

Advertising monitoring report 2009

looking at advertisements for food products
and non-alcoholic beverages

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Report compiled in June 2009 by
Laure Alexandre, Project manager and
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Independent reviewer's foreword

WFA has commissioned EASA to carry out an annual assessment of the extent to which the advertising standards relating to food and non-alcoholic beverages are being applied by self-regulatory bodies.

This year, the same 8 countries which participated in the project in 2008 have reported their findings, based on a comparable number of advertisements (3087 TV, print and pop-ups and banner ads). An estimated 95% of the advertisements appearing in these media between January and April 2009 were collated and assessed by the SROs and subsequently by EASA.

As in previous monitoring exercises, as independent reviewer, I can confirm that I had access to all relevant information and all my questions were answered. I also had the opportunity of examining as many advertisements as I wished. This has allowed me to comment on compliance with the 2006 ICC Code, the industry codes on the advertising of food and non-alcoholic beverages, and the various rules in force at national level.

This report contains results by media and by category, as well as the outcome of various complaints received. A certain number of conclusions present themselves.

First, it is worth noting that, contrary to widespread beliefs about advertising in the new media, these provided hardly any examples of failure to observe either legal or self-regulatory rules, apart from a perceived need for greater attention to the identification of advertising material as such.

In the case of print advertising, the rules appear to be strictly observed, but there is some scope for improvement in the unambiguous identification of 'advertorial' style advertising where appropriate.

Bearing in mind concerns expressed linking rising levels of obesity to a supposed encouragement of over-consumption in advertising, we note that in this respect codes appear to be adhered to and there is no evidence of complaints. However, care is needed in the case of claims relating to nutritional and health benefits.

As regards TV advertisements, rules are complied with in over 98% of cases and there is no longer evidence of visual treatments with problems relating to dangerous behaviour, gender portrayal or offensiveness; however, care is needed with claims suggesting that well-being results from the mere consumption of the advertised product.

As the numbers of advertisements monitored are comparable, it is worth noting that the number of complaints received each year continues to decrease (98 in 2007 – 72 in 2008 – 29 in 2009). At the same time, an increase in the number of complaints upheld indicates that SROs are paying more and more attention to the views expressed by consumers.

In the context of more and more Europe-wide advertising campaigns,, the results of this monitoring exercise are encouraging, as they demonstrate the value of self-regulatory procedures when it comes to applying rules or, where necessary, bringing about corrections..

This commitment by the advertising industry to maintaining high standards and honouring its obligations to legal, decent, honest and truthful advertising is shown to be both opportune and effective.

I would like to thank the EASA team, in particular the Director General and Laure Alexandre, for their professionalism and care throughout this exercise, which continues, year after year, to demonstrate the dynamism and effectiveness of self-regulation.

Lucien Bouis



Monitoring Publicité Produits alimentaires et boissons non alcoolisées

Apprécier chaque année l'évolution de la prise en responsabilité, par les Organismes d'autodiscipline, des règles déontologiques applicables à la publicité des produits alimentaires et des boissons non alcoolisées telle est la demande formulée par le WFA à l'EASA.

Cette année ce sont les mêmes 8 Pays que ceux ayant participé au monitoring de 2008 qui ont fait remonté leurs observations pour un volume de messages de même ampleur que le précédent (3087 visuels spots TV, annonces presse, bannières et pop-up sur site Web) On peut ainsi estimer que plus de 95% des publicités diffusées sur ces supports entre janvier et avril 2009 ont été collectées et analysée par les SROs puis par l'EASA.

Comme précédemment, en tant qu'examineur indépendant de ce monitoring, je tiens à attester que j'ai eu plein accès à toute information et obtenu réponse à toute demande complémentaire j' ai pu également observer à ma convenance un certain nombre de messages et ainsi donner mon sentiment eu regard de l'application effective des règles définies tant par le Code de la CCI de 2006, les recommandations professionnelles, les textes spécifiques en matière de produits alimentaires et de boissons non alcoolisées tout comme de réglementations nationales en vigueur.

Les résultats par médias et par thèmes tout comme les suites qui ont été données à diverses plaintes sont comme à l'accoutumée commentés dans cette Brochure. C'est à partir de ceux-ci qu'un certain nombre de réflexions peut être émis.

Tout d'abord il est à remarquer, à nouveau, que contrairement à des idées reçues en ce qui concerne les messages diffusés sur les nouveaux médias informatiques ceux-ci n'ont pratiquement fait l'objet d'aucune remarque quant à l'application des règles de droit et d'autodiscipline ; seule une attention soutenue doit s'exercer en ce qui concerne l'identification des messages en tant que Publicité.

En ce qui concerne la Presse écrite l'on note un strict respect de la réglementation mais il est toujours nécessaire que soit bien précisé et ce sans ambiguïté la formule « publi-reportage » ou « publi-rédactionnel » lorsqu'il s'agit effectivement de cette forme de message.

Compte tenu d'un certain de préoccupations touchant au risque de développement de l'obésité du fait d'incitation publicitaires à la surconsommation de certains produits on peut noter que les codes sont respectés et les plaintes inexistantes. Seule une attention particulière doit être exercée en ce qui concerne l'usage d'arguments nutritionnels et autres allégations santé.

Au regard des spots T.V les règles sont respectées à plus de 98 % et on ne note plus de visuels mettant en évidence de comportements dangereux, de sexisme ou de valeurs sociales ostentatoires ; mais il est nécessaire d'exercer toujours une vigilance en regard de formulations glorifiant le bien-être à partir de la seule consommation de ces produits.

En regard d'un nombre quasi équivalent de messages pris en compte il est à apprécier que le nombre de plaintes enregistrées continue à diminuer (98 en 2007 – 72 en 2008 – 29 en 2009) avec une augmentation du nombre de plaintes retenues ce qui confirme l'attention de plus en plus soutenue des SROs à la prise en compte des réactions des consommateurs.

Dans un contexte d'eupéanisation des actions publicitaires les résultats de ce monitoring 2009 sont des plus encourageants car il met en évidence l'intérêt de la démarche autodisciplinaire qui sait faire appliquer ses codes voire s'il en est nécessaire faire rectifier les manquements.

L'engagement de l'interprofession publicitaire dans sa démarche déontologique de rédaction et de respect de ses propres obligations au bénéfice d'une Publicité loyale, véridique et honnête se révèle dès lors des plus opportuns et des plus opérationnels.

Je tiens à remercier l'équipe de l'Alliance et tout particulièrement son Directeur général et Laure Alexandre d'avoir fait preuve de compétence et d'attention à mon égard tout au long de cette analyse qui année après année marque tout le dynamisme et l'efficacité de l'autodiscipline.

Lucien Bouis

2009-07-01

2009 Monitoring Results

1. Introduction

Eight self-regulatory organisations (SROs) across different parts of the EU were asked to monitor all advertisements for food and non-alcoholic drinks that appeared in their respective countries on TV, in the press and online (pop-ups, banners, flash, gif and jpeg ads) during a three month period (10/01/2009 – 09/04/2009). The purpose of this monitoring exercise was to assess the overall compliance of food advertising in these eight countries, by analysing each single ad captured by the Xtreme Information¹ Database.

Participating countries:

Country	SRO	Abbreviation
Greece	Advertising Self-Regulation Council (ΣΕΕ)	SEE
Hungary	Önszabályozó Reklám Testület	ÖRT
Italy	Istituto dell'Autodisciplina Pubblicitaria	IAP
Netherlands	Stichting Reclame Code	SRC
Poland	Związek Stowarzyszeń Rada Reklamy	RR
Slovak Republic	Rada Pre Reklamu	SRPR
Sweden	MarknadsEtiska Rådet	MER
UK	Advertising Standards Authority	ASA

Total number of ads captured:

	I	NL	GR	HU	PL	SK	S	UK	Total
TOTAL n° of ads in the database	541	255	377	60	173	91	492	1.098	3.087
TV	260	155	171	44	96	63	117	430	1.336
Print	140	62	189	7	68	28	232	392	1.118
Paid-for Internet	141	38	17	9	9	0	143	276	633

Table 1. number of ads per participating country

Benchmark for assessment:

The benchmark for assessment was the ICC Consolidated Code on Advertising and Marketing Communication Practice (2006) and the ICC Framework for responsible food and non-alcoholic beverage marketing communications (ICC Food Framework 2006), as well as national self-regulatory provisions and laws.

¹ Xtreme Information is an international advertising archive and media intelligence source.
<http://www.xtremeinformation.com/>

How is the advertising captured?

For this exercise, Xtreme Information captured:

- The first appearance of new TV ads on over 90 European channels monitored 24 hours/day (covering 99% of the creative on TV).
- Print ads were captured from a broad range of consumer, business and specialised newspapers and magazines (95 to 98% of print ads captured).
- Over 1,400 European websites, selected for the high traffic they drive, were monitored 4 times per day on 3 levels using spider technology to capture banners and pop-ups displayed on those pages. Special technology ensures that ads are not captured twice.

Independent reviewer

For reasons of impartiality and due process, an independent reviewer, knowledgeable in both advertising regulation and consumer protection issues, was appointed to perform the following functions:

1. Verify that the appropriate criteria have been set up;
2. Check SRO responses are made correctly by accessing the EASA-approved results online and viewing responses at random;
3. Testify to the correctness of the monitoring procedure and ensure the processes were transparent, participative and accountable.

How did the SROs conduct the monitoring exercise?

SROs were asked to view the ads and indicate:

- whether the ad included a claim
- whether the ad breached the codes (either the ICC code and framework, the national code or both)
- whether copy advice had been sought
- whether a complaint had been made about the ad and if so, the outcome of the complaint

Note: Xtreme considered each TV ad as a single execution. The same ad varying in the length of format was each time considered as a new execution and reviewed by the SRO as an ad on its own.

2. Compliance results for 2009

2.1 Ads withdrawn from the sample

Out of the 3.087 ads captured by Xtreme Information, 231 (7.5%) fell out of the remit of this exercise as they were either not classified as advertising (e.g. sponsorship) or not reviewable due to technical difficulties (18 out of the 231). A further 14 ads had been complained about and were still under investigation by the SRO juries at the time the monitoring ended. They could therefore not be included into the evaluation of the results.

Out of the 2.842 remaining ads, 765 (24.8% of the total amount) were flagged by the SROs as containing one or more claims which the SRO could not verify without further evidence from the advertiser. As SROs unfortunately have limited resources, it was not possible to investigate all the claims registered during the monitoring exercise. As with the previous food monitoring exercises and for the sake of consistency and clarity, these advertisements have been withdrawn from the evaluation. However, if an advertisement containing claims had been already investigated and assessed by the SRO jury following a complaint against the ad, then the result of the investigation and subsequent decision on the compliance of the ad has been included into the compliance figures based on the decision of the jury.

The compliance results have therefore been calculated on the basis of 2.077 ads.

Total no. of ads captured by the database	3.087
Out of remit	231
Ads with complaints under investigation	14
Ads containing claims not further investigated	765
Total no. of ads included in compliance monitoring	2.077

Table 2: Basis for calculation of compliance results

Compared with the previous year, the final sample of ads is higher, as less ads contained claims that could not be verified. While in 2009, 2.077 (67.3%) out of 3.087 ads could be assessed, in 2008, only 1.704 (57.6%) of 2.957 ads captured composed the final sample.

2.2 Compliance results

Results for the 2009 food monitoring exercise are as follows:

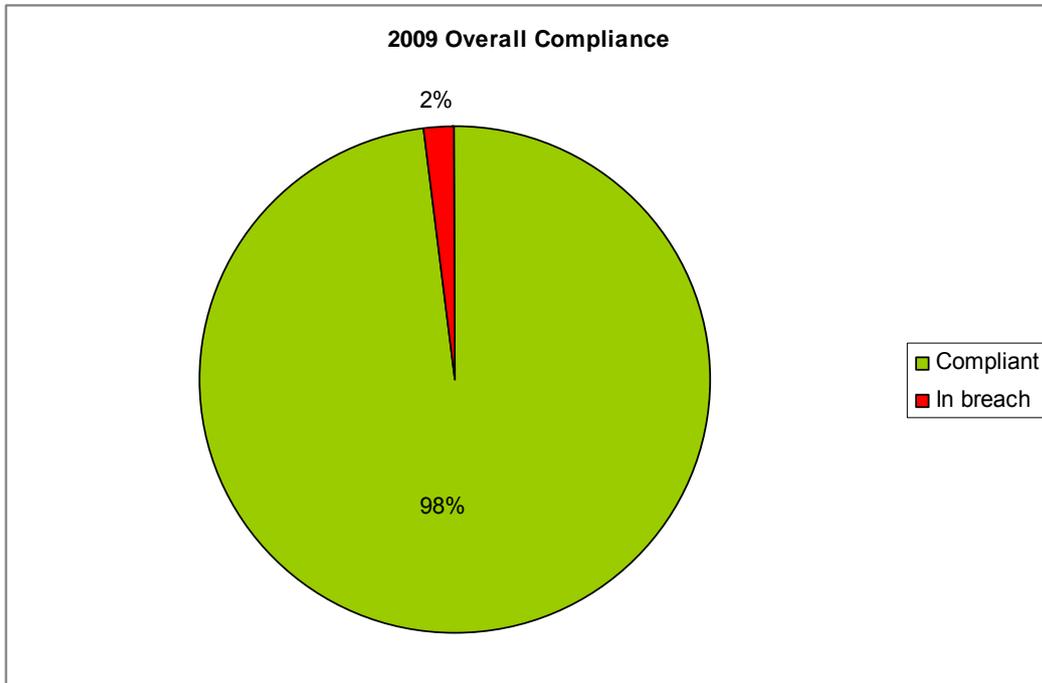
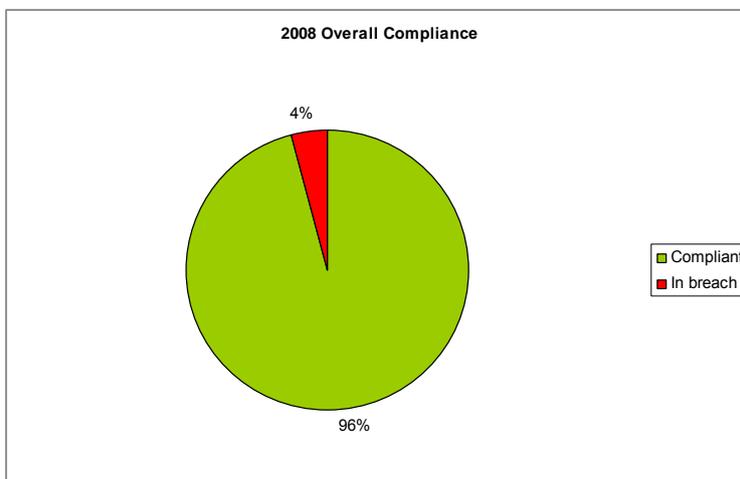


Fig. 1: Overall compliance results 2009



Compared with the previous year, the level of compliance has improved from 96 to 98%.

Fig. 2: Overall compliance results 2008

Overall compliance results per medium in 2009:

	TV	Print	Internet	Total
Compliant	866	668	502	2.036
In breach	28	10	3	41
Total	894	678	505	2.077

Table 3: Overall compliance results

2.3 Overview per country

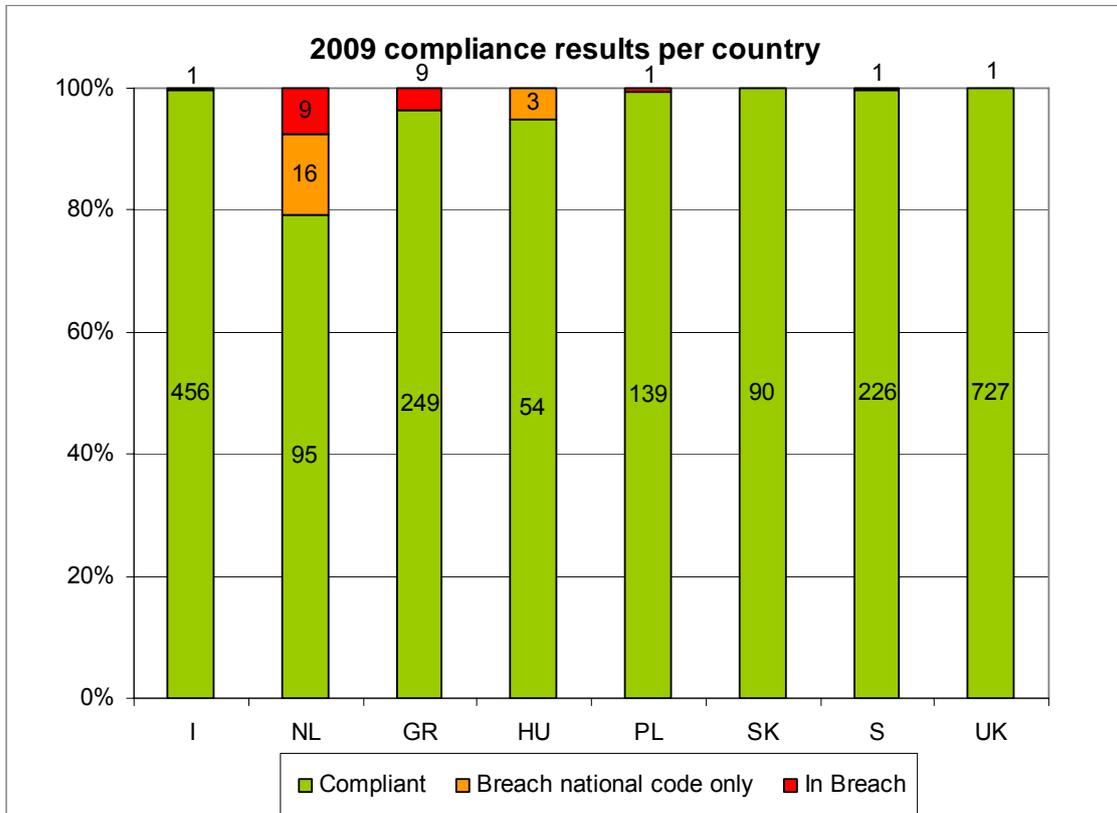


Fig. 3: Compliance results per country in 2009

The 16 ads found in breach with the national code in the Netherlands can be explained by the fact that all advertisements for confectionery and snacks need to feature a stylized image of a toothbrush according to article 4 CVZ (CoDe voor Zoetwaren/ Code for Confectionery) of the Dutch advertising code. Advertisements failing to indicate the toothbrush or failing to make it visible to the naked eye are considered in breach.

2.4 Detailed Results

	I	NL	GR	HU	PL	SK	S	UK	Total
Total n° of ads on database	541	255	377	60	173	91	492	1098	3087
Compliant	456	95	249	54	139	90	226	727	2036
CLAIMS	73	133	68	2	32	1	212	244	765
Health and nutrition	57	46	39	2	17	0	110	136	407
Superlative	0	20	1	0	9	0	3	23	56
Multiple	0	41	28	0	0	0	24	16	109
Other	16	26	0	0	6	1	75	69	193
BREACH TOTAL	1	25	9	3	1	0	1	1	41
Breach ICC and national code	0	9	4	0	1	0	1	0	15
Breach national code only	0	16	0	3	0	0	0	0	19
Breach ICC only	0	0	0	0	0	0	0	0	0
Complaint upheld	1	0	5	0	0	0	0	1	7
COMPLAINT TOTAL	10	1	8	0	0	0	0	8	27
Complaint upheld	1	0	5	0	0	0	0	1	7
Complaint not upheld	0	0	0	0	0	0	0	0	0
Under investigation	9	0	0	0	0	0	0	5	14
Complaint settled	0	0	3	0	0	0	0	0	3
Complaint rejected	0	1	0	0	0	0	0	2	3
Excluded	11	2	51	1	1	0	53	126	245
Technical problem	1	2	3	0	0	0	10	2	18
Out of remit	1	0	48	1	1	0	43	119	213
Under investigation	9	0	0	0	0	0	0	5	14
Copy advice received	2	0	0	8	0	0	0	0	10

Table 4: Detailed results per country

2.5 Types of breach

In 2009, misleading advertising accounted for 63% of the **22 advertisements** found in breach of the ICC and national code by the SROs. Most were related to the non-substantiation of claims. Concerns regarding the social value of advertisements directed to children ranked second (13%) and the lack of identification of the advertisement or advertiser ranked third (9%). Advertisements breaching technical national code provisions² only were left out of the sample.

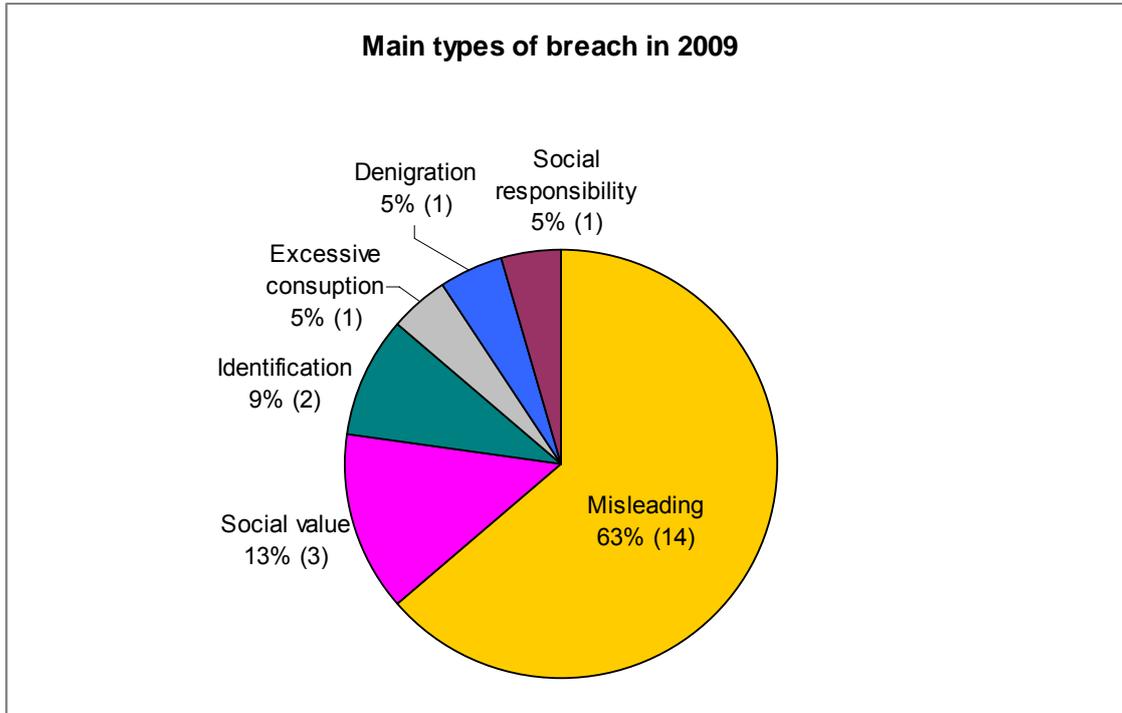


Fig. 4: Types of breach of the **22 ads** breaching the code in 2009 (not including breaches of technical provisions of national codes)

For comparison, the main reasons for 45 breaches of the codes in 2008 were:

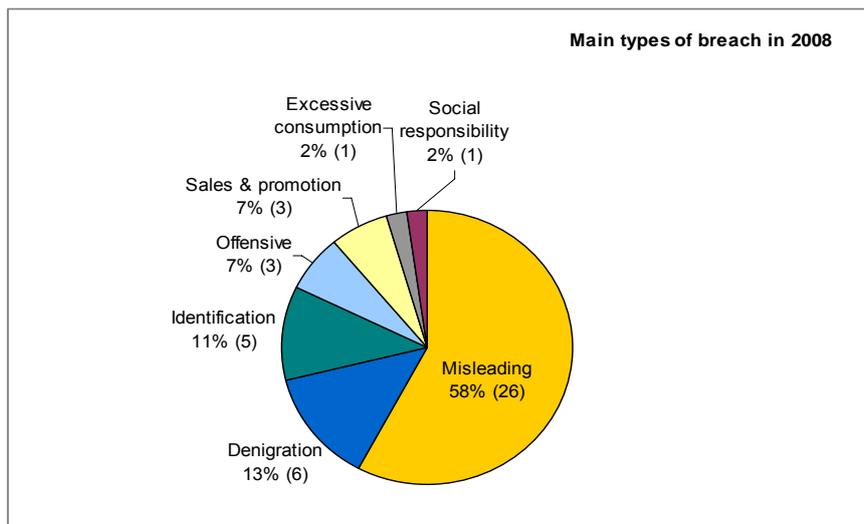


Fig.5: Types of breach of the **45 ads** found in breach in 2008 (not including breaches of technical provisions of national codes)

² Toothbrush symbol required for confectionary ads in the Netherlands.

2.6 Claims

In 2009, the compliance of 765 advertisements (24.8% of the total amount) could not be assessed by the SROs as they contained claims that would have required further substantiation by the advertiser. This is almost one out of four ads. Previous year it was one out of three ads that contained claims in need of further substantiation. (1.000 (33.9%) out of 2.957 ads)

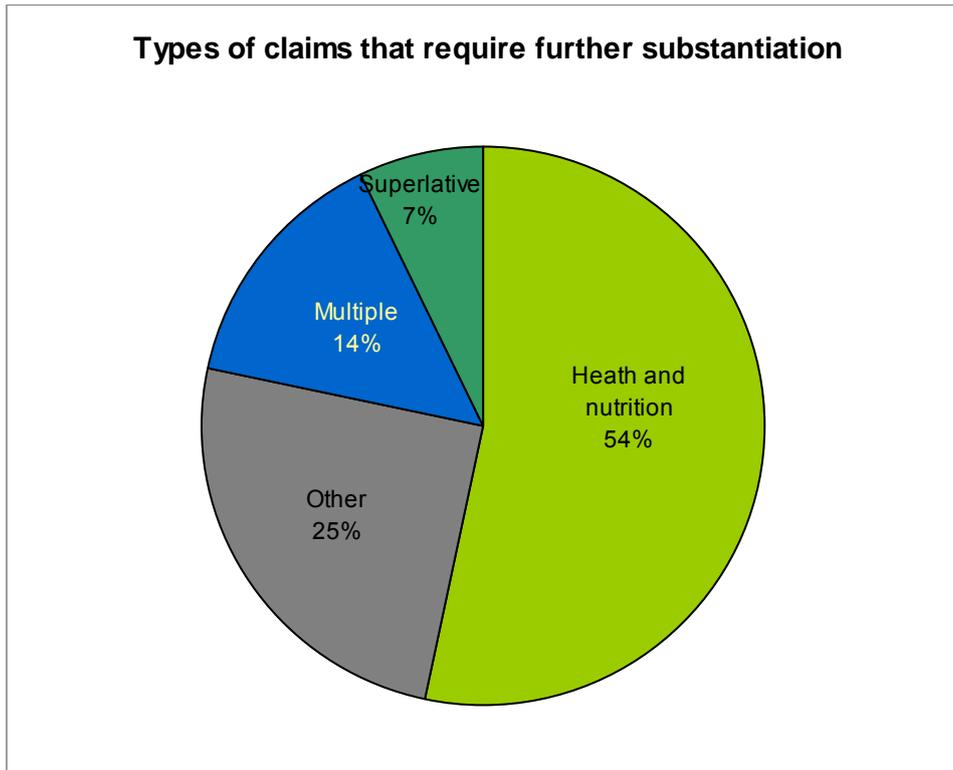


Fig. 6: Types of claims identified by the SROs in 2009

Definitions

- **Health and nutritional claims:** The ad contained a health or nutritional claim that would require scientific evidence to substantiate it (e.g. “Only 149 Kcal per serving”).
- **Superlative claims:** The ad contained a superlative such as “the only”, “the best”, “the biggest”... (e.g. “The best snack for active kids”).
- **Multiple claims:** The ad contains multiple claims such as “now with more fruits and no additives for a taste better than ever”.
- **Other claims:** The ad contains a claim that does not fall within one of the categories above (e.g. “Since 1889”).

3. Results per media

3.1 Results for TV ads

The following results show the compliance level for TV ads only.

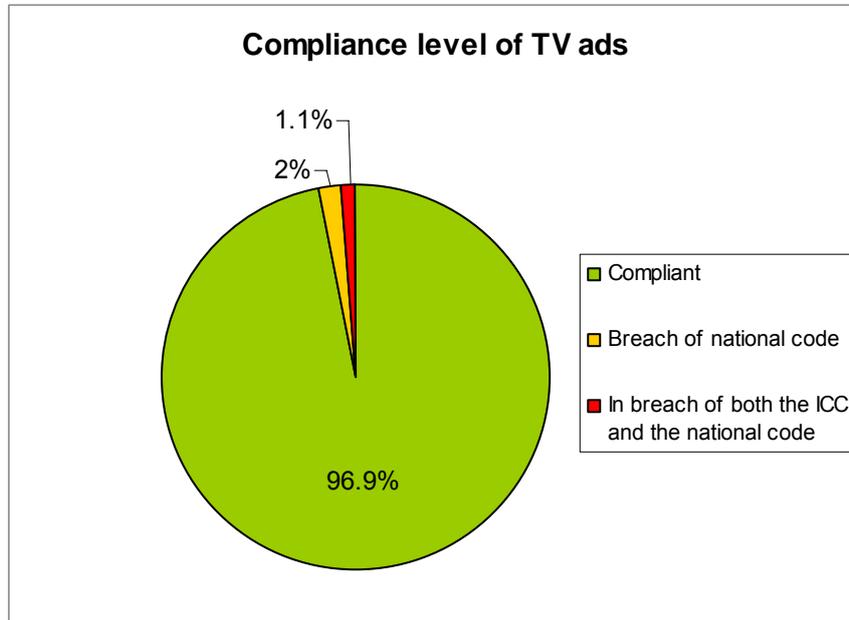


Fig. 7: Overall compliance of TV ads in 2009

	N° of ads	Percentage
Compliant	866	96,868%
Breach of national code	18	2,013%
In breach	10	1,118%
Total	894	100%

Table 5 : Overall compliance of TV ads in 2009

Out of the total 1.336 TV ads captured by Xtreme Information, 310 (23%) contained claims that could not be verified by the SROs and could therefore not be included in the exercise.

The TV ads in breach with the national code are mostly Dutch TV ads (15 out of the 18) for confectionery and snacks that fail to feature the obligatory stylized image of a toothbrush according to article 4 CVZ of the Dutch advertising code for confectioneries.

From the total number of ads included in the monitoring exercise only 27 ads had been complained about to SROs. Out of these 27, 2/3 (18) were about TV advertising.

Compared with the previous year, the compliance level on TV has improved slightly. In 2008, 3% of all TV ads were found in breach with the national code provisions and 1% in breach with the ICC code as well as the national code.

3.2 Results for print ads

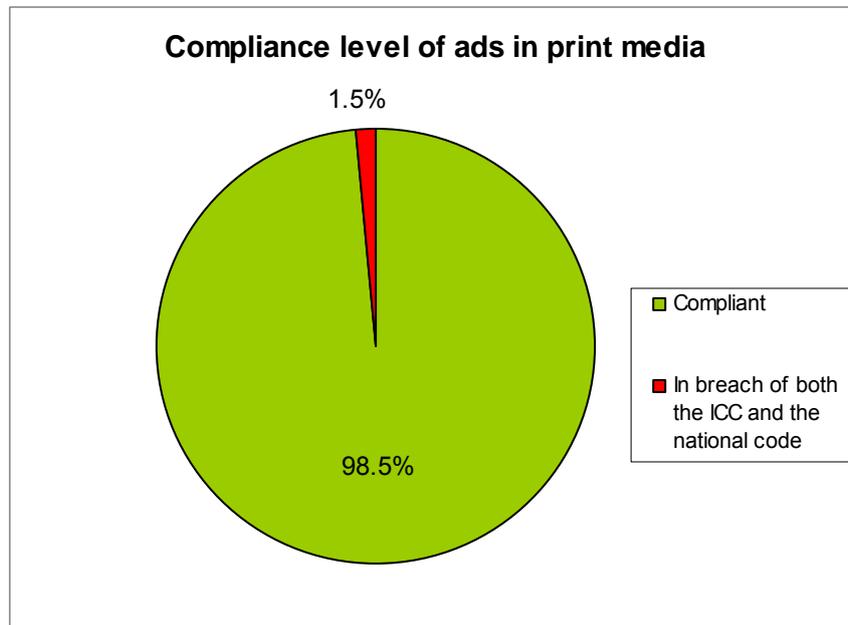


Fig. 8: Overall compliance of ads in the print media in 2009

	N° of ads	Percentage
Compliant	668	98,525%
Breach of national code	0	0%
In breach	10	1,475%
Total	678	100%

Table 6 : Overall compliance of print ads in 2009

Out of the total 1.118 print ads captured by Xtreme Information, 342 (30%) contained claims that could not be verified by the SROs and could therefore not be included in the exercise.

From the total number of ads included in the monitoring exercise only 27 ads had been complained about to SROs. Out of these 27, 1/3 (9) concerned print ads.

The compliance level of print ads has improved, compared to 2008. In the previous year, 3% of all print ads were found in breach with the codes.

3.3 Results for paid-for internet ads (pop-ups and banners)

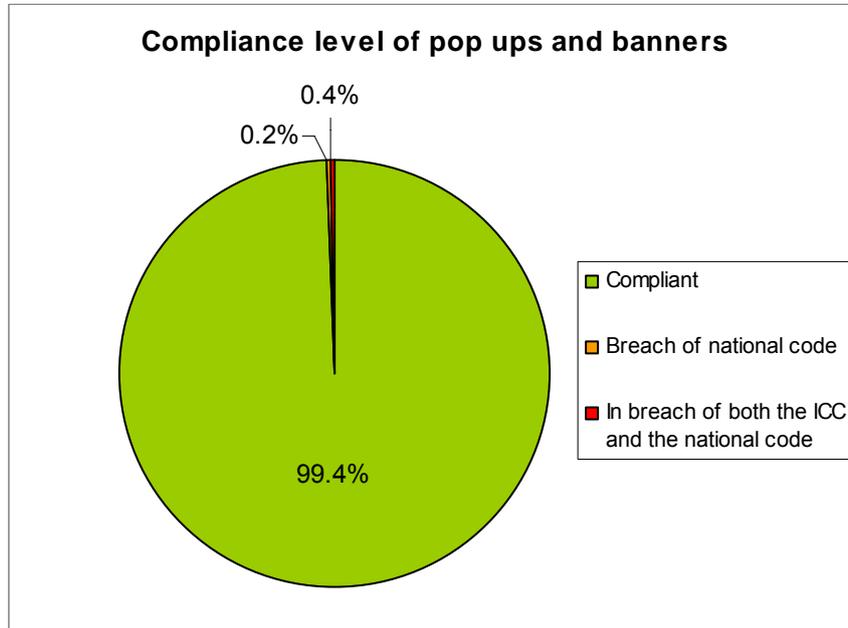


Fig. 9: Overall compliance of pop ups and banners in 2009

	N° of ads	Percentage
Compliant	502	99,406%
Breach of national code	1	0,198%
In breach	2	0,396%
Total	505	100%

Table 7 : Overall compliance of pop ups and banners in 2009

113 (17,85%) out of the 633 internet ads captured by Xtreme contained claims that could not be verified by the SROs and could therefore not be included in the exercise.

None of the monitored pop ups or banners had received a complaint.

Compared with previous year the compliance results have improved. In 2008, 3% of all online ads were found in breach with the ICC and national codes and 4% in breach with the national code provisions.

4. Complaints

During the monitoring period 27 ads of the 3087 ads captured had been complained about. Out of these, 14 were still under investigation during the review period and therefore been withdrawn from the compliance basis.

Seven ads were subject to an upheld complaint and have been included in the breach figures. The complaints not upheld, rejected or settled before transfer to the jury have been included in the main compliance figure.

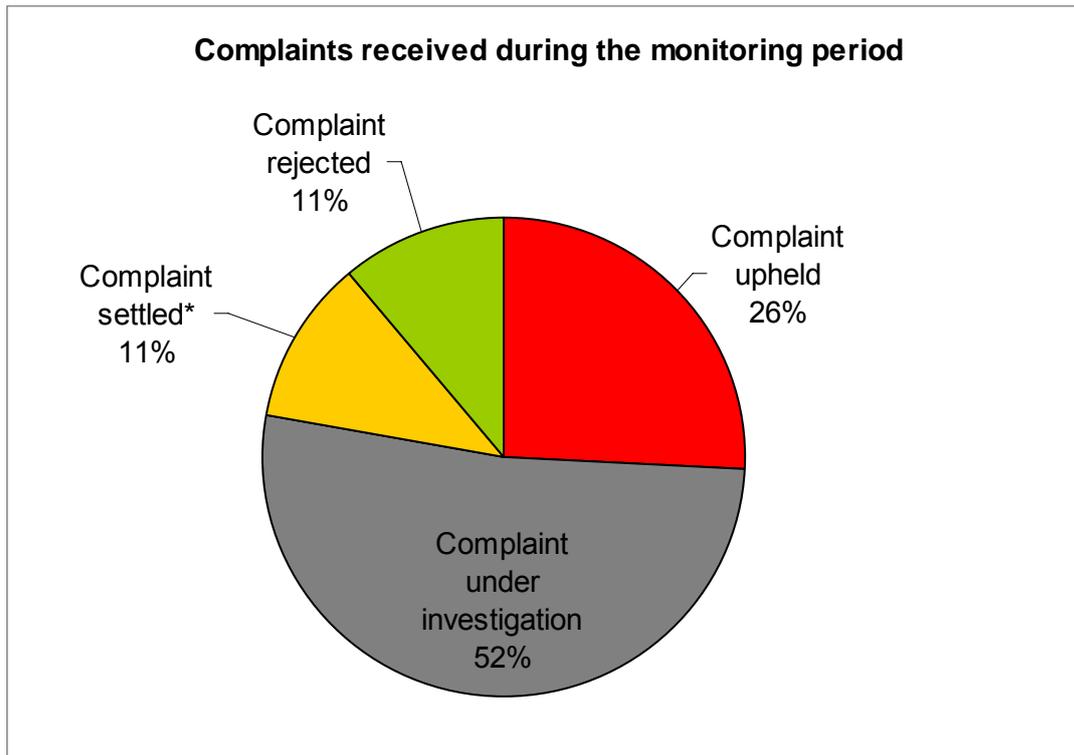


Fig. 10: Outcome of the complaints received during the monitoring period

* Complaint settled means that the advertiser modified the ad before the complaint was assessed by the SRO jury

Complaints upheld	7
Complaints not upheld	0
Complaints under investigation	14
Complaints rejected	3
Complaints settled	3
Total n° of complaints	27

Table 8: Outcome of the complained about ads in 2009

Definitions:

- **Complaint upheld:** The ad was complained about, transferred to the jury and the complaint was upheld.
- **Complaint not upheld:** The ad was complained about, transferred to the jury and the complaint was not upheld.
- **Complaint under investigation:** The ad was complained about and the case is still under investigation by the SRO.
- **Complaint rejected:** The ad was complained about, but the complaint was rejected by the SRO secretariat (because it was out of remit, e.g. the complaint was not about the ad but about the product itself etc.)
- **Complaint settled:** The ad was complained about, but before the ad was assessed by the SRO jury, the advertiser agreed to modify the ad.

All complaints that were upheld were lodged because the complainants deemed the ads to be misleading. Misleading advertising accounted also in 2008 for the highest number of upheld complaints (73%).

Out of all the complaints registered (regardless of the outcome of the complaint) dairy products, water and snacks, chocolates and candies were the products most complained about.

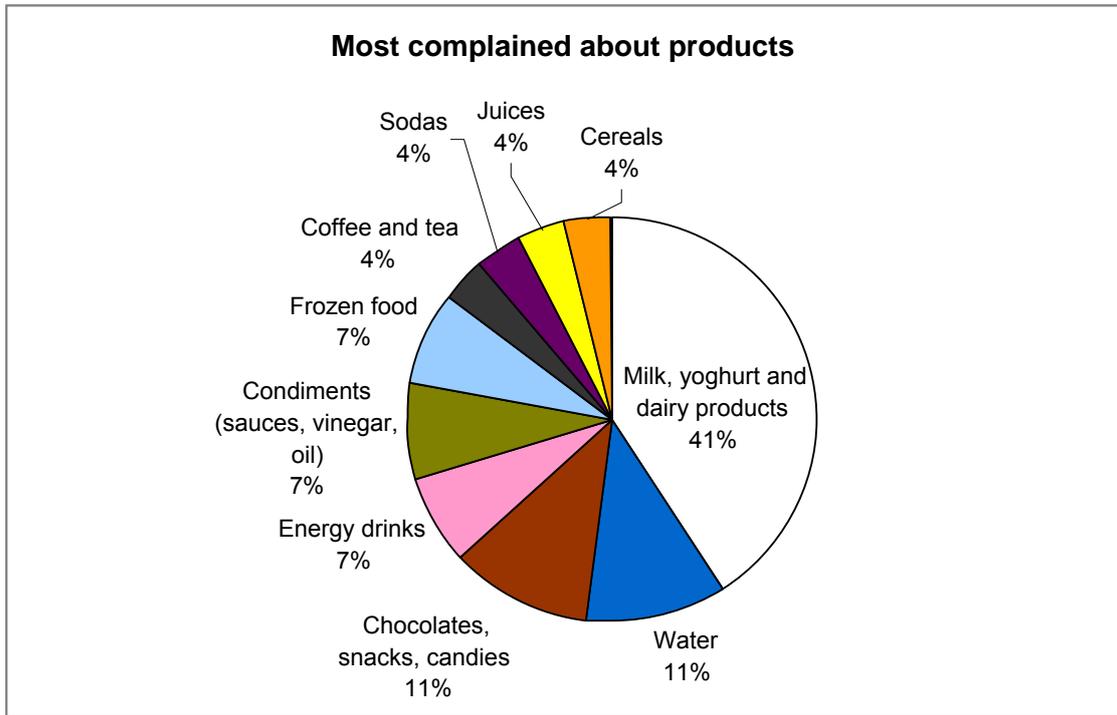


Fig. 11: Most complained about products in 2009

The main reasons for consumers or competitors to complain (disregarding the outcome of the complaint) was misleading advertising. Issues of social responsibility and offensive advertising came on 2nd and 3rd place respectively.

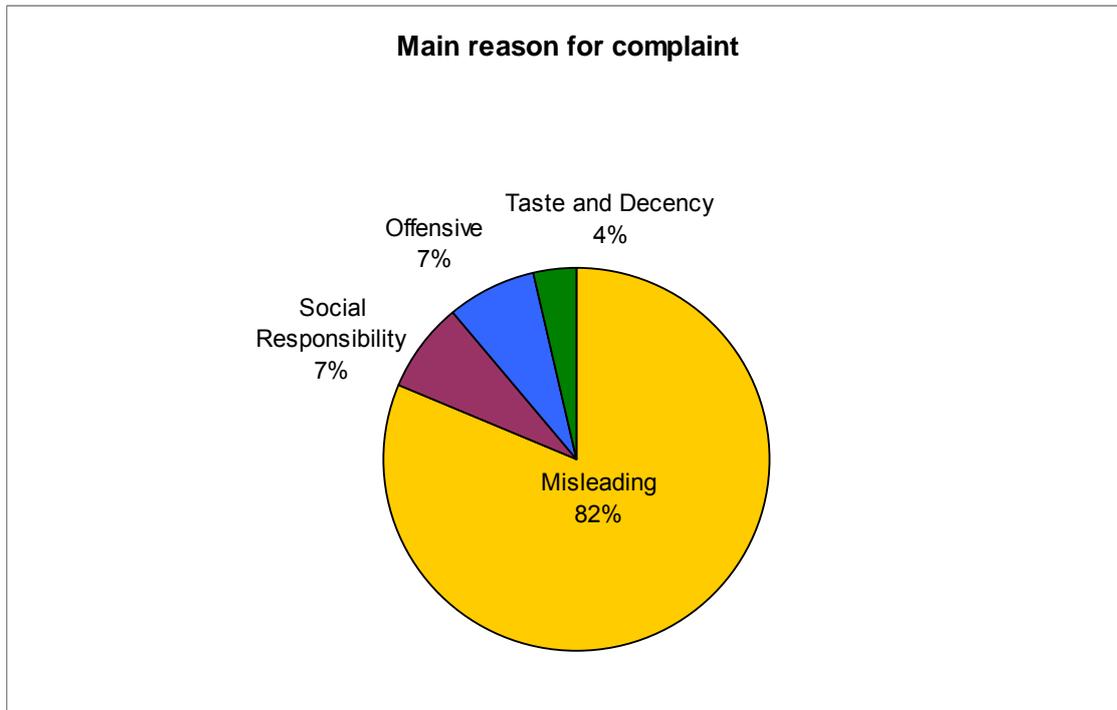
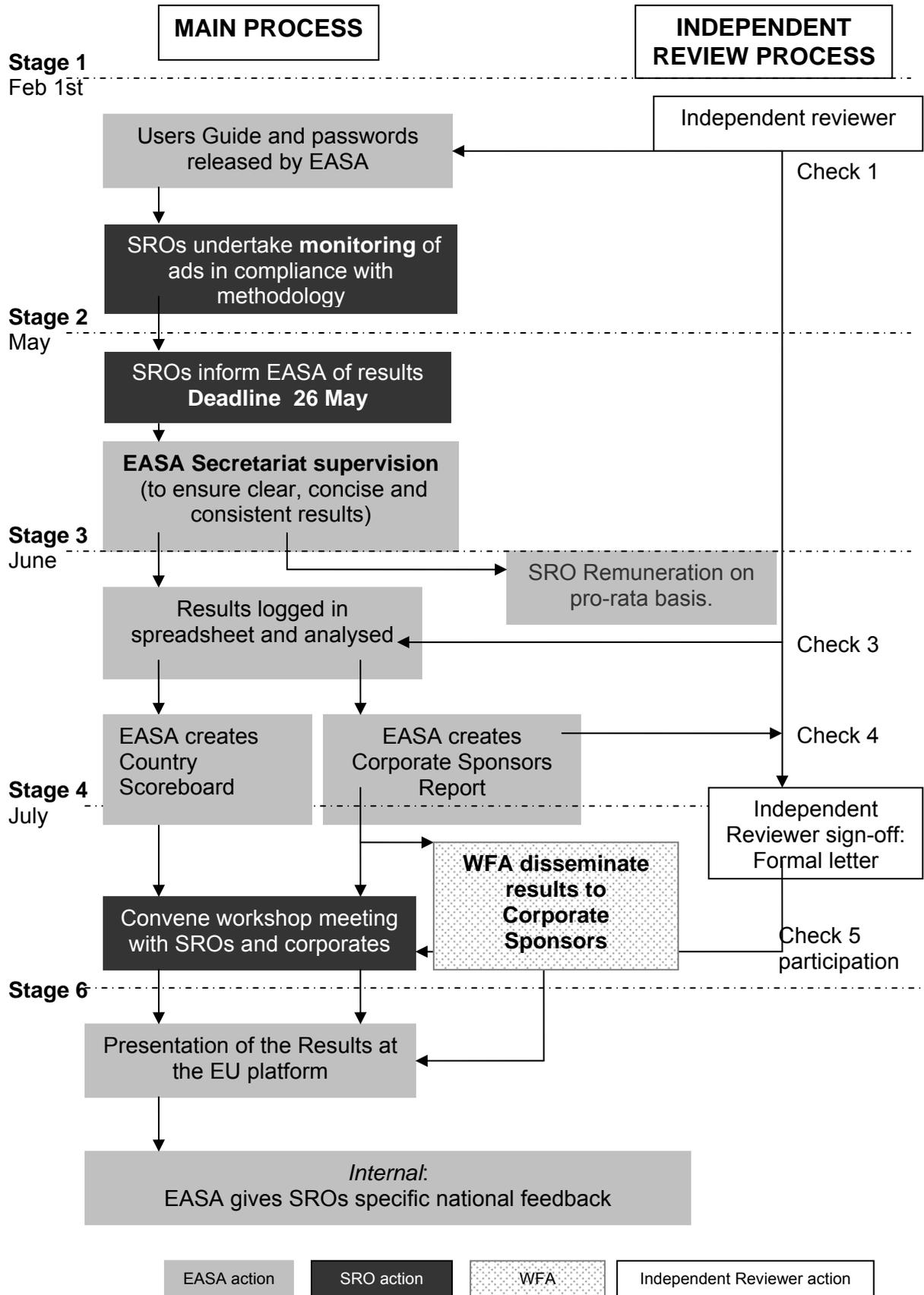


Fig. 12: The main reasons for complaint in 2009

ANNEX 1: Flowchart of monitoring process



ANNEX 2: Detailed results per media

	I	NL	GR	HU	PL	SK	S	UK	Total
TOTAL on database	541	255	377	60	173	91	492	1098	3087
TV	260	155	171	44	96	63	117	430	1336
Print	140	62	189	7	68	28	232	392	1118
Internet	141	38	17	9	9	0	143	276	633
ALL OK TOTAL	456	95	249	54	139	90	226	727	2036
TV	212	72	122	39	81	62	53	225	866
Print	129	12	111	6	49	28	83	250	668
Internet	115	11	16	9	9	0	90	252	502
CLAIMS TOTAL	73	133	68	2	32	1	212	244	765
TV	39	64	43	2	14	1	64	83	310
Print	8	47	24	0	18	0	106	139	342
Internet	26	22	1	0	0	0	42	22	113
H&N	57	46	39	2	17	0	110	136	407
TV	25	22	25	2	9	0	32	35	150
Print	6	18	13	0	8	0	39	91	175
Internet	26	6	1	0	0	0	39	10	82
SUP	0	20	1	0	9	0	3	23	56
TV	0	11	1	0	1	0	3	8	24
Print	0	2	0	0	8	0	0	15	25
Internet	0	7	0	0	0	0	0	0	7
MULTI	0	41	28	0	0	0	24	16	109
TV	0	17	17	0	0	0	3	7	44
Print	0	21	11	0	0	0	21	9	62
Internet	0	3	0	0	0	0	0	0	3
OTHER	16	26	0	0	6	1	75	69	193
TV	14	14	0	0	4	1	26	33	92
Print	2	6	0	0	2	0	46	24	80
Internet	0	6	0	0	0	0	3	12	21
BREACH TOTAL	1	25	9	3	1	0	1	1	41
TV	1	19	5	3	0	0	0	0	28
Print	0	3	4	0	1	0	1	1	10
Internet	0	3	0	0	0	0	0	0	3
BREACH BOTH	0	9	4	0	1	0	1	0	15
TV	0	4	2	0	0	0	0	0	6
Print	0	3	2	0	1	0	1	0	7
Internet	0	2	0	0	0	0	0	0	2
BREACH NC only	0	16	0	3	0	0	0	0	19
TV	0	15	0	3	0	0	0	0	18
Print	0	0	0	0	0	0	0	0	0
Internet	0	1	0	0	0	0	0	0	1
COMPLAINT UP	1	0	5	0	0	0	0	1	7
TV	1	0	3	0	0	0	0	0	4
Print	0	0	2	0	0	0	0	1	3
Internet	0	0	0	0	0	0	0	0	0

COMPLAINT TOTAL	10	1	8	0	0	0	0	8	27
TV	7	1	5	0	0	0	0	5	18
Print	3	0	3	0	0	0	0	3	9
Internet	0	0	0	0	0	0	0	0	0
COMPLAINT UP	1	0	5	0	0	0	0	1	7
TV	1	0	3	0	0	0	0	0	4
Print	0	0	2	0	0	0	0	1	3
Internet	0	0	0	0	0	0	0	0	0
COMPLAINT NU	0	0	0	0	0	0	0	0	0
TV	0	0	0	0	0	0	0	0	0
Print	0	0	0	0	0	0	0	0	0
Internet	0	0	0	0	0	0	0	0	0
COMPLAINT UI	9	0	0	0	0	0	0	5	14
TV	6	0	0	0	0	0	0	4	10
Print	3	0	0	0	0	0	0	1	4
Internet	0	0	0	0	0	0	0	0	0
COMPLAINT settled	0	0	3	0	0	0	0	0	3
TV	0	0	2	0	0	0	0	0	2
Print	0	0	1	0	0	0	0	0	1
Internet	0	0	0	0	0	0	0	0	0
REJECTED	0	1	0	0	0	0	0	2	3
TV	0	1	0	0	0	0	0	1	2
Print	0	0	0	0	0	0	0	1	1
Internet	0	0	0	0	0	0	0	0	0
OUT	11	2	51	1	1	0	53	126	245
TV	8	0	1	0	0	0	0	122	131
Print	3	0	50	1	0	0	42	2	98
Internet	0	2	0	0	0	0	11	2	15
Technical problem	1	2	3	0	0	0	10	2	18
TV	1	0	0	0	0	0	0	0	1
Print	0	0	3	0	0	0	1	0	4
Internet	0	2	0	0	0	0	9	2	13
Out of remit	1	0	48	1	1	0	43	119	213
TV	1	0	1	0	0	0	0	118	120
Print	0	0	47	1	1	0	41	1	91
Internet	0	0	0	0	0	0	2	0	2
COMPLAINT UI	9	0	0	0	0	0	0	5	14
TV	6	0	0	0	0	0	0	4	10
Print	3	0	0	0	0	0	0	1	4
Internet	0	0	0	0	0	0	0	0	0
CA YES	2	0	0	8	0	0	0	0	10
TV	0	0	0	8	0	0	0	0	8
Print	2	0	0	0	0	0	0	0	2
Internet	0	0	0	0	0	0	0	0	0

Abbreviations

Claims:

- **H&N:** Health and nutritional claims
- **SUP:** Superlative claims
- **MULTI:** Multiple claims
- **OTHER:** Other Claims

Complaints:

- **COMPLAINT UP:** Complaint upheld
- **COMPLAINT NU:** Complaint not upheld
- **COMPLAINT UI:** Complaint under investigation

Copy advice:

- **CA YES:** Copy advice received

Definitions

Banner: This form of online advertising entails embedding an advertisement onto the webpage. It is intended to attract traffic to a website by linking to the website of the advertiser.

Pop-up ad: Ad that appears in a separate window on top of content already seen on-screen.

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