in the UK? To find out, we surveyed their product packaging to identify those that appeal to children, and analysed how many of these products are unhealthy.

WHAT IS CHILD-APPEALING **PACKAGING?**

Packaging is considered child-appealing if it has characteristics that children notice and find relevant to them, driving a desire for the product. Product packaging can be child-appealing even if it is not a product developed primarily for children.

To identify and code child-appealing features, we used a validated framework of 18 core techniques outlined below.¹⁰ Our survey was limited to front-of-pack, and some of the techniques are used elsewhere on packaging, such as games or activities.

4 Bite Back (2024). Fuel us, don't fool us: Are food giants rigging the system against children's health? (Manufacturers).

5 Hawkes C. (2010). Food packaging: the medium is the message. Public Health Nutrition. 13(2):297-299.

10 Mulligan C, Potvin Kent M, Vergeer L et al. (2021). Quantifying Child-Appeal: The Development and Mixed-Methods Validation of a Methodology for Evaluating Child-Appealing Marketing on Product Packaging. Int J Environ Res Public Health. 29;18(9):4769.



1. Child-appealing visual/graphical design of package 2. Unconventional shape of the product, featured on the package 3. Unconventional flavour of the product, featured on the package 4. Unconventional colour of the product, featured on the package 5. Games or activities on package 6. Presence of branded characters or spokespersons 7. Presence of Licensed Characters 8. Presence of celebrities 9. Other characters or cartoons 10. Other child-appealing tie-ins 11. Presence of children/parents/families 12. Toys or prizes 13. Coupons, contests, or giveaways, specifically appealing to children 14. Children's product lines, featured on the package 15. Appeals to fun 16. Appeals to coolness or novelty 17. Recipes, specifically appealing to children 18. Promotion of websites, social media, rewards programs, specifically appealing to children

⁶ Smith R, Kelly B, Yeatman H, Boyland E. (2019). Food Marketing Influences Children's Attitudes, Preferences and Consumption: A Systematic Critical Review. Nutrients. 18;11(4):875.

⁷ Elliott C, Truman E. (2020). The Power of Packaging: A Scoping Review and Assessment of Child-Targeted Food Packaging. Nutrients.; 12(4):958

⁸ Corvalán C, Reyes M, Garmendia ML, Uauy R. (2019). Structural responses to the obesity and non-communicable diseases epidemic: Update on the Chilean law of food labelling and advertising. Obesity Reviews; 20: 367-374.

⁹ Crosbie E, Otero Alvarez MG, Cao M, et al (2023) Implementing front-of-pack nutrition warning labels in Mexico: important lessons for low- and middle-income countries. Public Health Nutr. Oct;26(10):2149-2161.

Figure 1: Examples of child-appealing features



SNACKERS

Bright colours

Unconventional cheese & cracker flavour mix with the chocolate fingers

Eating is an activity with 'Mix, make, munch!'

Appeals to fun with a hoola-hooping chocolate finger

RANDOMS
Bright colours
Theme relating to animals
Unusually-shaped jelly sweets

KINDER SURPRISE

Appeals to fun with a joke

- Bright colours
- Theme relating to adventure
- Egg shape is unconventional for chocolate
- Toy included inside
- Kinder is the German word for children
- 'Surprise' appeals to fun

MARKETING POLICIES

The businesses included in the survey have made a range of commitments about their policies around marketing to children more broadly and, in some cases, use of packaging.

DANONE, GROUPE¹¹

Approach to marketing to children

"Only products with a Health Star Rating (HSR) of 3.5 or above will be able to be advertised to audiences composed of more than 25% of children under the age of 16, across all channels for which age targeting is possible. For marketing communications for which the audience is not measurable, only products rated 3.5 stars or more with the HSR can be promoted in a way which is primarily appealing to children below the age of 13."

Approach specifically to packaging

"Licensed characters, movie tie-ins, celebrities and premiums primarily appealing to children below 13 years of age can only be used for marketing communications on packaging and at the point of sales for products rated 3.5 stars or more with the HSR."

11 https://www.danone.com/content/dam/corp/global/danonecom/about-us-impact/policies-and-commitments/en/2024/Danonepolicy-on-marketing-to-children-2024.pdf 12 https://www.ferrero.com/int/sites/ferrero_int/files/2023-05/4436.pdf 13 https://ifballiance.org/commitments/responsible-marketing





FERRERO & **RELATED PARTIES**¹²

Approach to marketing to children

Member of International Food and Beverage Alliance (IFBA) Global Responsible Marketing Policy.¹³ IFBA members commit not to advertise to children under the age of 13 the following product categories: confectionery, chocolate, soft drinks, ice cream and potatobased savoury snacks.

Approach specifically to packaging

"Third-party licensed characters cannot be used as a way to primarily appeal to children under 13 years of age. Ferrero reserves the right to continue to use its brand-owned characters for all audiences."

KELLOGG CO¹⁴

Approach to marketing to children

"We do not market products to children younger than 6 years old. We only advertise products that meet our Kellanova Global Nutrition Criteria on media primarily directed to children younger than 13. In addition, we will depict our trademarked characters as trustworthy figures and look for opportunities to use them to encourage all aspects of wellbeing including physical, societal, and emotional."

Approach specifically to packaging $N\!/\!A$

MARS INC¹⁰

Approach to marketing to children

"We will not market to children under 13 years."

Approach specifically to packaging

"Our brand characters are not intended to appeal to children under 13 and Character Guidelines will be strictly enforced across our business and across all marketing levers including advertising, packaging and display, with oversight from the Brand Board. In the case of the M&Ms® characters, we will emphasize their mature personalities and adult characteristics (voices, humor, mannerisms)."

KRAFT HEINZ CO¹⁵

Approach to marketing to children

"No advertising directed to children under 6 years of age; only qualified products which meet Children's Food and Beverage Advertising Initiative (CFBAI) uniform nutrition criteria may be marketed to children ages 6 to 12."

Approach specifically to packaging N/A

PEPSICO INC¹⁸

Approach to marketing to children

Member of (IFBA) Global Responsible Marketing Policy - see under Ferrero.

Approach specifically to packaging

"We do not promote or market HFSS products to under-16s across any media – a voluntary commitment we have held since 2007"

MONDELEZ INTERNATIONAL INC¹⁷

Approach to marketing to children

Member of (IFBA) Global Responsible Marketing Policy - see under Ferrero.

Approach specifically to packaging

"We do not advertise our products in any media primarily directed to children under age 13."

UNILEVER GROUP^{20, 21}

Approach to marketing to children

"We will not intentionally target any paid marketing communications to children aged under 16. For television and other measurable media."

Approach specifically to packaging

"We will use characters in our Point of Sale Communications primarily appealing to children aged under 16 but only in association with products which are meeting HNS or Responsibly Made for Kids. Gifts, toys, premiums or giveaways primarily appealing to children aged under 16 may only be

14 https://filecache.mediaroom.com/mr5mr_betterdayspromise/177402/Worldwide%20Marketing%20Communication%20

Guidelines%202023.pdf. NB. The hyperlink for Kellogg's Worldwide Marketing and Communications Guidelines was not working at the time of writing, so the hyperlink on the Kellanova website was used.

15 https://www.kraftheinzcompany.com/esg/responsible-marketing.html

16 https://www.mars.com/sites/g/files/dfsbuz106/files/2023-12/Mars%20Global%20Marketing%20Code%20for%20Human%20Food%20-%20January%202022%20%281%29.pdf

17 https://www.mondelezinternational.com/snacking-made-right/esg-topics/responsible-marketing/

18 https://www.pepsico.co.uk/our-impact/sustainability/pepsico-positive/positive-choices 19 https://www.nestle.com/sites/default/files/asset-library/documents/library/documents/corporate_social_responsibility/nestlemarketing-communication-children-policy.pdf

20 https://www.unilever.com/files/49d696a0-16c9-4cb4-bd64-599fd5cbfc9b/unilever-principles-on-responsible-food-beverage-marketing-to-children-update-october-2022.pdf

21 https://www.unilever.com/files/92ui5egz/production/f316d509cf3c8c9cb2be7f1e3901d414be593d3f.pdf

NESTLÉ SA¹⁹

Approach to marketing to children

"We do not advertise to children below 16 years of age through paid media on any media channels in which age targeting is possible."

Approach specifically to packaging

"We do not direct marketing communication to children below 13 years of age through other marketing activities, including the use of licensed characters and celebrities' endorsement on pack or at point of sales."

offered in Point of Sale Communications for products Responsibly Made for Kids. We will not use influencers who primarily appeal to children aged under 16. We will not direct any Marketing or Point of Sale Communications to children under 6 years of age".

For ice cream: "Our kid's product packs and price cards will carry the Responsibly Made for Kids logo."

ARE FOOD COMPANIES **USING CHILD-APPEALING TACTICS RESPONSIBLY?**



to children.



Anna, 17

METHOD

The top 10 global food and soft drink manufacturers based on sales of packaged food and drinks in the UK were identified based on Euromonitor global sales data for 2022. A list of brands for each manufacturer was produced based on Euromonitor sales data, and this list was verified by checking the company website.

Product lists for each brand were manually collated from 3 retailer websites - Tesco.com, Sainsburys.co.uk, and Asda.com - and an account was created for each retailer to ensure UK availability. A product was only counted once, regardless of portion size or multipack availability.

A validated coding tool was used to identify products with child-appealing features.²² The tool was developed by collating existing evidence on child-appeal techniques and validated with a panel of children. Initial analysis to code core techniques was carried out by the Bite Back team. The analysis was then peer reviewed by Action on Salt.

For products that were confirmed as child-appealing, Action on Salt calculated the UK 2004/05 Nutrient Profiling Model (NPM) score and the traffic light colours for fat, saturated fat, sugars and salt. Products classed as HFSS and/or received at least one red traffic light were classified as 'unhealthy'.²³ The proportion of products that are child-appealing and also unhealthy was calculated by the Bite Back team.

For a full methodology see Appendix 1. Where commentary on this report has been provided by a business, this is outlined in Appendix 2.

22 Mulligan C, Potvin Kent M, Vergeer L et al. (2021). Quantifying Child-Appeal: The Development and Mixed-Methods Validation of a Methodology for Evaluating Child-Appealing Marketing on Product Packaging. Int J Environ Res Public Health. 29;18(9):4769. 23 For the purposes of this survey we have used the UK NPM and Front of Pack colour coded labels to define products as unhealthy due to the robust body of evidence showing a causation between excess sugar, salt and fat with food related illness and the use of both tools in existing policy. We recognise the growing body of consistent evidence has shown associations with ultra-processed food (UPF) and poor health. All products identified as unhealthy are also likely to be UPF and future policy should take this into consideration.

RESULTS

The vast majority of products with child-appealing packaging sold by some of the biggest most successful global food businesses operating in the UK are unhealthy. Out of 262 food products with child-appealing packaging surveyed - including crisps, cereals, ice cream and confectionery - 78% (204) were HFSS and/or met the criteria for a red traffic light label and were therefore unhealthy. 60% (158) of the child-appealing products met the criteria for a red traffic light label for sugars.

Use of child-appealing visuals and graphics, such as bright colours, patterns and fun lettering was the most popular technique, and was used on 80% (164/204) of the products that are also unhealthy. This was followed by use of unusual shapes and/ or flavours, which was a feature of 59% (120/204) of unhealthy products identified.

Overall, the majority of products surveyed that include child-appealing techniques were unhealthy.

75% (164/218) of products with child appealing visuals were unhealthy. 78% (120/154) of unusually shaped and/or flavoured products were unhealthy. 67% (48/72) of products that included a character were unhealthy. 64% (44/69) of products with appeals to fun on pack were unhealthy.

I loved Frozen when I was young. Then all of a sudden, loads of food products had Frozen characters on them. The same thing is happening now. Bluey is an Australian TV programme that everyone is watching and now the companies are putting it on products to market them

Table 1: Use of child-appealing techniques by business

Business	Estimated value of sales from HFSS in 2022 (£mn) ²⁴	Unhealthy sales as a proportion of total value sales of packaged	Number of child- appealing products	Overall percentage that are HFSS/ red traffic light
		food and drink products		label
Mondelez International Inc	2820.4	98%	58	100% (58)
Ferrero & related parties	919.3	100%	22	100% (22)
Mars Inc	1458.0	72%	31	97% (30)
PepsiCo Inc	2095.2	68%	29	86% (25)
Kellogg Co	777.2	77%	32	78% (25)
Unilever Group ²⁵	1256.1	84%	17	59% (10)
Nestlé SA	1252.1	70%	59	56% (33)
Kraft Heinz Co	391.8	33%	12	8% (1)
Danone, Groupe	27.4	2%	2	0

Mondelez was one of the worst offenders - of 58 products deemed appealing to children, all were unhealthy. Similarly 100% of child-appealing products from brands owned by Ferrero were unhealthy, although there were far fewer child-appealing products overall (22).

Nestlé had the highest number of child-appealing products overall with 59. Out of these 56% (33) are unhealthy with Nestlé using child-appealing packaging on 26 healthier products. Mars, PepsiCo and Kellogg's all have around 30 products with child-appealing packaging - the majority of these are unhealthy. Unilever has 17 child-appealing products, of which 59% (10) are unhealthy.

The survey showed some businesses are making an effort to use child-appealing packaging more responsibly. Danone has no child-appealing unhealthy products and Kraft Heinz has just one. Other businesses such as Unilever and Nestlé have reformulated some of their child-appealing products but still have some way to go.

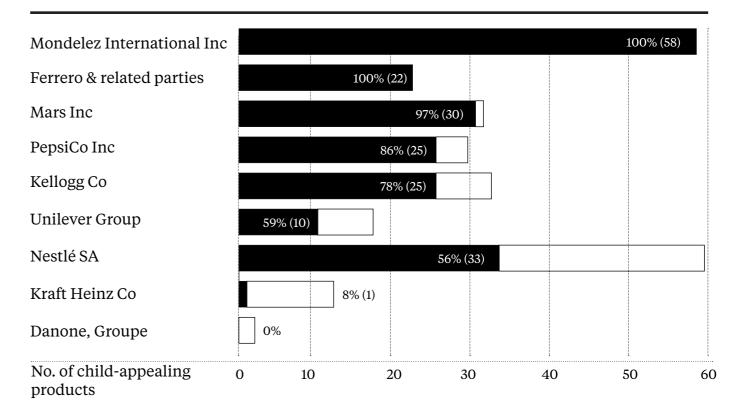
NB. The Coca-Cola Company is not included in the survey as it excluded beverages.

24 Bite Back (2024). Fuel us, don't fool us: Are food giants rigging the system against children's health? (Manufacturers). 25 In March 2024, Unilever announced that it will split off its ice-cream division into a standalone division, with full separation expected by the end of 2025.

Table 2: Top child-appealing techniques used on products

Technique	Number of child-appealing products using this technique	Proportion of products using technique that are unhealthy	Proportion of unhealthy products overall using this technique
Child-appealing visuals and graphics	218	75% (164/218)	80% (164/204)
Unusual shape and/ or flavour	154	78% (120/154)	59% (120/204)
Characters (including brand, licensed or other cartoon/ character)	72	67% (48/72)	24% (48/204)
Appeals to fun	69	64% (44/69)	22% (44/204)

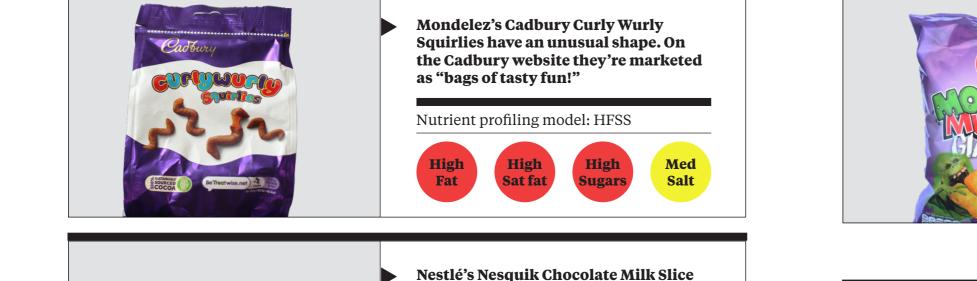
Visual 2: Use of child-appealing techniques by business



Child-appeal techniques are being used on products that score three red traffic lights

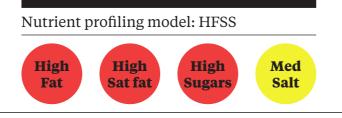
Our survey found examples of childappealing tactics being used on some of the unhealthiest products - those that are HFSS and would also score three red traffic light labels.

Unconventional shapes and flavours, and a sense of fun are common tactics on unhealthy products

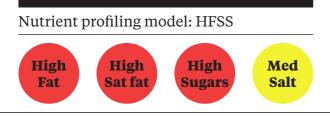


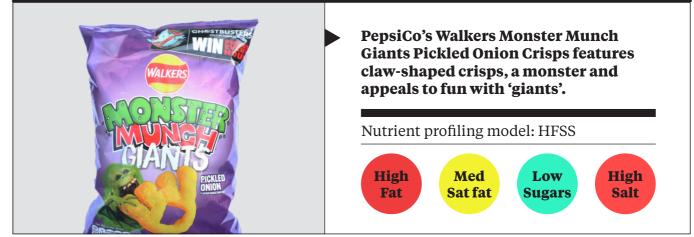


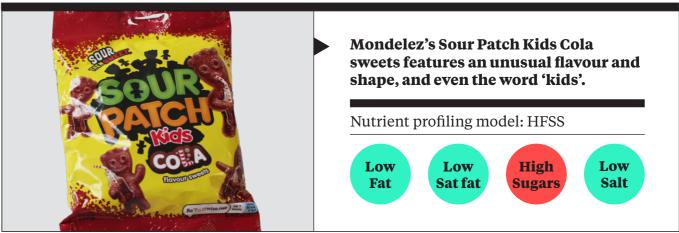
features the iconic Nesquik bunny who is even stamped on the slice itself. On the Nesquik website, it's marketed as "an ideal little treat that will delight vour children after school and at the end of meals."

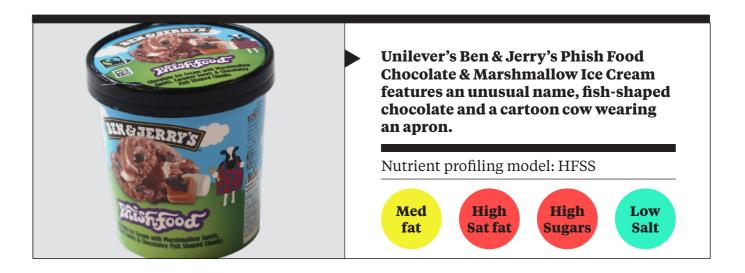


Mars' M&M's Crispy Milk Chocolate Bites feature the iconic character 'Red' and unusually-coloured chocolates. The M&M's brand is synonymous with fun, with its personalised chocolates and London store.





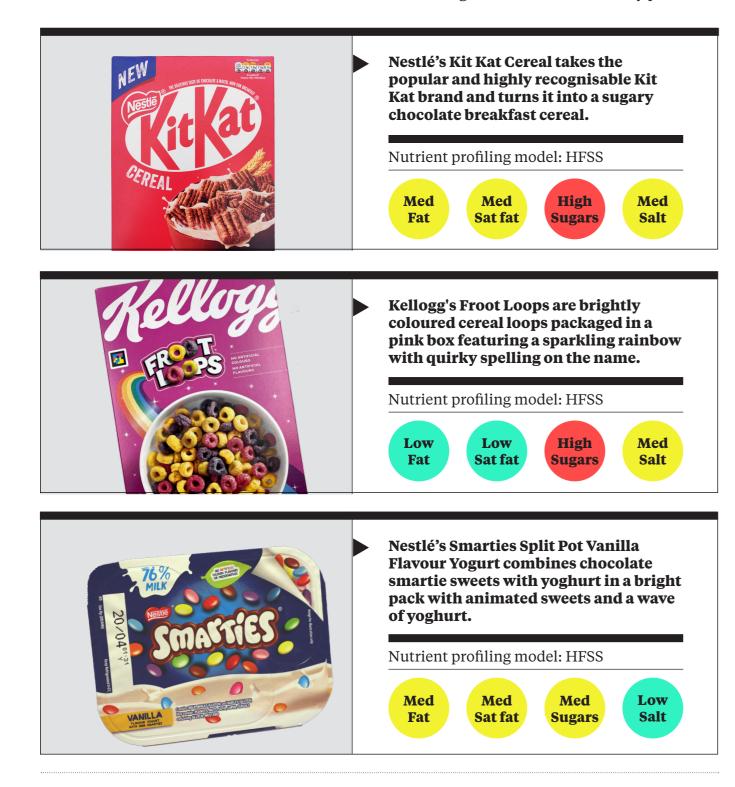




Examples include animal-shaped biscuits, cola-flavoured sweets, crisps shaped like a musical instrument, party-themed ice-cream, all turning eating into a fun activity. In fact, of 154 products featuring unconventional shapes and/or flavours, 78% were unhealthy.

Unconventional flavours are used to market cereals and yoghurts

Yoghurts and cereals have been popular staple breakfast options for families for decades, and can be a good source of fibre, protein and other nutrients. Today however, many of these products are ultraprocessed food (UPF) and high in sugar²⁵ with manufacturers even creating products based on existing chocolate confectionery products.



PROGRESS IN THE USE OF CHILD-APPEALING PACKAGING?

Our survey did find examples of childappealing tactics being used on products that are non-HFSS and would qualify for amber or green traffic lights (although are still all UPF). These include Danone's Actimel Kids Yoghurt drinks and Kraft Heinz's

CONCLUSION

This survey highlights the widespread use of a range of child-appealing techniques on unhealthy food and shows how some of the biggest and most successful businesses operating in the UK are using tactics to market unhealthy food to children.

The findings build on our first report in the #FuelUsDontFoolUs series showing how 7/10 of the top global food and drinks businesses are reliant on sales of unhealthy products in the UK. The large revenues of the businesses using child-appealing tactics show how businesses profit from this kind of aggressive marketing, while failing to protect children's health, with nearly one in three children aged 2-15 now at risk of having their future blighted by food related illness.

pasta shapes range. Other businesses have reformulated child-appealing products or brought out non-HFSS variants, such as Unilever's Mini Milks and Twisters, Kellogg's Coco Pops cereal, Nestlé's Munch Bunch range and some of PepsiCo's Snack a Jacks.



A small number of businesses show that it doesn't have to be this way and do not use child-appealing techniques on unhealthy food packaging or appear to be trying to move away from its use voluntarily. But the sheer scale of the issue needs firm action from the Government, to protect children's health by restricting businesses from marketing to children via child-appealing packaging as other countries have done. In the meantime, businesses should do the responsible thing and remove child-appealing features from packaging of their unhealthy products.

Businesses and governments hold the levers of change. We now need action to shift our food system into one that protects children's health rather than harming it.

LIMITATIONS

Product collection was limited to three retailers, so some products have not been included.

Product images were collected from retailer websites, which may differ to packaging available in-store.

Nutrition information was taken from retailer websites.

The analysis excludes seasonal products (such as Easter Eggs) which are likely to be unhealthy, so the proportion of childappealing products that are also unhealthy is likely to be higher than reported here.

ACKNOWLEDGMENTS

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Peer review of the child-appeal analysis and the nutrition analysis were conducted by Sonia Pombo, RNutr, Campaign Lead for Action on Salt. Please cite as: Bite Back (2024). Fuel us, don't fool us: dAre food companies using child-appealing tactics responsibly? (Manufacturers #2).

WEYE GOTABIG APPETITE FOR CHANGE



Report 2 in Fuel Us Don't Fool Us series

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