

Left wanting more

Food company policies on marketing to children



About Consumers International (CI)

Consumers International (CI) is the only independent global campaigning voice for consumers. With over 220 member organisations in 115 countries we are building a powerful international consumer movement to help protect and empower consumers everywhere.

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This report is part of *Junk Food Generation* – the Consumers International campaign to stop the marketing of unhealthy food to children

For more information, visit www.junkfoodgeneration.org

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Introduction

In March 2008, Consumers International (CI) launched a set of *Recommendations for an international code on the marketing of food and non-alcoholic beverages to children*.

The recommendations, produced together with the International Obesity Task Force (IOTF), were written in response to rising international levels of obesity and overweight, and the passing of a World Health Assembly (WHA) resolution in 2007 calling for the World Health Organization (WHO) to make recommendations on the marketing of food to children.

One argument that is sometimes used against the need for an international code is that self-regulatory systems would make such a code unnecessary. Over the last year, CI and its member organisations have put together a number of examples of the continued marketing of food that is high in fat, sugar or salt to children that, we believe, demonstrate why an international code is needed.¹

In this report we take a step back and look at the policies of some of these companies in the light of self-regulation and reveal the limited scope of their commitments.

The obesity crisis

Rising levels of obesity constitute a global crisis that is threatening the health of millions of people. Obesity and overweight contribute to the incidence of non-communicable diseases such as diabetes, heart disease and some cancers. These diseases now account for some 60% of global deaths and almost half (47%) of the global burden of disease.² Without preventative action the cost of these diseases will continue to escalate and threaten to overwhelm already overstretched health services.

An effective response to the crisis will require action to be taken in several different areas. However, central to any

successful strategy will be the promotion of healthier diets. Children are a particularly important target for this action as not only are obese and overweight children much more likely to suffer from related health problems in later life, but they are also free from the dietary habits and preconceptions that many adults have already formed.

Governments and civil society have woken up to this challenge and there are now many innovative programmes promoting healthy diets to children. However, any effort to promote healthy diets must also address the marketing to children of energy-dense, nutrient-poor foods that are high in fat, sugar and salt.

Global food companies spend millions of dollars every year on advertising. It is estimated that they spend \$500 for every dollar that the WHO spends on promotion of healthy diets. Not all of this advertising promotes food high in fat, sugar or salt however, when it does, it undermines the positive messages about diet that are being promoted by governments and others.

Marketing to children carries particular risks as children are less able to differentiate marketing messages from other communication and can be more susceptible to the techniques used in modern marketing.

Public and private sector responses

In 2004, the WHO published the *Global Strategy on Diet, Health and Physical Activity*³, which set out the preventative steps that should be taken by governments and companies to tackle the growing incidence of non-communicable disease. The strategy explicitly identifies health problems to be caused by the excess consumption of fat, sugar and salt, along with insufficient intake of fruit, vegetables, pulses and whole-grain cereals.

At the WHA in May 2007 the international response to this issue took another step forward when a resolution



was passed calling on the WHO to develop a set of recommendations on the marketing of food to children. The WHO is now involved in a consultation as to what these recommendations should consist of. The recommendations will be put to the WHO Executive Board in January 2010 and, if passed, will go to the WHA in May 2010.

At a national level governments and legislators have also started to address the issue of food marketing to children, in some cases passing national regulations to limit the marketing of food high in fat, sugar and salt to children.

Major food companies began to introduce policies in response to concerns from civil society and governments in the late 1990s. As the pressure grew, these company policies have been developed further and supplemented by a series of national and regional pledges, usually signed by a group of the largest food and drink manufacturers in that country or region.

Pledges now exist in the US, Canada, the EU, Thailand, Australia and Mexico.⁴ Each pledge contains a series of commitments that companies then complement with their own statements, explaining how they will be implementing the commitments.

The cause and effect relationship between public concern, action by legislators and action from the private sector is plain to see and is clear evidence, if needed, of the impact that the involvement of civil society and legislators can have on this issue. One of the clearest examples was the announcement of the US pledge, just prior to a US Federal Trade Commission report, to Congress on the Marketing of Food to Children and Adolescents.

The passing of the WHA resolution calling for the WHO to develop recommendations on the marketing of food to children has also led to companies engaging more

closely with the international dimension of their policies, as well as international processes. At the time of the WHA in May 2008, international food and drink companies made two further announcements.⁵ The International Council of Beverages Associations announced its intention to reduce its marketing to children and develop global policies (though no specific time commitment was given except that an update would be made available the following year). A number of international food and drink companies also chose this time to send a joint letter to Dr Margaret Chan, the Director General of the WHO, which announced the signatories intention to work towards developing global policies and monitoring systems in the future (though again no specific time frame was given).

An international code on the marketing of food to children

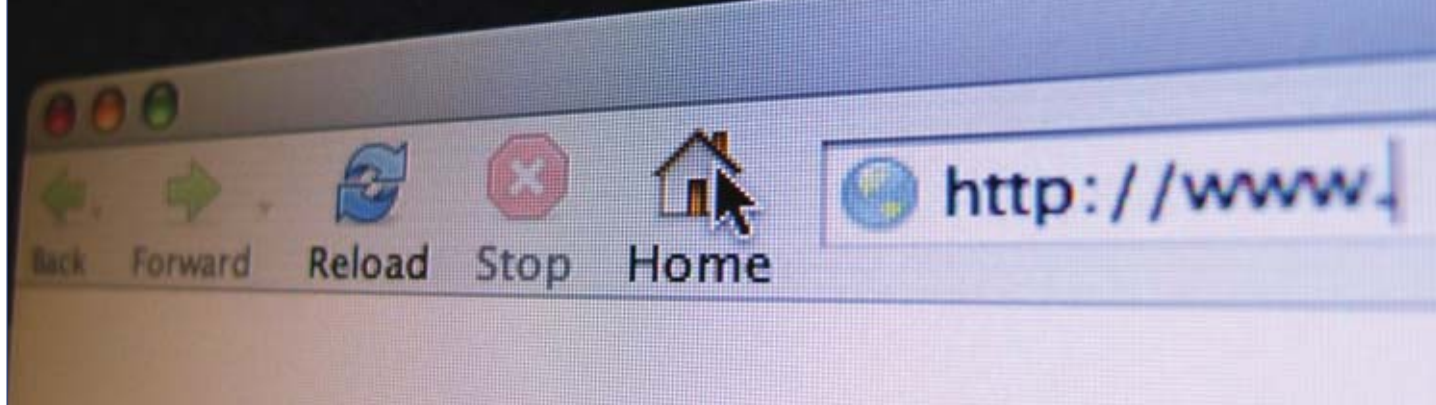
CI believes that a robust international code on the marketing of food is needed to guarantee young people the protection they should have from aggressive marketing of food high in fat, sugar or salt.

CI remains convinced that an international code is necessary and will provide valuable guidance to governments, both as to the need for regulation in this area and for the content of that regulation. It will also provide guidance for company self-regulatory measures.

Appendix I gives a summary of each company's commitments.

Appendix II gives a summary of multi-company initiatives, including the national and regional pledges.

Appendix III gives the website addresses that were used to source the information so that, those who want to, can check what the companies have said in their own words.



Methodology

CI looked at the commitments that the 10 food and drink companies with the largest global advertising spend⁶ had made on their corporate websites and logged on the websites of the US, Canadian, European, Thai, Australian and Mexican pledges.

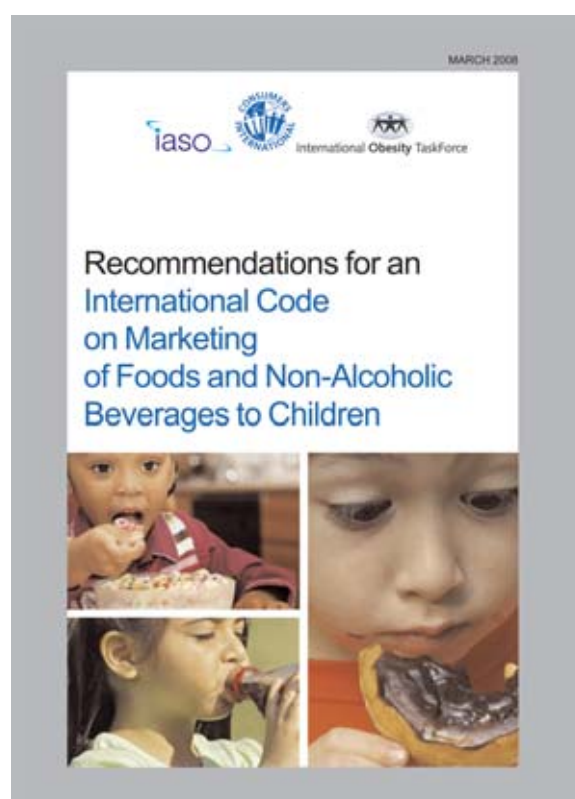
We have also noted the contents of a statement made by the International Council of Beverage Associations (ICBA) and a letter that a number of companies sent to Dr Margaret Chan, Director General of WHO, in May 2008. We have not included any information from companies' national sites in this survey.

Wherever possible, we noted explicit commitments that these companies had made in relation to their policies on the marketing of food to children.

The companies' commitments were then summarised against the areas highlighted in the CI and IOTF *Recommendations for an international code on the marketing of food and non-alcoholic beverages to children*.

This document makes recommendations for an international code. However, given the wide consultation – with consumer organisations around the world and international experts on the study of obesity – that went into the development of the recommendations, it also proves a useful tool for benchmarking the progress that companies are making in this area.

The research was carried out in January and February 2009.





Key findings

Over the last few years, major international food and drink companies have introduced a number of new policies and pledges covering the marketing of their products to children. This research aimed to look beyond the headlines to see what the companies have actually committed themselves to.

Analysing food and drink company policies on the marketing of food to children is a complicated and, at times, confusing undertaking. Commitments tend to vary across regions and countries, and it can be difficult to decipher the meaning from the phrases and terminology used in the policies. It is often what is not said, rather than what is said, that is significant.

The companies included in this survey have clearly made progress in recent years and as a result young people will be subjected to less marketing of food high in fat, sugar and salt than they were in the past. However, it is also clear that all of the companies included in this report are falling far short of CI's recommendations in the *Recommendations for an International Code on the Marketing of Food to Children*.⁷

In this section we give a brief overview of how the companies performed against four criteria that are fundamental to any effective action to limit the marketing of food to children.

Dis-honourary mention

Yum Brands, the owner of KFC, Tacco Bell and Pizza Hut, was one of the food and drink companies identified amongst the 10 international food and drink companies with the largest international advertising spend. However, it does not feature often in this report as we could find no reference to any policies on the marketing of food to children on its website or any of the pledge websites.

Although we had not intended to do a ranking of companies' policies as a result of this survey we do feel able to give last place to YUM brands.

Bite-size summary

Out of the 10 companies surveyed:

Fast food lagged behind

- **Yum brands** – owners of KFC, Tacco Bell and Pizza Hut – did not have any policy on the marketing of food to children on its corporate website or in any of the regional or national pledge websites.
- **McDonald's** does not have a global policy and had only made limited commitments in the US and Canadian pledges.

Which products can still be marketed to children?

- Consumers face a bewildering plethora of company-defined nutrient profiling schemes.
- Companies sometimes use more lenient criteria for the products they specialise in.
- Two schemes allow the marketing of a product if there has been a reduction in fat, sugar or salt, ie there is no commitment as to absolute amounts.

Defining marketing to children

- Several companies define a child audience as comprising more than 50% of under 12s, meaning that large numbers of children may still be exposed to their marketing.
- Packaging and point of sale materials are often excluded from pledges.



Left wanting more: Key findings

- Most companies will continue to market in schools if it is part of a programme agreed with the school authorities or a programme promoting a healthy lifestyle.
- None of the companies made a commitment to stop marketing products to children through their parents and carers.

Global policies

- Three companies didn't appear to have any global policies in this area.
- Some companies' global policies were relatively limited or lacked transparency.



What the companies say?

We were able to find commitments on the marketing of food to children for 9 out of the 10 companies in our original sample. In order to judge the effectiveness of these commitments we have analysed the companies' policies in several key areas.

How do the companies decide which products can be marketed to children?

The nutrient criterion that a company uses to decide which products can be marketed to children is fundamental in determining how effective its policy will be.

Most of the companies' policies only restrict the marketing of food to children if it fails to meet their criteria, therefore, it could be possible for a company to have the most comprehensive policy in all other areas but to design the nutritional criteria in such a way that the policy didn't affect the marketing of any of their products.

One company, **Coca-Cola**, stated that they will not market *any* of their products to children under 12 years old and therefore didn't require nutritional criteria.

Mars has also stated that they will not advertise any of their products to children under 12 years old, except for their 'better for you' range in the US, which will be marketed to children over 9 years old.

All of the remaining companies in the survey had developed their own nutritional criteria to define less healthy products that should not be marketed to children over 12. One, **Unilever**, also uses external schemes such as 'Choices,' 'Eat Smart, Drink Smart' and, in Australia the New South Wales School Canteen Association criteria.

This has resulted in a plethora of different standards, which creates a bewildering picture that individual consumers are unlikely to be able to understand.

Questions should also be asked about the consistency of individual company nutritional criteria. Whilst some categorisation of foods is necessary in developing nutritional criteria, some companies have developed highly complicated schemes with as many as 20 different categories. Some companies appear to have used this device to apply particularly lenient criteria to the products that they manufacture. **Kellogg's**, for example, has very lenient criteria for breakfast cereals.

Other companies such as **PepsiCo** and **Kraft** use criteria that would allow a product to be marketed to children if there had been a reduction in the level of fat, sugar or salt. Such a system says nothing about the actual nutrient profile of the product.

Faced with the current complexity, parents and carers are effectively asked to put their trust in the companies and assume that the companies' definition of the foods that are not appropriate for marketing to children bears some relation to theirs. The reality is that most companies' nutritional schemes allow them to continue marketing products to children that many would still consider to be too high in fat, sugar or salt.

All the companies that have developed their own schemes referenced a number of external sources and expert bodies that they used in the development of their nutritional profiling schemes. However, with several sources being referenced and no further details as to how the companies are using these sources this merely highlights the need for a single international system developed by an independent body such as the WHO that can be used by all companies.



Do the companies' commitments cover all children up to the age of 16?

Most national and international definitions of childhood include young people up to the age of 16. This is in recognition of the fact that young people below this age should not be expected to, or are not able to, take on the responsibilities of adulthood.

None of the companies' policies on marketing to children covered all children up to the age of 16. Most companies made commitments to limit the advertising of food to children up to the age of 12, with some companies making additional commitments not to market any products to children under the age of 6 (or 5 in Australia due to different audience segmentation).

Teenagers are entirely excluded from these company commitments, despite the fact they are in many ways more susceptible to marketing pressure than adults and are in many cases still forming opinions about what constitutes an appropriate diet. It is also usually in their teenage years that young people are just starting to exercise their own consumer power.

By excluding children older than 12 it is also probable that companies' marketing is still impacting on the children they are professing to be protecting. Most young children emulate their older counterparts and aspire to have the same interests and pastimes. As a result, advertising that is targeted to children over 12 is likely to appeal to children under 12 as well.

How do the companies define a child audience?

Several of the companies included in this survey defined a child audience as one where children exceeded 50% of the total audience. The problem with using a percentage of the audience in this way can mean, for a popular programme, that a large number of children may still be exposed to the marketing of food high in fat sugar or salt even though they are not the majority of the audience. For example some popular early evening family shows often attract large numbers of children even though they are not the majority of the audience.

The listed companies used the following percentages as a guide for defining a child audience:

- **Coca-Cola** – 50%
- **PepsiCo** – global policy 50%

- **Nestlé** – 50% and local authority definitions
- **Unilever** – global policy 50%

Some companies used lower percentages which reduces this risk, for example:

- **Kellogg's** – 50% or 30% - 49% if the programme is considered to be targeted at under 12s.
- **McDonald's** – 30%
- **Kraft** (US, Can, EU) – 35% and watershed times⁸
- **Mars** – 25%

Some companies included other criteria such as watershed times. Watershed times are times after which regulators allow material that would not be suitable for a child audience to be aired. If used appropriately this can help to reduce the risk of children being exposed to the marketing.

The weakest criterion was whether the advertising is 'directed primarily at children'. Without clarification it is not clear whether this refers to the audience, the timing or location of the marketing or the design and content of the marketing. **Unilever** global and **Danone** US used this non-specific wording in their policies.

CI believes that an approach based on percentages of the audience, a watershed time and the avoidance of marketing techniques targeting children, such as the use of cartoon characters, is the best approach.

None of the companies made firm commitments in respect to marketing where children were potential recipients regardless of the main target audience being adults.⁹ **Coca-Cola** came closest by stating that it is 'sensitive to the fact that children may also be watching programs with their family and we make every attempt to ensure that our advertising is appropriate for a general audience'. It was however the only company to have made such a statement.

Which marketing media do the companies refer to in their policies?

This survey looked at both the general statements that the companies included in their policies, as well as the more specific definitions of the marketing media and techniques that they would include in their commitment.

It was often hard to define which forms of advertising were included in the companies' commitment. Almost all the statements appeared to be comprehensive on first



viewing, however on closer inspection of the policies important forms of marketing were often excluded, in particular packaging and point of sale materials.

Explicit statements as to what forms of marketing communications the companies included were more reliable, although a clearer statement of what they were not including would also have been useful.

Some companies did refer to examples of what they were excluding from their commitments, with the most common exclusions being:

- packaging
- point of sale and promotions that included messages encouraging a healthy lifestyle, for example:
 - **McDonald's US** stated that 'point of sale materials (ie menus, tray liners, kiosks, signs, food wraps, boxes, bags, packages) were excluded.
 - **Unilever** stated that the Unilever commitment does not apply to packaging or labelling and the limited named point of sale materials.

However, none of the companies systematically described which forms of marketing were included and which weren't included in their commitments.

A significant area of potential confusion in the company policies came from the use of the word 'advertising' as opposed to 'marketing'. 'Advertising' often means marketing communications that are placed in a space that the company has bought from another company. It would therefore include adverts on TV, the radio, in cinemas and on third party websites. It would not include marketing on the company's own website, on its packaging or point of sale materials.

Which marketing techniques do the companies refer to in their policies?

CI is concerned about the use of the following marketing techniques when used to market food high in fat, sugar or salt to children.

Indirect marketing to children

None of the companies referred to indirect marketing to children through parents or carers. This is a widespread practice whereby companies address their marketing to the parent or carer and directly or indirectly market the product as suitable for their child. This can be done

through nutritional claims, portraying the product as contributing to a happier family life or by attaching 'free' items to the marketing or purchase of the product, such as games, competitions or coupons.

Whilst the indirect marketing of food to children through their parents or carers raises different issues to direct marketing to children, the aim is still to encourage children's consumption of these products.

The representation of children in their marketing of food high in fat, sugar and salt

None of the companies committed themselves to not using children in their advertising¹⁰. Some companies did however make references to how children may appear in their materials:

- **Coca-Cola** stated that children could be shown consuming their products in the presence of adults. However, this could cause concerns that this signals adult approval or support for children consuming the product.
- **Mars** stated that they 'will neither show children under 12 consuming our snack food nor allow them to act as a spokesperson for the brand'.

The use of toys, gifts, games, competitions and vouchers

Very few companies made any commitments in relation to the use of marketing techniques such as the use of toys, gifts, competitions and vouchers.

Games, in particular interactive games, did receive some attention particularly in the US and Canadian pledges where companies committed not to use these games to market food to children if they did not meet their nutritional criteria.

Additionally some companies committed to installing technology to make it harder for children to access these games. Examples of commitments in this area include:

- **Mars** committed to installing age screening techniques to 'ensure that only children over 12 can download branded wallpaper, screensavers and other leave-behind material from websites of potential interest to younger audiences'.
- **Kellogg's** will only use interactive media on its own websites and will introduce consent forms, time breaks and will only feature Kellogg Global Nutrient Criteria products on downloads.



Celebrities and licensed and own-brand characters

Several companies have made commitments not to use licensed characters, though in some cases the detail of the commitment reveals significant exclusions. For example:

- **McDonald's US** stated that 'this does not apply to the use of licensed characters on packaging, provided the packaging does not appear in advertising directed to children under 12'.
- **Kellogg's** stated that they will not use licensed characters 'on the front of packaging,' but will presumably continue to use it elsewhere on the package.

Very few companies made a commitment in relation to their own-brand characters:

- **Kraft** states in the Australian pledge that it would 'avoid developing characters that are likely to appeal to children.'

All other companies that have own-brand characters, such as those that appear on breakfast cereals and confectionary, will continue to use them; a practice that in most people's eyes will contradict their commitment not to market to children. For example:

- **McDonald's US** stated that the limitation on the use of licensed characters 'does not apply to the use of company created/owned characters'.

Sponsorship of materials, people or activities popular with children

Very few companies made any specific commitments in these areas. However, some companies did state that they would continue to support initiatives that promoted a healthy lifestyle.

Whilst the aim of such programmes can't be questioned, the association of a brand that produces food high in fat, sugar or salt with such activities can be problematic. The message that some young people may get from such associations is that these brands are also healthy or at least associated with things that they enjoy and adults support.

Marketing where children are gathered

Most companies made commitments in relation to the high profile issue of advertising in schools. However, very few companies made any commitments in relation to other places where children may be gathered such as youth clubs or on the way to and from school.

The commitments that companies made in relation to schools varied from what appeared to be a commitment not to conduct any marketing in schools, such as the commitment made by Kraft which stated 'Kraft has and will continue to eliminate advertising and promotion in schools around the world', to commitments that came with a range of exceptions. These exceptions related to having the school's permission, for example:

- **Nestlé** will consider activities in schools if they have the 'prior agreement from the school'.
- **PepsiCo** will not advertise in schools 'except where specifically requested by, or agreed with, the school administration for educational purposes'.
- **Coca-Cola's** commitment not to advertise in schools 'is not intended to prevent the company or its local bottler from offering appropriate added value programs to schools that encourage physical activity, academic achievement and positive youth development. In keeping with this policy, any company or bottler added value programs in primary schools will not carry product branding'.

Or activities that promoted a healthy lifestyle, for example:

- **McDonald's US** stated that it 'provides educators with curriculum materials and activities that address children's well-being'.
- **Danone** will not advertise in schools excluding 'sponsorship that promotes exercise'.

Have the companies made a global commitment?

CI sees no reason why young people in one country should receive worse treatment from international companies than children in another country and therefore argues that companies' commitments should be global.

Whilst the existence of a global policy is no guarantee of the quality of the commitments made in that policy, it is recognition of the fact that an international company should have the same responsibilities to children regardless of where they live in the world.

- **Coca-Cola, Kellogg's, Mars, Nestlé, PepsiCo and Unilever** all have statements or policies on their websites where they have made a clear global commitment. Though in the case of PepsiCo, they do not commit to implementing the policy until 2010 at the latest.



Left wanting more: What the companies say?

- **Kraft** did not appear to make a clear global commitment on its corporate website, however, some of the regional and national pledges included references to its global commitments.
- **McDonald's** website referenced their US and Canadian pledges, as well as the development in Europe of 'a number of ideas which add to the initiatives already undertaken on a market by market level'. We were unable to find any reference to their marketing of food to children in the rest of the world.
- **Danone** has a statement on its website, which only refers to implementation in Europe.

However, several of the global commitments were relatively limited in comparison to the commitments made under the regional and national pledges. For example:

- **PepsiCo's** global policy only refers to 'third-party advertising or marketing' and therefore does not include its own websites, packaging or point of sale materials.
- **Nestlé's** global policy lacked specific commitments on defining a child audience or the type of marketing that was covered by its policy.
- **Unilever's** global policy lacked detail and specific commitments, for instance on defining a child audience.



Conclusions and recommendations

In previous reports, CI has examined the marketing practices of food and drink companies and demonstrated that several of the companies covered in this report are continuing to market their products to children – in some cases children under the age of 12.¹¹

CI is still concerned about what is happening ‘on the ground’; on televisions, on websites, on shop shelves and in schools, but in this report we have taken a step back and looked at the companies’ policies in the belief that if these policies are not robust then it is unlikely that their practice will be better.

This survey suggests that, on the whole, major food and drink companies have made progress in adapting their marketing policies to reduce their marketing of food high in fat, sugar and salt to children. The very existence of the policies suggests acceptance of the idea that the marketing of food high in fat, sugar and salt is potentially damaging to children’s health. And, if these policies are properly implemented, these companies are less likely to be engaging in the crude and aggressive marketing of foods high in fat, sugar and salt to children under 12.

However, fast food chains are still an area of particular concern. Yum brands, owners of KFC, Taco Bell and Pizza Hut, was part of our sample, but it makes very little impact in this report because we were unable to find anything to report on from its corporate website or any of the regional or national pledge websites. McDonald’s, the other fast food chain in our sample, had made relatively limited progress, having only signed up to the US and Canadian pledges. Fast food chains are a major source of food marketing to children and contribute to children’s wider views on food and diet, as well as promoting their products and brands. Their relative lack of commitment to this issue stands out as a major concern.

Even amongst the other companies in this survey, progress is still sporadic and half hearted and as a result,

even these major international companies are falling significantly short of what CI believes is necessary to make an effective contribution to the effort to stem the global rise in obesity and overweight.

Despite significant progress, a number of company policies still fail four fundamental tests:

- Several companies use inconsistent criteria to decide which products can be marketed to children. As a result too many products high in fat, sugar or salt are still marketed to children.
- None of the companies make a commitment to limit the marketing of food high in fat, sugar and salt to children between 12 and 16.
- The company definitions of what is marketing have too many loopholes and exceptions.
- Global policies are in some cases limited in comparison to national and regional pledges.

Large international companies have a responsibility to set high standards and serve as an example to the wider industry. It is therefore doubly disappointing that these leading companies, the targets of scrutiny and campaigning, have not developed stronger policies.

Government regulation is likely to be the only way to raise standards and address the market as a whole. CI believes that the WHO has an important role to play in adopting an international code on the marketing of food to children that will give guidance for government response on this issue. An international code will also provide a clear benchmark by which to judge companies’ marketing practices.

CI hopes that companies can support an international code as a means of creating a level playing field and preventing those companies with high standards from being undercut by less scrupulous competitors.



The recommendations for an international code prepared by CI and the IOTF provide a model framework on how this can work. It would provide protection from advertising of products high in fat, sugar and/or salt for children up to 16 years old and would include:

- A ban on radio or TV adverts promoting unhealthy food between 06.00 and 21.00.
- No marketing of unhealthy food to children using new media (such as websites, social networking sites and text messaging).
- No promotion of unhealthy food in schools.
- No inclusion of free gifts, toys or collectible items, which appeal to children to promote unhealthy foods.
- No use of celebrities, cartoon characters, competitions or free gifts to market unhealthy food.

CI believes that all children up to the age of 16 years old should be protected from marketing of unhealthy food and drink through a global standard based on the recommendations prepared by CI and the IOTF. In particular, the following marketing techniques should not be allowed to promote food high in fat, sugar and/or salt:

1. Advertising or promotion that directly appeals to children, including the:

- Use of celebrities
- Use of cartoon characters, including brand owned and licensed
- Inclusion of free gifts, toys or collectible items
- Inclusion of competitions, vouchers or games
- Shape or novelty value of the food or food packaging

2. Advertising or promotion in places children visit frequently, which includes:

- Nurseries, pre-school centres, schools and school grounds
- Children's clubs, centres, playgrounds and sports halls
- Family and child clinics and paediatric services

3. Advertising that targets parents or carers:

- No indirect advertising to parents or other adults caring for children such as other family members, child carers, teachers, health workers. This includes suggesting that a parent or adult who purchases such a food or beverage for a child is a better, more intelligent or a more generous parent or adult than one who does not

do so, or that their child when fed these products will be more intelligent and gifted.

Consumers International calls on:

The WHO

- To develop an international code to restrict the marketing of food to children based on the CI/IOTF Code.
- Report on and monitor compliance with the international Code.

National governments

- To give their support to the development of an international code on the marketing of food to children.
- To implement national legislation based on the international Code to restrict the marketing of food to children.

Multinational food and beverage companies

- To voluntarily comply with all the provisions in the CI Code.
- To adopt a consistent global approach and ensure that all internal policies on advertising and nutrition are implemented to the same standard in all countries.
- To use their creativity and breadth of marketing techniques to encourage children to make healthy food choices.



Endnotes

- ¹ See www.junkfoodgeneration.org for CI reports and examples on the marketing of food to children
- ² International Obesity Task Force, www.ionf.org
- ³ World Health Organization (WHO), Global Strategy on diet, physical activity and health. GSDAPH 46(3), WHA 2004 A57/9. World Health Assembly (WHA) May 2004.
- ⁴ See Appendix I for a summary of what the pledges say.
- ⁵ See Appendix II for specific wording and website links to the letters sent in May 2008.
- ⁶ Advertising Ages *Global Marketers - Global ad spending by marketer*, 2008
- ⁷ *Recommendations for an International Code on Marketing of Foods and Non-alcoholic Beverages to Children*, Consumers International March 2008. Available at www.consumersinternational.org and www.junkfoodgeneration.org
- ⁸ Kraft use 35% at the time of the programme.
- ⁹ For example Kraft said it would continue to advertise its full portfolio of products to 'all family' audiences.
- ¹⁰ Mars stated that the company 'will neither show children under 12 consuming our snack food products nor allow them to act as a spokesperson for the brand.'
- ¹¹ See www.junkfoodgeneration.org



APPENDIX I

Summaries of company policies and pledges

Coca-Cola

	Global policies ¹	Statements on corporate websites	US	Canada	EU	Thai ²	Australia	Mexico
Signatory to?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Does the company include all children up to 16?	12	12	12	12	12	12	12	
What nutrient profiling does the company use?	Coca-Cola prohibits the advertising of any of its products to children under 12. ³							
How is a child audience defined for broadcast (TV and radio) advertising?	50% audience	50% audience	50% audience	50% audience	50% audience	50% audience	Note ⁴	

Does the company explicitly prohibit the following?

The marketing of food high in fat, sugar and salt (HFSS) where children are potential recipients regardless of the main target audience being adults?	Note ⁵	Note ⁶						
The representation of children in their marketing of HFSS foods?	Note ⁷	Note ⁷						
The use of celebrities or other people who may be familiar to or appeal to children?							Yes	
The use of licensed and own-brand cartoon characters ?			Licensed only	Licensed only	Licensed only		Note ⁸	
The use of toys or free gifts ?								
The use of games, competitions and vouchers ?								
The sponsorship of materials, people or activities popular with children?	Note ⁹							
Marketing where children are gathered, for example nurseries, schools, school grounds, playgrounds, and family and child clinics?	Schools ¹⁰		Schools ¹¹	Schools ¹¹	Schools ¹²	Schools ¹³	Schools ¹⁴	
Indirect marketing to parents or adults?								

Appendix I: Summaries of company policies and pledges

What forms of marketing are explicitly covered?															
	Television	Radio	Print	Packaging	Point of sale	Product placement	Interactive games	Cinema	Internet	Own website	Third party websites	Above the line	Phones	Interactive media	Other new media
Global policies	✓	✓	✓						✓				✓		
Statements on corporate websites	✓	✓	✓						✓				✓		
US	✓	✓	✓			✓	✓		✓					✓	
Canada	✓	✓	✓			✓	✓		✓					✓	
EU	✓	✓	✓			✓	✓		✓						
Thailand	✓	✓	✓								✓				
Australia	✓	✓	✓		✓	✓	✓				✓	✓			
Mexico															

- ¹ Referring to their new policy on marketing to children Coca-Cola's global website states, 'The other difference is that the new policy is global'.
- ² At the time of going to print there were no company action plans available on the Thai pledge website, therefore the company is only committed to the minimum points made in the pledge.
- ³ In the US pledge Coca-Cola retains the right to market new products that meet the initiatives nutritional criteria to children under 12 in the future, after notifying the relevant body.
- ⁴ Coca-Cola South Pacific states that it will not advertise 'where the audience is predominantly children and/or having regard to the theme, visuals, and language used are directed primarily to children'.
- ⁵ Coca-Cola states that it is 'sensitive to the fact that children may also be watching programs with their family, and we make every attempt to ensure that our advertising is appropriate for a general audience.'
- ⁶ Coca-Cola states that 'We are sensitive to the fact that children may also be watching programs with their family, and we make every attempt to ensure that our advertising is appropriate for a general audience.'
- ⁷ Coca-Cola's policy is that 'Children can be shown consuming the product in the presence of adults'.
- ⁸ Coca-Cola responded to each of these sections with the statement 'Coca-Cola South Pacific will undertake no direct targeting of children under 12 years in any media for any brand messaging. This applies to all media and all beverages.'
- ⁹ Coca-Cola supports youth education programmes that support active healthy living. 'While there may be some branding the primary intention of these programs is educational.'
- ¹⁰ Coca-Cola states that it 'also makes every attempt to avoid directly targeting children in other areas where parents may not be present to supervise, such as schools'.
- ¹¹ Coca-Cola states that the Company's Model School Guidelines for School Beverage Partnerships 'do not prevent the company or its US bottlers from offering appropriate programs to schools to encourage physical activity, academic achievement and positive youth development.'
- ¹² Coca-Cola states that it will not advertise in primary schools, unless requested. It will provide 'appropriate container sizes that allow for portion control' and 'unbranded vending machines' in secondary schools.
- ¹³ As a signatory to the Thai pledge, Coca-Cola states that it will not engage in any 'product-related communications in primary schools except where specifically requested by or agreed with the school administration for educational or informational purposes'.
- ¹⁴ Coca-Cola's commitment not to advertise in schools 'is not intended to prevent the Company or its local bottler from offering appropriate added-value programs to schools that encourage physical activity, academic achievement and positive youth development. In keeping with this policy, any Company or bottler added-value programs in primary schools will not carry product branding.'

Appendix I: Summaries of company policies and pledges

Danone

	Global policies	Statements on corporate websites	US	Canada	EU	Thai	Australia	Mexico
Signatory to?		Yes ¹	Yes	No	Yes	No	No	No
Does the company include all children up to 16?			12		12			
What nutrient profiling does the company use?			Food System Profiler		Food System Profiler			
How is a child audience defined for broadcast (TV and radio) advertising?			Note ²		50% audience			

Does the company explicitly prohibit the following?

The marketing of food high in fat, sugar and salt (HFSS) where children are potential recipients regardless of the main target audience being adults?								
The representation of children in their marketing of HFSS foods?								
The use of celebrities or other people who may be familiar to or appeal to children?								
The use of licensed and own-brand cartoon characters?			Licensed only		Licensed only			
The use of toys or free gifts?								
The use of games, competitions and vouchers?								
The sponsorship of materials, people or activities popular with children?								
Marketing where children are gathered, for example nurseries, schools, school grounds, playgrounds, and family and child clinics?			Schools ³		Schools ⁴			
Indirect marketing to parents or adults?								

What forms of marketing are explicitly covered?

	Television	Radio	Print	Packaging	Point of sale	Product placement	Interactive games	Cinema	Internet	Own website	Third party websites	Above the line	Phones	Interactive media	Other new media
Global policies															
Statements on corporate websites															
US	✓	✓	✓			✓	✓		✓						
Canada															
EU	✓	✓	✓						✓						
Thai															
Australia															
Mexico															



Appendix I: Summaries of company policies and pledges

- ¹ The Danone website only references its EU pledge.
- ² Danone will exclude marketing 'primarily directed to' children.
- ³ 'The Dannon Company, Inc. commits to not advertising its products in elementary schools. This limitation does not apply to displays of food products, charitable fundraising activities, public service messaging, or items provided to school administrators, teachers or other school personnel.'
- ⁴ Danone will not advertise in schools 'Excluding sponsorship that promotes exercise'.

Appendix I: Summaries of company policies and pledges

Kellogg's

	Global policies	Statements on corporate websites	US	Canada	EU	Thai ¹	Australia ²	Mexico
Signatory to?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Does the company include all children up to 16?	12 ³	12 ³	12 ⁴	12	12	12	12	
What nutrient profiling does the company use?	Kellogg's Global Nutrient Criteria (KGNC)							
How is a child audience defined for broadcast (TV and radio) advertising?	50% audience	50% audience	50% ⁵ audience	50% audience	50% ⁵ audience	50% audience		

Does the company explicitly prohibit the following?

The marketing of food high in fat, sugar and salt (HFSS) where children are potential recipients regardless of the main target audience being adults?								
The representation of children in their marketing of HFSS foods?								
The use of celebrities or other people who may be familiar to or appeal to children?	Yes	Yes			Note ⁸		Yes	
The use of licensed and own-brand cartoon characters?	Licensed only ⁹	Licensed only ⁹	Licensed only ⁹	Licensed only ⁹	Licensed only ⁹		Licensed only ⁸	
The use of toys or free gifts?	Yes	Yes			Yes			
The use of games, competitions and vouchers?	Yes	Yes						
The sponsorship of materials, people or activities popular with children?	Yes	Yes			Yes	Note ¹⁰		
Marketing where children are gathered, for example nurseries, schools, school grounds, playgrounds, and family and child clinics?	Note ¹¹	Note ¹¹	Schools ¹²	Schools ¹²	Schools			
Indirect marketing to parents or adults?								

What forms of marketing are explicitly covered?

	Television	Radio	Print	Packaging	Point of sale	Product placement	Interactive games	Cinema	Internet	Own website	Third party websites	Above the line	Phones	Interactive media	Other new media
Global policies	✓	✓	✓			✓				✓	✓		✓	✓ Note 6	
Statements on corporate websites	✓	✓	✓			✓				✓	✓		✓	✓ Note 6	
US	✓	✓	✓			✓					✓			✓ Note 7	
Canada	✓	✓	✓			✓					✓			✓ Note 7	
EU	✓	✓	✓			✓					✓			✓ Note 7	✓
Thai	✓	✓	✓								✓				
Australia															
Mexico															



Appendix I: Summaries of company policies and pledges

- ¹ At the time of going to print there were no company action plans available on the Thai pledge website, therefore the company is only committed to the minimum points made in the pledge.
- ² At the time of going to print Kellogg's did not appear to have provided an action plan for the Australian pledge.
- ³ Kellogg's states that it 'anticipates that, by the end of 2008, the majority of our products currently marketed to children will meet the new Kellogg's Global Nutrient Criteria (KGNC). Those that do not meet the criteria will no longer be marketed to children under the age of 12.'
- ⁴ Kellogg's says it does not advertise any products in media where more than 50% of the audience is under 6 years old. Kellogg's will not advertise products that don't meet their nutrient criteria to children under 12.
- ⁵ 50% or 35-49% of audience if programme considered to be targeted at under 12s.
- ⁶ Kellogg's will only use Interactive media on its own websites and will introduce consent forms, time breaks and will only feature KGNC products on downloads etc.
- ⁷ Kellogg's will only use Interactive media on its own websites and will introduce consent forms, time breaks and will only feature KGNC products on downloads etc.
- ⁸ Kellogg's is committed to not using ... 'celebrity spokespersons who are related to or affiliated with mass media that itself is directed primarily to children under 12'.
- ⁹ Kellogg's state that they will not use licensed characters on front of packaging, but presumably will use it elsewhere on packaging.
- ¹⁰ As a signatory to the Thai pledge, Kellogg's is committed to not engaging in any 'product-related communications in primary schools except where specifically requested by or agreed with the school administration for educational or informational purposes.'
- ¹¹ Kellogg's states that it will not advertise directly in schools where students are below age 12. Kellogg's also states that it will not sponsor 'an event or location, eg theme parks, booths, tents targeted to reach an audience of children under 12, and parents would not generally be expected to accompany those children.'
- ¹² Kellogg's will not advertise directly in elementary schools – 'subject to the exceptions identified in the Initiative's Core Principles'.

Appendix I: Summaries of company policies and pledges

Kraft

	Global policies	Statements on corporate websites	US	Canada	EU	Thai ¹	Australia	Mexico
Signatory to?	Yes ²	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Does the company include all children up to 16?	12 ³		12 ³	12 ³	12 ³	12	12	
What nutrient profiling does the company use?	"Sensible Solution" ⁴							
How is a child audience defined for broadcast (TV and radio) advertising?				35% audience + Time ⁵		50% audience	35% audience + Time	

Does the company explicitly prohibit the following?

The marketing of food high in fat, sugar and salt (HFSS) where children are potential recipients regardless of the main target audience being adults?	Note ⁵							
The representation of children in their marketing of HFSS foods?								
The use of celebrities or other people who may be familiar to or appeal to children?								
The use of licensed and own-brand cartoon characters?			Licensed only	Licensed only	Licensed only ⁶		Both ⁷	
The use of toys or free gifts?							All ⁸	
The use of games, competitions and vouchers?							All	
The sponsorship of materials, people or activities popular with children?								
Marketing where children are gathered, for example nurseries, schools, school grounds, playgrounds, and family and child clinics?	Schools ⁹		Schools ¹⁰	Schools	Schools	Schools ¹¹	Schools	
Indirect marketing to parents or adults?								

What forms of marketing are explicitly covered?

	Television	Radio	Print	Packaging	Point of sale	Product placement	Interactive games	Cinema	Internet	Own website	Third party websites	Above the line	Phones	Interactive media	Other new media
Global policies	✓	✓	✓						✓						
Statements on corporate websites															
US	✓	✓	✓			✓	✓		✓						
Canada	✓	✓	✓			✓	✓		✓						
EU	✓	✓	✓			✓	✓		✓						
Thai	✓	✓	✓								✓				
Australia	✓	✓	✓			✓	✓		✓	✓	✓				
Mexico															



Appendix I: Summaries of company policies and pledges

- ¹ At the time of going to print there were no company action plans available on the Thai pledge website, therefore the company is only committed to the minimum points made in the pledge.
- ² Kraft did not appear to have any references to global policies on its corporate website except for information about its 'Sensible Solution' nutritional guide. All references to global policies were found in regional pledges.
- ³ Kraft does not advertise any of its products to children under 6.
- ⁴ Kraft has different nutritional criteria for different products, which can make comparison difficult.
- ⁵ Kraft states that it 'does not advertise during any part of the day where more than 35 % of the total audience is under 6 years old. In addition, Kraft restricts its advertising to only those products that meet its Sensible Solution nutrition criteria during:
 - any program where more than 35% of the total audience is under 12
 - any program that falls within time periods traditionally regarded as "kids' viewing time" (as designated by media providers), irrespective of the size of the child viewing audience.'
- ⁶ Kraft will continue to use licensed characters for 'short-term promotions and promotions designed to support healthy lifestyles'.
- ⁷ Kraft says it will 'avoid developing characters that are likely to appeal to children'.
- ⁸ Kraft states that it 'will not use premium offers for non *Sensible Solution* products.'
- ⁹ Kraft has, and will continue to eliminate advertising and promotion in schools **around the world**. (In Australian pledge.)
- ¹⁰ Kraft states that it 'abandoned all in-school advertising and marketing several years ago'.
- ¹¹ As a signatory to the Thai pledge, Kraft is committed to not engaging in any 'product-related communications in primary schools except where specifically requested by or agreed with the school administration for educational or informational purposes'.

Appendix I: Summaries of company policies and pledges

Mars

	Global policies	Statements on corporate websites	US	Canada	EU	Thai ¹	Australia	Mexico
Signatory to?	Yes ²	Yes	Yes	Yes	Yes	Yes		
Does the company include all children up to 16?	12	12	12/9 ³	12	12	12		
What nutrient profiling does the company use?	Does not advertise to children under 12. ⁴							
			Better for you products advertised to children over 9.					
How is a child audience defined for broadcast (TV and radio) advertising?	25% ⁵ audience	25% audience	25% audience	25% audience	25% ⁵ audience	50% audience		

Does the company explicitly prohibit the following?

The marketing of food high in fat, sugar and salt (HFSS) where children are potential recipients regardless of the main target audience being adults?			Note ⁷					
The representation of children in their marketing of HFSS foods?	Note ⁸	Note ⁸			Note ⁸			
The use of celebrities or other people who may be familiar to or appeal to children?	Yes	Note ¹¹			Note ¹¹			
The use of licensed and own-brand cartoon characters?	Licensed only	Licensed only	Licensed only	Licensed only	Licensed only			
The use of toys or free gifts?								
The use of games, competitions and vouchers?								
The sponsorship of materials, people or activities popular with children?								
Marketing where children are gathered, for example nurseries, schools, school grounds, playgrounds, and family and child clinics?	Schools ⁹	Schools ⁹	Schools ¹⁰	Yes ¹¹		Schools ¹²		
Indirect marketing to parents or adults?								

What forms of marketing are explicitly covered?

	Television	Radio	Print	Packaging	Point of sale	Product placement	Interactive games	Cinema	Internet	Own website	Third party websites	Above the line	Phones	Interactive media	Other new media
Global policies	✓	✓	✓			✓			✓	Note 6			✓		
Statements on corporate websites	✓	✓	✓			✓			✓	Note 6			✓		
US	✓	✓	✓			✓	✓		✓	✓					
Canada	✓	✓	✓			✓	✓		✓	✓					
EU	✓	✓	✓			✓			✓	Note 6			✓		
Thai	✓	✓	✓								✓				
Australia															
Mexico															



Appendix I: Summaries of company policies and pledges

- ¹ At the time of going to print there were no company action plans available on the Thai pledge website, therefore Mars is only committed to the minimum points made in the pledge.
- ² Mars states that 'These principles, reflected in our new Marketing Code, will apply globally across all advertising and marketing channels, including online and new marketing techniques'.
- ³ Mars will continue to advertise products to children older than nine years old if they are part of the *Better for you* range.
- ⁴ Mars commitment refers to 'our traditional confectionery and snackfoods'.
- ⁵ Mars defines the audience 'in terms of ad content and media purchasing'.
- ⁶ Mars indicates that it will use 'age-screening techniques to ensure that only young people above 12 can download branded wallpaper, screensavers or other leave behind material from websites of potential interest to younger audiences'.
- ⁷ Mars states that it 'will continue to advertise our ... products in venues suitable for families'.
- ⁸ Mars states that it 'may show children under 12 in our marketing communications' however 'will neither show children under 12 consuming our snackfood products nor allow them to act as a spokesperson for the brand. We will not portray physically inactive children.'
- ⁹ Mars states that it 'will not place vending machines offering our core snackfood products in primary schools. We will cease to offer branded educational materials for use in schools by children under 12. We will not sponsor sports events in primary schools. We will continue to donate funds or products to schools and community institutions where the school/institution has specifically requested this support in writing. We will continue to engage in activities aimed at children regarding nutrition, health or physical exercise, in co-operation with government and/or other recognized authorities.'
- ¹⁰ Mars states that it 'will not advertise products in elementary schools'.
- ¹¹ As above. Plus Mars Canada states that it is 'ceasing all advertising in third party venues primarily directed to children under 12'.
- ¹² As a signatory to the Thai pledge, Mars is committed not to engage in any 'product-related communications in primary schools except where specifically requested by or agreed with the school administration for educational or informational purposes'.

Appendix I: Summaries of company policies and pledges

McDonald's

	Global policies	Statements on corporate websites	US	Canada	EU	Thai	Australia	Mexico
Signatory to?		Yes ¹	Yes	Yes				
Does the company include all children up to 16 ?			12	12				
What nutrient profiling does the company use?			The advertised meal	The advertised meal				
How is a child audience defined for broadcast (TV and radio) advertising?			30% ² audience	30% audience				

Does the company explicitly prohibit the following?

The marketing of food high in fat, sugar and salt (HFSS) where children are potential recipients regardless of the main target audience being adults?								
The representation of children in their marketing of HFSS foods?								
The use of celebrities or other people who may be familiar to or appeal to children?								
The use of licensed and own-brand cartoon characters ?			No ⁶	No ⁶				
The use of toys or free gifts ?								
The use of games, competitions and vouchers ?								
The sponsorship of materials, people or activities popular with children?								
Marketing where children are gathered, for example nurseries, schools, school grounds, playgrounds, and family and child clinics?			Schools ⁷	Schools ⁷				
Indirect marketing to parents or adults?								

What forms of marketing are explicitly covered?

	Television	Radio	Print	Packaging	Point of sale	Product placement	Interactive games	Cinema	Internet	Own website	Third party websites	Above the line	Phones	Interactive media	Other new media
Global policies															
Statements on corporate websites															
US	✓	✓	✓ Note 3			✓	✓		✓	✓ Note 4					
Canada	✓	✓	✓ Note 3			✓	✓		✓	✓ Note 5					
EU															
Thai															
Australia															
Mexico															



Appendix I: Summaries of company policies and pledges

- ¹ McDonald's corporate website references the US and Canadian pledges and in Europe the development of 'a number of ideas which add to the initiatives already undertaken on a market by market level'.
- ² McDonald's states that it will not advertise food that doesn't meet its nutritional criteria in media 'primarily directed' to children.
- ³ McDonald's states that it 'generally does not utilize print media in its National Advertising primarily directed to children under 12 years old'.
- ⁴ McDonald's states that 'All food on pages of McDonald's-owned websites that are primarily directed to children under 12 years old will be the Advertised Meal. In addition, McDonald's will distribute materials on its websites that prominently include "healthy lifestyle messages".'
- ⁵ McDonald's states that 'McDonald's generally does not utilize print media in its National Advertising primarily directed to children under 12 years old.
- ⁶ McDonalds is only limiting the use of Licensed characters to its healthy options in external media such as TV, Radio or Internet. This does not apply to company created characters nor to point of sale or packaging. 'As stated in the CCFBAI, this does not apply to the use of licensed characters on packaging, provided the packaging does not appear in advertising directed to children under 12. This limitation does not apply to the use of company-created/owned characters.'
- ⁷ McDonalds states that it 'provides educators with curriculum materials and activities that address children's well-being'. 'As stated in the CCFBAI, this limitation will not apply to displays of food and beverage products, charitable/not-for-profit activities, including fundraising, public service messaging, and educational programs.'

Appendix I: Summaries of company policies and pledges

Nestlé

	Global policies	Statements on corporate websites	US	Canada	EU	Thai ¹	Australia	Mexico
Signatory to?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Does the company include all children up to 16?	12 ²	12 ²	12	12	12	12	12	
What nutrient profiling does the company use?	'Clear limits to product size and ingredients such as sugar, salt and fat'		Health and dietary choices.	Nestlé nutritional profiling system ³			Nestlé nutritional profiling system and healthy lifestyle	
How is a child audience defined for broadcast (TV and radio) advertising?			Note ⁴		Note ⁵	50% audience	Note ⁶	

Does the company explicitly prohibit the following?

The marketing of food high in fat, sugar and salt (HFSS) where children are potential recipients regardless of the main target audience being adults?								
The representation of children in their marketing of HFSS foods?								
The use of celebrities or other people who may be familiar to or appeal to children?							Yes	
The use of licensed and own-brand cartoon characters ?			Licensed ⁸ only				Licensed only	
The use of toys or free gifts ?								
The use of games, competitions and vouchers ?								
The sponsorship of materials, people or activities popular with children?								
Marketing where children are gathered, for example nurseries, schools, school grounds, playgrounds, and family and child clinics?			Schools ⁹		Schools ¹⁰	Schools ¹¹	Schools ¹¹	
Indirect marketing to parents or adults?								

What forms of marketing are explicitly covered?

	Television	Radio	Print	Packaging	Point of sale	Product placement	Interactive games	Cinema	Internet	Own website	Third party websites	Above the line	Phones	Interactive media	Other new media
Global policies															
Statements on corporate websites															
US	✓	✓	✓			✓	✓		✓	✓					
Canada															
EU															
Thai	✓	✓	✓								✓				
Australia	✓	✓	✓			✓	✓	✓	✓	✓			✓		
Mexico															



Appendix I: Summaries of company policies and pledges

- ¹ At the time of going to print there were no company action plans available on the Thai pledge website, therefore the company is only committed to the minimum points made in the pledge.
- ² Additionally Nestlé states that it will engage in no advertising to children under 6 (5 in Australia).
- ³ Nestlé describes its profiling system as identifying 'products with a nutritional profile which helps children achieve a healthy balanced diet, including clear limits for such ingredients as sugar, salt and fat.' However there are a number of different nutrient profiles for different products making comparisons particularly difficult.
- ⁴ CI was unable to access the appendix giving details of audience demographics.
- ⁵ Nestlé states that 'By marketing and communication to children, we refer to marketing activity where adult supervision is not present and communication in media where adult audience is not predominant, as defined by media measurements, market assessment or local authorities'.
- ⁶ Nestlé states that they will not advertise in media where the audience is 'predominantly children, as defined by media measurement, market assessment or local authorities and/or having regard to the them, visuals, and language used are directed primarily to children under 12 years'.
- ⁷ Nestlé commit to update a number of websites in the course of 2009.
- ⁸ This commitment is effective from 2009
- ⁹ Nestlé USA states that it complies with the 'Advertising in Schools Principle' subject to the 'exceptions identified in the initiative'.
- ¹⁰ Nestlé will consider activities in schools if they have the 'prior agreement from the school'.
- ¹¹ Nestlé is committed to not engaging in any 'product-related communications in primary schools except where specifically requested by or agreed with the school administration for educational or informational purposes'.

Appendix I: Summaries of company policies and pledges

PepsiCo

	Global policies	Statements on corporate websites	US	Canada	EU	Thai ¹	Australia	Mexico
Signatory to?	Yes ²	Yes ²	Yes	Yes	Yes	Yes	Yes	Yes
Does the company include all children up to 16?	12	12	12	12	12	12	12	
What nutrient profiling does the company use?	TBC ³	TBC ³	Smart Spot	Smart Spot	Can be based on a reduction rather than an absolute amount		Currently does not advertise to children ⁴	
How is a child audience defined for broadcast (TV and radio) advertising?	Note ⁵	Note ⁵	Note ⁶	Note ⁷		50% audience	Note ⁷	

Does the company explicitly prohibit the following?

The marketing of food high in fat, sugar and salt (HFSS) where children are potential recipients regardless of the main target audience being adults?	Note ⁸	Note ⁸						
The representation of children in their marketing of HFSS foods?								
The use of celebrities or other people who may be familiar to or appeal to children?							Yes	
The use of licensed and own-brand cartoon characters ?			Licensed only	Licensed only			Licensed only	
The use of toys or free gifts ?							All	
The use of games, competitions and vouchers ?								
The sponsorship of materials, people or activities popular with children?								
Marketing where children are gathered, for example nurseries, schools, school grounds, playgrounds, and family and child clinics?			Schools ⁹	Schools ⁹	Schools ¹⁰	Schools ¹¹	Schools ¹²	
Indirect marketing to parents or adults?								

What forms of marketing are explicitly covered?

	Television	Radio	Print	Packaging	Point of sale	Product placement	Interactive games	Cinema	Internet	Own website	Third party websites	Above the line	Phones	Interactive media	Other new media
Global policies	✓	✓	✓			✓	✓	✓			✓				
Statements on corporate websites	✓	✓	✓			✓	✓	✓			✓				
US	✓	✓	✓			✓	✓			✓	✓				
Canada	✓	✓	✓			✓	✓			✓	✓				
EU															
Thai	✓	✓									✓				
Australia	✓	✓				✓	✓	✓			✓				
Mexico															



Appendix I: Summaries of company policies and pledges

- ¹ At the time of going to print there were no company action plans available on the Thai pledge website, therefore the company is only committed to the minimum points made in the pledge.
- ² PepsiCo's website refers to the fact that PepsiCo was a signatory to the International Council of Beverages Arrangements (ICBA) statement made in May 2008. In this statement the signatories commit to announcing a global policy on the marketing of their products to children under 12. Few details are currently available.
- ³ The nutritional profile has not yet been announced. Furthermore PepsiCo states that it 'may differ around the world to take into account different dietary habits and nutrition requirements'.
- ⁴ However, if this changes PepsiCo will only advertise Smart Spot products to children under 12 and in context of healthy lifestyle.
- ⁵ PepsiCo defines the media it will not use as '50% and/or directed primarily to children'.
- ⁶ In accordance with CARU (Children's Advertising Review Unit) guidelines, PepsiCo defines "advertising directed primarily to children under 12" based on an analysis of the following factors, no single one of which will be controlling: whether the content of the media (eg subject matter, format, characters and other advertising) is designed for children under 12, whether the advertised product or service is intended for use by, or is of interest to children under 12; where the media in which the advertising appears is promoted and advertised; available projections, at the time the advertising is placed, of audience demographics (ie whether a majority of the audience is projected to be children under 12); and for television programs, whether they are aired during what is generally understood to be children's programming".
- ⁷ PepsiCo states that 'We will not place advertising in programs that specifically target children under 12 years (defined as either an ACMA-classified 'C program' or 'P program' or where >50% of the program's audience is under 12)'.
- ⁸ PepsiCo states that 'PepsiCo advertising which is not directed primarily to children under 12 will continue to be held to the highest standards of the advertising industry'.
- ⁹ PepsiCo states that 'it is the only company that is a signatory to both the snack food and the beverage school policy statements of the Alliance for a Healthier Generation, a joint initiative of the William J. Clinton Foundation and the American Heart Association. PepsiCo is fully committed to compliance with these policy commitments.'
- ¹⁰ PepsiCo will not advertise in schools 'except where specifically requested by, or agreed with, the school administration for educational purposes'.
- ¹¹ As a signatory to the Thai pledge, PepsiCo states that it will not engage in any 'product-related communications in primary schools except where specifically requested by or agreed with the school administration for educational or informational purposes.'
- ¹² It is important to note that this commitment only refers to "product related communications" in schools – which may still allow for PepsiCo branded promotions.

Appendix I: Summaries of company policies and pledges

Unilever

	Global policies	Statements on corporate websites	US	Canada	EU	Thai ¹	Australia	Mexico
Signatory to?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Does the company include all children up to 16?	12 ²	12 ²	12 ²	12 ²		12	12	
What nutrient profiling does the company use?	Nutrition Enhancement Programme (NEP) ³ Choices Program 'Eat Smart-Drink Smart'						(NEP) ³ New South Wales (NSW) School Canteen Association ⁴	
How is a child audience defined for broadcast (TV and radio) advertising?	Note ⁵		Note ⁶	Note ⁶		50% audience	Note ⁷	

Does the company explicitly prohibit the following?

The marketing of food high in fat, sugar and salt (HFSS) where children are potential recipients regardless of the main target audience being adults?								
The representation of children in their marketing of HFSS foods?								
The use of celebrities or other people who may be familiar to or appeal to children?							Yes	
The use of licensed and own-brand cartoon characters?			Licensed only	Licensed only			Licensed only	
The use of toys or free gifts?								
The use of games, competitions and vouchers?								
The sponsorship of materials, people or activities popular with children?								
Marketing where children are gathered, for example nurseries, schools, school grounds, playgrounds, and family and child clinics?			Schools ¹⁰	Schools ¹⁰	Schools ¹¹	Schools ¹²	Schools ¹³	
Indirect marketing to parents or adults?								

What forms of marketing are explicitly covered?

	Television	Radio	Print	Packaging	Point of sale	Product placement	Interactive games	Cinema	Internet	Own website	Third party websites	Above the line	Phones	Interactive media	Other new media
Global policies	Note ⁸														
Statements on corporate websites	Note ⁹														
US	✓	✓	✓			✓	✓		✓						
Canada						✓	✓								
EU															
Thai	✓	✓	✓								✓				
Australia	✓	✓	✓		✓	✓	✓			✓	✓				
Mexico															



Appendix I: Summaries of company policies and pledges

- ¹ At the time of going to print there were no company action plans available on the Thai pledge website, therefore the company is only committed to the minimum points made in the pledge.
- ² Unilever states that it does not market its products to children under 6 years old. However the Unilever commitment 'does not apply to packaging/labelling and the limited, named POS materials'.
- ³ Unilever established new Nutrition Enhancement Programme (NEP) benchmarks in 2008 to take account of the new products they were developing. These new benchmarks allowed for increases in sugars and added sugars.
- ⁴ Unilever will use the New South Wales (NSW) School Canteen Association criteria for green or amber foods.
- ⁵ Unilever states that they will not advertise in media 'primarily directed at' children.
- ⁶ Unilever states that it will consider the following:
 - i) 'Whether the specific medium (eg the particular TV show, website, radio show or magazine/newsletter) in which the ad is placed is used primarily by children under 12;
 - ii) Whether the ad was intended/created to appeal primarily to children under 12; and
 - iii) For TV ads, whether the ad appears during, or just before or after, a program generally understood to be children's programming, considering the time of day during which the ad appears and the media outlet (US or which is counted towards the broadcaster's or cablecaster's Children's Television Act obligations).'
- ⁷ Unilever states that it will consider the following 'Where the audience is predominantly children and/or having regard to the theme, visuals, and language used are directed primarily to children.' However Unilever does not specifically refer to a percentage in the factors that it considers.
- ⁸ Unilever states that the commitment refers to all 'advertising in any medium.' However, it should be noted that advertising is not necessarily the same as marketing and some media for marketing messages may not be included (see below).
- ⁹ Exceptions include packaging/labelling, and the following PoS materials:
 - i) materials affixed to and/or holding product, and
 - ii) those containing basic product descriptions.
- ¹⁰ Unilever US commitment 'will not include/will not apply to branded or unbranded displays of food and beverage products, charitable fundraising activities, public service messaging, or advertising directed to school administrators.
- ¹¹ Unilever states that it 'will not promote any products in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes'.
- ¹² As a signatory to the Thai pledge, Unilever is committed to not engaging in any 'product-related communications in primary schools except where specifically requested by or agreed with the school administration for educational or informational purposes'.
- ¹³ Unilever states that it will not promote products in schools 'unless requested by or agreed with the school administration and unless the food/beverage product complies with NSW Schools Canteen Association criteria for green or amber AND Unilever's global internal nutrient criteria'.



APPENDIX II

Multi-company initiatives

The national and regional pledges

Starting with the US pledge in November 2007, several leading food and beverage companies have come together to announce commitments on the marketing of food to children. The US pledge was rapidly followed by the Canadian pledge, then the EU, Thai, Australian and Mexican pledges.

Each pledge sets out the minimum core principles that each company must agree to in specific areas. The companies then provide action plans stating how they will implement these commitments. In most cases the companies in this survey have gone beyond the minimum commitments contained in the pledge. Different pledges have different groups of companies involved. Some of the pledges such as the Thai and Mexican pledge do not yet have any company action plans available.

Comparing the pledges reveals that, on the whole, the Australian pledge has the strongest commitments, with the EU next, and the US and Canadian pledges containing relatively lax commitments.

An important example of this is the fact that according to the core principles of the US and Canadian pledges it would be possible for a company that was a signatory to

one of those pledges to continue marketing any of its products, regardless of their nutritional value, as long as that marketing included messages about healthy lifestyles.

By the time the EU pledge was written, the option of providing messages about healthy lifestyles was no longer included and companies simply had to limit the products they marketed.

Finally, when the Australian pledge was written companies had to limit the products they advertised and provide healthy messages.

However, it should be noted that even in the Australian pledge no commitments are made to children over 12 years of age and significant areas of marketing such as packaging and point of sale are excluded.

None of the pledges make any mention of important areas in the CI recommendations including novelty-shaped food or advertising to parents to encourage them to buy products for their children.

All the pledges leave it to the companies to define their own nutritional criteria.



Appendix II: Multi-company initiatives

Which companies have signed the pledges?

	US	Canada	EU	Thailand*	Australia	Mexico*
Signed	July 2007	April 2007	December 2007	May 2008	January 2009	January 2009
Number of participants	Originally 11 now 13	17	11	6	8	22 regional/global
Coca-Cola	✓	✓	✓	✓	✓	✓
Danone	✓		✓			
Kellogg's	✓	✓	✓	✓	✓	✓
Kraft	✓	✓	✓	✓	✓	✓
Mars Inc	✓	✓	✓	✓		
McDonald's	✓	✓				
Nestlé	✓	✓	✓	✓	✓	✓
Pepsico	✓	✓	✓	✓	✓	✓
Unilever	✓	✓	✓	✓	✓	✓
Yum!						

* No company specific action plans published yet.

What the pledges say

ADVERTISING	
US	Participants will devote at least 50% of TV, radio, print and internet advertising primarily directed to children under 12 to advertising that will further the goal of promoting healthy dietary choices and healthy lifestyles by (1) advertising products that represent healthy dietary choices AND/OR (2) advertising that prominently includes healthy lifestyle messages.
Canada	Participants will devote at least 50% of TV, radio, print and internet advertising primarily directed to children under 12 to advertising that will further the goal of promoting healthy dietary choices and healthy lifestyles by (1) advertising products that represent healthy dietary choices AND/OR (2) advertising that prominently includes healthy lifestyle messages.
EU	No advertising of products to children under 12 except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines. For the purpose of this initiative, advertising to children under 12 years means advertising to media audiences with a minimum of 50% of children under 12 years.
Thailand	Not to advertise food and beverage products to children under the age of 12, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines. For the purpose of the Pledge, "advertising to children under 12 years" means advertising which intentionally targets children under 12 years and advertising to media audiences with an intended minimum of 50% of children under 12 years. "Advertising" covers marketing communications via TV, radio, print media and third party Internet sites.
Australia	Participants will not advertise food and beverage products to children under 12 in media unless (1) those products represent healthy dietary choices, consistent with established scientific or Australian government standards AND (2) the advertising and/or marketing communication activities reference, or are in the context of, a healthy lifestyle, designed to appeal to the intended audience through messaging that encourages: good dietary habits; physical activity (more detailed definitions available in an appendix to the pledge).
Mexico	
LICENSED CHARACTERS	
US	Reduce use of third-party licensed characters in advertising primarily directed to children under 12 unless it complies with messaging options.
Canada	Reduce use of third-party licensed characters in advertising primarily directed to children under 12 unless it complies with messaging options.
EU	
Thailand	
Australia	Not use popular personalities or licensed characters in advertising primarily directed to children under 12 unless it complies with the messaging options and specific requirements of the Children's TV Standards.
Mexico	

Appendix II: Multi-company initiatives

PRODUCT PLACEMENT	
US	Not pay for/actively seek to place products in programme/editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products. Reduce use of third-party licensed characters in advertising primarily directed to kids under 12 unless it complies with messaging options.
Canada	Not pay for/actively seek to place products in programme/editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products.
EU	
Thailand	
Australia	Not pay for/actively seek to place products in programme/editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products unless they are consistent with healthy dietary choices.
Mexico	
USE OF PRODUCT IN INTERACTIVE GAMES	
US	In any interactive game primarily directed to children under 12, game must incorporate or be accompanied by products representing (1) or (2).
Canada	In any interactive game primarily directed to children under 12, game must incorporate or be accompanied by products representing (1) or (2).
EU	
Thailand	
Australia	In any interactive game primarily directed to children under 12, game must incorporate or be consistent with (1) or (2).
Mexico	
ADVERTISING IN SCHOOLS	
US	Not advertise in elementary schools.
Canada	Not advertise in elementary schools.
EU	No communication related to products in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes.
Thailand	Not to engage in any product-related communications in primary schools, except where specifically requested by or agreed with the school administration for educational or informational purposes.
Australia	Participants will refrain from product-related communications in primary schools, except where specifically requested by, or agreed with, the school administration for educational or informational purposes, or related to healthy lifestyle activities under the supervision of the school administration or appropriate adults.
Mexico	

Appendix II: Multi-company initiatives

USE OF PREMIUM OFFERS	
US	
Canada	
EU	
Thailand	
Australia	Not advertise premium offers unless the reference to the premium is merely incidental to product being advertised in accordance with AANA/Children's TV Standards
Mexico	

IMPLEMENTATION	
US	Formalise/publish pledge in 6-9 months. Because companies and their product lines vary, company commitments will also vary. However, all commitments will be consistent with the core principles of the pledge.
Canada	Formalise/publish individual plan Q1 2008
EU	Commitments during 2008 on pledge website, implement by 31 December 2008.
Thailand	Publish all company commitments related to the Thai Pledge on a dedicated website in the course of 2008.
Australia	Because companies and their product lines vary, the way companies comply with this framework will differ. However, all commitments will be consistent with the core principles outlined in this initiative. Company Action Plans by 1 January 2009
Mexico	

MONITORING/ENFORCEMENT	
US	First review after programme operational for more than 3 years.
Canada	Advertising Standards Canada
EU	Monitoring of TV, print and Internet advertising will start January 2009.
Thailand	Commission independently verified compliance monitoring of the advertising commitment on TV, print media and the Internet, starting in January 2009.
Australia	Sanctions will be developed to ensure that participants meet their obligations. Compliance programme – first review shall be started after the new programme has been operational for at least 1 year.
Mexico	



Appendix II: Multi-company initiatives

OTHER	
US	
Canada	
EU	
Thailand	Pledge signatories further commit to promote the concepts of this Pledge within the rest of the food and beverage industry in Thailand as best practices. This would include outreach to suppliers, franchisees, trade associations, and other industry operators who are not currently or who may not become signatories to the Pledge.
Australia	
Mexico	



APPENDIX III

Website references for pledges and companies

All websites accessed January - February 2009

Please note that websites may have been updated and addresses changed since the publication of this report.

National and regional pledges

US Pledge Children's Food and Beverage Advertising Initiative (CFBAI)

Children's' Food & Beverage Advertising Initiative Program Document

<http://us.bbb.org/WWWRoot/storage/16/documents/InitiativeProgramDocument.pdf>

The Children's Food & Beverage Advertising Initiative in Action

http://www.bbb.org/us/storage/16/documents/CFBAI/ChildrenF&BInit_Sept21.pdf

Food and Beverage Products that Meet Participants' Approved Nutrition Standards

<http://www.bbb.org/us/storage/16/documents/Feb%20%20%20product%20list%20updated%202009.pdf>

Synopsis of Participants' Nutrition Guidelines

http://www.bbb.org/us/WWWRoot/storage/16/documents/Jan_2009_revised_Chart.pdf

The Coca-Cola Company's Pledge

http://www.bbb.org/us/WWWRoot/storage/16/documents/ForBusinesses/childrens-food-and-beverage-initiative/Coca_Cola_Pledge.pdf

Pledge by the Dannon Company, Inc.

<http://www.bbb.org/us/storage/16/documents/CFBAI/dannon-cfbai-pledge.pdf>

Kellogg Company Pledge

<http://www.bbb.org/us/SitePage.aspx?site=113&id=83821469-3cbd-4a7f-b9d2-c1acce9f4400>

Submission of Kraft Foods Global, Inc.

http://www.bbb.org/us/WWWRoot/storage/16/documents/ForBusinesses/childrens-food-and-beverage-initiative/Kraft_Pledge.pdf

(Kraft) Supplement to Pledge Concerning Advertising to Children

<http://www.bbb.org/us/WWWRoot/storage/16/documents/ForBusinesses/childrens-food-and-beverage-initiative/CFBAI%20Supplement1.pdf>

(Kraft) Supplement to Pledge Concerning Advertising to Children

<http://www.bbb.org/us/WWWRoot/storage/16/documents/CFBAI/KraftSupplementalJuly08.pdf>

Mars Pledge Outline

http://www.bbb.org/us/WWWRoot/storage/16/documents/ForBusinesses/childrens-food-and-beverage-initiative/Mars_Pledge.pdf



Appendix III: Website references for pledges and companies

Mars Pledge Updated March 31, 2008

<http://www.bbb.org/us/WWWRoot/storage/16/documents/ForBusinesses/childrens-food-and-beverage-initiative/Mars%20Food%20Pledge%20revised%20fnl%20dated%203%2031%202008.pdf>

McDonald's USA

http://www.bbb.org/us/WWWRoot/storage/16/documents/ForBusinesses/childrens-food-and-beverage-initiative/McDonald%27s_Pledge.pdf

McDonald's USA Supplement to Pledge

http://www.bbb.org/us/WWWRoot/storage/16/documents/MCDONALD_S_USA_SUPPLEMENTAL_FOOD_PLEDGE_2008.pdf

Nestle USA's Pledge

<http://www.bbb.org/us/storage/16/documents/CFBAI%20PLEDGE%2011-20.pdf>

Pledge of PepsiCo, Inc.

http://www.bbb.org/us/WWWRoot/storage/16/documents/ForBusinesses/childrens-food-and-beverage-initiative/Pepsi_Pledge.pdf

February 2008 Amended Pledge of PepsiCo, Inc.

<http://www.bbb.org/us/WWWRoot/storage/16/documents/ForBusinesses/childrens-food-and-beverage-initiative/supplementalpledge.pdf>

Unilever Pledge Outline

http://www.bbb.org/us/WWWRoot/storage/16/documents/ForBusinesses/childrens-food-and-beverage-initiative/unilever_Pledge.pdf

Supplement to Pledge July 22, 2008

<http://www.bbb.org/us/storage/0/Shared%20Documents/Copy%20of%20Unilever%20Pledge%20Supplement.pdf>

EU Pledge

<http://eu-pledge.eu/>

The Responsible Children's Marketing Initiative of the Australian Food and Beverage Industry

<http://www.afgc.org.au/cmsDocuments/Responsible%20Marketing%20to%20Children%20.pdf>

Company Action Plan - Nestle Australia Ltd.

<http://www.afgc.org.au/cmsDocuments/Nestle%20CAP.pdf>

Company Action Plan - Kraft Foods Australia / New Zealand

<http://www.afgc.org.au/cmsDocuments/Kraft%20CAP.pdf>

Company Action Plan - Unilever Australia Ltd.

<http://www.afgc.org.au/cmsDocuments/Unilever%20CAP.pdf>

Company Action Plan - Coca-Cola South Pacific

<http://www.afgc.org.au/cmsDocuments/Coca-Cola%20CAP.pdf>

Company Action Plan - PepsiCo Australia

<http://www.afgc.org.au/cmsDocuments/Pepsico%20Australia%20CAP.pdf>

Thai Pledge

<http://www.wfanet.org/globalnews.cfm?id=74>

Canada CCFBAI

<http://www.adstandards.com/en/childrensinitiative/ccfbai-en.pdf>

The Coca-Cola Company's Commitment

http://www.adstandards.com/en/childrensinitiative/Coke_E.pdf



Appendix III: Website references for pledges and companies

Kellogg Canada Inc. Commitment

http://www.adstandards.com/en/childrensinitiative/Kellogg_E.pdf

Kraft Canada Inc. Commitment

http://www.adstandards.com/en/childrensinitiative/Kraft_E.pdf

Mars Canada Inc. Commitment

http://www.adstandards.com/en/childrensinitiative/Mars_E.pdf

McDonald's Restaurants of Canada Limited

http://www.adstandards.com/en/childrensinitiative/McDonalds_E.pdf

Nestle Canada Inc.'s Commitment

http://www.adstandards.com/en/childrensinitiative/Nestle_E.pdf

Commitment of PepsiCo Canada ULC

http://www.adstandards.com/en/childrensinitiative/PepsiCo_E.pdf

Unilever - Commitment Outline

http://www.adstandards.com/en/childrensinitiative/Unilever_E.pdf

Other multi-company initiatives

ICBA Guidelines on Marketing to Children

<http://www.icba-net.org/linkdocs/guidelines080520.doc>

Joint letter to Dr Margaret Chan, DG WHO

<http://www.nestle.com/Resource.axd?Id=AB07212C-14E2-4945-AFF4-7B1B1D0569AE>

Corporate websites

Coca-Cola

ICBA Guidelines on Marketing to Children

<http://www.thecoca-colacompany.com/citizenship/icba.html>

Responsible Marketing - Advertising and Marketing to Children Policy

http://www.thecoca-colacompany.com/citizenship/responsible_marketing.html

Responsible Marketing - Advertising and Marketing to Children Policy - Policy details

http://www.thecoca-colacompany.com/citizenship/responsible_marketing_more.html

FAQs- Advertising and Marketing to Children Policy

http://www.thecoca-colacompany.com/contactus/faq/advertising_marketing_children.html

Nutrition information

http://www.thecoca-colacompany.com/ourcompany/hal_nutritional_labeling.html

Danone

Food, Nutrition and Health Charter

http://www.danone.com/images/pdf/danone_nutrition_charter.pdf

Group Danone pledge on advertising aimed at children

http://www.danone.com/images/pdf/pledge_on_advertising_children_dec07.pdf



Kellogg's

Our Company

<http://www.kelloggcompany.com/company.aspx?id=32>

Corporate Responsibility Report 2008

http://www.kelloggcompany.com/uploadedFiles/KelloggCompany/Corporate_Responsibility/Kelloggs_CSR_12-19-08.pdf

Marketing to Children Practices - Fact Sheet

<http://kelloggs.mediaroom.com/index.php?s=82>

Progress on Its Global Health and Nutrition Initiatives

<http://kelloggs.mediaroom.com/index.php?s=43&item=207>

Kraft

Advertising Responsibly to Children

<http://www.kraft.com/brands/healthandwellness/communications.htm>

The Sensible Solution Program

<http://www.kraftcanada.com/en/HealthyLiving/SensibleSolution/Pages/SensibleSolution.aspx>

Mars

Mars Marketing Commitments

http://www.mars.com/NR/rdonlyres/9A506325-12FD-4A64-BB5C-1B9E7DD07D56/2176/Mars_Marketing_Commitments_March_2009.pdf

Creating a Healthier Environment

http://www.mars.com/NR/rdonlyres/895D9B32-A17F-4BF8-BBC5-638BD35DFD9B/0/mars_creating_a_healthier_environmentdec2007.pdf

McDonald's

2008 Corporate Responsibility Report - Nutrition

http://www.crmcdonalds.com/publish/csr/home/report/nutrition_and_well-being/practices.html

2008 Corporate Responsibility Report - Marketing Guidelines

http://www.crmcdonalds.com/publish/csr/home/report/nutrition_and_well-being/promotions.html

Nestlé

Shared value CSR

<http://www.nestle.com/SharedValueCSR/ProductsAndConsumers/MarketingandCommunications/MarketingAndAdvertising.htm>

Communication Principles

<http://www.nestle.com/Resource.axd?Id=5712709D-347D-4C03-AB74-7D4FFB78A4C6>

PepsiCo

PepsiCo Policy on Responsible Advertising & Marketing to Children

<http://www.pepsico.com/Downloads/Responsible-Marketing-Children.pdf>

Pepsi-Cola North America's U.S. School Policy

http://www.pepsico.com/Downloads/PCNA_School_Policy.pdf



Appendix III: Website references for pledges and companies

Citizenship - Health and Wellness - Frito-Lay School Policy

http://www.pepsico.com/Downloads/FritoLay_School_Pol.pdf

PepsiCo Food Service Policy for Snacks in K-12 Schools

<http://www.pepsico.com/Purpose/Health-and-Wellness/Responsible-Marketing.aspx>

Sustainability Report - Engaging in Responsible Marketing and Advertising

<http://www.pepsico.com/Purpose/Sustainability/Sustainability-Report/Human-Sustainability.aspx>

Unilever

Unilever Global Principles for Food and Beverage Marketing

http://www.unilever.com/Images/30370_Global_Principles_A5_PDF-2_tcm13-48998.pdf

Updates on Unilever Global Principles for Food and Beverage Marketing

<http://www.unilever.com/sustainability/sustainabledevelopmentreport/people-partners/consumers/advertising-and-marketing.aspx>

Advertising and Marketing

<http://www.unilever.com/sustainability/sustainabledevelopmentreport/people-partners/consumers/advertising-and-marketing.aspx>

Nutrition Enhancement Programme

<http://www.unilever.com/sustainability/sustainabledevelopmentreport/nutrition-hygiene-wellbeing/nutrition/>

Yum! Brands

Serving the World - Yum! Brands 2008 Corporate Responsibility Report

<http://www.yum.com/responsibility/pdf/yum08csrpt.pdf>

Other

Unanswered questions about children's food and beverage advertising

<http://usfoodpolicy.blogspot.com/2008/11/unanswered-questions-about-childrens.html>

A Mexican Code on Food/Beverage Advertising to Children

<http://www.temasactuales.com/temasblog/consumer-protection/a-mexican-code-on-foodbeverage-advertising-to-children/>

Unanswered questions about children's food and beverage advertising

<http://usfoodpolicy.blogspot.com/2008/11/unanswered-questions-about-childrens.html>

Federal Trade Commission - Marketing Food to Children and Adolescents

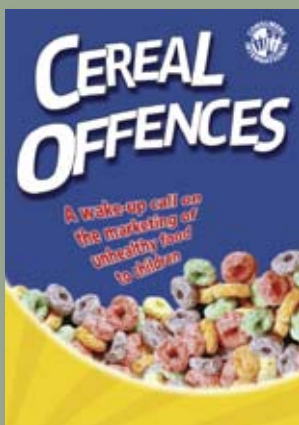
<http://www.ftc.gov/os/2008/07/P064504foodmktgreport.pdf>



Also from the Junk Food Generation Campaign:



The Junk Food Trap
Marketing unhealthy food to children in Asia Pacific



Cereal Offences
A wake-up call on the marketing of unhealthy food to children



New media, same old tricks
A survey of the marketing of food to children on food company websites



Consumers International
24 Highbury Crescent
London N5 1RX, UK
email: consint@consint.org
www.consumersinternational.org



Find out more about Consumers International's
campaign by visiting www.junkfoodgeneration.org

