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### Table of Contents

- 3 Executive Summary and Key Results
- 8 Report by Lucien Bouis, Independent Reviewer
- 11 Compliance Monitoring Advertising
- 11 TV
- 12 Print
- Internet
- Measuring Change In The Balance Of Advertising
- 17 Compliance Monitoring Primary Schools
- 19 Comparison with 2009 Results
- 22 Next Steps
- 23 Annex I Accenture Compliance Monitoring Report 2010 Advertising
- 38 Annex II BDRC Compliance Monitoring Report 2010 Presence in Primary Schools

### **Executive Summary**

#### About the EU Pledge

he EU Pledge is a voluntary initiative by leading food and beverage companies to change food and beverage advertising on TV, print and internet to children under the age of twelve in the European Union.

The EU Pledge was launched in December 2007 as part of signatories' commitment to the European Union Platform for Action on Diet, Physical Activity and Health, the multistakeholder forum set up by former EU Health and Consumer Affairs Commissioner Markos Kyprianou in 2005 to encourage stakeholders to take initiatives aimed at promoting healthy lifestyles in Europe. In the context of the EU Platform, the EU Pledge commitment is owned by the World Federation of Advertisers (WFA), which also supports the programme.

The founding members of the EU Pledge are the following companies: Burger King, Coca-Cola, Danone, Ferrero, General Mills, Kellogg, Kraft Foods, Mars, Nestlé, PepsiCo and Unilever.

Since April 2010, the European Snacks
Association (ESA) and five of its leading
corporate members (Intersnack, Lorenz SnackWorld, Procter & Gamble, Unichips and
Zweifel Pomy-Chip) have also joined the EU
Pledge. However, these members will not be
subject to independent monitoring until 2011,
in order to leave sufficient time for the
implementation of their corporate commitments
in the framework of the EU Pledge.

EU Pledge member companies represent over two thirds of the food and beverage advertising expenditure in the EU. The initiative is open to any food and beverage company active in Europe and willing to subscribe to the EU Pledge commitments.

#### The EU Pledge commitments

The EU Pledge is a framework initiative whereby signatories are committed to changing the way they advertise to children under 12 years old by respecting the following two criteria:

- No advertising of products to children under 12 years, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines<sup>1</sup>. For the purpose of this initiative, "advertising to children under 12 years" means advertising to media audiences with a minimum of 50%<sup>2</sup> of children under 12 years<sup>3</sup>.
- No communication related to products in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes.

Participating companies must all meet these criteria, but can go further. The framework EU Pledge commitments provide a common benchmark against which companies can jointly monitor and verify implementation.

Since the initiative was launched, all participating companies have made their individual corporate commitments within the framework of the EU Pledge programme. All company commitments, published on the EU Pledge website (<a href="www.eu-pledge.eu">www.eu-pledge.eu</a>), were implemented across the EU by 31 December 2008<sup>4</sup>.

To facilitate compliance with the EU Pledge commitments, member companies developed detailed implementation guidance, for all relevant staff in marketing, media planning and corporate affairs departments in all EU markets.

<sup>&</sup>lt;sup>1</sup> To date there is no one single global or European set of nutritional guidelines, because of the substantial differences across food cultures. There are nonetheless national and some elements of international guidance (e.g. World Health Organisation). Such guidelines usually include recommendations on daily caloric/nutritional intake and dietary habits/regimens and are dietary guidelines, not specific to individual foods. EU Pledge companies have developed their own nutritional guidelines on the basis of the most widely accepted national and international guidelines that exist (e.g. WHO, FAO, USDA, IOM, EURODIET). They have done so individually to reflect the diversity of members' product portfolios. Some include products from a number of categories; others include only one category (e.g. confectionery, soft drinks). Other EU Pledge member companies still have taken the decision not to advertise any of their products to children under 12. All applicable nutritional guidelines are published as part of the individual company commitments under the EU Pledge on www.eu-pledge.eu

<sup>&</sup>lt;sup>2</sup> This is a commonly agreed benchmark to identify media with an audience composed of a majority of children under 12 years old. This method of audience indexing has been agreed as a pragmatic system to determine the applicability of advertising rules. Nevertheless, this is a minimum common benchmark for all EU Pledge member companies. For further detail see: <a href="www.eu-pledge.eu">www.eu-pledge.eu</a>

<sup>&</sup>lt;sup>3</sup> The rationale for this threshold is the strong degree of academic consensus that by the age of 12 children develop their behaviour as consumers, effectively recognise advertising and are able to adopt critical attitudes towards it. Although children between the ages of 6 and 12 are believed to generally understand the persuasive intent of advertising, care should be taken because they may not have a fully developed critical understanding. For further information see: http://www.wfanet.org/pdf/adv\_papers/when\_is\_a\_child\_a\_child.pdf

<sup>&</sup>lt;sup>4</sup> In case of mergers or acquisitions, an agreed transition period is allowed for the implementation of measures taken under the EU Pledge.

#### Third Party Monitoring

In line with the Terms of Reference of the EU Platform for Action on Diet, Physical Activity and Health, EU Pledge signatories are required to monitor and report on the implementation of their commitments. EU Pledge member companies have committed to carry out independent, third-party compliance monitoring of the EU Pledge commitments.

This is the second monitoring exercise. The 2009 Monitoring Report is available on <a href="www.eu-pledge.eu">www.eu-pledge.eu</a>. In 2010, EU Pledge member companies commissioned the following independent third parties to monitor implementation of the EU Pledge commitments:

- Accenture Media Management<sup>5</sup>, to review EU Pledge member companies' compliance with the commitment relating to food and beverage advertising on TV, print and internet; and
- BDRC Continental<sup>6</sup>, to monitor compliance with the commitment on product-related communications in primary schools.

Both monitoring programmes were carried out and completed during the first half of 2010; and both have been independently reviewed by Mr. Lucien Bouis, member of the European Economic and Social Committee and former Director of the Bureau de Verification de la Publicité (BVP, now called ARPP, Autorité de Régulation Professionnelle de la Publicité – the French advertising Self-Regulatory Organisation), whose appraisal of the fairness and accuracy of the monitoring methodologies and processes is given in this report.

<sup>&</sup>lt;sup>5</sup> Accenture is a global management consulting, technology services and outsourcing company. Accenture Media Management helps companies measure and optimise investments in marketing, media, retail and digital.

<sup>&</sup>lt;sup>6</sup> BDRC Continental is UK's largest independent full service market research agency.

### Key Results

On the basis of independent compliance monitoring in six EU markets, EU Pledge member companies achieved the following compliance rates on their advertising commitment:

#### TV: overall compliance rate is 98.87%

This report is based on the review of 586,809 advertising spots promoting products of EU Pledge signatories, broadcast in Q1, 2010, in 6 EU countries (Greece, Hungary, the Netherlands, Poland, Portugal and Spain). The overall compliance rate is 98.87%, with only minor variations among the markets monitored.

#### Print: overall compliance rate is 100%

Nearly 100 publications were identified as targeting children under 12 years old in four sample markets (France, Spain, Portugal and the UK)<sup>7</sup>. All ads published in these titles during the monitoring period (Q1, 2010) were reviewed. Accenture did not find any ads in any of these publications during this period which promoted products that did not meet EU Pledge companies' nutritional criteria. The overall compliance rate was therefore 100%.

#### Online: overall compliance rate is 100%

For verifying compliance with the EU Pledge commitment online, Accenture drew up a list of the top child-targeted websites in the same six markets as for TV advertising and monitored the presence of advertising by EU Pledge member companies on these sites during a three-week

<sup>7</sup> The markets chosen for print monitoring are partly different from those chosen for TV monitoring because adequate print readership data for children's titles is not available in all markets. The list of publications monitored is available in Annex I.

period (July-August 2010). Nearly 50 websites were identified as targeting children under 12 years old. With only one non-compliant instance found, the overall compliance rate was virtually 100%.

# Beyond compliance: measuring change in the balance of food advertising to children

In addition to monitoring the implementation of commitments, EU Pledge member companies have sought to go beyond compliance and measure the change in the overall balance<sup>8</sup> of their food and beverage advertising to children as a result of the EU Pledge and individual company commitments made within the framework and in the spirit of the EU Pledge.

Accenture Media Management was therefore commissioned to develop a methodology to measure to what extent children's viewing of TV adverts for products marketed by EU Pledge member companies has changed since 2005 to the best of our knowledge. This allows us to measure the number of adverts by EU Pledge member companies which were seen by children under the age of twelve in 2005, and draw a comparison with 2010.

This change monitoring exercise has delivered a measure of the concrete impact that the EU Pledge initiative and related company policies have had on the balance of food advertising to children, by giving us an accurate measure of trends in children's "exposure" to food and beverage advertising. The analysis is limited to TV advertising because of the lack of comparable historic data for other media.

<sup>&</sup>lt;sup>8</sup> i.e. a change in exposure of children under 12 to advertising for foods that meet/do not meet companies' nutritional criteria.

The exposure of children to TV advertising for EU Pledge members' products that <u>do not meet companies' nutritional criteria</u> has declined since 2005 by:

- 83% in programmes with a majority of children under 12 in the audience.
- 60% in all programmes in the six markets monitored.

The exposure of children to TV advertising for <u>all</u> EU Pledge members' products (i.e. regardless of nutritional criteria) has declined since 2005 by:

- 10% in programmes with a majority of children under 12 in the audience.
- 36% in all programmes in the six markets monitored.

This change is not due to an overall migration away from TV advertising, but seems to be the intentional result of deliberate company efforts. This means that:

- The general population (all individuals) saw only 3% less TV advertising than in 2005 for all product advertising by EU Pledge companies.
- By contrast, for products that do not meet companies' nutritional criteria the general population saw 27% less advertising than in 2005.
- The change is much bigger for advertising to children under 12, who over the same period saw 36% less advertising for all products and 60% less for products not meeting companies' nutritional criteria.

## Communications in primary Schools

A representative sample of 400 schools was selected across 4 sample countries (Belgium, Italy, Slovakia and the UK), and an online survey was performed with school staff. EU Pledge member companies achieved an overall compliance rate of 92% with regard to their commitment relating to communications in primary schools.

#### Comparison with 2009

The 2010 monitoring results confirm the generally high levels of compliance with the EU Pledge commitments by member companies, both with regard to advertising and in-school communications.

The analysis of the exposure of children under 12 to TV advertising for food and beverage products that do not meet companies' nutritional criteria since 2005 also confirms the declining trend observed in 2009. On the basis of both the two markets already monitored in 2009 (Poland and Spain) and the four new markets covered in 2010 (Greece, Hungary, the Netherlands and Portugal) it is apparent that this trend has continued, leading to a significant overall reduction in children's overall exposure. The analysis shows that this shift in the balance of food and beverage advertising is also apparent in respect of the general population's exposure, but significantly more accentuated in respect of children under 12.

# Report from the independent reviewer

#### Lucien Bouis

#### Objective

In the context of the EU Platform for Action on Diet, Physical Activity and Health set up by the European Commission's Directorate General for Health and Consumers and with the support of the World Federation of Advertisers, 11 leading food and beverage companies have taken a major commitment affecting the way they advertise to children under 12, called the "EU Pledge".

In 2009, during the first compliance monitoring exercise of the EU Pledge, I agreed to review the effectiveness, the methodology and the results of that exercise. The results of the monitoring as well as the methodology used were found to be satisfactory by the European Commission. EU Pledge members decided to undertake a similar monitoring exercise in 2010.

At the request of Landmark Europe, acting as Secretariat to the EU Pledge initiative, I have agreed to act as independent reviewer for this second monitoring exercise, through which I have assessed whether compliance monitoring, performed by two independent agencies (Accenture Media Management and BDRC Continental) was carried out with an

appropriate methodology, resources and diligence.

## Communication in primary schools:

I have reviewed the work undertaken by BDRC Continental to monitor the compliance of the EU Pledge commitment concerning communications in schools, and I have found that adequate means were deployed in order to guarantee the reliability of the results. BDRC monitored the following four sample countries: Belgium, Italy, Slovakia and the United Kingdom. Over 3000 primary schools were approached by telephone to be offered a chance to participate in the online survey designed by BDRC. BDRC picked a random but representative sample of one hundred schools per country (with different geographic and socio-economic characteristics) and carried out the surveys between March and May 2010.

The questionnaire was submitted to senior school staff (headmasters, teachers) in order to assess children's exposure to EU Pledge member companies' communications in:

school property

- vending machines
- school furniture and equipment
- school publications
- events organised at/by the school
- sponsorship requested by or agreed with the school

BDRC took full account of potential interpretation issues by defining precisely all possible instances of non-compliance and by designing the questionnaire in such a way that it would guarantee reliable responses and avoid duplication. The survey reached a 95% confidence level.

Overall, the non-compliance rate in primary schools is below 8%.

Furthermore, the results of the survey identify clearly each case of non-compliance with the EU Pledge commitment. Most respondents have agreed to be contacted by either BDRC or the advertiser in breach of the EU Pledge commitment to discuss this breach. This will allow EU Pledge members to take corrective actions where necessary.

## Advertising in TV, print and on the internet

Accenture Media Management selected 6 countries to form the sample for compliance monitoring regarding the EU Pledge commitment not to advertise certain products when the majority (over 50%) of the audience is made of children under 12 years old: Greece, Hungary, the Netherlands, Poland, Portugal and Spain.

Between January and May 2010, Accenture Media Management deployed all necessary resources to ensure that the compliance monitoring was rigorous and reliable (identification of channels and websites, TV audience analysis, database...).

#### TV

Accenture gathered data about all advertisements broadcast on all channels in the 6 sample countries. Satellite and cable channels were also included where the data was available.

During the observation period (January – March 2010), the 11 EU Pledge members broadcast 586.809 advertising spots for their products. Accenture selected these spots and used TV audience data to assess whether the audience – at the time of broadcast – was composed of more than 50% of children under 12 years old. 2590 spots were found to be in breach of the EU Pledge, representing less than one percent of all ads broadcast by EU Pledge members.

Accenture compared these figures with similar data from 2005, before the EU Pledge was adopted, and concluded that the signatories are committed to complying with the EU Pledge and have effectively reduced children's exposure to the advertising of some of their products.

#### Print

Accenture drew up a list of publications which were considered likely to attract a majority of readers under 12 years in 4 sample countries (France, Portugal, the Netherlands, Spain and the UK).

All advertisements published in these selected titles during the monitoring period were analysed to assess whether any of them promoted certain products of EU Pledge members.

No case of non-compliance was found amongst the 120 magazines reviewed.

#### Internet

Compliance monitoring on the internet was performed following a method similar to print advertising monitoring. A list of websites likely to be visited by a majority of children under 12 was drawn up and a manual analysis of all commercials (banners, pop-ups...) on these websites was made by Accenture representatives in each country of the sample.

The results of this analysis contradict common belief that online advertising is less controlled than traditional media. Indeed, only 1 case was reported non-compliant during the monitoring period, which encompassed a three week period during the months of July and August.

#### Conclusions

Taking into account the number of countries in the sample, the populations covered, the significant number of companies that are part of the EU Pledge, the diversity of their brands and product portfolios, and the range of media analysed, the compliance monitoring performed by Accenture and BDRC can be considered as faithful and reliable.

I have been fully informed of all the steps taken through the entire process and after having

Lucien Bouis

Brussels, 15 August 2010

10

consulted the final reports, I can vouch for the seriousness and reliability of the results. They correspond to the terms of reference agreed to by all operators involved.

During the course of my mission, I have had full access to all information and all my questions were answered. I have been in regular contact with Landmark Europe as well as BDRC and Accenture, whom I have interviewed to assess the quality of their reports.

In view of the significant number of food and drink companies involved, and in light of their willingness to submit their commitments to independent verification, the results of this EU-wide self-regulatory initiative should be of great interest to all stakeholders involved in health and consumer protection.

Finally, it is worth noticing that other advertisers in the food and beverage sector have expressed their interest in joining the EU Pledge, and that this programme has been (and is being) replicated in several countries across the world.

# Compliance monitoring:

### Advertising

#### Objective and Scope

Accenture Media Management was commissioned to carry out the independent monitoring of member companies' compliance with the following EU Pledge commitment:

"No advertising of products to children under 12 years, 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."

For the purpose of this exercise, six sample EU markets were chosen: Greece, Hungary, the Netherlands, Poland, Portugal and Spain. Poland and Spain had already been monitored in 2009; they were chosen again in 2010 in order to compare results year-on-year.



#### Methodology

All advertising spots for products marketed by EU Pledge member companies, aired in the six markets during the period 1 January to 31 March 2010 were collected (Kantar data in Spain; Nielsen data in all other markets). With this methodology, all advertising spots aired over a three-month period in the six markets -



586,809 spots - were reviewed for compliance with the EU Pledge commitment.

Spots for products that do not meet EU Pledge companies' nutritional criteria, where applicable, were identified, on the basis of full product lists submitted by each member company for each market. For those member companies that do not apply nutritional criteria and do not advertise any products to children under twelve, all spots were included.

For all these spots, audience composition at the time of broadcast of each spot was analysed on the basis of national ratings data. This allowed Accenture to isolate ads aired at a time when the majority of the audience was composed of children under twelve years of age.

All spots for products that EU Pledge member companies have committed not to advertise to children under twelve, aired at times when the audience was composed of a majority of children under twelve, were deemed non-compliant with the EU Pledge.

#### Results

The overall weighted compliance rate was as follows:

# 98.87% of signatories' TV advertising was compliant with the EU Pledge commitment.

The detailed compliance rates reported by Accenture per market and per medium can be found in the Accenture presentation included in this report.

It is worth noting that of the 2590 spots found non-compliant (i.e. achieving an under-twelve audience share above 50%), only 99 were actually broadcast in or around children's programmes. Most of the other reported cases of non-compliance concern general/adult programmes that display a high share of children in the audience, but based on very low ratings (small audiences), which are not statistically reliable with regard to demographic composition of the audience. All these cases were nonetheless included in the reported non-compliance rates for the sake of transparency and simplicity, even though they are, at worst, examples of "technical" non-compliance.

#### Follow-up

All instances of non-compliance were reported to the EU Pledge member company concerned. Companies were thus able to identify each non-compliant spot by market, product, channel and time. This has allowed companies to take corrective action where necessary, to adapt media planning where appropriate, and to update guidance to marketing departments where needed.



Methodology

Because age-specific readership data for children's press is not available, Accenture drew up a list of children's titles in each market monitored, on the basis of national genre classifications used in the industry. The lists of titles selected for the compliance monitoring exercise per country are available in Annex I. The print monitoring exercise was limited to four markets (France, Spain, Portugal and the UK), which partly differ from the markets selected for TV monitoring. This is because adequate advertising monitoring data for print is only available in a limited number of EU markets.

Using advertising data from national monitoring agencies (databases of all ads placed in the ted print titles), Accenture identified any

advertising in these children's print titles for products that EU Pledge members have committed not to advertise.

#### Results

100% of signatories' print advertising was compliant with the EU Pledge commitment.

#### Internet

#### Methodology

Because there is no reliable demographic audience data for most websites, Accenture drew up a sample list of child-targeted websites in each market (Greece, Hungary, the Netherlands, Poland, Portugal and Spain). The lists of websites selected for the compliance monitoring per country are available in Annex 1.

Manual compliance checks were performed during a three-week period (during July-August 2010) on the selected websites to assess whether EU Pledge members promoted products that did not meet companies' nutritional criteria on these websites.

The monitoring revealed only one instance of non-compliance.

Virtually 100% of signatories' online advertising was compliant with the EU Pledge commitment.

### Beyond compliance:

## Measuring Change in the Balance of Advertising

#### Objective and scope

In an effort to go beyond merely verifying compliance with their commitments, EU Pledge member companies have sought to measure the change in the balance of food and beverage products advertised to children under twelve, in order to assess the tangible impact of the initiative and corporate policies implemented in the framework and spirit of the initiative.

Due to the lack of historic data for print and Internet advertising, this exercise was limited to TV advertising – still by far the dominant medium in terms of food and beverage marketing spend.

The year 2005 was chosen as a benchmark, coinciding with the launch of the EU Platform for Action on Diet, Physical Activity and Health.

#### Methodology

The outcome indicator used to measure the change in the balance of food advertising to children was the number of times that children under 12 years old saw ads by EU Pledge member companies, for products that do not

meet companies' nutritional criteria, in the period 1 January – 31 March 2005 vs. the same period in 2010. This was measured in "*impacts*", which is the statistical number of times **each spot is viewed by one person** and hence the most accurate measure of "exposure".

Accenture was asked to report the findings in terms of:

- Change in programmes with an audience composed of a majority of children, the minimum common benchmark applied under the EU Pledge initiative.
- Change in general programming, i.e. all programmes aired during the monitoring periods in the six markets during Q1 2005 and Q1 2010.

This analysis was carried out by contrasting two comparable sets of data:

 The advertising and ratings data already analysed to measure compliance in Q1 2010. The equivalent data for Q1 2005, i.e. all advertising spots for products marketed by EU Pledge member companies in that period on the same channels.

#### Outcome

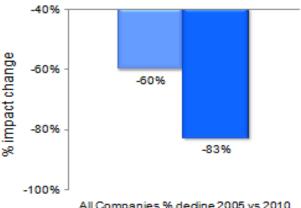
The results reported by Accenture show a marked decline in children's exposure to ads for products that do not meet companies' nutritional criteria. This trend is visible on the basis of both change measurement parameters chosen, namely:

- An 83% decline in programmes with an audience composed of a majority of children.
- A 60% decline overall, i.e. in all programmes on all channels at all times.

For all EU Pledge member companies' advertising across all products, i.e. regardless of nutritional criteria, this represents, in the six markets monitored since 2005:

- A 10% decline in programmes with an audience composed of a majority of children.
- A 36% decline overall, i.e. in all programmes on all channels at all times.

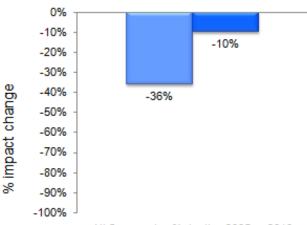
Figure 1 – Children's exposure – Products that do not meet nutritional criteria. 2005 vs. 2010



All Companies % dedine 2005 vs 2010

- Impacts for products that do not meet nutritional criteria, in all programmes
- Impacts for products that do not meet nutritional criteria, in programmes with reported profile >50%

Figure 2 – Children's exposure – All products. 2005 vs. 2010



All Companies % decline 2005 vs 2010

- Impacts for all products in all programmes
- Impacts for all products in programmes with reported profile >50%

The shift in the balance of food and beverage advertising is visible in the exposure of all individuals' (adults and children, all ages). This change is not due to an overall migration away from TV advertising, but seems to be the intentional result of deliberate company efforts:

- The general population (all individuals) saw only 3% less TV advertising than in 2005 for all products advertised by EU Pledge companies (fig. 3).
- By contrast, for products that do not meet companies' nutritional criteria, the general population saw 27% less advertising than in 2005 (fig. 3).

The change is much bigger for advertising to children under 12, who saw 36% (all products) and 60% (not meeting nutritional criteria) less advertising over the same period (fig.4).

Figure 3: All individuals' exposure – all products vs. products that do not meet nutritional criteria, 2005 vs. 2010

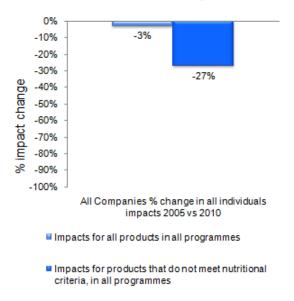
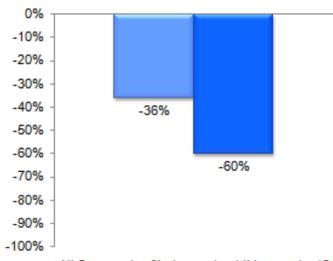


Figure 4: Children's exposure – all products vs. products that do not meet nutritional criteria, 2005 vs. 2010



All Companies % change in children under 12 impacts 2005 vs 2010

- Impacts for all products in all programmes
- Impacts for products that do not meet nutritional criteria, in all programmes

# Compliance monitoring:

# Communication in primary schools

#### Objective and scope

BDRC was commissioned to carry out independent monitoring of member companies' compliance with the following EU Pledge commitment:

"No communication related to products in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes."

For the purposes of this verification, four sample EU markets were chosen, to complement the geographical sample chosen for the advertising monitoring component: Belgium, Italy, Slovakia and the UK. Schools were audited between 12th May and 4th June 2010.

#### Methodology

BDRC Continental pulled from lists of all primary schools of each country a random sample of schools, representative of the population of schools in terms of their geographical distribution in each of the countries. Schools selected from the sample lists were recruited by telephone and asked to

complete the online questionnaire. The email addresses of the appropriate school contacts were gathered during the recruitment phone calls to allow an email with the embedded questionnaire link and audit instructions to be sent.

400 online interviews were conducted for the audit – 100 in each of the participating countries.

Online interviews lasted approximately 10-15 minutes and were conducted in the local language – i.e. English, French, Flemish, Italian or Slovakian.

As an incentive, respondents received a £30/€30 voucher or charity donation for participating.

Instances of non-compliance reported include all incidences of branding including those which were agreed with the relevant authority, with the exception of branded sponsorship of school materials deemed to have an educational purpose. In this respect, only unauthorised sponsorship is included in the non-compliance figures.

The interviews aimed to identify whether advertising for products of EU Pledge signatories was present in the following locations/instances:

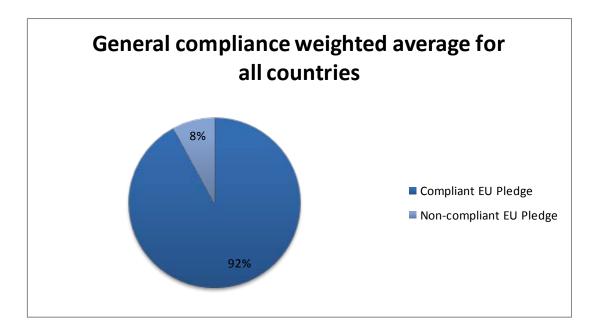
- School property
- Vending machines
- School infrastructures
- In publications and products produced for or distributed by the school
- During events organised by the school
- Material from food and beverage companies (unless with the school's agreement)

Responses were collected and analysed by BDRC Continental.

#### Results

The compliance rates reported by BDRC are available in more detail – per country and per type of non-compliance – in the BDRC report in Annex II.

The overall weighted compliance rate was as follows:



#### Follow-up

Each EU Pledge member company was informed of the number of reported instances of non-compliance relating to their brands, per instance of breach and per market. School staff members interviewed were asked for the permission to be re-contacted by either BDRC

Continental or the EU Pledge members themselves. Permission was granted inmore than half of cases (overall 53%), which will allow companies to follow-up with schools on cases of non-compliance, learn from these instances and adapt their marketing practices and/or guidelines where appropriate.

# Comparison with 2009 results

## Advertising compliance monitoring

The compliance rates reported by Accenture for 2010 in respect of all three media are very similar to the 2009 results (close to 100%). For TV advertising, the instances of non-compliance are slightly higher in 2010 than in 2009, even though to a marginal and statistically insignificant extent. The slightly higher number of non-compliant TV spots reported, particularly in Poland, may be explained by increasing media fragmentation, i.e. a proliferation of smaller, typically digital TV channels. This results in a higher overall number of advertising spots, though it does not necessarily translate into higher advertising expenditure, or a wider reach (impacts).

## Measuring change in the balance of food advertising to children

The change measurement carried out in 2009 assessed the change in the exposure of children under the age of twelve to TV advertising for

products that did not meet companies' nutritional criteria since 2005. This showed a significant overall reduction in children's exposure: 93% in programmes with audiences composed of a majority of children under 12; and 56% across all TV programmes in the six markets monitored.

The 2010 change measurement results confirm and corroborate this trend, both in the markets where monitoring was repeated in 2010 (Poland and Spain) and overall, indicating that the exposure of children under twelve to TV advertising for products that do not meet companies' nutritional criteria has decreased significantly and continues to decrease, both in programmes that attract a majority child audience and across general programming.

The 2010 analysis looked at one further measure of change, namely a comparison of trends in the balance of food advertising between the general population (all ages) and children under twelve. This analysis shows that a shift in the balance of food advertising, expressed in terms of exposure to TV ads for all products vs. products that do

not meet the nutritional criteria, is under way both in respect of children under twelve and in respect of the general population:

- In 2010 the general population saw 3% less advertising for all products than in 2005 and 27% less advertising for products that do not meet the nutritional criteria.
- In comparison, children under twelve were exposed to significantly less TV advertising both in respect of all products (-36%) and products that do not meet the nutritional criteria (-60%).

The EU Pledge 20009 monitoring report drew a parallel with the only other similar exercise available at the time to measure the change in the balance of food advertising to children, namely the 2008 Review of the effects of HFSS restrictions on advertising and media<sup>9</sup> by UK communications regulator Ofcom. In that report, Ofcom measured the change in the number of impacts for high fat/sugar/salt food advertising on children and adolescents under the age of 16 between 2005 and 2008, reporting a 34% drop overall (63% in children's airtime and 20% in adult programmes).

In July 2010, Ofcom published its <u>Final review</u> of the UK HFSS Food Advertising

Restrictions<sup>11</sup>, updating the 2008 Review. The report assesses the effectiveness of the UK rules restricting HFSS food and drink product

<sup>9</sup> Ofcom 2008: Changes in the nature and balance of television food advertising to children – A review of HFSS advertising restrictions

(http://www.ofcom.org.uk/research/tv/reports/hfssdec08/)

advertising to children under 16, agreed in 2006 and phased in between April 2007 and January 2009, in reducing exposure among this target group. The report finds an overall reduction of 41% in this respect since 2005 in the UK, deemed a significant and satisfactory result by Ofcom.

While the parameters used by Ofcom differ from those in the EU Pledge monitoring report (use of the Food Standards Agency's nutrient profiling model vs. company-specific criteria; and age 16 vs. age 12), Ofcom's analysis offers a useful reference. In the light of the significant market coverage of the EU Pledge (over two-thirds) and the comparable results observed in 2009 and 2010, the significant change measurement results reported by Accenture are likely representative of the EU market as a whole.

#### Schools compliance monitoring

A slightly lower proportion of compliant schools was recorded in 2010 (-1%). However, overall compliance remains high (92%). In addition, instances of non-compliance are only slightly higher at school events (+2.3%) compared to those observed in 2009. There are a number of variables that might explain differences between the 2009 and 2010 results:

- Different markets were monitored
- Improvements in the design of the questionnaire used to carry out the survey
- A switch to telephone recruitment (vs. a postal survey in 2009), implemented in order to reduce any self-selection bias

It should be noted that the schools monitoring exercise is qualitatively different to the advertising monitoring programme: whereas the latter is based on independent audience data and

<sup>&</sup>quot;HFSS" foods, as defined on the basis of the UK Food Standards Agency nutrient profiling system.

<sup>&</sup>lt;sup>11</sup> http://stakeholders.ofcom.org.uk/binaries/research/tv-research/hfss-review-final.pdf

is therefore fully objective, the schools monitoring exercise necessarily relies on reporting by school staff and therefore inevitably involves a degree of subjectivity. Follow-up investigations carried out following the 2009 schools monitoring project indicate that reported instances of non-compliance were sometimes not such, but cases of misreporting by school staff, suggesting that actual compliance rates might be slightly higher than

reported. In order to better ascertain such cases, in 2010 schools were asked whether they would be prepared to be re-contacted by BDRC or EU Pledge member companies for further verification. While such verifications are still under way at the time of publication of this report, since 53% of schools surveyed agreed to be re-contacted, it can be expected that most cases where there may be any doubts about the accuracy of reporting will be clarified.

### Next steps

Following presentation of the EU Pledge 2010 monitoring report to the EU Platform for Action on Diet, Physical Activity and Health in September 2010 and ensuing debate with stakeholders, EU Pledge member companies intend to repeat the monitoring programme in 2011, with the necessary adaptations if appropriate.

The share of the food advertising market to be monitored in 2011 will be even larger, since the monitoring exercise will cover new EU Pledge members (five leading savoury snacks manufacturers).

While it is difficult to measure the precise share of the EU food advertising market that the EU Pledge member companies represent, it is likely that the above expansions mean that the challenge tabled by former EC Director-General for Health and Consumer Protection Robert Madelin in September 2009 to reach 80% market coverage will soon be met. The EU Pledge initiative will continue its drive to broaden membership further during the remaining months of 2010 and in the course of 2011.

## EU Food and Drink Advertising to Children Pledge

Compliance and change measurement report 2010



High performance. Delivered.

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0

#### **Contents**

- TV compliance monitoring 2010
  - Objective & methodology
  - Results
- Measuring change: Trends in EU Pledge companies' TV advertising Q1 2005 vs. Q1 2010
  - Objective & methodology
  - Results
- · Print compliance monitoring 2010
  - Methodology
  - Results
- · Website compliance monitoring 2010
  - Methodology
  - Results
- · Appendices
  - Glossary
  - Monitored Media















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2



#### TV compliance monitoring 2010 - Objective

- Assess EU Pledge member companies' compliance with the following commitment:
  - "No advertising of products to children under 12 years, except for products which fulfill 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."
- For the purposes of this verification, 6 sample EU markets were chosen: Greece, Hungary, Netherlands, Poland, Portugal and Spain.

















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#### TV compliance monitoring 2010 - Methodology

- All spots by all EU Pledge member companies, aired in the 6 markets from 1 January to 31 March were collected (TNSofres (Kantar) data in Spain; Nielsen data in all other markets). Total sample size: 586,809 spots
- Spots for products that do not meet EU Pledge companies' nutritional criteria, where applicable (some member companies do not advertise any products to children <12), were identified on the basis of product lists supplied by companies.
- Audience composition at the time each spot was aired was analysed, on the basis of national ratings data, to identify ads aired in and between programmes with an audience in which the majority were children <12.
- · Those ad spots were deemed non-compliant with the EU Pledge, i.e. all those ads for products that EU Pledge member companies have committed not to advertise to children <12 ("products that do not meet companies' nutritional criteria"), aired at times when the audience was composed of a majority of children <12.



















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#### Contents

- TV compliance monitoring 2010
  - Objective & methodology
  - Results
- Measuring change: Trends in EU Pledge companies' TV advertising Q1 2005 vs. Q1 2010
  - Objective & methodology
  - Results
- Print compliance monitoring 2010
  - Methodology
  - Results
- · Website compliance monitoring 2010
  - Methodology
  - Results
- Appendices
  - Glossary
  - Monitored Media



















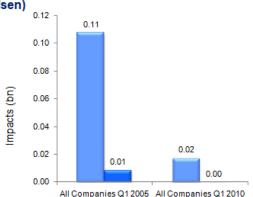
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All products that do not meet companies' nutritional criteria - impacts: Children under 12 (Nielsen)

Children's exposure to advertising of products that do not meet companies' nutritional criteria fell by:

- 96% in spots with a reported profile of 50% or more of children under 12
- · 84% across all programming



- Impacts for products that do not meet companies' nutritional criteria
- Above impacts appearing in spots with a profile >50% (bn)















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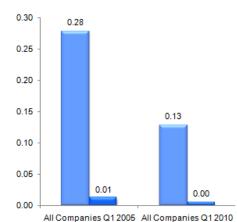


#### Hungary: Trends 2005 vs. 2010

All products that do not meet companies' nutritional criteria - impacts: Children under 12 (Nielsen)

Children's exposure to advertising of products that do not meet companies' nutritional criteria fell by:

- 60% in spots with a reported profile of 50% or more of children under 12
- 54% across all programming



- Impacts for products that do not meet companies' nutritional criteria
- Above impacts appearing in spots with a profile >50% (bn)















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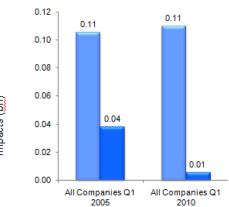


#### Netherlands: Trends 2005 vs. 2010

All products that do not meet companies' nutritional criteria - impacts: Children under 12 (Nielsen)

Children's exposure to advertising of products that do not meet companies' nutritional criteria:

- Fell by 86% in spots with a reported profile of 50% or more of children under 12
- Rose by 4% across all programming



- Impacts for products that do not meet companies' nutritional criteria
- Above impacts appearing in spots with a profile >50% (bn)

















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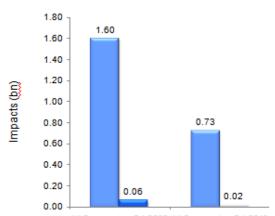
10

#### Poland: Trends 2005 vs. 2010

All products that do not meet companies' nutritional criteria - impacts: Children under 12 (Nielsen)

Children's exposure to advertising of products that do not meet companies' nutritional criteria fell by:

- 64% in spots with a reported profile of 50% or more of children under 12
- · 55% across all programming



All Companies Q1 2005 All Companies Q1 2010

- Impacts for products that do not meet companies' nutritional criteria
- Above impacts appearing in spots with a profile >50% (bn)



















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11

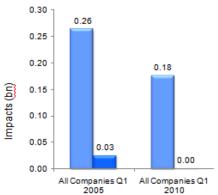


#### Portugal: Trends 2005 vs. 2010

All products that do not meet companies' nutritional criteria - impacts: Children under 12 (Nielsen)

Children's exposure to advertising of products that do not meet companies' nutritional criteria fell by:

- 96% in spots with a reported profile of 50% or more of children under 12
- 33% across all programming



- Impacts for products that do not meet companies' nutritional criteria
- Above impacts appearing in spots with a profile >50% (bn)

















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12

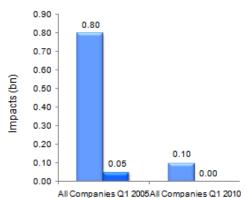


#### Spain: Trends 2005 vs. 2010

Products that do not meet companies' nutritional criteria - impacts: Children under 12 (Kantar)

Children's exposure to advertising of products that do not meet companies' nutritional criteria fell by:

- 99% in spots with a reported profile of 50% or more of children under 12
- 87% across all programming



- Impacts for products that do not meet companies' nutritional criteria
- Above impacts appearing in spots with a profile >50% (bn)



















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13

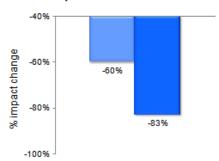


#### All markets & All Companies % Trends in products that do not meet companies' nutritional criteria 2005 vs. 2010

All products that do not meet companies' nutritional criteria - impacts: Children under 12

Children's exposure to EU Pledge member companies' TV advertising for products that do not meet companies' nutritional criteria has dropped since 2005 by:

- 83% in programmes with a majority of children under 12 in the audience
- 60% overall, i.e. in all programmes in all channels in the 6 markets monitored



All Companies % dedine 2005 vs 2010

- Impacts for products that do not meet nutritional criteria, in all programmes
- Impacts for products that do not meet nutritional criteria, in programmes with reported profile >50%















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14

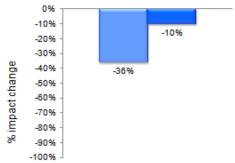


## All markets & All Companies % Trends in all products 2005 vs. 2010

All product impacts: Children under 12

Children's exposure to advertising of all products in all markets fell by:

- 10% in <12 impacts across all products in spots with a profile of >50%
- 36% in <12yr impacts across all programmes



All Companies % dedine 2005 vs 2010

- Impacts for all products in all programmes
- Impacts for all products in programmes with reported profile >50%















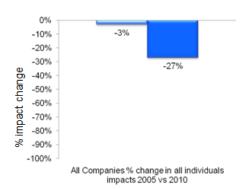


## All markets & All Companies % Trends in all products 2005 vs. 2010 – All individuals

All products vs. products that do not meet nutritional criteria - impacts: All Individuals

All individuals' exposure to advertising in all markets fell by:

- 3% for all products
- 27% for products that do not meet companies' nutritional criteria



- Impacts for all products in all programmes
- Impacts for products that do not meet nutritional criteria, in all programmes















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16

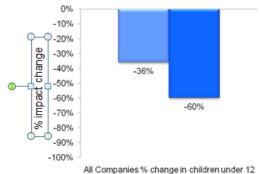


## All markets & All Companies % Trends in all products 2005 vs. 2010 – Children under 12

All products vs. products that do not meet nutritional criteria - impacts: Children Under 12

Children's exposure to advertising in all markets fell by:

- · 36% for all products
- 60% for products that do not meet companies' nutritional criteria



- impacts 2005 vs 2010
- Impacts for all products in all programmes
- Impacts for products that do not meet nutritional criteria, in all programmes

















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17



#### **Contents**

- TV compliance monitoring 2010
  - Objective & methodology
  - Results
- · Measuring change: Trends in EU Pledge companies' TV advertising Q1 2005 vs. Q1 2010
  - Objective & methodology
- · Print compliance monitoring 2010
  - Methodology
  - Results
- · Website compliance monitoring 2010
  - Methodology
  - Results
- · Appendices
  - Glossary
  - Monitored Media















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#### Print compliance monitoring - Methodology

- · As age-specific readership data for children's print titles is not available, Accenture prepared a list of children's titles in each of the four monitored markets, on the basis of national genre classifications used in the industry.
- · Using advertising data from national monitoring agencies (databases of all ads placed in print titles), Accenture verified the presence in any of these children's print titles of advertising for products that EU Pledge member companies have committed not to advertise to children under twelve (products that do not meet companies' nutritional criteria).
- · Any adverts for such products in any of these titles were deemed instances of non-compliance.











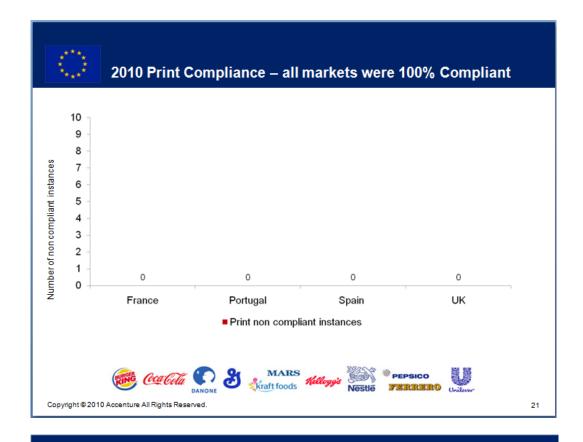








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#### **Contents**

- TV compliance monitoring 2010
  - Objective & methodology
  - Results
- Measuring change: Trends in EU Pledge companies' TV advertising Q1 2005 vs. Q1 2010
  - Objective & methodology
  - Results
- Print compliance monitoring 2010
  - Methodology
  - Results
- · Website compliance monitoring 2010
  - Methodology
  - Results
- Appendices
  - Glossary
  - Monitored Media

















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22



#### Online compliance monitoring - Methodology

- A list of younger children's sites were selected by the local markets to represent a sample of kids orientated websites.
- The websites were accessed over a period of three weeks to check for advertising content relating to the non compliant products from the pledge members
- Any adverts for such products in any of these sites were deemed instances of non-compliance.

















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23

#### 2010 Website Compliance – Only one instance was found of non-compliance 10 9 8 Number of non compliant instances 7 6 3 2 1 0 Netherlands Spain Portugal Greece Hungary Poland Online non compliant instances Copyright @ 2010 Accenture All Rights Reserved.



- · Impacts (Impressions) number of times a message is seen by the audience. In this report, when represented as a percentage, this is the proportion of the total children's impacts across the period that were within spots with a profile share of 50% or more.
- · Profile the audience make-up- who was watching at that time (the demographic breakdown)
- · Spot each individual advertising activity the airtime used by the advertiser

















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27

## France: Children's print titles





















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28



### Spain: Children's print titles

Spain				
Aprende y Juega con Pokemon	Mega Hiro			
Art Attack	Muy Interesante Junior			
Barbie	Nintendo Accion			
Bratz	Pelo Pico Pata			
Caracola	Pequeñno Pais			
Care	Playhouse Disney			
Cartoon Network	Pokemon			
Dibus!	Popi			
Disney Cuadricula	Princesas			
El Increible Spiderman	Princesas Especial			
Hadas	Reportero Doc			
High School Musical	Revista Dels Super			
Juan y Tolola	Sapos y Princesas			
letix	Super Mini			
Jugon!	Wendy			
Leo Leo	Winx Club			
Los Lunnis	Witch			
Los Lunnis (Especial)	Witch Especiales			

















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#### Portugal: Children's print titles

The only listed children's title in Portugal is Visão Junior for 2010.



















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30



## UK: Children's print titles

UK				
All About	Doctor Who Adventures			
Animals & You	Dora The Explorer			
Barbie	Fireman Sam			
BBC All About Animals	Fun To Learn - Favourites			
BBC Bob The Builder	Fun To Learn - Friends			
BBC Charlie & Lola	Fun To Learn - Peppa Pig			
BBC In The Night Garden	Girl Talk			
BBC Teletubbies [closed]	Girl Talk Extra [closed]			
BBC Toybox	Go Girl			
BBC Waybuloo	Goodie Bag Mag			
Beano	Lazy Town			
BeanoMAX	Numberjacks			
Ben 10	Play & Learn - Thomas & Friends			
Bratz	Playhouse Disney			
Cbeebies Animals	Power Rangers			
Cheebies Art	Simpsons Comic Presents			
CBeebies Weekly	Simpsons Comics			
Dandy	Sky Kids Magazine [closed]			
DC Thomson Childrens Entertainment Package (Boys)	Sparkle World			
DC Thomson Childrens Entertainment Package (Girls)	Sparkle World			
Disney & Me	Spectacular Spider-Man			
Disney Fairies Tinkerbell	Spectacular Spider-Man			
Disney Hannah Montana	Spongebob Squarepants			
Disney High School Musical	Thomas & Friends			
Disney High School Musical	Toxic			
Disneys Princess	World of Cars			















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31

#### TV Channels monitored by market

Greece	Hungary	Netherlands	Poland	Portugal	Spain
ALPHA	AXN	COMC	4FunTV	AXN	83
ALTER	CARTOON NETWORK	DISC	Ale Kino	Disney Channel	7RM
ANTENNA	COMEDY CENTRAL	KNET	Animal_Planet	Fox	BTV
ET-1	COOL	MTVE	AXN	Fox Life	A3
MEGA	DEKO	NED1	AXN Crime	Hollywood	ANIMAX
NET	DISCOVERY CHANNEL	NED2	AXN Sci-Fi	MTV Portugal	ANTENA.NEOX
STAR	F+	NED3	BBC Entertainment	Panda	ANTENA.NOVA
	FEM3	NET5	BBC Knowledge	RTP1	ATV
	FILMMUZEUM	RTL4	BBC Lifestyle	SIC	AXN
	HALLMARK	RTL5	Boomerang	SIC Mulher	BIOGRAPHY CHANNEL
	HALOZAT	RTL7	Canal+	SIC Noticias	BOOMERANG
	M1	RTL8	Canal+ Sport	TVI	BOOMERANG +1
	MAGYAR ATV	SBS6	Canal+ Sport 2		BUZZ
	MINIMAX/A+	TMFA	Cartoon Network		C.HISTORIA
	MOVIES24	VER8	Comedy Central		C.SUR
	MTV (MUSIC TELEVISION)		Discovery		C+
	NATIONAL GEOGRAPHIC CHANNEL		Discovery Science		C+ 2
SPEKT SPOR SPOR SPOR SPOR STORIT TV PA TV2 TV6 MIASA MIVA 2ONE 20NE	RTL KLUB		Discovery Travel and Living		C+ 30
	SPEKTRUM		Discovery World		C+ ACCION30
	SPORT KLUB		Disney XD		C+ DEPORTES
	SPORT1		Domo		C+ GOLF
	SPORT2		E!Entertainment		C+ LIGA
	STORY-TV4		Eska TV		C9
	TV PAPRIKA		Extreme Sports		CALLE 13
	TV2		FilmBox		CANAL COCINA
	TV6		Foxlife		CANAL HOLLYWOOD
	VIASATB		Hallmark		CARTOON NETWORK
	VIVA		ITV		CARTOON NETWORK +1
	ZONE CLUB		Jetix Play		CINESTAR
	ZONE REALITY		Kino Polska		CINESTAR +1
	ZONE ROMANTICA		kuchnia.tv		CMT
			Mini Mini		CNN+
			Movies 24		COSMOPOLITAN

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# TV Channels monitored by market

Poland	Spain				
MTV Classic/VH1 Polska	32				
MTV Polska	CUATRO				
National Geographic	DECASA				
Nickelodean	DISCOVERY				
Planete	DISNEY CH +1				
Polonia1	DISNEY CHANNEL				
Polset	DISNEY XD				
Poisat Cafe	ETB1				
Polset Film	ETB2				
Polset News	EXTREME TEUVE				
Poiset Sport	FDF-T5				
Polset Sport Extre	FOX				
Polset2	SOLT				
PULS	83				
Rebel.tv	NTERECONOMIA				
Superstacja	LA OTRA				
TCM	A SEXTA				
Tele5	ASIETE				
Travel Channel	MGM				
TV4	MTV ESP				
TVN	NATIONAL GEOGRAPHIC				
TVN Meteo	NATURA				
TVN Style	NICK				
TVN Turbo	DDISEA				
TVN24	DNDA 6 TV				
TVN7	PARAMOUNT COMEDY				
TVP INFO/TVP3	PUNT2				
TVP Kultura	BOL MÚSICA				
TVP Sport	SOMOS				
TVP1	SUPER3				
TVP2	SYFY				
TVPolonia	13				
TVS	TOM				
Universal	TELEDEPORTE				
Viva Polska	TNT				
Wedding TV	TPA				
ZigZep/Hyper/MiniMax	TV3				
Zone Club	TVE1				
Zone Europa	TVG				
Zone Reality	TVM				
Zone Romantica	VE07				



# Websites monitored by market

#### **Portugal**

JUNIOR - Brincar e aprender, como deve serl Sitio dos Miúdos Cidade da Malta Floribella Eu seil Ciencia Divertida AFLY - O Portal para criancas RTP Criancas. Zonix - Actividades Educativas

O Leme - Sites para crianças

#### Greece

Nickelodeon.gr Games.gr Miniclip.com 1001paixnidia.gr 123paixnidia.gr

### Hungary

minimax.hu/ miniclip.com/games/hu/ nickelodeon.hu/ cartoonnetwork.hu/ startlapjatekok.hu/ hotdog.hu/

#### Spain

disney.es cartoonnetwork.es nick.es juegosjuegos.com minijuegos.com clubpenguin.com/es webkinz.es

#### Netherlands

schooltv.nl nickelodeon.nl kleurplaten.nl donaldduck.nl kinderpleinen.nl disney.nl neopets.com speelzolder.com tina.nl jetix.nl

#### **Poland**

wolnifarmerzy.pl wyspagier.pl zapytaj.com.pl <u>Spilgames</u> group Pino.pl group nasza-klasa.pl 33



### Management summary

Instances of non-compliance with the EU Pledge are few.

Communications about food or drink are most likely to be seen:

- in corridors/ eating areas around the school (all countries)
- on vending machines (Italy)
- at events (Belgium)
- on sponsored materials (Slovakia).

In most instances these communications have been authorised by the relevant school authorities.

ļaņd**mark** 

## 2010 vs. 2009 non-compliance comparison (overall)

Countries audited in 2010: UK, Belgium, Italy, Slovakia

Countries audited in 2009: Portugal, The Netherlands, Hungary, Finland

	Areas of the school (any)*	Vending machines (any)*	School property (any)*	School events (any)*	Publications/ products (any)*	Branded sponsorship (unauthorised)	Fully compliant schools
2010 EU Pledge brands	2.8%	1.8%	0.3%	3.3%	0.5%	0%	92%
2009 EU Pledge brands	3%	3%	1%	1%	2%	0%	93%

Slightly lower proportion of compliant schools recorded in 2010 (-1%). However, instance of prohibited communication is only higher at school events (+2.3%) compared to 2009.

There are a number of variables that could influence differences between the 2009 and 2010 results:

- · Level of prohibited communications may have fluctuated since 2009.
- Level of prohibited communications could be a higher at school events in the countries selected for audit in 2010 (predominantly in Belgium).
- Some expansion of lists used to prompt respondents (notably school events) in 2010.
- In 2010 we moved to a telephone recruitment (vs. a postal survey in 2009), in order to reduce any self-selection bias. It is therefore possible that the 2010 figures more accurately represent level of prohibited communications.

\* Please note that non-compliance incorporates all incidences of branding including those which were agreed with the relevant authority, with the exception of branded sponsorship of school materials, which are deemed to have an educational purpose. In this respect, only unauthorised sponsorship is included in the non-compliance figures.



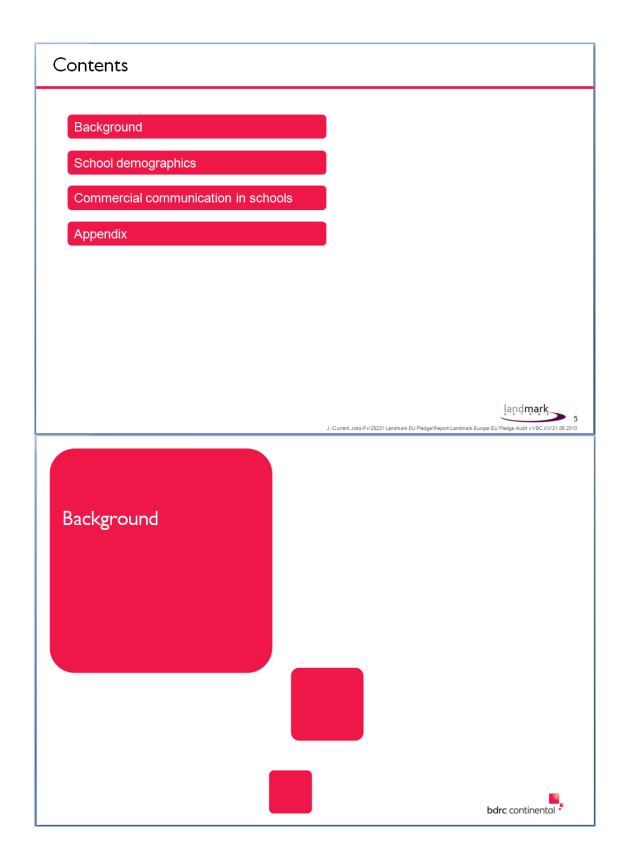
:\Current Jobs\F+\29231 Landmark EU Pledge\Report\Landmark Europe EU Pledge Audit v1/BC KV/21.06.2010

### 2010 EU Pledge member non-compliance

	Areas of the school (any)	Vending machines (any)	School property (any)	School events (any)	Publications/ products (any)	Branded sponsorship (unauthorised)	Fully compliant schools
Belgium	6%	2%	1%	9%	1%	0%	83%
Italy	1%	5%	0%	1%	0%	0%	93%
Slovakia	2%	0%	0%	1%	0%	0%	97%
UK	2%	0%	0%	2%	0%	0%	96%

<sup>\*</sup> Please note that non-compliance incorporates all incidences of branding including those which were agreed with the relevant authority, with the exception of branded sponsorship of school materials, which are deemed to have an educational purpose. In this respect, only unauthorised sponsorship is included in the non-compliance figures.





### Background and objectives

The EU Pledge is a voluntary commitment by leading food and beverage companies in Europe to comply with the following:

- Not to advertise any products to children under 12 years of age unless they meet specific nutrition criteria and/ or national/ international dietary guidelines.
- Not to engage in any "communication related to products in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes."

Participating companies include: Burger King, Coca-Cola, Danone, Ferrero, General Mills, Kellogg's, Kraft Foods, Mars, Nestlé, PepsiCo and Unilever. Since April 2010, the European Snacks Association (ESA) has also joined the EU Pledge initiative – however ESA member companies will not be subject to independent monitoring until 2011.

The initiative was launched in December 2007 with the first audit of compliance being conducted in the first half of 2009.

In order to assess continued adherence to the Pledge, a second audit to assess compliance was undertaken by BDRC Continental between 12<sup>th</sup> May and 4<sup>th</sup> June 2010.



Current Jobs\F+\29231 Landmark EU Pledge\Report\Landmark Europe EU Pledge Audit v1/BC KV/21.06.201

### Methodology

Lists of the universe of schools in each country were sourced by BDRC Continental. From these lists the sample was drawn to be representative of the population of schools in terms of their geographical distribution in each of the countries.

To ensure the most representative sample, schools selected from the sample lists were recruited by telephone and asked to complete the online questionnaire. The email addresses of the appropriate school contacts were gathered during the recruitment phone calls to allow an email with the embedded questionnaire link and audit instructions to be sent.

400 online interviews were conducted for the audit - 100 in each of the following of EU countries:

- · United Kingdom
- Belgium
- Italy
- Slovakia

Online interviews lasted approximately 10-15 minutes and were conducted in the local language – i.e. English, French, Flemish, Italian or Slovakian.

Respondents received a £30/€30 voucher or charity donation for participating.

Findings in this report are based on non-compliance amongst EU Pledge members. Mentions of other brands have been discounted to give a clear picture of EU Pledge compliance.

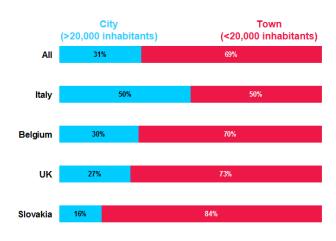
Throughout the report, at school level, prohibited material detailed incorporates all incidences of branding including those which were agreed with the relevant authority, with the exception of branded sponsorship of school materials, which are deemed to have an educational purpose. In this respect, only unauthorised sponsorship is included in the non-compliance figures



## School location

Greater proportion of Italian schools surveyed were located in a city, with an even 50-50 split. Slovakia had the smallest ratio of city to town school location, with less than 1/5 being based in a city.

Q. In which type of area is your school located?



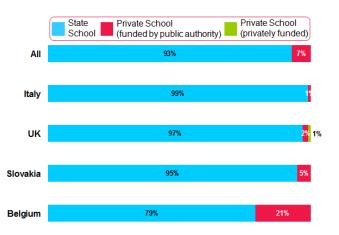
Q2. Base: All schools

landmark 10

# School funding

Greater representation of private schools in Belgium (1 in 5), although these schools are still publicly funded.

Q. Please mark the kind of funding system that applies to your school:



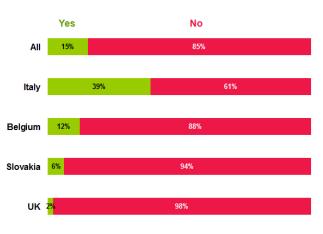
Q3. Base: All schools

1: Idily II dik

# Space sharing with secondary schools

Italy has the highest incidence of primary school pupils sharing buildings/areas with secondary schools. Less prevalence of space sharing in the other three countries surveyed, particularly in the UK where a minimal 2% coalesce.

Q. Do the pupils in your primary school share buildings/areas (classrooms, open spaces, sports rooms, play grounds...) with students of a secondary school?



Q4. Base: All schools

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### Areas of the school

Food/drink advertising is found within the following locations in 3% of schools, with children most likely to be exposed to prohibited communications in Belgium.

 $Q. \ \textit{Is any prohibited communication for food or drink products found in any of the following locations around the school?}$ 

 $\underline{\text{\% of SCHOOLS where prohibited communications are displayed (N.B. May be multiple brands advertised in a school)}^*$ 

	ALL SCHOOLS			#	
Corridors	1.3	4	1	0	0
Staff room	0.8	2	0	0	1
Cafeteria	0.8	0	0	2	1
Sport room(s)	0.5	2	0	0	0
Canteen	0.3	0	0	0	1
Other locations	0.3	1	0	0	0
Sports fields	0.3	1	0	0	0
Dining room/refectory	0.3	1	0	0	0
Doors	0.3	0	0	0	1
Classrooms	0.3	1	0	0	0
Parking Spaces	0.3	1	0	0	0

\*Please note that prohibited communication incorporates all incidence of branding, including those which were agreed with the relevant authority 💹 and mark

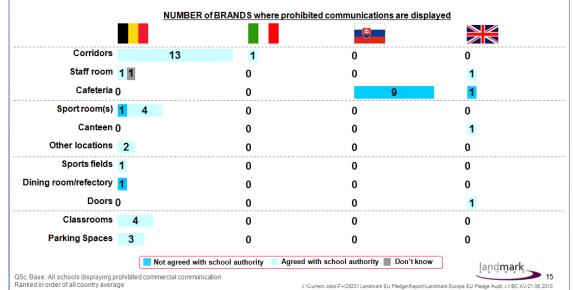
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Q5. Base: All schools

# Areas of the school: authorisation of commercial communication

In the main, permission has been sought from school authorities before any 'prohibited' communications are displayed, although in a few schools this is not the case.

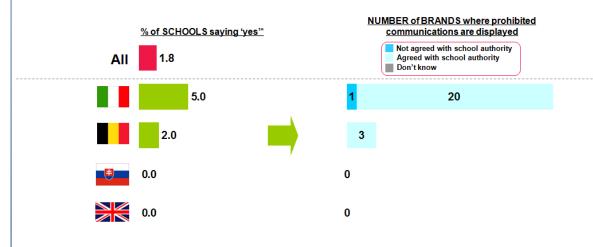
Q. Was the commercial communication agreed with the relevant school authorities?



# Vending machines

Prohibited communications are displayed on vending machines in less than 2% of schools. Marketing communication on vending machines is quite common in Italy, although permission is typically sought from the school.

- Q. Is any prohibited commercial communication for food or drink found on any vending machines in school?
- Q. Was the commercial communication agreed with the relevant school authorities?



\* Please note that prohibited communication incorporates all incidence of branding, including those which were agreed with the relevant authority Q6. Base: All schools Q6c. Base: All schools displaying prohibited commercial communication

landmark.

# School property

Almost a clean board on school property – only one instance of non-compliance in Belgium and permission was sought from the school.

Q. Is any prohibited commercial communication for food or drink products found on any of the following school property/ equipment?

Q. Was the commercial communication agreed with the relevant school authorities?

#### % of SCHOOLS where prohibited communications are displayed\*

	ALL SCHOOLS			#	
Toys	0.3	1	0	0	0
Sport equipment	0	0	0	0	0
Tables/ Chairs	0	0	0	0	0
Blackboards/ whiteboards	0	0	0	0	0

\* Please note that prohibited communication incorporates all incidence of branding, including those which were agreed with the relevant authority



Q7. Base: All schools

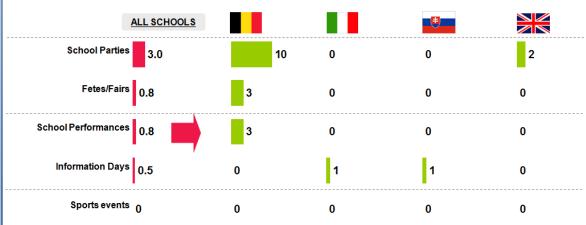
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### School events

3.5% of schools reported prohibited communications at events. School parties are the most likely event to be subject to prohibited communications about food/ drink.

Q. Has any prohibited commercial communication for food or drink products been displayed during any events organised on school premises (in the last 12 months)?

#### $\underline{\% \ of \ SCHOOLS \ where \ prohibited \ communications \ are \ displayed^*}$



\* Please note that prohibited communication incorporates all incidence of branding, including those which were agreed with the relevant authority

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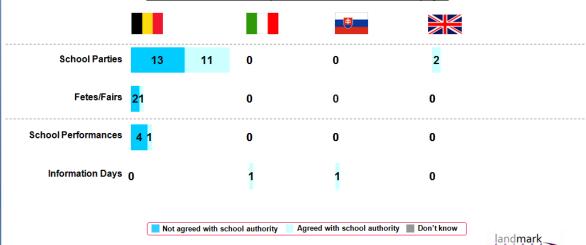
Q8. Base: All schools

### School events: authorisation of commercial communication

Several cases of non-compliance in Belgium, especially commercial communications at school parties.

Q. Was the commercial communication agreed with the relevant school authorities?

#### NUMBER of BRANDS where prohibited communications are displayed



Q8. Base: All schools displaying prohibited commercial communication Ranked in order of all country average

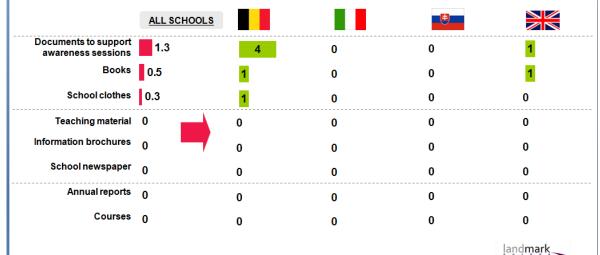
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# Publications/ products

1.5% of schools reported commercial communication through branded publications/ products given to the school. Brand communications most likely through documents supporting health awareness.

Q. Is any prohibited commercial communication for food or drink found in publications and products produced for or distributed by the school?

#### $\underline{\%}$ of SCHOOLS where commercial communications are displayed\*



Q9. Base: All schools

# Publications/ products: authorisation of commercial communication

Only one school in Belgium mentioned that products had been provided without prior authorisation.

Q. Was the commercial communication agreed with the relevant school authorities?

#### NUMBER of BRANDS where commercial communications are displayed



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Q9. Base: All schools displaying prohibited commercial communication Ranked in order of all country average

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Agreed with school authority Don't know

# Sponsorship of school materials (EU Pledge & other brands)

Not agreed with school authority

3% of schools own materials sponsored by food/ drink companies. However, in most instances this is unbranded or provided by a brand that is not a member of the EU Pledge. Sponsorship is most common in Slovakia.

Q. Are any of the school materials sponsored by food or drink companies?

Q. Is/ are the materials branded by the sponsor?

% of SCHOOLS with ANY sponsored materials (including unbranded and non-EU Pledge brands)



% of SCHOOLS with BRANDED sponsored material from an EU PLEDGE MEMBER

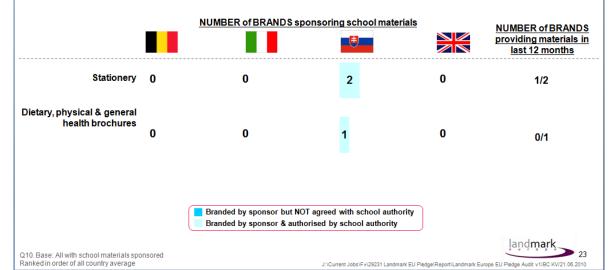


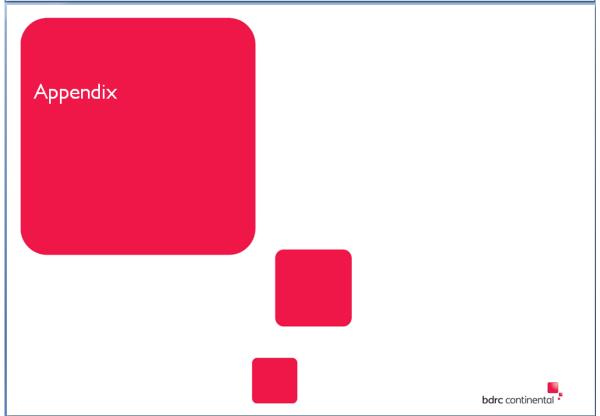
Q10. Base: All schools Q10b. Base: All schools with sponsored school materials landmark 22

# Sponsorship of school materials: authorisation of commercial communication

No instances recorded of branded sponsorship material being provided by EU Pledge members without permission from the relevant authorities.

- Q. What kind of material is sponsored?
- Q. Was the commercial communication agreed with the relevant school authorities?
- Q. Was this material provided to the school within the last 12 months?





# Response rate

	UK	Belgium	Italy	Slovakia	Total
Approached by telephone	660	692	714	1065	3131
Recruited by telephone	244	410	317	542	1513
Email failed (rebound from address provided)	0	46	30	77	153
Incomplete surveys	19	33	80	53	185
Completed surveys	100	100	100	100	400
% of schools approached completing the audit	15%	15%	14%	9%	13%

This is an improvement on the 2009 audit where the overall response rate was 7%.



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### Confidence level

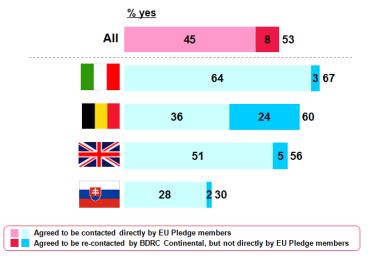
- · This research was designed to ensure robust sample sizes for analysis.
- As the survey is conducted with a sample of the target audience, we cannot be 100% certain that a census of the whole population would yield the same results.
- We can be 95% certain that the actual figure (in the population as a whole) falls within a certain range of the survey figure.
- · The percentages within the table below represent the error variance:

Base size	5 / 95%	20 / 80%	50 / 50%
400 (Total)	+/-2.1%	+/-3.9%	+/-4.9%
100 (Each country)	+/-4.3%	+/-7.8%	+/-9.8%



### Permission to re-contact

- Q. Would you be happy for us to re-contact you concerning any of the answers which you have given as part of this survey, or for further research?
- Q. Would you be happy to be contacted directly by EU Pledge members or administrators about this research, if necessary?



Q12/13. Base: All schools

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### For further information...

Please contact us if you have any questions or comments regarding the contents of this report



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