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# **The Swedish Cancer Society's response to the call for evidence on EU rules on audiovisual media services**

## **Summary**

We underline the need for a strong public health perspective in the EU rules on audiovisual media services, with particular urgency around regulating digital marketing of unhealthy products targeted at children and adolescents. As traditional marketing has shifted to personalised, algorithm-driven content on digital platforms - often delivered through influencers and trusted celebrities - young people are routinely exposed to intrusive and manipulative advertisements for unhealthy products. This contributes to rising rates of overweight and obesity, which in turn drive serious health consequences, including cancer. Strengthening regulation is essential to make healthier choices easier, safeguard the well-being of our children and adolescents, and support broader EU ambitions to prevent disease and reduce pressure on healthcare systems.

## **Full response**

The Swedish Cancer Society is an independent charity organisation established in 1951. We are one of the largest research funders in Sweden, and our vision is to defeat cancer. Our goal is to reduce the number of people affected by cancer, ensure that more patients survive, and that everyone has the best possible quality of life, both during and after cancer.

We are responding to this consultation to emphasise the importance of a strong public health perspective in the rules governing audiovisual media services in the EU. We are specifically focusing on the need for better regulation of digital marketing of unhealthy products.

In today's society, where many people spend a substantial portion of their day online, marketing has shifted from traditional media to digital platforms. Global digital ad spend has been predicted to reach over 600 billion USD in 2025, representing 60 percent of total global ad spend.

Using algorithms and AI, companies can now deliver highly personalised advertisements to children, which are largely invisible to parents. Influencers and trusted celebrities are commonly involved, making it difficult for users to recognise that they are being exposed to marketing. The content is also often designed to be interactive, encouraging engagement through hashtags, likes, shares, comments or gameplay. Together, these tactics create a manipulative marketing environment to which children and young people are routinely exposed.

A study by the Karolinska Institute in Sweden shows that children and young people are exposed to no less than 17 ads for junk food per hour on TikTok. A survey conducted in Denmark found that 79 percent of online marketing concerned unhealthy food, and of the content promoted by influencers, 76 percent was about unhealthy food. Children and young people are being targeted to ensure life-long consumers of harmful products.

Poor dietary habits contribute to the increasing prevalence of various health problems among children, including overweight and obesity. This is a fast-growing problem. Compared to the late 1980s, obesity is now four times more common among children aged 11-15 in Sweden. Overweight and obesity lead to serious health consequences. Research has shown that overweight and obesity are associated with at least 13 different types of cancer. Cases of cancer linked to overweight and obesity are increasing faster than all other

preventable cancer forms, both in Sweden and globally. Other than cancer, overweight and obesity is linked cardiovascular diseases, diabetes, neurological disorders, chronic respiratory diseases, and poor oral health.

Overweight and obesity also impose significant costs on healthcare systems. According to the Swedish Public Health Agency, they cost SEK 125 billion ( $\approx$  11.5 billion euros) per year - about 2% of Sweden's GDP, which is in line with OECD estimates. If current trends continue, costs are expected to rise further. The World Obesity Federation projects that societal costs could triple by 2060. An analysis from the The Swedish Institute for Health Economics also highlights significant costs from overweight and obesity in children: lifelong societal costs are estimated at SEK 7 billion ( $\approx$  640 million euros) if a child is overweight or obese at age 15, and SEK 4 billion ( $\approx$  360 million euros) at age 6. Major cost drivers include productivity losses in adulthood and poorer school performance during childhood.

The current regulatory environment is failing in protecting children. Voluntary self-regulation and codes of conduct have proven ineffective. Companies are allowed to aggressively target children and young people to sell unhealthy products. There are, however, evidence-based measures that can be implemented to shape our society in ways that encourage healthier habits and make the healthy choice the easy choice, and stricter marketing regulation is one such measure. Digital marketing of foods that are high in fat, sugar and/or salt must be banned for children and adolescents up to 18 years of age. Such a ban should also apply to digital marketing of other harmful products such as alcohol, tobacco, and nicotine products.

It is important to recognise that children and young people are particularly vulnerable. They are more susceptible to influence, have limited critical judgment, and are more exposed to social pressure. Under the UN Convention on the Rights of the Child, all children have the right to the highest attainable standard of health and development, adequate and nutritious food, privacy, and freedom from exploitation. Policymakers must take greater responsibility in protecting these rights. A commitment to protect children from harmful

impact of food marketing, including digital marketing, was also included in the political declaration of the fourth high-level meeting of the UN General Assembly on the prevention and control of NCDs and the promotion of mental health and well-being.

It is crucial that these measures are implemented at the EU level to ensure consistency in regulation across Member States and to provide all children and young people across the region with equal opportunities. Online content is inherently cross-border, making uniform rules necessary. Regulation must also be continuously updated to keep pace with rapid technological developments, ensuring that new marketing techniques and platforms are adequately covered. Strengthening regulation in this area also aligns with the upcoming EU Cardiovascular Health Plan and the broader ambition to ease pressure on European healthcare systems by preventing disease.

**Sources and further reading:**

- [Preventing childhood overweight and obesity – Policy recommendations from the Nordic Cancer Societies](#)
- [A Child Rights Impact Assessment on Marketing of Unhealthy Food – Swedish Cancer Society, Swedish Heart Lung Foundation, Generation Pep](#)
- [In Your Phone – about the online food environment of children and their exposure to digital marketing of food and beverages – Swedish Heart Lung Foundation, Karolinska Institute, Unicef](#)
- [Policies to protect children from the harmful impact of food marketing – World Health Organisation](#)
- [Understanding the digital media ecosystem – How the evolution of the digital marketing ecosystem impacts tobacco, alcohol and unhealthy food marketing – WHO Europe](#)
- [Feeding Profit: How food environments are failing children – Unicef](#)
- [Harmful marketing: selling a sick future to children and teens – NCD Alliance](#)
- [Samhällskostnader för övervikt och obesitas – Folkhälsomyndigheten \(Swedish Public Health Agency\)](#)