

# HFSS & LHF: What You Need to Know



billion,dollar,boy



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01  
**INTRODUCTION**



# Introduction

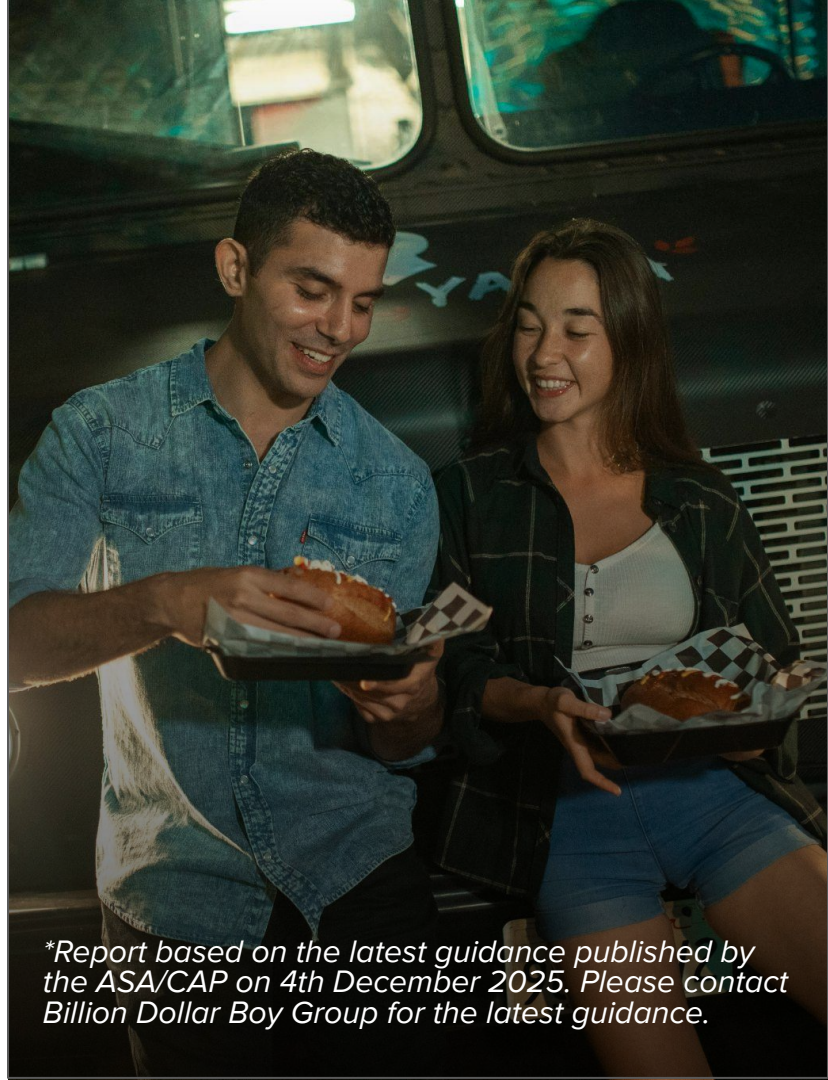
The introduction of the UK's Less Healthy Food (LHF) ad restrictions mark a significant shift in how brands promote high fat, salt, or sugar (HFSS) products.

From 5 January 2026, all online ads in paid-for spaces featuring identifiable LHF products - including creator content featured on creator-owned channels - have been banned, alongside a 9pm watershed for TV and on-demand\*.

It sounds like a big change, but it's a chance to rethink, refresh, and get creative.

This report breaks down what the ban means, which products are affected, and most importantly, how to adapt with confidence - from compliance advice to new creative strategies.

For brands navigating these changes, this moment marks a shift toward smarter, more strategic creator campaigns built to perform under a more mature set of rules.



*\*Report based on the latest guidance published by the ASA/CAP on 4th December 2025. Please contact Billion Dollar Boy Group for the latest guidance.*

# 02 WHAT IS HFSS & LHF





## What is HFSS?

The HFSS rules are official UK government rules restricting the promotion of products which contain “High Fat, Salt and/or Sugar” levels\*.

The rules dictate where and when HFSS products can be advertised. For example, ads for HFSS foods are restricted across children’s TV programming and online platforms where young audiences are significant and apply to all creator content - including organic, paid and gifted.

Even if your brand doesn’t make the food, your marketing still needs to follow the rules.

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*\* HFSS PRODUCTS ARE THOSE THAT ARE ASSESSED AS BEING HIGH IN FAT, SALT OR SUGAR IN ACCORDANCE WITH WITH THE DEPARTMENT OF HEALTH AND SOCIAL CARE'S [2011 NUTRIENT PROFILING TECHNICAL GUIDANCE](#).*



# What is LHF?

The "LHF rules" refer to new advertising restrictions in the UK on "Less Healthy Food" and drink products, which are a subset of HFSS (high in fat, sugar or salt) products\*.

The new LHF restrictions supplement the existing HFSS restrictions, applying a ban to the promotion of LHF food products across TV ads pre-9pm and a total ban on paid-for online ads (with some exceptions that this guidance will set out).

Initially, scheduled to launch on 1 October 2025, the rollout was delayed following an amendment to the legislation which exempts brand-only advertising.

The LHF ad ban's new legally enforceable date began on **5 January 2026**.

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*\*LHF PRODUCTS ARE SPECIFIED IN [THE ADVERTISING \(LESS HEALTHY FOOD DEFINITIONS AND EXEMPTIONS\) REGULATIONS 2024](#).*



03  
**WHAT PRODUCTS  
ARE AFFECTED?**



## Key categories include:

- Soft drinks (incl. energy drinks)
- Crisps, chocolate, sweets, ice cream
- Cakes, biscuits, desserts
- Pizza, fried food, chips, nuggets
- Breakfast cereals
- Pies, ready meals
- Flavoured yoghurts
- Savoury pastries

Always check the category and product - even healthy looking foods (granola bars, yogurts etc) can be HFSS/ LHF.

Please note, all LHF products are HFSS - but not all HFSS products are LHF; the classification is stricter.



A top-down view of a table with a pepperoni pizza, a bowl of chips, and hands reaching for the food. The pizza is in a cardboard box, and the chips are in a grey bowl. The text is overlaid on a white box with a blue border.

**The expected impact: removal of 7.2 billion calories per year from children's diets and prevention of 20,000 childhood obesity cases**



04  
**HFSS vs LHF**



# Unwrapping The Nuances



Due to LHF being a subset of HFSS, there are some important nuances in the interplay between the two sets of regulations:

## HFSS

- No paid promotions featuring anyone under 16, whether they are a creator, actor or brand ambassador.
- No paid promotions by an influencer who has more than 25% of their audience aged under 16.
- No 'overconsumption' content in paid ads, such as hauls or multiple flavour product trials.

## LHF

- No promotions featuring identifiable LHF products in any content posted on a creator-owned page - including illustrations or animations.
- No paid or free gifting/affiliate marketing involving LHF products.
- Brands with fewer than 250 employees are exempt.
- Audio-only ads can mention LHF products, as long as all the LHF and HFSS rules are followed.
- Brands can post content featuring identifiable LHF products on Brand owned-and-operated online channels, but cannot boost such content with paid media.

05  
**HOW BRANDS  
CAN ADAPT**



# How Brands Can Adapt

If an LHF product is shown, named, or recognisably featured, the ban is applicable. The rule applies regardless of the tone or storytelling.

Whilst it will change how brands advertise with creators, it's important to remember that the ban is about products, **not** brands.

That means there are still plenty of opportunities to collaborate with creators without showing the product - but it will require creative thinking. This is not an end, but the start of smarter storytelling.



# Use Distinctive Brand Codes

Distinctive brand codes - such as brand colours, sounds, or cultural cues - may potentially be used to suggest a brand without directly showing products (seek expert legal advice for guidance).

Sometimes called “stealth branding”, brands using this approach can evoke the essence of their brand through mood and storytelling to reflect the brand personality.

Props, locations, wardrobe, and styling all work to create a branded universe that feels intentional and ownable.

Generative AI can also be an effective tool to express brand feel in expressive ways without showing products.



Cadbury's famous drumming Gorilla advert drove huge sales and sentiment uplifts - showcasing the brand in a new and unexpected way without showing product.

9%

Increase in sales YoY

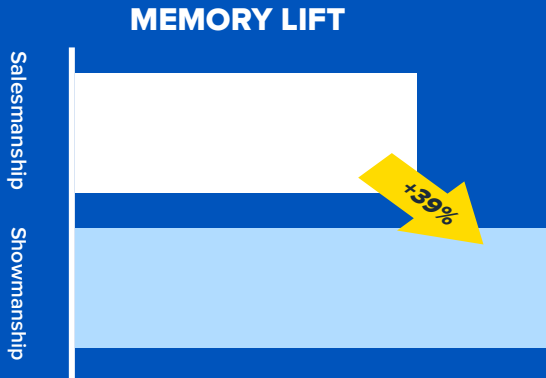
20%

Increase in positive brand perception

# Brand Storytelling

Instead of showing an identifiable restricted product, showcase the brand's heritage, its values, recipes and cooking tips, or chefs at work in behind-the-scenes content.

Moving away from transactional, product-centric content to more intimate or thoughtful branded content not only helps brands to stay LHF compliant - it can unlock better performance.



Assets with high levels of 'Showmanship' (built for entertainment) saw a 39% higher lift in memory vs. assets with high levels of 'Salesmanship' (built for sales).



# Lifestyle-Driven Content

Embrace more emotive content that doesn't require product shots, such as family dinner scenes.

Diversifying your creator partnerships outside your sector - for example lifestyle, parenting, and wellness creators - can help you naturally pivot messaging towards compliant branded content.

Unique creator-brand partnerships outside native food and drink sectors can also help brands to spark cultural talkability by feeling fresh and new.

Stepping outside the category also means stepping outside of the noise, showcasing the brand in a new context and reaching new audiences.

Billion Dollar Boy helped Lipton launch a limited-edition 25-piece clothing collection that seamlessly blended Lipton's brand with 90s-inspired designs from creator-founded streetwear brand, Cruel Pancake, to evoke "that summer feeling"

**96.7M**

Combined Creators  
Following (Potential Reach)  
(Sponsored + Gifting)

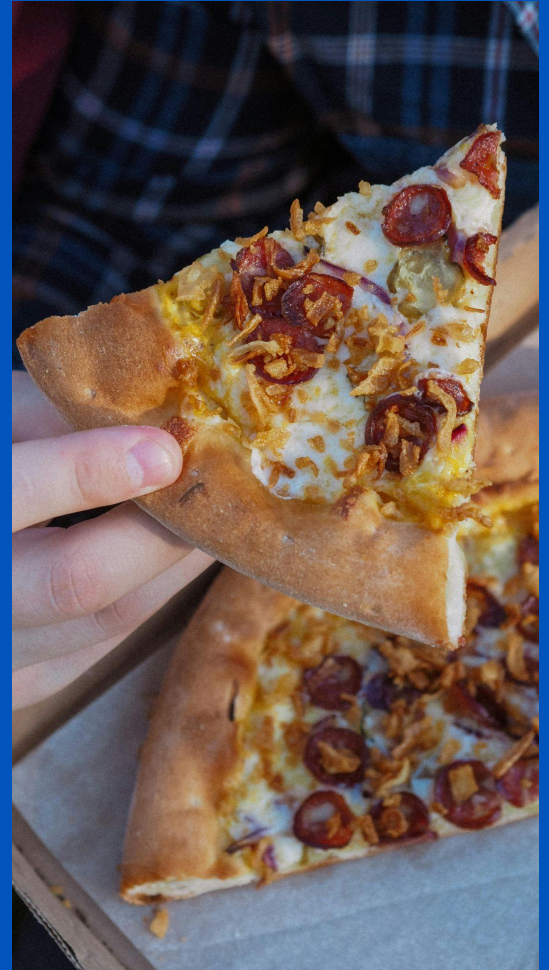
**4.0%**

Still AER  
+ 1.8% against global  
agency benchmark



06

# EXEMPTIONS & PITFALLS



# Exemptions & Pitfalls



Sponsored creator content promoting identifiable LHF products posted *only* on the Brand's owned online channels (with no paid spend) is still permitted.



Explore permitted healthier products and reformulated ranges, and plan permitted healthier recipes with LHF products.



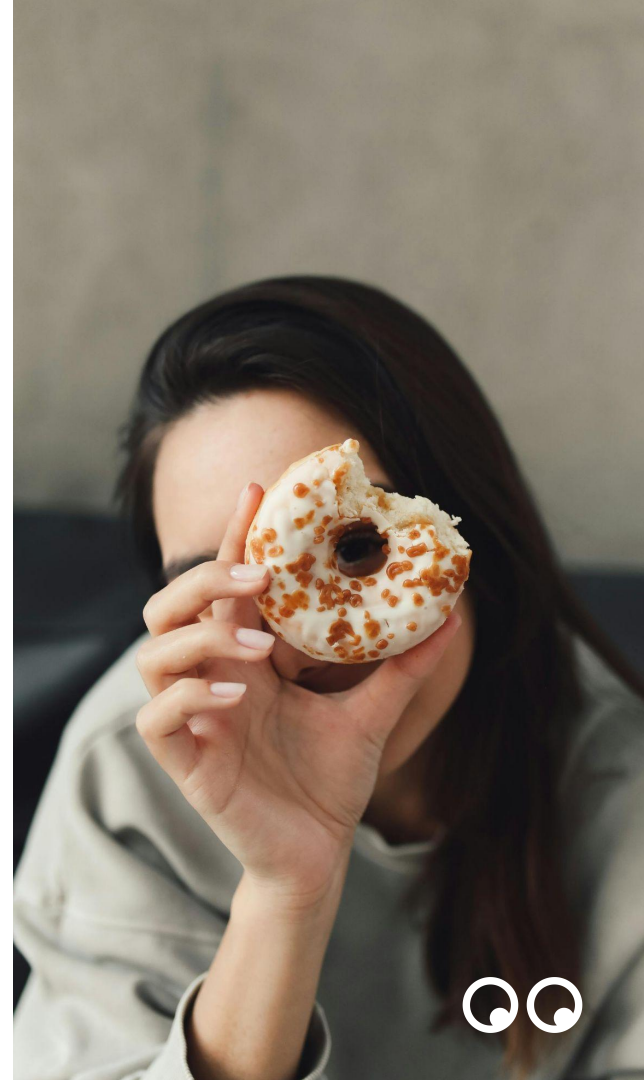
Pivot creator marketing to permitted channels and formats such as TV (post 9pm), OOH and radio. Creators are proven effective marketing partners across the advertising landscape - not just social.



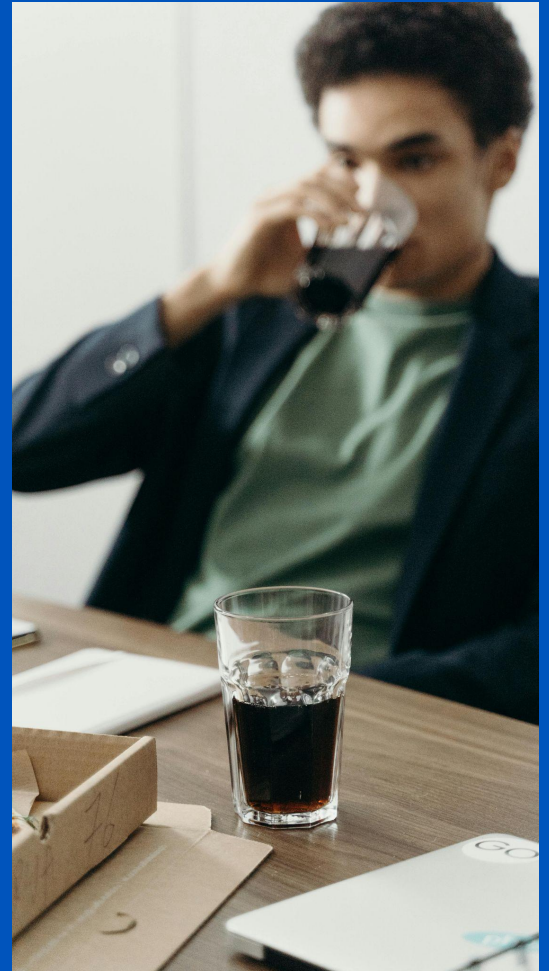
The ad ban exempts SMEs - businesses with <250 employees - with certain store size/specialist retail carve-outs.



Pack shots, product silhouettes, flavour callouts, price flashes, product-linked slogans, or menus that obviously point to a specific LHF can all make an ad "identifiable" (and, therefore, in scope).



07  
**A LOOK TO  
THE FUTURE**



# The Post-LHF Creator Economy: An Industry POV

*“At first glance, the LHF advertising restrictions feel like they’re clipping the industry’s creative wings - in particular because we lose the option of straightforward product-centric content. But constraints often fuel invention, this is a moment of recalibration.”*

*“We exist in an era where audiences reject transactional sponsored content. Audiences don’t want to receive one big blunt brand message in one format - they want value: entertainment, education and relevance. Remove the packshot and brands and creators are forced to think bigger, building worlds, rituals and personalities instead of simply pushing products. That’s where growth now sits.”*

*“We’ve seen this play out before. When alcohol and beauty brands were restricted, the smartest built emotional narratives and cultural moments - and their work became stronger. The same will happen here, and creativity will move into more interesting territory.”*

*“If the last decade was about performance and product, the next will be about imagination, emotion and distinctiveness - and the brands that embrace that shift earliest will win.”*



**Thomas Walters, Chief  
Innovation Officer  
and Co-Founder of  
Billion Dollar Boy**





**Calum Harris, Creator**  
[@calumharris](#)

*“It’s a step in the right direction for making people want to eat healthier and make better choices. I’d advise all creators to make sure they diversify their content and to be a bit more mindful about the content they create and the brands they work with.”*

*“I’ll continue to review collaborations carefully to make sure they align with both the new guidance and my own values. My focus will remain on creating recipes that are balanced, full of flavour, easy and feel accessible.”*



**Crystelle Pereira, Creator**  
[@crystellepereira](#)



**Zainab Pirzada, Creator**  
[@cookingwithzainab](#)

*“I think this ruling will encourage more brands to reformulate their products so they can be classified as healthier. That could actually create new opportunities for collaborations where creators can help audiences understand and trust those changes.*

*“For me, the focus will remain the same: showcasing homemade food that feels inspiring and relatable. My approach has always been to partner with brands that fit with my ethos of real, everyday cooking.”*



# QUESTIONS?

**Billion Dollar Boy is an award-winning  
global social agency with Creator Instinct™**

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To learn how we can support your brand through HFSS and LHF regulation changes, get in touch:

[www.billiondollarboy.com](http://www.billiondollarboy.com)  
[mail@billiondollarboy.com](mailto:mail@billiondollarboy.com)



08  
**APPENDIX**



# Brand Advertising Exemption

In accordance with The Advertising (Less Healthy Food and Drink) (Brand Advertising Exemption) Regulations 2025, advertisements that promote a brand, including the brand of a range of products are exempt i.e. a piece of brand advertising could be used in influencer-owned channels and in paid media (provided all other HFSS/LHF regulations and other parts of the ASA's CAP code were also complied with).

If an ad includes a piece of branding like logos, livery or jingles relating to a company or a range of products, **but does not include branding references related only to a specific less healthy product (such as logos/sonic branding)**, the advertisement is likely to fall under the brand advertising exemption.

## When the brand advertising exemption does not apply:

The content of which depicts a specific less healthy food or drink product;

- That promotes a brand the name of which is the name of a specific less healthy food or drink product (unless the product's full name is the name or is included in the name of a company, franchise or other commercial entity which was established before 16th July 2025 and which held that name immediately before that date; or it is the name of the brand of a range of products, where that brand was in use, as the brand of that range, for the purposes of marketing, advertising or retail sale immediately before 16th July 2025 and held that name immediately before 16th July 2025); or
- The content of which includes a realistic image of a food or drink product where the realistic image shows the food or drink itself and is not only of the product's packaging, and the food or drink product is visually indistinguishable from a specific less healthy food or drink product.
- If an advertisement includes a piece of branding that is related only to a specific LHF product (such as a product's logo), it would not fall under the brand advertising exemption, as it would be deemed to depict a specific less healthy product; watch out for sonic branding - if it's too closely tied to an LHF product (e.g. the Magnum 'crack') this is also potentially likely to make the exemption invalid.





## Other Exemptions

- LHF product-featuring adverts by SMEs (a business that employs less than 250 people)
- Any advertisements on the internet, which are not intended to be accessed principally by persons in the UK.
- B2B adverts (advertisements directed solely at persons who are engaged in, or employed by, a business which involves or is associated with the manufacture or sale of food or drinks)
- Online radio advertising/ Ofcom regulated radio advertising (where any visual advertisements for LHF products are not to be treated as part of that service)
- Advertisements included in other online audio services that are not visual advertisements e.g. podcasts
- On-demand programme advertising
- Any advertising on Brand-owned spaces e.g. Brand owned-and-operated online channels (e.g. social media and website), provided no paid advertising/ paid media is placed behind it; this can feature creators (either self-shooting or featuring in brand-shot content), as long as the creators don't also post the content on the creator-owned channels.

