



2014 Monitoring report

February 2015





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Executive summary & Key results

Background

The EU Pledge is a voluntary initiative by leading food and beverage companies to change food and beverage advertising to children under the age of twelve in the EU.

Signatories have committed to changing the way they advertise to children under 12 years old by respecting the two following minimum common requirements:

- No advertising of products to children under 12 years, except for products which fulfil common nutrition criteria¹.
- No product marketing communications to children in primary schools.

This is the sixth annual monitoring report of the EU Pledge. The monitoring was carried out in the first half of 2014 by the following independent third parties:

- **Accenture Media Management**², to review EU Pledge member companies' compliance with the commitment relating to TV advertising;
- **EASA – The European Advertising Standards Alliance**, to review EU Pledge companies' branded websites, for compliance with the EU Pledge commitment.

In addition to the monitoring of “traditional” TV advertising, which has been the object of monitoring since the first report of the EU Pledge, in 2009, the compliance monitoring also focuses on company-owned websites since 2012.

Due to resource constraints, members decided to suspend the monitoring of the EU Pledge commitment in primary schools in 2013, in order to be able allocate sufficient resources for the website monitoring exercise. In previous years, the monitoring of the EU Pledge commitment in primary schools always highlighted compliance rates nearing 100%.

The methodology and process of the monitoring of company-owned websites was reviewed by Dr Verónica Donoso, post-doctoral researcher at the Interdisciplinary Centre for Law and ICT (ICRI), KU Leuven, iMinds, and an independent consultant. Dr Donoso is highly experienced in research on children and young people's uses of new media and e-safety. She has worked on a number of European and Belgian projects, including the projects EU Kids Online I, II and III. She also coordinated the 2nd Assessment of the Safer Social Networking Principles for the EU.

¹ Common EU Pledge nutrition criteria – for those member companies that do use nutrition criteria – entered into force across the EU on 1 January 2015. Those are available on www.eu-pledge.eu. Some EU Pledge member companies have taken the decision not to advertise any of their products to children under 12.

² 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. It also provides independent media auditing services, which is the function it performs with regard to the EU Pledge.

Key 2014 results

The record of compliance is positive and consistent with previous years:

- **TV: The overall compliance rate is 98.5%**
- **Company websites: The overall compliance rate is 97%**

In addition to monitoring the implementation of commitments, EU Pledge member companies have sought to measure the change in the overall balance of their food and beverage TV advertising to children as a result of the EU Pledge and of companies' individual commitments.

For the sixth year running, monitoring confirms a downward trend in children's exposure to TV food advertising by EU Pledge member companies:

- A very substantial reduction in children's exposure to advertising for products that do not meet nutrition criteria through children's programmes (>35% <12 audiences): **-88% this year. Over all markets monitored in the past 6 years the average is -83%**
- A reduction in children's exposure to advertising for products that do not meet nutrition criteria in all programmes: **-52% this year. Over all markets monitored in the past 6 years the average is -48%.**
- An overall reduction in children's exposure to advertising for all EU Pledge member companies' products (regardless of nutrition criteria): **-42% this year. Over all markets monitored in the past 6 years the average is -32%.**

For the third time since the extension of the EU Pledge commitment to company-owned websites at the end of 2011, EASA - The European Advertising Standards Alliance, monitored member companies' brand websites. 343 national brand websites were monitored in ten EU countries. The results show that:

- **97% of websites reviewed were deemed compliant with the EU Pledge. 11 websites out of 326 were found non-compliant with the EU Pledge commitment.**

Implementation of common EU Pledge nutrition criteria

At the end of 2012, the EU Pledge was further strengthened through the adoption of harmonised nutrition criteria for those companies that so far have used company-specific criteria to determine what foods they may advertise to children under 12.

Since 1 January 2015, these criteria – which are overall more stringent - replace individual company criteria applied until then. The common criteria set energy caps, maximum thresholds for nutrients to limit (salt, saturated fat and sugar) and minimum requirements for positive nutrients, category by category.

EU Pledge member companies that do not advertise any of their products to children under 12 at all have decided to maintain their policies. Therefore, the common nutrition criteria are not relevant for them.



Growth in membership

The EU Pledge was launched in December 2007 by eleven leading food and beverage companies³, representing approximately two-thirds of food and non-alcoholic beverage advertising spend in the European Union.

In 2010, the European Snacks Association (ESA) and its leading corporate members joined the EU Pledge. Today, those are: Intersnack (including Estrella Maarud acquired in May 2014), KiMs (owned by Orkla Confectionery and Snacks), Lorenz Snack-World, Unichips San Carlo, Zweifel Pomy-Chips, Amica Chips and ICA Foods (which both joined in July 2014).

McDonald's joined the EU Pledge in November 2011, Royal FrieslandCampina in 2012, and the Quick Group in 2013, bringing membership to twenty-one leading food and beverage companies. Together, EU Pledge member companies account for over 80% of food and beverage advertising spend in the EU.

³ EU Pledge founding member companies are: Burger King, Coca-Cola, Danone, Ferrero, General Mills, Kellogg, Mars, Mondelez, Nestlé, PepsiCo and Unilever.



About the EU Pledge

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 multi-stakeholder forum set up by the European Commission 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.

EU Pledge Members

The founding members of the EU Pledge are the following companies: Burger King, Coca-Cola, Danone, Ferrero, General Mills, Kellogg, Mars, Mondelez, Nestlé, PepsiCo and Unilever. The membership has since been expanded, representing today 21 leading food and beverage companies, accounting for over 80% of EU food and non-alcoholic beverage advertising spend.



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 two following requirements:

- **No advertising of products to children under 12 years, except for products which fulfil common nutrition criteria⁴.**

For the purpose of this initiative, “advertising to children under 12 years” means advertising to media audiences with a minimum of 35%⁵ of children under 12 years⁶.

- **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 founding member company commitments, published on the EU Pledge website (www.eu-pledge.eu), were implemented across the EU by 31 December 2008⁷. Members that joined the EU Pledge in 2010 implemented their commitments by the end of that year. McDonald’s and Friesland Campina implemented the commitments upon joining, in January and September 2012 respectively. The Quick Group implemented the commitment on 1 January 2014. Amica Chips and ICA Foods, which both joined the initiative and applied the commitments on 1 July 2014, were therefore not included in this year’s monitoring exercise.

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.

⁴ Common EU Pledge nutrition criteria – for those member companies that do use nutrition criteria – entered into force across the EU on 1 January 2015. Some EU Pledge member companies have taken the decision not to advertise any of their products to children under 12. All applicable guidelines are published as part of the individual company commitments under the EU Pledge on www.eu-pledge.eu.

⁵ 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: www.eu-pledge.eu

⁶ 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

⁷ 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 sixth such monitoring exercise. All previous Monitoring Reports are available on www.eu-pledge.eu. In 2014, EU Pledge member companies commissioned the following independent third parties to monitor implementation of the EU Pledge commitments:

- **Accenture Media Management**⁸, to review EU Pledge member companies' compliance with the commitment relating to food and beverage advertising on TV.
- **EASA – The European Advertising Standards Alliance**⁹, to review EU Pledge companies' brand websites for compliance with the EU Pledge commitment.

The EASA monitoring programme was independently reviewed by Dr Veronica Donoso, a research fellow at the Catholic University Leuven (KUL) and a highly experienced researcher in the areas of children and young people's uses of new media and e-safety.

⁸ 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. It also provides independent media auditing services, which is the function it performs with regard to the EU Pledge.

⁹ The [European Advertising Standards Alliance](http://www.easa.europa.eu) brings together national advertising self-regulatory organisations in Europe. Based in Brussels, EASA is the European voice for advertising self-regulation.

Compliance Monitoring: TV 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 guidelines. For the purpose of this initiative, “advertising to children under 12 years” means advertising to media audiences with a minimum of 35% of children under 12 years.”

This is the third monitoring exercise assessing the compliance of EU Pledge member companies with the enhanced commitment. Until the end of 2011, the audience threshold used was 50% children under 12. By lowering the audience threshold to 35% of children under 12 years, the EU Pledge commitment covers more media channels that have a significant child audience. This commitment entered into force on 1 January 2012.

For this exercise, seven sample EU markets were chosen: **France, Germany, Hungary, Italy, Poland, Portugal and Spain**. The intent has been to cover a number of new markets each year, within the limits of data availability and affordability, so as to assess performance in as broad a sample of Member States as possible. Some markets have been covered repeatedly in order to provide a benchmark.

Methodology

Accenture Media Management was commissioned to analyse national audience data in the sample markets over a full three-month period. This data is provided by official national TV audience measurement agencies. Viewing estimates are obtained from panels of television-owning private homes representing the viewing behaviour of households.

The data provides detailed statistics about advertising spots: advertiser, product, channel, programme, date and time of broadcast, estimated audience and demographic breakdown – typically including the segment 4-12 years of age. In Portugal the only available demographic segment is children aged 4-14. The implication is a likely overstatement of non-compliance in these markets with respect to the EU Pledge commitment.

On this basis, Accenture gathered and reviewed all advertising spots for products marketed by EU Pledge member companies, aired in the seven markets during the period 1 January to 31 March 2014 – 1,016,983 spots were reviewed.

Spots for products that do not meet EU Pledge companies' nutrition 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 nutrition 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 was analysed on the basis of national ratings data. This allowed Accenture to isolate ads aired at a time when more than 35% 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 over 35% children under twelve, were deemed non-compliant with the EU Pledge.

Results

The overall compliance rate was as follows:

- **98.5% of signatories' TV advertising spots were compliant with the EU Pledge commitment**

This figure is comparable to those reported in previous years in different markets (2013 compliance rate: 98.1%). The detailed compliance rates reported by Accenture per market can be found in the Accenture presentation included in this report.

Statistical anomalies and overstatement of non-compliance

It is worth noting that of the vast majority of spots found technically non-compliant (i.e. achieving an under-twelve audience share above 35%, regardless of the time of broadcast and of the adjacent programme), only a few can be considered to be certainly in breach of the spirit of the EU Pledge commitment, i.e. broadcast in or around children's programmes as such.

Most spots included as non-compliant in this report are spots broadcast in or around general/adult programmes that were reported in national ratings data as displaying a share of children under 12 above 35%.

The reason for this discrepancy is that audience statistics for programmes and advertising spots with a small audience – included in these monitoring results – are not reliable: a small audience means a small sample of households, rendering the demographic analysis of the audience unreliable. For statistical reliability, marketers typically exclude advertising spots below 1 Gross Rating Point (GRP). GRPs are the measure of television ratings. They are calculated in relation to the target audience – children under 12 for the purposes of this analysis. In this case a spot with less than 1 GRP is a spot that reaches less than 1% of the under-12 audience in the country in question. These spots often display an implausible share of under-12 viewers: e.g. a spot during a sports programme broadcast at 2AM shows a child audience of 100%. This is the result of statistical anomalies.

Accenture's analysis shows that if spots below 1 GRP (unreliable audience data) and night-time spots (clearly not targeted at children) are excluded, only 0.3% spots by EU Pledge member companies are non-compliant, as opposed to 1.5% if all spots are counted. 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 companies 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.



Beyond compliance: Measuring Change in the Balance of Advertising

Objective and scope

In an effort to go beyond the assessment of 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 impact of the initiative and corporate policies implemented in the framework and spirit of the initiative.

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' nutrition criteria and for all EU Pledge company products, in the period 1 January – 31 March 2005 vs. the same period in 2014. 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 over 35% 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 seven markets during Q1 2005 and Q1 2014.

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

- The advertising and ratings data already analysed to measure compliance in Q1 2014.
- 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' nutrition criteria since 2005. This trend is visible on the basis of both change measurement parameters chosen, namely:

- **An 88% reduction in programmes with an audience composed of over 35% of children.**



- **A 52% reduction in all programmes on all channels at all times.**

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

- **A 42% reduction overall, i.e. in all programmes on all channels at all times.**

These figures appear to confirm the overall trend observed over six years of monitoring, of a significant decrease in children's exposure. The six year average observed (2009-2014) is as follows:

- **An 83% reduction in exposure to ads for products that do not meet nutrition criteria in programmes with an audience composed of over 35% of children.**
- **A 48% reduction in exposure to ads for products that do not meet nutrition criteria overall, i.e. in all programmes on all channels at all times.**
- **A 32% reduction in exposure to ads for all products, regardless of nutrition criteria, overall, i.e. in all programmes on all channels at all times.**



Compliance monitoring: Company-owned websites

In 2011, EU Pledge members decided to enhance their framework voluntary commitments by **improving the coverage of the commitment in the online sphere. Since its inception**, the EU Pledge commitment has applied to advertising on TV, print media and third-party internet advertising. As of 1 January 2012, **EU Pledge member companies have extended their commitment to company-owned websites**. By extending the coverage of the commitment to cover both third-party online advertising and brand websites, the EU Pledge covers online marketing comprehensively.

Methodology

EASA – the European Advertising Standards Alliance was commissioned to undertake the review of the compliance of EU Pledge branded websites with their commitment.

Compliance with the EU Pledge criteria is determined on the basis of whether:

- The website features marketing communications
- Such marketing communications promote food or beverage products, as opposed to a brand/corporate brand in general
- Such food and beverage products meet or do not meet EU Pledge companies' nutrition criteria
- Such marketing communications are designed to be targeted primarily at children under 12.

A methodology with a 'consumer-oriented approach' was drawn up by the EASA secretariat in collaboration with the EU Pledge Secretariat and the independent reviewer of this exercise, Dr Verónica Donoso.

National self-regulatory organisations for advertising (SROs) from ten countries (Belgium, France, Germany, Hungary, the Netherlands, Portugal, Poland, Romania, Spain and the UK) were asked to review a selection of EU Pledge member companies' national brand websites which promoted products not meeting the applicable nutrition criteria.

Each SRO was asked to review a total of 20-40 national brand websites, depending on the size of the market, including at least two websites per company, where available, in July and August 2014. SROs could review national brand websites as well as promotional websites set up by the companies, but not the main corporate websites as these are per definition more intended to inform the public rather than to provide services and entertainment, especially to children. The SRO in Poland reviewed 39 national brand websites while 30 brand websites were reviewed in Belgium and 29 in Czech Republic and in Spain. In Portugal and Hungary, 20 and 19 websites were reviewed respectively. In countries where 30 or less websites were reviewed, this included, where available, at least one website per company.



When making their selection of websites to review, the SROs were requested to take into account products that are popular amongst children in their country. The reviewers were requested to check if the marketer-owned websites complied with the EU Pledge criteria, using a dedicated questionnaire and methodology developed by EASA, the EU Pledge secretariat and the independent reviewer Dr Verónica Donoso.

The reviewers noted whether a website contained features to screen the age of the website visitor. This element was, however, not considered as sufficient to ensure compliance if the marketing communications on the website were clearly designed to appeal primarily to children under 12.

The reviewers were asked to check whether the websites contained elements, such as games, animation, licensed characters and toys and to decide if these were in their view primarily designed for children under 12. Lastly, they had to judge if these elements, in conjunction with the overall creative execution of the website (i.e. simplicity of language, use of font size and typeface, use of colours etc.), were clearly intended to make the marketing communication(s) on the website primarily appealing to under-12s.

On the basis of the level of appeal of the creative execution to under-12s and the overall findings reported by the SROs, EASA determined the final compliance of the websites with the EU Pledge criteria.

Beyond EU Pledge compliance, self-regulation experts also flagged any item on a website that potentially breached either one or several of the following advertising codes or laws:

- ICC Framework for Responsible Food and Beverage Marketing Communications;
- Relevant advertising standards and national sectoral codes;
- Relevant advertising laws.

All reviews were performed by self-regulation experts from national SROs; whereas EASA ensured that the results were reported in a consistent manner.

Monitoring results

A total of 326 national brand websites were reviewed, all of which contained product promotion. Out of these 326 websites, 11 websites were found not to comply with EU Pledge criteria, as they were deemed to be designed to be of particular appeal to children under 12 and promoting products that did not meet the nutrition criteria of the EU Pledge member companies.

13 out of the 326 websites reviewed contained items that were in breach of advertising codes or relevant advertising laws. In total 22 problematic items were flagged by the SROs.

Overall, 97% of the websites reviewed were in compliance with the EU Pledge commitment



EU Pledge nutrition criteria: Implementing common criteria for companies advertising to children under 12

The EU Pledge is a voluntary initiative and as such, it is able to respond promptly to new challenges and evolving consumer expectations. Since its adoption in 2007, the EU Pledge has significantly enhanced its commitment by increasing the types of media covered and by increasing its membership. These changes are the result of a constant review of the commitments and an ongoing dialogue with key stakeholders and decision-makers, first and foremost in the context of the Platform on Diet, Physical Activity and Health.

EU Pledge member companies embarked in 2012 on an ambitious project to respond to concerns regarding the nutrition criteria applied by those companies that chose to continue advertising certain of their products to children under 12. Until their entry into force on 1 January 2015, members used company-specific nutrition criteria which, although science-based, raised potential problems of transparency and consistency. The EU Pledge therefore committed to developing common criteria, applicable only to those companies that use nutrition criteria. The criteria are not applicable to companies that do not advertise any of their products to children under 12.

The EU Pledge nutrition criteria are designed for the exclusive purpose of food and beverage advertising to children under twelve and specifically for the product categories covered. This reflects international guidelines underlining the necessity to develop nutrient criteria that are tailored for a specific purpose. The use of the EU Pledge nutrition criteria for other purposes, such as for instance nutrition and health claims or taxation, would not be appropriate or scientifically credible.

The common EU Pledge nutrition criteria were developed on the basis of available international guidance and underpinned by some key principles agreed at the outset, including: a firm scientific basis; comprehensiveness; ability to make a difference; appropriateness in an EU-wide context; suitability for validation; and a clear and communicable rationale.

Different approaches to developing and applying nutrition criteria have been adopted across the globe. One approach is not necessarily better than another, but each system has specific advantages and disadvantages and all have inherent limitations. On the basis of a comprehensive discussion informed by the available evidence and guidance and underpinned by the above principles, the EU Pledge opted for a category-based approach, based on thresholds for key nutrients.

A category-based approach was selected because it is better able than a universal, across-the-board approach to reflect the role that different types of foods and beverages play in the average diet. It is also better at discriminating between food products within categories and therefore appropriate to further the core aim of the EU Pledge, i.e. to limit the types of food and beverage products that are advertised to children, while incentivising competition based on innovation and reformulation.

A threshold-based system was preferred to a scoring system since a key driver of common criteria was to enhance the consistency of existing company-specific criteria, most of which were based on



threshold systems. Another factor in favour of a threshold-based system was increased transparency, a threshold system being more transparent and easier to communicate than a scoring system, whereby nutrition scores are worked out on the basis of an algorithm.

The common nutrition criteria are not intended as a universally applicable system. They cover nine defined categories produced or marketed by EU Pledge member companies. The choice of categories was motivated by the need to balance the need for simplicity and consistent treatment of similar products on the one hand and, on the other, the need to avoid categories so broad that only lax nutrition criteria would accommodate all types of products represented in a category. In order to ensure both robustness and fairness, it was necessary to create sub-categories within most of the nine categories.

No nutrition criteria were developed for certain categories, such as chocolate, confectionery and soft drinks. This reflects existing commitments by several member companies active in these categories and it confirms that none of the EU Pledge member companies will advertise these products to children under 12, as defined in the EU Pledge commitments.

The common nutrition criteria are based on a set of “nutrients to limit” and “components to encourage” (nutrients and food groups). A system taking into account both is more in line with the core objective of the EU Pledge – to foster innovation, reformulation and competition for a shift towards advertising of products meeting nutrition criteria – than a system based solely on “nutrients to limit”.

The “nutrients to limit” - sodium, saturated fat and total sugars – were chosen on the basis of widely available evidence that they are of public health concern because population average intakes are in excess of those recommended or desirable for health. Importantly, and in contrast to a scoring system, in the EU Pledge nutrition criteria “components to encourage” do not counterbalance “nutrients to limit”: to be eligible for advertising to children under twelve, a product needs to contain the required quantity of “components to encourage”, *in addition to* being below the thresholds for “nutrients to limit” and under the calorie cap set for each category. A specific rationale is outlined for the choice of energy caps and nutrient values in each category.

The common nutrition criteria entered into force on 1 January 2015. In line with the framework approach of the EU Pledge, whereby companies must meet a common benchmark but can go beyond if they wish, member companies may use different nutrition criteria than the common criteria, but on condition that they are demonstrably more stringent than the common ones.

The EU Pledge nutrition criteria should be seen against the backdrop of the great challenge of developing EU-wide criteria. It is clear that any nutrition criteria will have their advantages and drawbacks and all systems will have inherent limitations. However, EU Pledge member companies believe that these common criteria are an important step forward in terms of improved transparency and consistency. These criteria also make a tangible difference in practice: for many of the companies that use nutrition criteria, the new criteria mean that significantly fewer products are eligible for advertising to children under twelve than was the case.

The full EU Pledge Nutrition Criteria White Paper is available at www.eu-pledge.eu



Conclusions and next steps

After six years of independent third-party monitoring, the EU Pledge has been able to demonstrate a high level of member companies' compliance with their commitments, as well as a significant change in the balance of food advertising to children in the EU towards options that meet common nutrition criteria. The membership of the initiative has also grown from 11 to 21 member companies, to cover over 80% of food and beverage advertising spend in the EU.

The EU Pledge is a dynamic initiative. While it provides a common framework, member companies can make commitments that go beyond it, and several do. Since its launch, over half of the founding member companies have stepped up their corporate commitments, tightening the way they define advertising to children, broadening the scope of their actions and strengthening the nutrition criteria.

In the same spirit and following constructive dialogue with stakeholders, the EU Pledge enhanced its framework voluntary commitments in 2012, applicable to all existing and any new members of the initiative throughout the EU.

The 2014 monitoring programme has shown that member companies were able to achieve high compliance levels with the new commitments. However, the compliance monitoring programme for company-owned websites has shown that there is still room for improvement. While reported instances of non-compliance have already or are being addressed by member companies, the EU Pledge will prepare detailed guidance to ensure improved compliance rates in 2015. The third monitoring programme for company-owned websites has further enabled the EU Pledge to draw lessons on how to further refine the monitoring methodology for the future – the development of a robust methodology for measuring compliance with the company-owned commitments was a challenge in itself.

The development of common nutrition criteria for those companies that apply nutrition criteria was an even more complex undertaking. Having adopted the new criteria, affected member companies have been working on their implementation swiftly, as significant adjustments to marketing, reformulation and R&D plans will be needed.

On 24 November 2014, EU Pledge member companies announced plans to extend the scope of the EU Pledge commitment to cover a number of additional media and to address the content of their marketing communications by the end of 2016:

- **Extension of scope:** the EU Pledge currently covers commercial communications on TV, print, third-party internet and company-owned websites. From 31 December 2016, EU Pledge member companies will also apply this commitment to radio, cinema, DVD/CD-ROM, direct marketing, product placement, interactive games, mobile and SMS marketing.
- **Addressing creative execution:** The new policy will ensure that where no reliable audience measurement data is available, advertisers consider not only the placement, but also the overall impression of the marketing communication, to ensure that if the product in question does not meet the common nutrition criteria, the communication is not designed to appeal primarily to children.¹⁰

The adoption of new commitments represents a new challenge for EU Pledge members. The EU Pledge is confident that these commitments will further enhance the robustness of the initiative.

¹⁰ Further information about the enhanced commitments can be found here: <http://www.eu-pledge.eu/content/enhanced-2014-commitments>

Annex I – Accenture Compliance Report

EU Pledge Advertising to Children Commitment

Compliance and Change
Measurement Report 2014

The Accenture logo features a stylized orange chevron pointing right, positioned above the word "accenture" in a bold, lowercase, sans-serif font.

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TV Methodology

The purpose of this report is to assess EU Pledge member companies' compliance with the following 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 35% of children under 12 years."

Seven sample EU markets were chosen for monitoring: **France, Germany, Hungary, Italy, Poland, Portugal, and Spain***. All spots aired in these markets in Q1 2014 and Q1 2005 (benchmark) were reviewed for audience composition at the time of broadcast. Spots for products not meeting nutritional criteria and reporting an audience >35% children under 12 were deemed non-compliant.

EU Pledge member companies covered: Burger King, The Coca-Cola Company, Danone, Ferrero, Friesland Campina, General Mills, Intersnack, Kellogg's, Lorenz Snack World, Mars, McDonald's, Mondelēz, Nestlé, PepsiCo, the Quick Group, Unichips, Unilever and Zweifel-Pomy Chips (the Chips Group and Estrella did not advertise any products in the markets monitored).

* Please refer to appendix for age range definitions

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TV Methodology

- All spots by all EU Pledge member companies, aired in the seven markets from 1 January to 31 March 2014 were analysed. This amounted to a total of 1,016,983 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 composed of 35% of more children <12*.
- Those 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 35% or more of children <12*.
- In the analysis we have included all platforms and channels that are monitored by market by year. Please note that for some markets the list of channels has increased compared to previous years as more channels and platforms are now monitored.

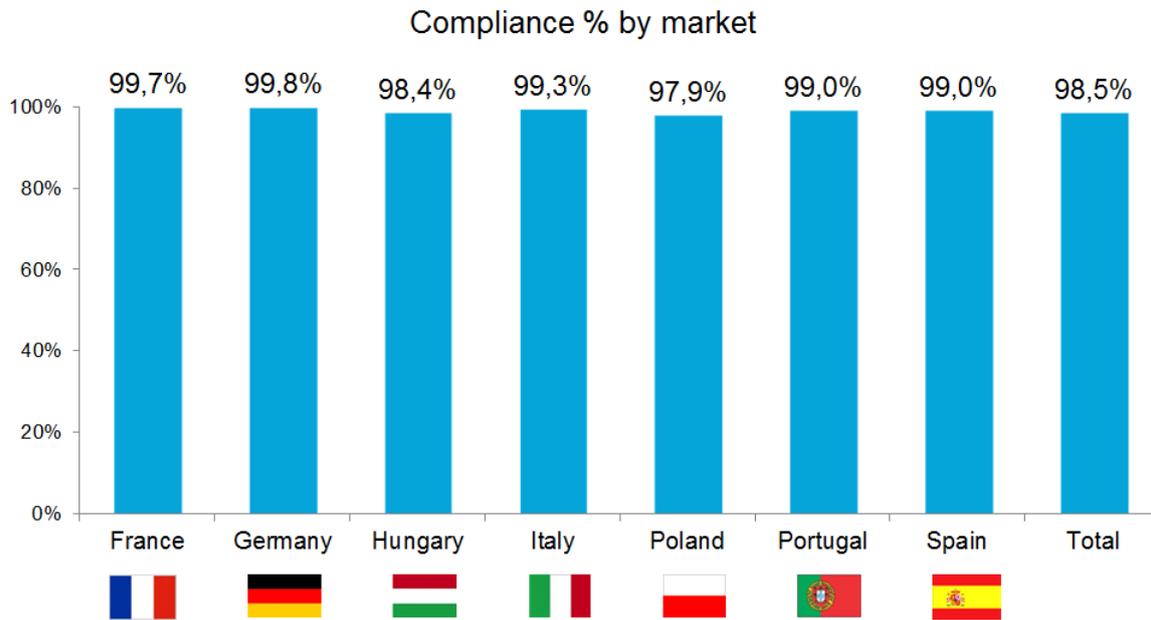
* Please refer to appendix for age range definitions

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Overall Compliance Results – All Spots



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Non compliant spots are Spots for restricted products with children profile >35%

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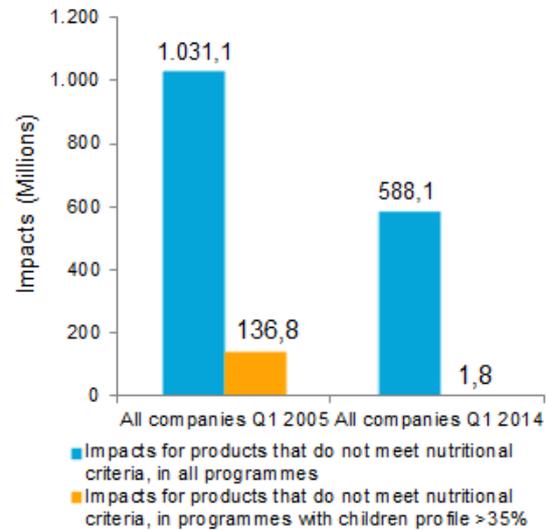
France: TV Trends Q1 2014 vs. Q1 2005



All spots advertising products that do not meet companies' nutritional criteria:
Children under 12 Impacts (under 11 for France)

Children's under 11 exposure to advertising of products that do not meet companies' nutritional criteria in all markets:

- Fell by 99% in spots with a reported profile of 35% or more of children under 11
- Fell by 43% across all programming



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Non compliant spots are Spots for restricted products with children profile >35%

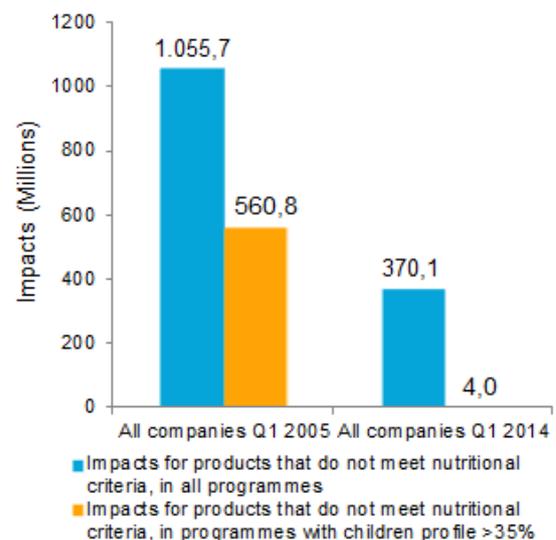
Germany: TV Trends Q1 2014 vs. Q1 2005



All spots advertising products that do not meet companies' nutritional criteria:
Children under 12 Impacts (under 13 for Germany)

Children's under 13 exposure to advertising of products that do not meet companies' nutritional criteria in all markets:

- Fell by 99% in spots with a reported profile of 35% or more of children under 13
- Fell by 65% across all programming



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Non compliant spots are Spots for restricted products with children profile >35%

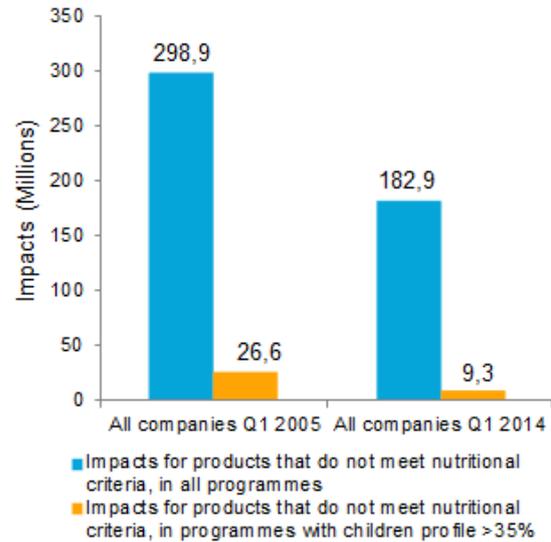
Hungary: TV Trends Q1 2014 vs. Q1 2005



All spots advertising products that do not meet companies' nutritional criteria:
Children under 12 Impacts (Under 13 for Hungary)

Children's under 13 exposure to advertising of products that do not meet companies' nutritional criteria in all markets:

- Fell by 65% in spots with a reported profile of 35% or more of children under 13
- Fell by 39% across all programming



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Non compliant spots are Spots for restricted products with children profile >35%

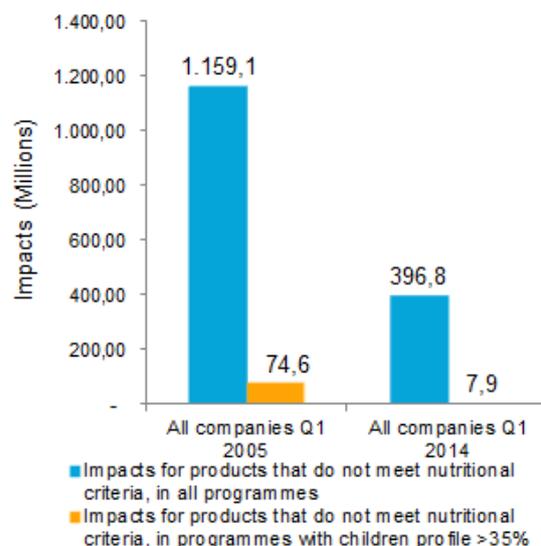
Italy: TV Trends Q1 2014 vs. Q1 2005



All spots advertising products that do not meet companies' nutritional criteria:
Children under 12 Impacts

Children's under 12 exposure to advertising of products that do not meet companies' nutritional criteria in all markets:

- Fell by 89% in spots with a reported profile of 35% or more of children under 12
- Fell by 66% across all programming



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Non compliant spots are Spots for restricted products with children profile >35%

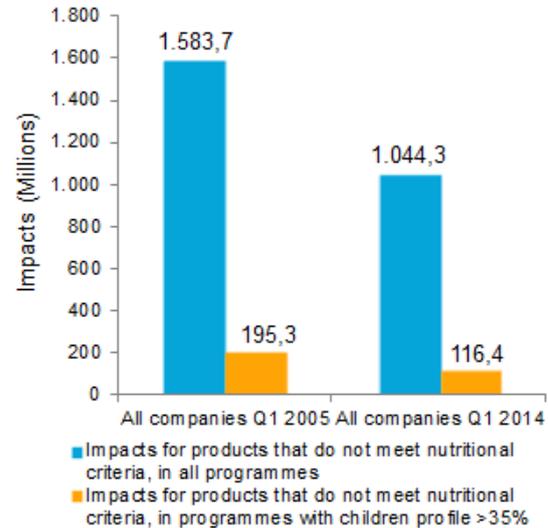
Poland: TV Trends Q1 2014 vs. Q1 2005



All spots advertising products that do not meet companies' nutritional criteria:
Children under 12 Impacts (Under 13 for Poland)

Children's under 13 exposure to advertising of products that do not meet companies' nutritional criteria in all markets:

- Fell by 40% in spots with a reported profile of 35% or more of children under 13
- Fell by 34% across all programming



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Non compliant spots are Spots for restricted products with children profile >35%

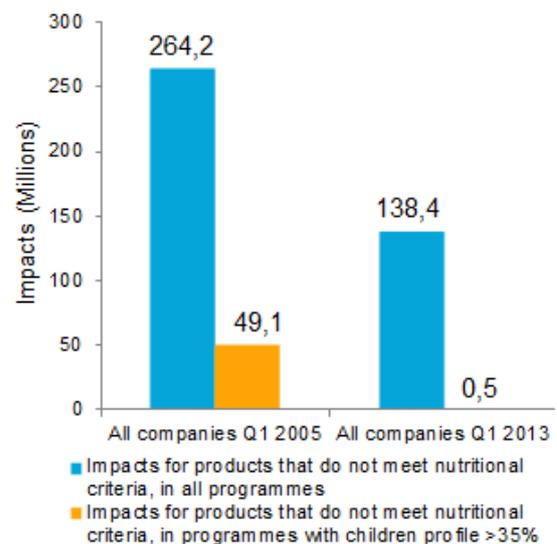
Portugal: TV Trends Q1 2014 vs. Q1 2005



All spots advertising products that do not meet companies' nutritional criteria:
Children under 12 Impacts (Under 15 for Portugal)

Children's under 15 exposure to advertising of products that do not meet companies' nutritional criteria in all markets:

- Fell by 99% in spots with a reported profile of 35% or more of children under 12
- Fell by 48% across all programming



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Non compliant spots are Spots for restricted products with children profile >35%

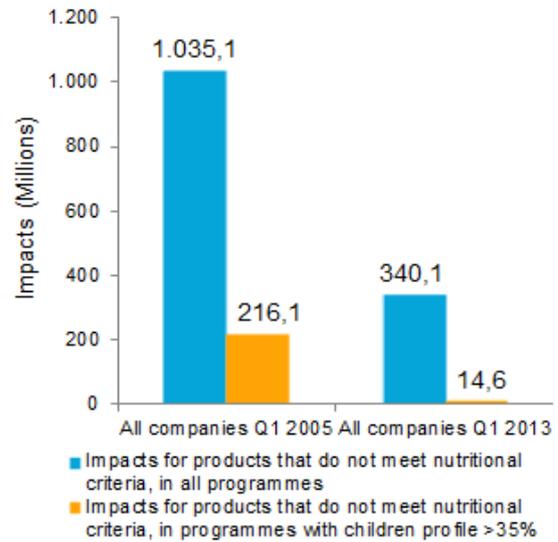
Spain: TV Trends Q1 2014 vs. Q1 2005



All spots advertising products that do not meet companies' nutritional criteria:
Children under 12 Impacts

Children's under 12 exposure to advertising of products that do not meet companies' nutritional criteria in all markets:

- Fell by 93% in spots with a reported profile of 35% or more of children under 12
- Fell by 67% across all programming



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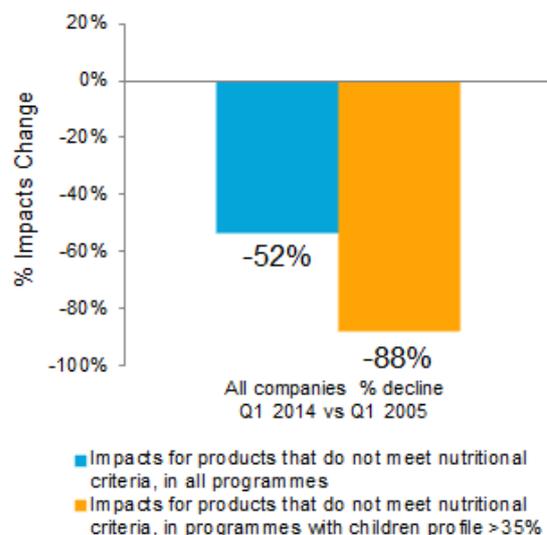
Non compliant spots are Spots for restricted products with children profile >35%

All Markets & All Advertisers

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:

- 88% in programmes with a reported profile of 35% or more of children under 12
- 52% across all programming



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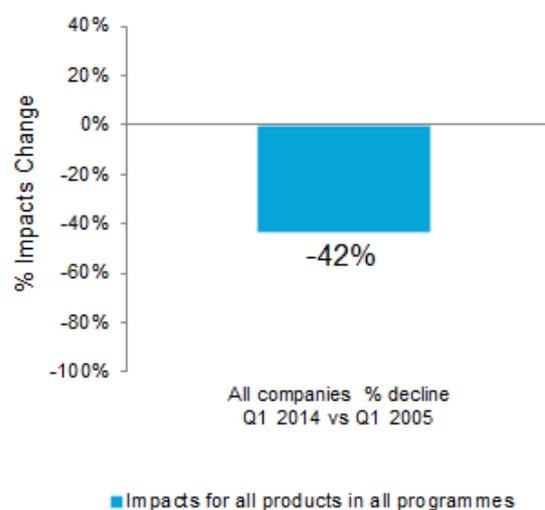
Non compliant spots are Spots for restricted products with children profile >35%

All Markets & All Advertisers

All products regardless of nutritional criteria – impacts: Children under 12

Children's exposure to EU Pledge member companies' TV advertising for all products has dropped since 2005 by:

- 42% across all programming



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- 3 **Appendix**

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TV Definitions

Spot

Each individual advertising activity - the airtime used by the advertiser

Restricted products

Products that do not meet the advertiser's nutritional criteria for marketing to children

Profile

Demographic breakdown of the audience at spot level, with regard to children under 12 (under 15 in Portugal)

Impacts (Impressions)

Number of times a message is seen by the audience

GRP (Gross Rating Point)

Percentage of the target audience reached by an advertisement, multiplied by the frequency that the audience sees it. For example, a TV advertisement that is aired 5 times reaching 50% of the target audience, would have 250 GRPs (GRP = 5 x 50%)

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Age Group Definitions

France	4 - 10
Germany	1 - 12
Hungary	4 - 12
Italy	4 - 11
Poland	4 - 12
Portugal	4 - 14
Spain	4 - 11

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TV Channels Monitored

France	Germany	Hungary	
Canal +	DisneyChan	ATV	SPORT1
D17	DMAX	AXN	FILM+2
D8	KABEL 1	NATIONAL GEOGRAPHIC	SPORT2
France 2	N 24	CHANNEL	LifeNetwork
France 3	Nick	CARTOON NETWORK	STORY4
France 4	Nitro	NICKELODEON	M2
France 5	N-TV	CBS REALITY	STORY5
Gulli	PRO7	OzoneNetwork	MAGYAR SLAGERTV
M8	RTL	COMEDY CENTRAL	Super TV2
NRJ12	RTL II	PRO4	MINIMAX
NT1	SAT.1	COOL	TV PAPIKA
TF1	sixx	RTL II	MTV (MUSIC TELEVISION)
TMC	SPORT1	DISCOVERY CHANNEL	TV2
W9/6TER PUISSANCE TNT	SUP RTL	RTL KLUB	MUSIC CHANNEL
	Tele 5	DISNEY CHANNEL	UNIVERSAL CHANNEL
	VIVA	RTL+	MUSICMIX
	VOX	F+	VIASAT3
	ZDF	SOROZAT+	MUZSIKA TV
	COMEDY C	FEM3	VIASAT8
		SPEKTRUM	NAT GEO WILD
		FILM CAFÉ	VIVA
		SPEKTRUM HOME	
		FILM MANIA	

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TV Channels Monitored

Italy			
Animal Planet	Fox Sports Sat	Premium Cinema	Sky Calcio 9
AXN +1	Fox/HD	Premium Cinema Comedy	Sky Cinema +1
AXN Sci-Fi	Frisbee	Premium Crime	Sky Cinema +24
AXN/HD	Gambero Rosso Channel	Radio Italia Tv	Sky Cinema 1
BBC Knowledge	Giallo	Rai 1	Sky Cinema Classics
Boing	History Channel	Rai 2	Sky Cinema Comedy
Canale 5	History Channel +1	Rai 3	Sky Cinema Cult
Cartoonito	Iris	Rai 4	Sky Cinema Family
Cielo	Italia 1	Rai 5	Sky Cinema Family +1
Cinema Emotion	Italia 2 Mediaset	Rai Gulp	Sky Cinema Hits
Cinema Energy	Joi	Rai Movie	Sky Cinema Max
Discovery Channel	K2	Rai News	Sky Cinema Max +1
Discovery Channel +1	La5	Rai Premium	Sky Cinema Passion
Discovery Science	La7	Rai Sport 1	Sky Meteo24
Discovery Travel e Living	La7d	Rai Storia	Sky Sport 1
Discovery World	Lei	Rai Yoyo	Sky Sport 2
Dmax	Lei +1	Real Time	Sky Sport 24
Dove Tv	Mediaset Extra	Real Time +1	Sky Sport 3
Focus	Mya	Rete 4	Sky Sport Moto GP
Fox +1	NatGeo People	Sky Calcio 1	Sky Super Calcio
Fox +2	NatGeo Wild	Sky Calcio 10	Sky TG24
Fox Crime +1	National Geographic Channel +1	Sky Calcio 11	Sky TG24 Eventi
Fox Crime +2	National Geographic Channel/HD	Sky Calcio 12	Sky TG24 Primo Piano
Fox Crime/HD	Premium Action	Sky Calcio 2	Sky TG24 Rassegne
Fox Life	Premium Calcio 1	Sky Calcio 3	Sky Uno
Fox Life +1	Premium Calcio 2	Sky Calcio 4	Sky Uno +1
Fox Life +2	Premium Calcio 3	Sky Calcio 5	Studio Universal
Fox Retro	Premium Calcio 4	Sky Calcio 6	Top Crime
Fox Sports Plus Sat	Premium Calcio/HD	Sky Calcio 7	

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TV Channels Monitored

Poland

13 Ulica [13th Street Universal]	Disney Junior [Playhouse Disney]	Polsat JimJam [JimJam]	TV6
4fun.tv	Disney XD	Polsat News	TVN
Ale Kino+ [Ale Kino]	Domo+ [Domo]	Polsat News 2 [Polsat Biznes]	TVN Meteo
Animal Planet	Eska TV	Polsat Play	TVN Style
ATM Rozrywka	Eurosport	Polsat Romans	TVN Turbo
AXN	Extreme Sports	Polsat Sport	TVN24
AXN Black [AXN Sci-Fi]	FilmBox	Polsat Sport Extra	TVN24 Biznes i Swiat
AXN Spin	FOX	Polsat Sport News	TVN7 [RTL7]
AXN White [AXN Crime]	FOXLife	Polsat Viasat Explorer [Viasat Explorer]	TVP ABC
BBC CBeebies	HISTORY	Polsat Viasat History [Viasat History]	TVP HD
BBC Entertainment	Investigation Discovery	Polsat Viasat Nature [Viasat Nature]	TVP Historia
BBC Knowledge	ITV	Polsat2	TVP INFO [TVP3]
BBC Lifestyle	Kino Polska	Puls 2	TVP Kultura
Boomerang	Kino Polska Muzyka	Rebel.tv	TVP Polonia
Canal+ Sport [Canal+ Niebieski]	kuchnia+ [kuchnia.tv]	Religia.tv	TVP Regionalna
Cartoon Network	MiniMini+ [MiniMini]	Scifi Universal	TVP Rozrywka
CBS Action [Zone Romantica]	MTV Polska	Sportklub	TVP Seriale
CBS Drama [Club TV]	Nat Geo Wild	Stars.tv	TVP Sport
CBS Europa [Zone Europa]	National Geographic	Superstacja	TVP1
CBS Reality [Zone Reality]	Nickelodeon	TCM	TVP2
CI Polsat [Polsat Crime & Investigation Network]	nSport	Tele5	TVR
Comedy Central	Orange Sport [Orange Sport Info]	teleTOON+ [ZigZap/Hyper]	TVS
Comedy Central Family [VH1 Polska]	Planete+ [Planete]	TLC	Universal Channel
Discovery	Polo TV	Travel Channel	VH 1 [VH1 Europe]
Discovery Historia	Polsat	TTV - Twoja Telewizja	Viacom Blink
Discovery Science [Discovery Sci-Trek]	Polsat Cafe	TV PULS [PULS]	VIVA Polska
Discovery Turbo Xtra	Polsat Film	TV.DISCO	
Disney Channel	Polsat Food	TV4	

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TV Channels Monitored

Portugal

AXN
Disney Channel
Fox
Fox Life
Hollywood
MTV Portugal
Panda
RTP1
SIC
SIC Mulher
SIC Noticias
SIC Radical
TV Record
TVI
TVI24

Spain

13 TV
24H
3/24
40 TV
8MADRID
8TV
A3
A3 PREMIUM
ANDALUCÍA TV
ARAGON TV
AXN
AXN WHITE
BIO
BOING
BUZZ ROJO
C.SUR
CALLE 13
CANAL COCINA
CANAL HOLLYWOOD
CANAL HOLLYWOOD+1
CANAL+ 1
CANAL+ 1 ...30
CANAL+ 2
CANAL+ ACCION
CANAL+ COMEDIA
CANAL+ DCINE
CANAL+ LIGA
CANAL+ SERIES

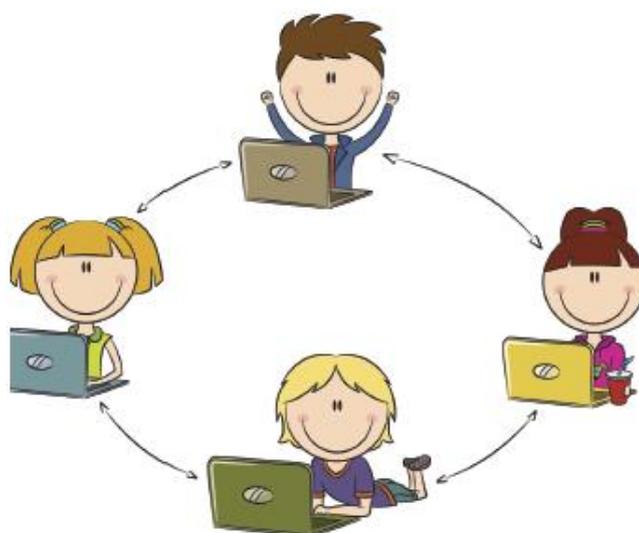
CANAL+ XTRA
CINEMATK
COMEDY CENTRAL
COSMOPOLITAN
CRIMEN + INVESTIGACION
CUATRO
CYLTV
DECASA
DISCOVERY
DISCOVERY MAX
DISNEY CH+1
DISNEY CHANNEL
DISNEY XD
DIVINITY
ENERGY
ESPORT3
ETB2
FDF-T5
FOX
FOX CRIME
HISTORIA
INTERECONOMIA
LA SEXTA
LA SEXTA 3
La1
La2
LAOTRA
LASIETE

MGM
MTV
MTV ESP
NATIONAL GEOGRAPHIC
NATURA
NEOX
NGC WILD
NICK
NITRO
NOVA
NUEVE
ODISEA
PANDA
PARAMOUNT CHANNEL
SOL MÚSICA
SOMOS
SUPER3/33
SYFY
T5
TELEDEPORTE
TELEMADRID
TNT
TPA
TPA2
TV3
TVG
VIAJAR
XPLORA
XTRM

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2014

EU PLEDGE SURVEY



EASA

EASA – the European Advertising Standards Alliance is the single authoritative voice of advertising self-regulation. EASA promotes high ethical standards in commercial communications by means of effective self-regulation for the benefit of consumers and business. For further information, please visit: www.easa-alliance.org.

As a non-profit organisation based in Brussels, EASA brings together national advertising self-regulatory organisations and associations representing the advertising industry in Europe.

EASA Editorial Team

Maria Tsoumou, Project and Finance Coordinator

Chiara Odelli, Project and EU Affairs Officer

Greg Mroczkowski, Compliance and Digital Issues Assistant

Jennifer Pearson, Communications Manager

EASA Contact Information

Maria Tsoumou

+32 (0)2 513 7806

maria.tsoumou@easa-alliance.org

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Compiled between October/November 2014



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Introduction

EASA was commissioned by the World Federation of Advertisers (WFA) and the EU Pledge Secretariat to review a number of food and beverage brand websites belonging to the EU Pledge¹ member companies. The goal of the project was to determine whether the company-owned websites reviewed were compliant with the relevant EU Pledge Commitment.

Compliance with the EU Pledge Commitment is determined as follows:

- The website features marketing communications;
- Such marketing communications promote food or beverage products (as opposed to a brand in general);
- Such food and beverage products meet or do not meet the EU Pledge companies' nutritional criteria;
- Such marketing communications are designed to be targeted primarily at children under 12.

In order to offer unbiased, independent and accountable results, a 'consumer-oriented approach' was drawn up by the EASA Secretariat in collaboration with the EU Pledge Secretariat and the independent reviewer of this exercise, Dr. Verónica Donoso². Advertising self-regulation experts were requested to try and think from the perspective of a child younger than 12 while reviewing brand websites and keep in mind what a child of this age would find interesting and attractive. Special attention had to be paid to specific aspects of the websites that would make them appealing to under-12s.

¹ The EU Pledge is a voluntary commitment of leading food and non-alcoholic beverage companies to limit their advertising to children under 12 to products that meet specific nutritional standards (as defined by each company). The EU Pledge is a response from industry leaders to calls made by the EU institutions for the food industry to use commercial communications to support parents in making the right diet and lifestyle choices for their children. The EU Pledge programme is endorsed and supported by the World Federation of Advertisers.

² Verónica Donoso (PhD) is Post-doctoral researcher at the Interdisciplinary Centre for Law and ICT (ICRI), KU Leuven, iMinds. Her main areas of expertise are user experience research, children and young people's uses of new media and e-safety. Verónica has worked on a number of European and Belgian projects, including the EU Kids Online I, II and III. She also coordinated the 2nd Assessment of the Safer Social Networking Principles for the EU.



Project Overview

Experts from ten European self-regulatory organisations (SROs) were invited by EASA and the EU Pledge Secretariat to conduct the monitoring exercise in July and August 2014 in order to assess the appeal of marketer-owned websites to children under 12. The ten chosen SROs represent different systems in terms of size (big vs. small SROs), location (geographical coverage) and maturity (new vs. old systems).

Table 1: List of participating countries/SROs

Country	SRO	Date of Establishment
Belgium	JEP	1974
Czech Republic	CRPR	1994
France	ARPP	1935
Germany	DW	1972
Hungary	ÖRT	1996
Netherlands	SRC	1964
Poland	RR	2006
Portugal	ICAP	1991
Spain	AUTOCONTROL	1977
UK	CAP	1962

Self-regulation experts from SROs in France, Germany, Netherlands and the UK each reviewed 40 national brand websites of EU Pledge company members; 39 brand websites were reviewed in Poland, including where available at least two websites per company. 30 brand websites were reviewed in Belgium and 29 in Czech Republic and in Spain; in Portugal and Hungary, 20 and 19 websites were reviewed respectively. In countries where 30 or less websites were reviewed, this included, where available, at least one website per company. Corporate websites³ were excluded from the exercise.

Table 2: List of the EU Pledge member companies

EU Pledge Signatories	
Coca-Cola	Burger King
Ferrero	DANONE
FrieslandCampina	Intersnack
Mondelez International	Lorenz Snack-World
Kellogg's	EstrellaMaarud ⁴
McDonald's	KiMs (owned by Orkla Confectionery & Snacks) ⁵
Mars	General Mills
Nestlé	Zweifel Pomy-Chip
PepsiCo	Unichips-San Carlo

³ A corporate website is a general informational website operated by a company.

⁴ No products available in the market.

⁵ No products available in the market.

EU Pledge Signatories	
Unilever	Quick Group

Methodology

For the markets selected for monitoring, the EU Pledge Secretariat provided EASA with a list of all products promoted by the EU Pledge member companies. The list indicated whether or not these products met the applicable nutritional criteria set out in the EU Pledge. From this, EASA compiled a list of websites that promoted products that do not meet the nutritional criteria; from EASA's list, the self-regulatory experts selected websites to review. When making their selection, reviewers were requested to take into account products popular amongst children in their country.

EASA, the EU Pledge Secretariat and independent reviewer Dr. Verónica Donoso, developed a methodology for self-regulatory experts to follow when completing a standard compliance questionnaire for each website selected. The methodology and questionnaire were developed to ensure objectivity and consistency across the project.

The questionnaire asked the self-regulatory experts if the website being reviewed contained elements, such as games/entertainment activities⁶, animations/sound effects/videos, licensed characters and toys and to decide if these were in their view primarily designed for children under 12. Reviewers then had to judge if these elements, in conjunction with the creative execution of the website (i.e. simplicity of language, use of font size and typeface, use of colours, etc.), were clearly intended to make the marketing communication(s) on the website primarily appealing to under-12s.

A number of websites contained features to screen the age of visitors to the website; the reviewers were asked to note if a website contained such features. However, this element was not considered to be sufficient to ensure compliance if the marketing communications on the website were clearly designed to appeal primarily to children under 12.

On the basis of the level of appeal of the creative execution to under-12s as well as the overall findings reported by the self-regulatory experts, EASA determined the final compliance of the websites with the EU Pledge criteria.

Beyond compliance with the EU Pledge, the self-regulatory experts also flagged any items on a website that potentially breached any applicable advertising codes or relevant legislation:

The following were taken into account:

- ICC Framework for Responsible Food and Beverage Marketing Communications;
- Relevant advertising standards and national sectoral codes;
- Relevant advertising laws.

All reviews were performed by self-regulatory experts from national SROs; EASA's role in the project was to ensure that the results were reported in a consistent manner.

⁶ A game/entertainment activity is an activity engaged for diversion or amusement. A non-exhaustive list of games/entertainment activities are: online games which are played over the Internet, games such as Casual/Social Games, Puzzles, Board Games, Role-Playing Games Show, Trivia, Card Games, Racing, Arcade, colouring sheets, activity sheets, Do it yourself activities, etc.



Note from the Independent Reviewer

This monitoring exercise attempted to assess whether company-owned websites are compliant with the EU Pledge commitment. This year's results seem quite positive compared to previous editions of this assessment. A total of 326 national brand websites containing product promotion and featuring at least one product not compliant with the nutritional criteria were evaluated. Of these, only 11 websites (3%) were considered in breach of the EU Pledge as they contained elements such as games or entertainment activities, toys used as premiums, animations, videos, sound effects designed primarily for under-12s, as well as language, text or navigation clearly intended to make the marketing communications on the website appealing primarily to children under 12.

Last year's monitoring identified more non-compliant websites, 22 in total, accounting for 6% of the sample. We must be cautious though when interpreting these results because of the differences between the samples of websites reviewed. On the one hand, the countries participating in this year's assessment are not the same and, therefore, cultural differences relating to marketing practices may play a role in the review. On the other hand, the methodologies employed differ slightly, like, for instance, criteria regarding non-complaint product promotion were further specified.

It is also interesting to observe some emerging trends. For instance, more websites were employing age-screening mechanisms (14% this year vs. 8% last year), more websites featured licensed characters (15% this year vs. 9% last year), but less websites targeted children under 12. There was also a considerable presence of games or entertainment activities on websites (22% this year vs. 24% last year), however, only 9% were considered as primarily appealing to young children, as opposed to 15% last year. A high increase in the amount of websites displaying animations was observed (60% this year vs. 21% last year), although only 9% were assessed as designed to appeal primarily to children under 12. The amount of websites using toys as premiums remained low (5% this year vs. 4% last year).

On the basis of these results, we can conclude that, in general, the industry takes measures to ensure compliance with the EU Pledge. This is particularly evident when looking at the high increase of the age-screening mechanisms present on brand-owned websites as well as the low number of websites featuring toys used as premiums. Nevertheless, it is also important to note that even though current age-screening mechanisms can be useful, especially with very young children (e.g. children who still do not know how to read), there is no evidence available demonstrating their effectiveness as gate-keepers with older children. Therefore, it is important to keep in mind that age-screening is a helpful feature, but, on its own, it cannot be considered as a sufficient tool to prevent children from accessing inappropriate online content.

Another important aspect to take into consideration is the fact that even though at first glance the results of the assessment seem positive, there are still important methodological issues to consider. For instance, the fact that a website is not designed to appeal "primarily" to children under 12 does not necessarily mean that the website is not attractive to younger children at all. Furthermore, the frequent presence of animations, licensed characters and games make the results of this year's monitoring somehow worrying. In particular, a

number of borderline cases were identified. They were not considered as being in breach of the EU Pledge, however, many of these compliant websites seemed highly attractive to young children (and the general population), especially because they contained funny videos, entertaining music, animations or games that would typically appeal children younger than 12 even though their content may be targeting a 12+ audience.

The rapid evolution of digital technologies, their ubiquitous and interconnected nature as well as the fact that more and more young children (0-8 years old) are using digital technologies on an everyday basis demands the continuous review of the objectives set by the EU Pledge. As pointed out in previous editions of this monitoring exercise, it seems timely to expand the scope of this monitoring exercise to other platforms such as social networking sites, photo or video-sharing applications (e.g. YouTube) and even to downloadable applications. Nowadays, it is common for many product or brand websites to employ social media as powerful mechanism for marketing, advertising or to increase customer-loyalty. Indeed, some of the websites evaluated in this report featured hyperlinks to social media or video-sharing platforms such as Facebook, Twitter or YouTube, some of which contained features highly appealing to children younger than 12. Furthermore, apps have also become popular among very young children given the advent and penetration of mobile technologies such as tablets, and smartphones. It would be, therefore, also important to evaluate this impact.

I would like to emphasise the need of extending the scope of the assessment so as to account for a broader set of online services and platforms. If the current methodology was not updated to include these "indirect" forms of promoting products, the quality, exhaustiveness and credibility of this exercise might be at risk. As a final recommendation, I would like to stress, once again, that more reliable results would be obtained if tests with children were carried out in order to assess the appeal of specific websites (or elements thereof). The fact that the results presented in this report are based solely on the evaluation carried out by adults presents obvious limitations to the review.

Lastly, I would like to highlight EASA's and the participating self-regulatory experts' professionalism and dedication during the monitoring exercise. In particular, I would like to thank them for carrying out a rigorous evaluation. This is indispensable for an objective, critical and transparent assessment of a self-regulatory initiative like the EU Pledge. I would also like to stress the importance of monitoring exercises such as EU Pledge Survey; as they serve to foster the effective implementation of self-regulatory practices, while encouraging responsible marketing communication which take into account children's vulnerabilities, needs and rights.

Dr. Verónica Donoso

Important Note

EASA, in collaboration with the EU Pledge Secretariat and independent reviewer Dr. Verónica Donoso, has taken great care to ensure that the results of this project are objective and consistent.

To do this, a detailed methodology was developed; it was then applied by all self-regulatory experts when assessing the websites. However, although it may be relatively easy to determine if a website appeals to children in general, it is much harder to determine if a website is designed to appeal primarily to children younger than twelve. As a result, the decisions of the self-regulatory experts retain an unavoidable degree of subjectivity, although it is informed by their extensive day-to-day professional experience. Readers are requested to bear this in mind.

Executive Summary

- A total of 326 national brand websites were reviewed.
- All of the websites reviewed contained product promotion and featured at least one product that was not compliant with the nutritional criteria.
- Out of the 326 websites, 11 were considered in breach of the EU Pledge as they contained elements, such as games or entertainment activities, toys used as premiums or animations, videos, sound effects designed primarily for under-12s as well as language, text or navigation clearly intended to make the marketing communications on the website appealing primarily to under-12s.
 - Ten websites contained animations, videos or sound effects that were considered to be designed to appeal primarily to under-12s.
 - Seven websites featured games or entertainment activities that were considered to be designed to appeal primarily to under-12s.
 - Five websites exhibited licensed characters that were considered to be designed to target primarily under-12s.
 - Three websites were connected to a toy that was considered to be designed to appeal primarily to under-12s.
- 13 out of the 326 websites reviewed contained items that were in breach of advertising codes or relevant advertising laws. In total, 22 problematic items were flagged by the self-regulation experts.

1 Introductory Remarks

1.1 General Information

The table below provides an overview of the number of websites that were reviewed per country. A total of 326 websites were reviewed by self-regulation experts.

Table 3: Number of websites reviewed per country

Country	Number of Websites Reviewed
Belgium	30
Czech Republic	29
France	40
Germany	40
Hungary	19
Netherlands	40
Poland	39
Portugal	20
Spain	29
UK	40
TOTAL	326

2 Findings

2.1 Product Promotion

The reviewers identified product promotion on all of the 326 websites reviewed. All websites reviewed featured at least one product that did not meet the nutritional criteria set by the companies.

2.2 Age Screening/Parental Consent

45 brand websites out of 326 reviewed contained mechanisms to screen the age of the website visitor. Methods ranged from a field where the visitor had to enter his/her date of birth to a pop-up asking whether the visitor was older than a certain age.

Figure 1: Number of websites featuring age screening (N=326)

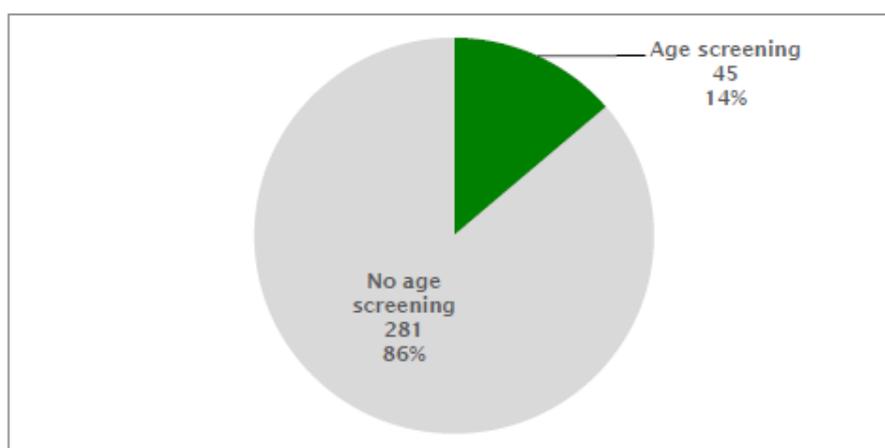
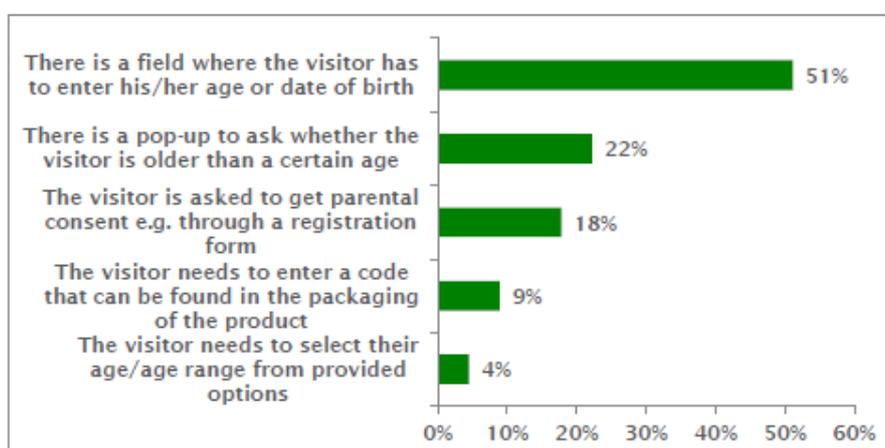


Figure 2: Types of age screening/parental consent (N=45)

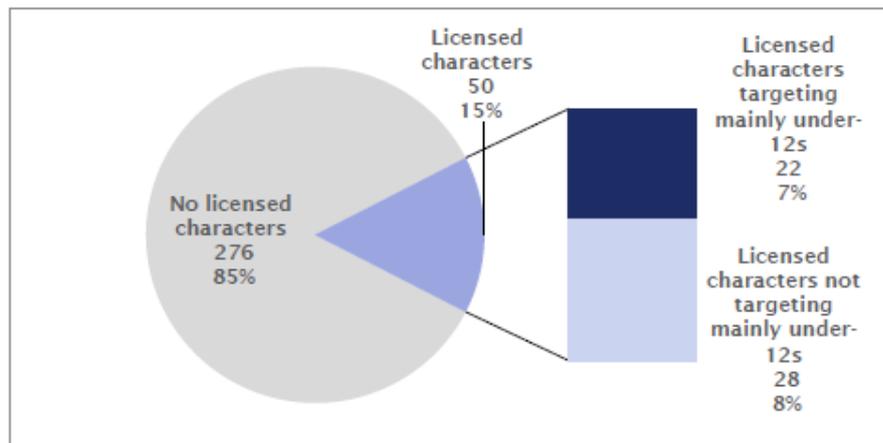


2.3 Licensed Characters/Tie-ins

The reviewers checked if the websites or the children's section(s) of the website featured "licensed characters", i.e. characters acquired externally and linked for example to movies, cartoons or sports, or if they featured movie tie-ins as a means to promote a food or beverage.

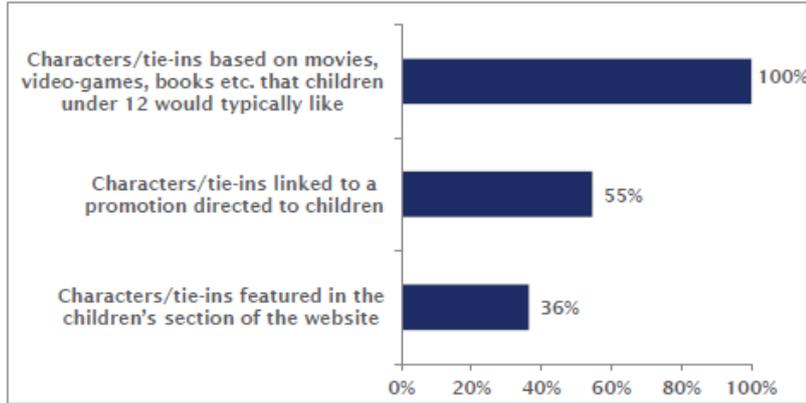
50 out of the 326 websites featured licensed characters/tie-ins and the reviewers considered that in 22 instances these characters/tie-ins were designed to target primarily children under 12. In addition, 20 of these websites used the licensed characters/tie-ins to promote food or beverages.

Figure 3: Number of websites featuring licensed characters/tie-ins (N=326)



Reasons as to why the reviewers considered the licensed characters/tie-ins to be appealing primarily to under-12s are featured in the following chart. The combination of several of these criteria is a strong indicator that the licensed character is primarily appealing to young children.

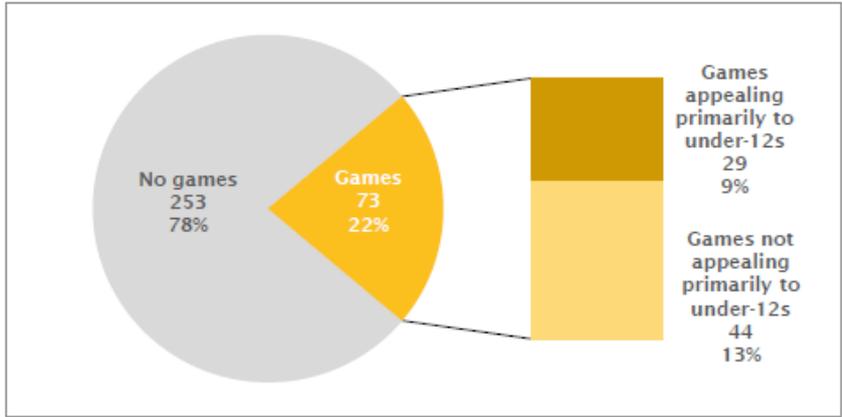
Figure 4: Main indicators for licensed characters/tie-ins considered primarily appealing to under-12s (N=22)



2.4 Games/Entertainment Activities

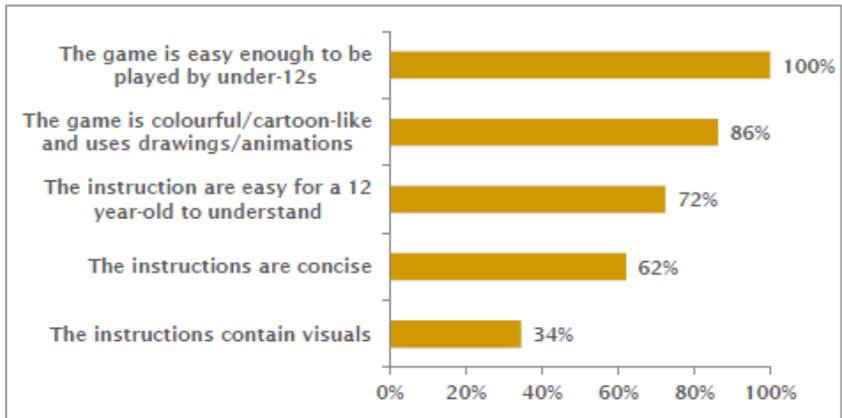
The reviewers identified games/entertainment activities on 73 of the 326 websites reviewed and in 29 instances the reviewers considered that the games/entertainment activities were designed to appeal primarily to under-12s. In addition, 18 of these websites used the games/entertainment activities to promote food or beverages to children.

Figure 5: Number of websites featuring games/entertainment activities (N=326)



Reasons as to why the reviewers considered the games/entertainment activities to be appealing primarily to under-12s are featured in the following chart. The combination of several of these criteria is a strong indicator that the game/entertainment activity is primarily appealing to young children.

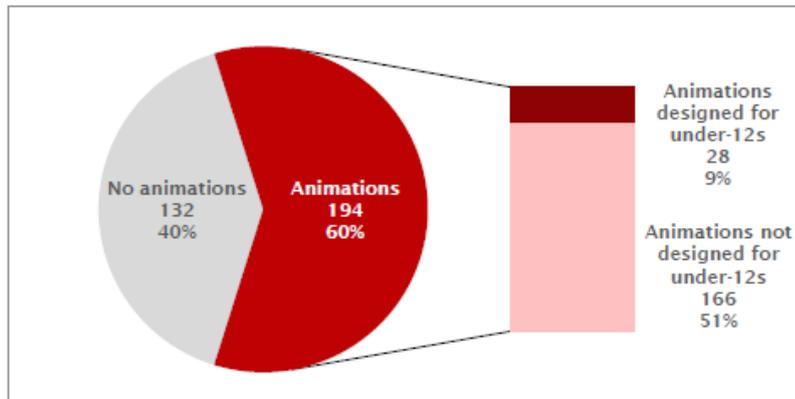
Figure 6: Main indicators for games/entertainment activities considered primarily appealing to under-12s (N=29)



2.5 Animations, Sound Effects and Videos

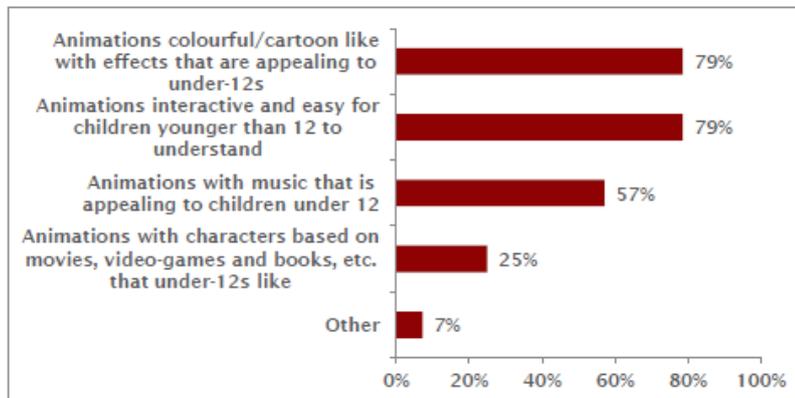
194 of the 326 websites reviewed featured animations, such as cartoons, animations depicting fantasy situations, sound effects or videos. According to the reviewers, 28 of these websites used animations, which were designed to appeal primarily to under-12s, and 22 of these websites used the animations to promote food or beverages to children.

Figure 7: Number of websites featuring animation (N=326)



Reasons as to why the reviewers considered the animations, sound effects and videos to be appealing primarily to under-12s are featured in the following chart. The combination of several of these criteria is a strong indicator that the animations are primarily appealing to young children.

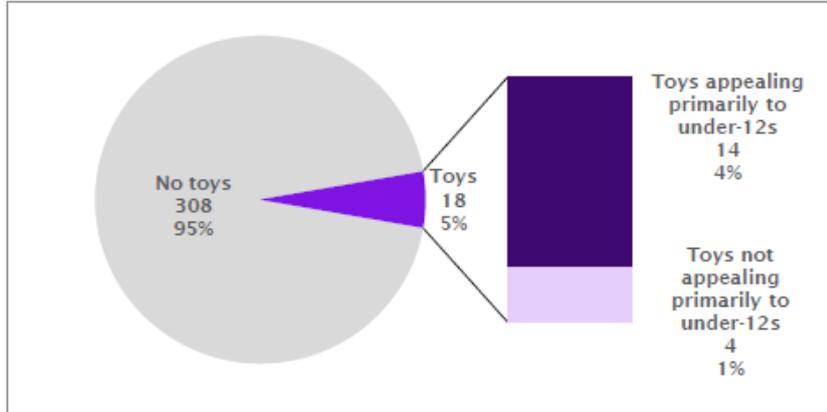
Figure 8: Main indicators for animations considered primarily appealing to under-12s (N=28)



2.6 Toys Used as Premiums

The reviewers identified 18 websites that used toys or other premiums to promote a food or non-alcoholic beverage product. Examples of toys included figures of cartoon characters, stickers, board games, soccer balls and other premiums such as watches featuring cartoon characters. In 14 of the 18 cases the toys were considered to be designed to appeal primarily to children under the age of 12.

Figure 9: Number of websites featuring toys used as premiums (N=326)



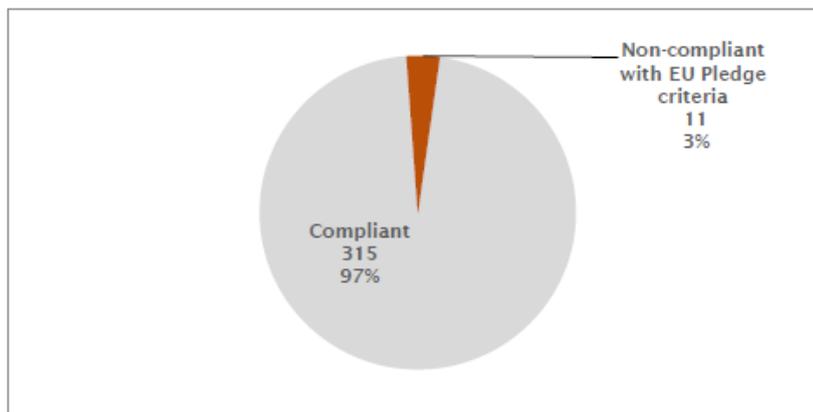
3 Compliance with the EU Pledge Criteria

11 of the 326 websites reviewed were found not to be compliant with the EU Pledge.

In order to determine whether the website was designed to target primarily under-12s, and subsequently to assess if the marketing communications were intended to appeal primarily to under-12s all of the previously identified elements had to be considered. This included the use of animations/sound effects/videos, games/entertainment activities, toys or licensed characters as well as the creative execution of the website, i.e. the overall impression of the website design (use of colours, typeface, font size, language, etc.).

Decisive factors in judging the appeal of a website to young children were the usability of the websites (i.e. ease of navigation), simplicity of language, font size, colour schemes and the level of entertainment offered on the websites.

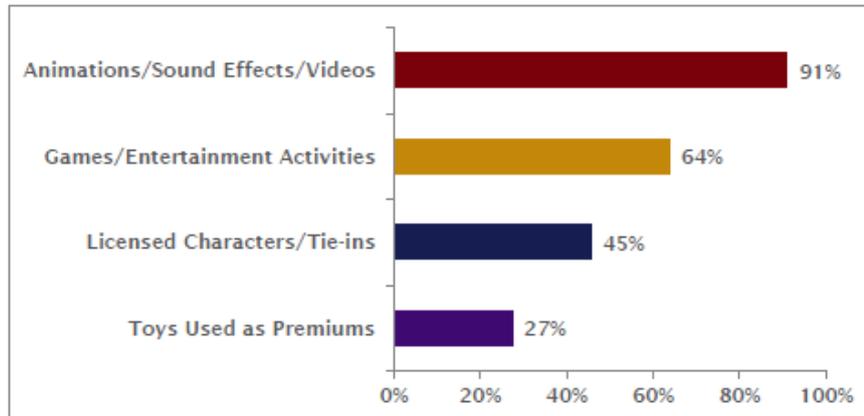
Figure 10: Number of websites in breach of the EU Pledge criteria (N=326)



Ten websites, that were considered as appealing primarily to children under 12 and therefore in breach of the EU Pledge, featured animations, while seven websites contained games designed for under-12s. Five websites featured licensed characters and three of them included toys designed for children under 12.

It is important to highlight that although the use of an age gating mechanisms does indicate the intent of the marketer to be compliant, it does not per se render a website compliant with the commitment. A case in point is one of the websites monitored this year that was considered to be primarily appealing to children under 12 despite the use of an age screening tool.

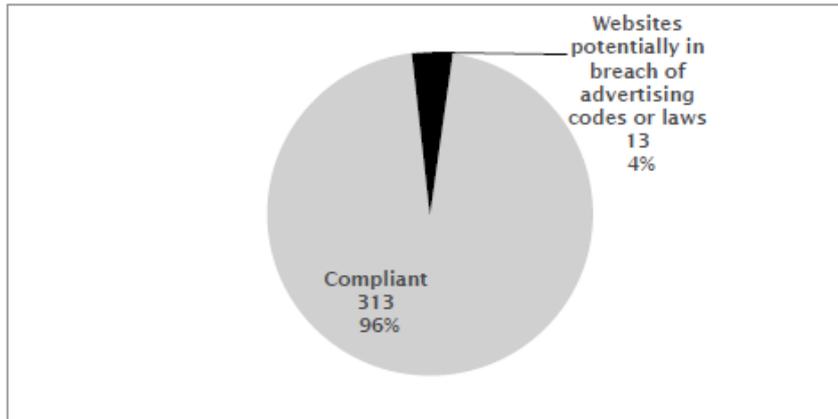
Figure 11: Elements of websites primarily appealing to under-12s (N=11)



4 Breaches of Advertising Codes/Laws

On 13 out of the 326 websites, the reviewers identified items that were considered as potentially in breach of advertising codes and/or relevant advertising laws.

Figure 12: Number of websites potentially breaching advertising codes/laws (N=326)



On these 13 websites, a total of 22 problematic items were found.

In ten instances the websites were found to be potentially in breach of advertising codes and/or laws because of the lack of the duration of sales promotions or raffles. Eight of these cases included the expiration date only in the terms and conditions section of the websites as opposed to the banner of a promotion or a raffle, while two websites did not include the duration of a sales promotion at all.

In addition, in five cases, the reviewers found sales promotions that had already expired at the time of the review.

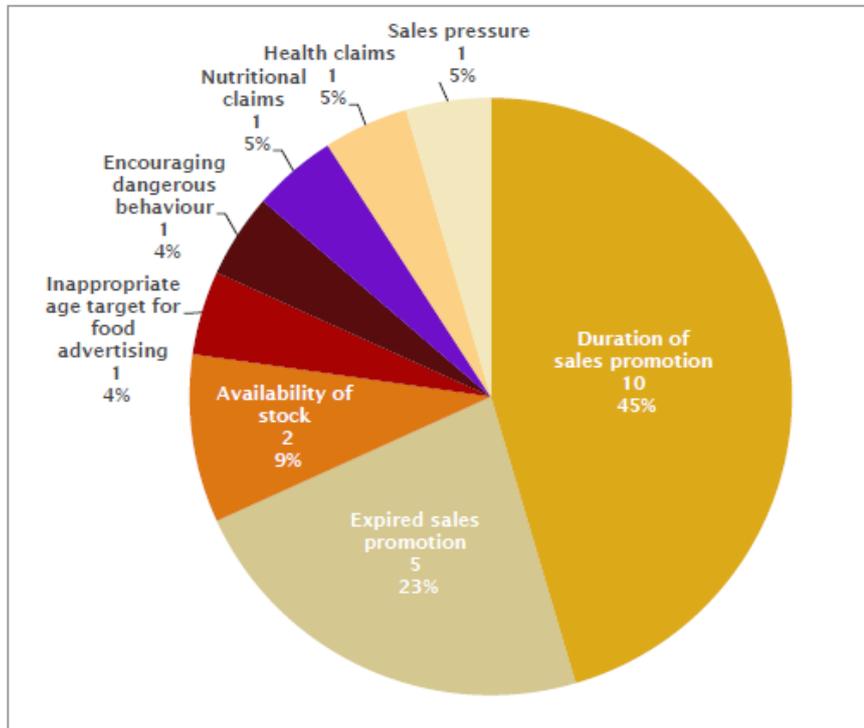
Furthermore, the reviewers flagged two websites for not specifying the number of products available for a sales promotion.

One website was flagged for potentially inappropriate age target for food advertising and were considered to be potentially in breach of the national Standards of Food Advertising Targeting Children.

On one website the reviewer identified claims that were considered as condoning or encouraging dangerous behaviour and another website used imperative verbs which according to the self-regulatory experts could make children feel compelled to buy the product.

Finally, one website contained problematic health claims and another problematic nutritional claim.

Figure 13: Potential breaches of advertising codes/laws (N=22)



On the remaining 313 websites no items were found that were in breach of either advertising codes or laws.



ANNEX III – Nutrition Criteria Overview



Nutrition Criteria

Overview



Table 1: EU Pledge Nutrition Criteria Overview

Category 1: Vegetable and animal based oils, fats and fat containing spreads & emulsion-based sauces					
Sub-category A: Vegetable & animal based oils, fats & fat containing spreads: all animal and vegetable based fats & oils used as spreads on bread and/or food preparation. ¹¹					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g, except when specified otherwise</i>					
Oils and fats (all types), full & low-fat margarine, butter mélanges, solid or liquid oil/fat products for roasting and frying	≤ 85	≤ 500	≤ 33% total fat is SAFA (incl. TFA)	(5)	≥ 25% of total fat is PUFA
Sub-category B: Emulsion-based sauces: sauces that constitute only a minor component of the meal to which an emulsifying agent is added OR have a fat content ≥ 10% w/w.					
Mayonnaise, salad dressings, marinades, vinaigrettes...	≤ 85	≤ 750	≤ 33% total fat is SAFA (incl. TFA)	≤ 5	≥ 25% of total fat is PUFA
Category 2: Fruits, vegetables and seeds,¹² except oil Vegetables include legumes and potatoes. Seeds include seeds, kernels, nuts. Nuts include peanuts and tree nuts.					
Sub-category A: Products of fruits and vegetables except oils & potatoes (≥ 50g fruit and/or veg per 100g of finished product) that constitute a substantial component of the meal.					
Vegetable gratin, canned vegetables, baked beans, fruit compote, fruit in syrup, fruit salad	≤170	≤ 300	≤ 1.5	≤ 15	Min. ½ portion fruit and/or veg. Nutrients delivered through ingredients (fruit and/or veg).
Subcategory B: Potato & potato products, except dehydrated potato products: all potato based dishes (≥ 50g potato per 100g of finished products) that constitute a substantial component of the meal.					
Mashed potato, gnocchi, gratin, dumplings, fried or roasted potato...	≤170	≤ 300	≤ 1.5	≤ 5	Nutrients delivered through main ingredient (potato)
Subcategory C: Potato chips and & potato based snacks, incl. dough-based products					
Potato chips/crisps	≤170	≤670	≤10% kcal from SAFA	≤ 10	Fibre : ≥3g/100g/ml; and/or ≥70% UFA/total fat
Extruded & pelleted snacks, stackable chips	≤170	≤900 ¹³	≤10% kcal from SAFA	≤10	Fibre : ≥3g/100g/ml; and/or ≥70% UFA/total fat

¹¹ Butters as defined in Council regulation (EC) 1234/2007 Annex XV, are excluded from this category because they will not be advertised towards children.

¹² Exemptions: 100% fruit and vegetables and their products, including 100% fruit and vegetable juices, as well as 100% nuts and seeds and mixes thereof (with no added salt, sugar or fat). These products, presented fresh, frozen, dried, or under any other form may be advertised to children without restrictions.

Sub-category D: Seeds and nuts					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g, except when specified otherwise</i>					
Salted or flavoured nuts, mixed nuts, nut-fruit mixes, peanut butter	≤200	≤670	≤10	≤ 15	Nutrients delivered through ingredients (nuts and seeds)
Sub-category E: Fruit/Vegetable based meal sauces: all fruit/vegetable based sauces (≥ 50g fruit and/or vegetable per 100g of finished products) that constitute a substantial component of the meal					
Tomato sauce, pasta sauce...	≤ 100	≤ 500	≤ 1.5	≤ 10	Nutrients delivered through ingredients (fruits and/or veg)
Sub-category F: Fruit/Vegetable based condiments: all fruit/vegetable based condiments (≥ 50g fruit and/or vegetable per 100g of finished products) that constitute only a minor component of the meal					
Tomato ketchup, chutney...	≤ 85	≤ 750	≤ 1.5	≤ 25	Nutrients delivered through ingredients (fruit and/or veg)
Category 3: Meat based products: processed meat/poultry, and meat products, consisting of minimally 50g of meat per 100g finished product					
Meatballs, salami, grilled ham, chicken fillet, sausages...	≤ 170	≤ 800	≤ 6	(≤ 5)	≥ 12% of energy as protein
Category 4: Fishery products: processed fish, crustaceans and shellfish, consisting of min. 50g of fish, crustaceans, and/or molluscs per 100g of finished product					
Cod parings, fried fillet of haddock, fish fingers, pickled mussels, tinned tuna	≤ 170 OR > 170 IF ≥ 25% total fat is PUFA	≤ 450	≤ 33% total fat is SAFA (including TFA)	(≤5)	≥ 12% of energy as protein
Category 5: Dairy products					
Sub-category A: Dairy Products other than cheeses: Must contain minimum 50% dairy (Codex Alimentarius standard)					
Milks & milk substitutes; yoghurts; sweet fresh/soft cheese; curd & quark; fermented milks; dairy desserts	≤170	≤ 300	≤ 2.6	≤ 13.5	Protein: ≥12 E% or ≥ 2g /100g or 100ml AND/OR At least 1 source of: Ca or Vit D or any Vit B
Sub-category B: Cheese and savoury dairy based products: Must contain minimum 50% dairy (Codex Alimentarius standard)					
Hard, semi-hard cheeses	≤ 85	≤ 900	≤ 15	(< 5)	At least one source of: Ca, Vit B12, Vit B2
Other cheeses, curd & quark and savoury dairy-based products	≤170	≤ 800	≤ 10	≤ 8	

¹³ Individual ESA member companies may benefit from a longer period – up to the end of 2015 – in respect of this value, reflecting the uneven advancement of salt reduction programmes among EU member states. Should any member wish to benefit from such derogation, individual member companies shall specify this in their corporate EU Pledge commitments published on the EU Pledge website. During the additional transition period, the applicable sodium threshold shall not exceed 970mg/100g.

Category 6: Cereal based products					
Sub-category A: <u>Sweet</u> biscuits, fine bakery wares and other cereal based products: cereal must be listed as the main ingredient on the ingredient declaration.					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g, except when specified otherwise</i>					
All kinds of biscuits and cakes, cereal bars, flapjacks...	≤200	≤ 450	≤10	≤35	Fibre (≥3 g/100g) and/or whole grain (15% total ingredients) and/or 20%E from UFA and ≥70% UFA/total fat
Sub-category B: <u>Savoury</u> biscuits, fine bakery wares and other cereal based products, including dough-based products: cereal must be listed as the main ingredient on the ingredient declaration.					
Savoury crackers, extruded, pelleted & popcorn-based snacks, popcorn, pretzel products	≤170	≤900 ¹⁴	≤10% kcal from SAFA	≤10	Fibre : ≥3 g/100g; and/or ≥70% UFA/total fat
Sub-category C: Breakfast Cereals including porridge					
Ready to eat breakfast cereals such as cornflakes, puffed rice, porridge	≤210	≤450	≤5	≤30	Fibre (≥3g/100g) and/or wholegrain (15% whole grain per total ingredients)
Sub-category D: Cereal and cereal products except breakfast cereals, biscuits and fine bakery wares: cereal must be listed as the main ingredient.					
Bread, rusks, rice, noodles, pasta, polenta	≤340	≤500	≤5	≤5	Fibre (≥3 g/100 g) and/or wholegrain (15% of total ingredients)
Category 7: Soups, composite dishes, main course and filled sandwiches					
Sub-category A: <u>Soups</u> : all kinds of soups and broths containing min 1 of the following: 30g fruit, vegetables, cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion. (Thresholds apply to food as reconstituted, ready for consumption, following manufacturer's instructions).					
Tinned tomato soup, instant vegetable soup, soup in stand-up pouches	≤ 170	≤ 350	≤ 1.5	≤ 7.5	Nutrients delivered through ingredients (fruits and/or veg, cereals, meat, fish, milk)
Sub-category B: <u>Composite dishes, main dishes, and filled sandwiches</u> : all kinds of dishes & sandwiches containing min 2 of the following: 30g fruit, veg, cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion. (Thresholds apply to food as reconstituted, ready for consumption, following manufacturer's instructions).					
Pasta salad with veg, noodles with sauce, pizza, croque-monsieur, moussaka, filled pancakes	≤ 425	≤ 400mg	≤ 5	≤ 7.5	Nutrients delivered through ingredients (fruits and/or veg, cereals, meat, fish, milk)

¹⁴ See footnote 3.

Category 8: Meals: The combination of items served as meal (main dish, side item (s) and a beverage) for breakfast, lunch or dinner.					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g/100ml, except when specified otherwise</i>					
Children's meals	≤510/meal ^{a)} ≤340/meal ^{b)}	≤660/meal	≤10% Kcal from saturated fats	≤20/meal (minus natural occurring sugar ^{c)} from 1 portion ^{d)} J/F/V/M/D)	Each meal must contain min. of: 1 portion ^{d)} fruit/ vegetables or/and 1 portion ^{d)} 100% juice or/and 1 portion qualified ^{d,e)} dairy product or milk or/and 1 portion ^{d)} of whole grain ^{f)}
Category 9: Edible ices: all kinds of edible ices (water ices and ice cream)					
Ice cream, water ice, ice lollies, sherbet ice	≤ 110	≤ 120	≤ 5	≤ 20	-
Exclusions (no nutrition criteria; are not advertised to children <12 by EU Pledge member companies)					
<ul style="list-style-type: none"> Sugar and sugar-based products, which include: Chocolate or chocolate products; Jam or marmalade; Sugar, honey or syrup; Non-chocolate confectionary or other sugar products¹⁵ Soft drinks¹⁶ 					

Notes:

^{a)} For lunch/dinner (30% energy)

^{b)} For breakfast (20% energy)

^{c)} If sugar content is higher than 20g for a meal and contains more than 1 J/F/V/M/D.

^{d)} Portions are:

- Fruits (F)/Vegetables (V): 60-80g
- 100% juice (J): 150-250ml
- Dairy (D): e.g. 30g cheese/100-150g yoghurt
- Milk (M): 150-250ml

^{e)} Meet individual category requirements

^{f)} Product qualified for a reasonable source of fiber which contains ≥ 8g whole grain

¹⁵ Sugar-free gum and sugar-free mints are exempted, i.e. outside the scope of EU Pledge restrictions.

¹⁶ The rationale for this exclusion is that currently some EU Pledge companies committed in 2006 not to market any soft drinks directly to children younger than 12 years old (see UNESDA commitments: <http://www.unesda.org/our-unesda-commitments-act-responsibly#year2006>). Discussions are ongoing regarding low-energy beverages. In the meantime companies that are not signatories to the UNESDA commitment will continue using their own nutrition criteria for these beverages, including fruit-based drinks. Bottled water is exempted from the EU Pledge restrictions.

