

LONDON BOROUGH OF NEWHAM

CABINET

Report title	Newham Healthier Food Advertising Policy	
Date of Meeting	Tuesday 30 th January 2024	
Lead Officers	Andy Gold, Community Public Health Manager (Food System) & Billie Hamilton, Public Health Officer – Food Strategy	
Corporate Director	Colin Ansell, Corporate Director of Adults & Health, Change & Transformation	
Lead Member	Councillor Neil Wilson, Cabinet Member For Adults & Health	
Key Decision?	Yes / No	Reasons:
Exempt Information & Grounds	Yes / No	Grounds:
Wards Affected		
Appendices	1. Newham Healthier Food Advertising Policy 2. Newham Advertisement of Breastmilk Substitutes Policy	

Lead Member Introduction

There is clear evidence that advertisements for unhealthy food and drink products have a direct and indirect impact on what we eat and drink. There are successful Healthier Advertising Policies, implemented first by Transport for London and then by councils in the UK, which have demonstrated that advertising revenues can be successfully maintained and enhanced, whilst restricting the advertising of food high in Fat, Salt and Sugar.

Newham's Healthier Advertising Policy builds on this legally robust approach enabling an immediate and objective assessment of advertisements containing food, based on the contents of those adverts. It offers no bar to any company and has been shown to have a strong influence not only on what companies choose to advertise, but also the nature of the products they choose to sell. By adopting this Healthier Advertising Policy, Newham is demonstrating that good government does not have to be a confrontational choice between revenues on one hand and, on the other, health and well-being and a just transition to a green economy. By contrast, it can be systems serving residents well and decisions that represent a clear and obvious net benefit to society. Underpinned by overwhelming data and evidence, significant work with leading regional and national partners, this policy is the product of a One Council approach to the challenges we face to deliver a Firer Newham. Newham is pleased to join other authorities taking the lead on this issue.

1. Executive Summary

- 1.1 Evidence shows that advertisements for unhealthy food and drink products directly and indirectly impact what we eat. Successful Healthier Advertising Policies implemented first by TFL and then by other UK councils have demonstrated that advertising revenues can be successfully maintained and grown whilst restricting the advertising of food High in Fat, Salt and Sugar. Newham's Healthier Advertising policy builds on this legally robust approach enabling an immediate and objective assessment of advertisements containing food, based on the contents of those adverts. It offers no bar to any company and has been shown to impact not just on what companies choose to advertise but indeed the nature of the products they choose to sell.
- 1.2 The policy applies to all of Newham's advertising estates and regulates objectively what food and drink can be advertised. In a future Cabinet agenda, the Cabinet is going to be asked to agree the procurement of a concessions contract for a media supplier for digital advertising. The policy recommended in this document ensures the Council will be well placed to significantly grow revenues, working efficiently with advertisers, whilst supporting the health of residents.

2. Recommendations

- 2.1 For the reasons set out in the report and its appendices, Cabinet, is recommended to approve the policy as outlined in the appendices.

3. Background

- 3.1 The Healthier Food Advertising Policy is the formalisation of an effective set of guidelines and operational processes that have been used since autumn 2021 to ensure that we avoid the advertising of High Fat Salt and Sugar (HFSS) products on Newham's public realm estate.
- 3.2 This initial and rapidly implemented work was delivered in response to advertising content on the Newham estate that was flagged immediately by officers and members as being out of step with corporate policy in August 2021.
- 3.3 The guidelines have proven both effective and streamlined. Officers from public realm and public health have worked together operationally to ensure that the guidelines have been applied.
- 3.4 Newham is taking a whole systems approach to food and health, of which this policy is a part, in response to a national landscape and a local picture that reflects the need to combat over 40 years of changes in our food system that have made HFSS foods and drinks ever more ubiquitously available and promoted.
- 3.5 Evidence shows that advertisements for unhealthy food and drink products directly and indirectly impact what we eat. Young people who recall seeing junk food adverts every day are more likely to be obese.
- 3.6 The National Child Measurement Programme (NCMP) data from 2021/22 shows that prevalence of Newham children living with overweight or obesity in reception was 22.7%, rising to 46.4% for children in Year 6.

- 3.7 Research shows that high exposure to HFSS advertising influences food choices. HFSS marketing is linked to a strong preference for HFSS products, more snacking, eating more calories and HFSS products replacing healthier foods. Children growing up in more deprived areas are more likely to be exposed to HFSS product advertising. This contributes to higher rates of obesity – worsening health inequalities between rich and poor.
- 3.8 There has similarly been an increase in aggressive marketing of follow-on formulas and unnecessary milks for children over one years of age which research has shown can have an impact on childhood obesity. Newham has Stage 2 UNICEF Baby Friendly Initiative accreditation. To maintain and progress towards full accreditation we are required to adhere to the [WHO Code of Marketing of Breastmilk Substitutes and subsequent WHA Resolutions \(The Code\)](#)
- 3.9 In February 2019, Transport for London (TfL) introduced an advertising restriction on all food and non-alcoholic drink products that are HFSS. This restriction is across all advertising opportunities on the TfL estate (including bus stops, taxi wraps and stations).
- 3.10 The London School of Hygiene and Tropical Medicine’s research found that the healthier food advertising policy across TfL led to London households consuming 1000 less calories a week, with 20% reductions of high sugar products being purchased.
- 3.11 The University of Sheffield’s research estimates that the reduced calorie intake associated with the TFL policy could lead to 94,867 fewer cases of obesity, 2,857 cases of diabetes prevented or delayed and 1,915 fewer cases of cardiovascular disease. In turn, the lower incidence of these diet-related illnesses could then save the NHS £218 million over the lifetime of the current population.
- 3.12 Arguments made against introducing tighter restrictions on HFSS advertising were the potential for estate holders to see reduced revenues. However, the evaluation of a growing body of evidence has shown this not to be the case:
 - 3.12.1 Advertising revenues across the TfL estate rose by £2.3million the first year after implementing the policy. TfL have continued to maintain advertising revenues in the years since implementation that were not impacted by Covid.
 - 3.12.2 No local authorities that have implemented healthier food advertising policies have reported losing advertising revenues.
 - 3.12.3 Because no brand is banned from advertising, only a company that sells exclusively HFSS products would be unable to advertise on estates with a policy. Since the introduction by TFL of a policy advertisers have worked proactively and constructively to produce advertising which adheres to the policy. National and international brands, are aware of the TFL policy and process, and so compliant advertising content often already exists or has been designed to be readily adapted.
 - 3.12.4 A rigorous and clear policy, with a straightforward and objective process underpinning it, has been shown to provide certainty to both officers managing estates and advertisers enabling them to minimise delays in approval and efficiently manage assets.

3.12.5 Newham's work with 'mandatory guidelines' has shown this to be operationally straightforward and that our existing partners have not found the ask either onerous or obstructive.

- 3.13 Review of the Newham estate in 2021 established that revenues from advertising were c £35k/annum and with a low turnover of adverts due to the physical nature of the estate. However, the operating processes co-produced between public health and public realm to support 'mandatory guidelines' were done so anticipating work to increase capacity.
- 3.14 Cabinet will have seen the report elsewhere on this agenda detailing the modernisation to digital advertising estate. These processes are expected to cope robustly with approving a higher volume of adverts every year.

4. Proposals

- 4.1 Consistent with similar advertising policies implemented by Bristol City Council, Barnsley Council, as well as the London Boroughs of Greenwich, Southwark, Haringey, and Merton, the UK Nutrient Profiling Model (NPM) has been adopted by Newham Council to identify HFSS products and enable us to objectively and consistently restrict their advertisement on our estate.
- 4.2 The NPM is widely used and has been subject to rigorous scientific scrutiny, extensive stakeholder consultation, and review. Furthermore, the scoring system it uses balances the contribution made by beneficial nutrients that are particularly important in children's diets with components in the food that children should eat less of.
- 4.3 All potential advertisers should familiarise themselves with the NPM's technical guidance on how to identify whether a product is considered HFSS under the NPM. In any case of doubt, it is for the advertiser to show that their product is not HFSS.
- 4.4 Any revisions to the NPM will be reflected in the advertisement decisions made by the council.
- 4.5 It is the responsibility of advertisers and their agents to verify the status of the products featured using the NPM. Newham Council's Public Health team provide the operational support required to evaluate any advert containing food.
- 4.6 Newham Council or its representatives may request evidence of nutrition information of food and drink products advertised, and in line with the Food Standards Agency recommendations, Newham Council expects any laboratory used for nutrition analysis to have ISO 17025 accreditation and this should be by the United Kingdom Accreditation Service (UKAS).

5. Delivering Council Policy and Corporate Priorities

- 5.1 Key council policy address includes:
 - 5.1.1 Priority 1 of the We Are Fairer Corporate Plan – A healthier Newham and Ageing well
 - 5.1.2 The policy addresses the 50 Steps to a Healthier Newham including Priority 2 – supporting young people to be healthy, Priority 3 – supporting people around the determinants of health and Priority 6 – Creating a healthier food environment.

- 5.1.3 The Policy also supports the action 'Eating well, sustainability' of the upcoming Climate 365 policy.

6. Alternatives Considered

- 6.1 Do nothing. This would be inconsistent with key council policy. See sections 5 and 8

7. Consultation

- 7.1 Councillor Neil Wilson, Lead Member for Health and Adult Social Care, consulted on various dates including 19 September, 9 October and 18 October 2023
- 7.2 There is no consultation required in respect of recommendations in this report.

8. Implications

8.1 Financial Implications

- 8.1.1 Advertising revenue streams are unlikely to be adversely affected by the enactment of the policy described. Officers have been informed by evaluating the impact of similar policies in comparable London boroughs, as referenced in section 3.13
- 8.1.2 No additional resources are required to implement or police the recommended policy. Responsibilities sit in the Public Health and contract management teams.
- 8.1.3 The introduction of this policy is therefore not expected to have any negative financial impact on the council. Moreover, there is some evidence to suggest that clear and streamlined policies in this area can have a positive impact on revenue.

8.2 Legal Implications

- 8.2.1 Section 2 B of the National Health Act 2006 places a duty on the Council to take such steps as it considers appropriate for improving the health of the people in its area. Section 111 of the Local Government Act 1972 provides that local authorities have the power to do anything calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions. The policies contained in the appendices to this report intend to improve public health.
- 8.2.2 Further, the Council has power under its general power of competence under Section 1 of the Localism Act 2011 to do anything an individual can do, subject to any statutory constraints on the Council's powers. None of the constraints on the Council's Section 1 power are engaged by this decision.

8.3 Equalities Implications

- 8.3.1 Advertising of HFSS products directly impacts unhealthy weight which correlates with socio-economic disadvantage. Action on HFSS advertising policy will support our work in reducing health inequalities.
- 8.3.2 There are significant inequalities in child excess weight levels with higher rates reported for children living in disadvantaged households, children with disabilities, children from specific ethnic backgrounds. Children and adults from lower socio-economic groups are 50% more likely to be exposed to such advertisements for HFSS foods and drinks.
- 8.3.3 The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have 'due regard' to:
 - 8.3.3.1 The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
 - 8.3.3.2 The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
 - 8.3.3.3 Foster good relations between those who have protected characteristics and those who do not.
- 8.3.4 Note: 'Protected characteristics' are age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex/gender, and sexual orientation.
- 8.3.5 The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Newham residents in respect of socio-economics and health determinants.

8.4 Climate Emergency

- 8.4.1 Newham has declared a Climate Emergency.
- 8.4.2 HFSS products come at a high cost for planet and communities. They are some of the most exploitative foods and drinks for the environment.
- 8.4.3 Most of the HFSS products that are advertised are highly or ultra-processed foods and drinks and these highly chemically processed foods alone uses vast amounts of energy and unsustainable ingredients. The production of packaging and commonly used ingredients such as sugar and palm oil are associated with destruction of habitats.
- 8.4.4 HFSS products advertised are often associated with single use packaging that uses fossil fuels and often requires landfill.
- 8.4.5 The Newham Healthier Advertising Policy in this paper will drive reduced consumption in Newham (and beyond) of foods and drinks that negatively impact the environment.

9. Background Information Used in the Preparation of this Report

1. Critchlow, N. et al. (2020) 'Awareness of marketing for high fat, salt or sugar foods, and the association with higher weekly consumption among adolescents: a rejoinder to the UK government's consultations on marketing regulation'. Accessed via: <https://pubmed.ncbi.nlm.nih.gov/32434618/>
2. World Health Organization (WHO). (2022) 'Food marketing exposure and power and their associations with food-related attitudes, beliefs and behaviours: a narrative review'. Accessed via: [Food marketing exposure and power and their associations with food-related attitudes, beliefs and behaviours: a narrative review \(who.int\)](https://www.who.int/publications-detail/food-marketing-exposure-and-power-and-their-associations-with-food-related-attitudes-beliefs-and-behaviours-a-narrative-review)
3. Cancer Research UK. (2018) 'Obesity risk doubles for teens bombarded with junk food adverts'. Accessed via: <https://news.cancerresearchuk.org/2018/03/15/obesity-risk-doubles-for-teens-bombarded-with-junk-food-adverts/>
4. Local Government Association. (2022). 'Future health challenges: public health projections – childhood obesity'. Accessed via: <https://www.local.gov.uk/publications/future-health-challenges-public-health-projections-childhood-obesity>
5. NHS Digital. (2022). 'National Child Measurement Programme, England, 2021/22 school year'. Accessed via: <https://digital.nhs.uk/data-and-information/publications/statistical/national-child-measurement-programme/2021-22-school-year>
6. Yau, A. et al. (2021) 'Sociodemographic differences in self-reported exposure to high fat, salt and sugar food and drink advertising: A cross-sectional analysis of 2019 UK panel data', Accessed via: <https://bmjopen.bmj.com/content/11/4/e048139>
7. Ferguson CJ, Muñoz ME, Medrano, MR. (2012) Advertising Influences on Young Children's Food Choices and Parental Influence The Journal of Paediatrics. Accessed via: <https://www.sciencedirect.com/science/article/abs/pii/S0022347611008183>
8. 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. Accessed via: https://www.cancerresearchuk.org/sites/default/files/see_it_want_it_buy_it_eat_it_final_report.pdf
9. 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. Accessed via: <https://pubmed.ncbi.nlm.nih.gov/26791177/>
10. Boyland EJ, Whalen R, Christiansen P, McGale L, Duckworth J, Halford J, Clark M, Rosenberg G, Vohra J. (2018) See it, want it, buy it, eat it: how food advertising is associated with unhealthy eating behaviours in 7-11 year old children [online]. Cancer Research UK. Accessed via: https://www.cancerresearchuk.org/sites/default/files/see_it_want_it_buy_it_eat_it_final_report.pdf
11. Warwick Obesity Network. (2020) Government Consultation: Rapid review of the academic evidence for and against restrictions on advertising to fight obesity [online]. Accessed via: https://warwick.ac.uk/research/priorities/food/research/food-health/hp-contents/response_to_open_consultation_online_hfss_advertising.pdf
12. Ro, C. (2020). How outdoor advertising can deepen inequality [online] BBC. Accessed via: <https://www.bbc.com/worklife/article/20200817-the-inequality-of-outdoor-advertising-exposure>
13. Lucan SC, Maroko AR, Sanon OC, Schechter CB. (2017). Unhealthful Food and Beverage Advertising in Subway Stations: Targeted Marketing, Vulnerable Groups,

- Dietary Intake, and Poor Health. Journal of Urban Health. Accessed via: <https://pubmed.ncbi.nlm.nih.gov/28271237>
14. Yau A, Berger N, Law C, Cornelsen L, Greener R, Adams J, et al. (2022) Changes in household food and drink purchases following restrictions on the advertisement of high fat, salt, and sugar products across the Transport for London network: A controlled interrupted time series analysis. Accessed via: <https://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1003915>
 15. Thomas, C., Breeze, P., Cummins, S. et al. (2022). The health, cost and equity impacts of restrictions on the advertisement of high fat, salt and sugar products across the transport for London network: a health economic modelling study. Int J Behav Nutr Phys Act 19, 93. Accessed via: <https://ijbnpa.biomedcentral.com/articles/10.1186/s12966-022-01331-y#citeas>
 16. First Steps Nutrition. (2020). Why Government should end online infant formula marketing to protection children from overweight. Accessed via: https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/605363e5a4c746541de7cd5b/1616077802431/Online_marketing_report_final.pdf
 17. UNICEF. The International Code of Marketing of Breastmilk Substitutes. Accessed via: <https://www.unicef.org.uk/babyfriendly/baby-friendly-resources/international-code-marketing-breastmilk-substitutes-resources/the-code/>

Appendix One – Newham Healthier Food Advertising Policy

Newham Healthier Food Advertising Policy

This Policy will constitute a formal addendum to Newham Council's Street Furniture Policy (currently being developed) and should be read and applied in concert with that policy.

Application

This policy applies to all of Newham's advertising estates.

Purpose of Policy

Evidence shows that advertisements for unhealthy food and drink products directly and indirectly impact what we eat. Young people who recall seeing junk food adverts every day are more likely to be obese. The National Child Measurement Programme (NCMP) shows that prevalence of Newham children living with overweight or obesity in reception was 22.7%, rising to 46.4% for children in Year 6.

The Local Government Association child obesity analysis shows that if we do not intervene, the levels of Year 6 age children living with overweight and obesity in Newham will rise from 42.8% in 2020 to 50% by 2040.

There are significant inequalities in child excess weight levels with higher rates reported for children living in disadvantaged households, children with disabilities and children from specific ethnic backgrounds. Both children and adults from lower socio-economic groups are 50% more likely to be exposed to such advertisements for high fat, salt, or sugar (HFSS) foods.

In February 2019, Transport for London (TfL) introduced a restriction on the advertising of food and non-alcoholic drink products. The policy covers all advertising opportunities on the TfL estate. The policy focuses in particular on products that contribute to childhood obesity.

1. General Principles

The Department of Health and Social Care's Nutrient Profiling Model (NPM) has been adopted by Newham Council to identify HFSS products. The 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's diets with components in the food that children should eat less of. Guidance on how to identify whether a product is considered HFSS under the NPM is available [here](#).

- It is for the advertiser to demonstrate (in case of any doubt) that the featured product is not HFSS.
- Any revisions to the NPM will be reflected in the advertisement decisions made by the council.
- It is the responsibility of advertisers and their agents to verify the status of the products featured using the NPM.

- Newham Council or its representatives may request evidence of nutrition information of food and drink products advertised, and in line with the Food Standards Agency recommendations, Newham Council expects any laboratory used for nutrition analysis to have ISO 17025 accreditation and this should be by the United Kingdom Accreditation Service (UKAS).

2. Advertisements featuring only non-HFSS products

These would normally be approved but would still need to comply with existing principles and procedures relating to any advertising carried by Newham Council.

3. Advertisements featuring only HFSS products

Where a proposed advertisement features only food and/or non-alcoholic drink which is rated HFSS, such copy would be rejected.

It is therefore recommended that, before committing to advertising production agreements, advertisers should discuss their eligibility with the Council or its agents.

4. Advertisements where there is a range of food/non-alcoholic drink featured, some of which is HFSS

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

5. Advertisements where no food or non-alcoholic drink is featured directly but the advertisement is from or features a food and/or non-alcoholic drink brand

This may include:

- Advertisements where the brand's logo is included but no products, e.g. a brand values campaign.
- Directional signage to a store, app or website
- Promotional advertising which is price led but features no products e.g. '50% off everything' or similar
- Advertising about a business or its performance

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. Where advertisers are uncertain about the classification of proposed copy under these guidelines, they should discuss this with the Council or its agents.

6. Advertisements where food and non-alcoholic drink is shown 'incidentally' i.e. it is not the subject of the advertisement but is included (or implied) by visual or copy

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. 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 on the basis that the advertisement promotes the consumption of HFSS products.

7. Advertisements where food and non-alcoholic drink is referenced in text, through graphical representations or other visual representation

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.

8. Indirect promotion of HFSS food and/or drink

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 noncompliant 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). Children should not usually be shown in advertisements for products covered by PHE's recommendations for sugar or calorie reduction.

9. Portion sizes

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.

Alignment Council-wide

Newham Council Public Health team will be consulted on any planning application which includes advertising.

Newham Council will consider the potential impact of HFSS advertising when looking at planning applications which include advertising sites. Unhealthy food and drink marketing is an important consideration upon healthy town centres and is therefore considered in planning applications.

Sites which are likely to be used for HFSS advertising, for example, telephone boxes, will be refused.

Operating procedure

If advertisers 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.

All Newham Council officers responsible for advertisements, will need to ensure they do a quality check in line with this policy. If they are unsure about how to interpret an advert, they can reach out to the SMARTfood team at SMARTFood@newham.gov.uk

Appendix Two – Newham Advertisement of Breastmilk Substitutes Policy

Newham Advertisement of Breastmilk Substitutes Policy

This Policy constitutes a formal addendum to Newham council's Street Furniture Policy (currently being developed) and should be read and applied in concert with that policy. It details further guidance relating to restrictions of Breastmilk Substitute (BMS) products and requirements for advertising or sponsorship approvals.

Application

The International Code of Marketing of Breastmilk Substitutes (World Health Organisation)

The London Borough of Newham has Stage 2 UNICEF Baby Friendly Initiative accreditation. To maintain and progress towards full accreditation we are required to adhere to the WHO Code of Marketing of Breastmilk Substitutes and subsequent WHA Resolutions (The Code) [International Code of Marketing of Breast-Milk Substitutes \(who.int\)](http://www.who.int/nutrition/publications/infantfeeding/9789241548435/en/).

The following is therefore prohibited; advertising of all formula milk (infant formula, follow on formula, infant milks marketed as a food for special purposes), bottles, teats, related equipment or commercially prepared foods marketed for babies and children up to 3 years of age.