

Australian Food and Grocery Council
RESPONSIBLE CHILDREN'S
MARKETING INITIATIVE
2010 COMPLIANCE REPORT



PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

With an annual turnover of \$102 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest and most important manufacturing industry. Representing 28 per cent of total manufacturing turnover, the sector is comparable in size to the Australian mining sector and is more than four times larger than the automotive sector.

The growing and sustainable industry is made up of 38,000 businesses and accounts for \$44 billion of the nation's international trade. The industry's total sales and service income in 2008-09 was \$102 billion and value added increased to nearly \$27 billion². The industry spends about \$3.8 billion a year on capital investment and over \$500 million a year on research and development.

The food and grocery manufacturing sector employs more than 315,000 representing about 3 per cent of all employed people in Australia paying around \$14 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia³. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

¹ Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc..

² AFGC and KMPG. State of the Industry 2009. Essential information: facts and figures. Australian Food and Grocery Council. Oct 2009.

³ About Australia: www.dfat.gov.au

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1. EXECUTIVE SUMMARY

This report documents signatory compliance with the Responsible Children's Marketing Initiative (RCMI) for 2010. The review captured three monitoring components: company reported activity; an external audit; and complaint adjudications by the Advertising Standards Board.

Overall, compliance with the RCMI core principles during the second year of operation was high. **Eleven** signatories reported that they did not pay for, or actively undertake, marketing communication activities to children in 2010. One of these signatories acknowledged that products that did not comply with their nutrition criteria were advertised during children's television programs. A further signatory reported that an advertisement for a product that complied with their nutrition criteria but used an animated character was screened during 'C' classified television ratings periods, which is not permitted under the RCMI. These occurrences were unintentional due to the allocation of bonus airtime by the TV network. After being alerted to these occurrences, the signatories initiated actions to prevent a reoccurrence, which included providing additional instructions to their media buying agencies.

A further **six** signatories undertook some marketing communication activities to children, which met the RCMI core principles.

Results of the external audit found there were some foods that did not meet the signatories' nutrition criteria advertised during children's television programs. These occurrences were subsequently found to be largely due to the provision of bonus airtime by the television network and not undertaken at the direction of the signatories. In addition, there were three complaints upheld by the Advertising Standards Board; also due to the provision of bonus airtime. The two signatories in question mentioned these in their activity reports.

The review has identified some implementation aspects that require strengthening, particularly in relation to the provision of bonus airtime and signatories have acted to eliminate these occurrences. The Australian Food and Grocery Council has committed to on-going monitoring of signatory activities against the RCMI core principles and will continue to encourage other food and beverage companies to sign on to the initiative.

2. INTRODUCTION

The Responsible Children's Marketing Initiative (RCMI) was developed by the Australian food and beverage manufacturing industry in 2008 in response to community concerns about the level of advertising of foods high in energy, fat, sugar and salt to children (HFSS). These concerns were highlighted by the Australian Communication and Media Authority (ACMA) in its report on the Review of the Children's Television Standards 2005⁴.

The Australian Food and Grocery Council (AFGC) and its members took particular note of comments made by ACMA that "industry should have regard to the strong concerns of interested parties in this area and consider how it can effectively address these concerns without additional regulation" (page 12)⁴. AFGC considered that a collective, voluntary approach by industry would provide an effective means to moderate the amount and type of advertising directed to children.

As a result, AFGC worked in partnership with its members and the Australian Association of National Advertisers (AANA) to develop the RCMI to provide a framework for collective action and address these concerns and demonstrate commitment to the responsible marketing of food and beverages to children.

The RCMI was launched in October 2008 and became effective on 1 January 2009. As required by the initiative, signatories have submitted reports against their Company Action Plans and highlighted the specific steps they have taken to meet their commitment during 2010. This report provides an overview of compliance with the RCMI core principles during its second year of operation.

2.1. HOW THE RCMI WORKS

The goal of the RCMI is to ensure a high level of social responsibility in marketing food and beverage products in Australia. The RCMI captures advertisements in media with an appreciable audience of children (greater than 50%) and/or that is directed primarily to children; and marketing techniques directed primarily to children⁵. The media captured by the initiative are television, radio, print, cinema and third-party internet sites.

The RCMI sets out clear expectations in the form, spirit and context of advertising to children (Appendix 1). Signatories to the RCMI publicly commit to undertake marketing communications to children only when it will further the goal of promoting healthy dietary choices and healthy lifestyles. Other core principles relate to:

- Use of popular personalities and licensed characters
- Product placement
- Use of products in interactive games
- Advertising in schools
- Use of premium offers

⁴ Australian Communications and Media Authority, Review of the Children's Television Standards 2005 Report, 2008

⁵ Programs and marketing techniques that are directed primarily to children are measured through the theme, visuals and language used.

Companies that sign up to the initiative publish individual Company Action Plans on the AFGC website that outline their specific commitments. Each signatory is required to specify the nutrition standards that will be applied (if applicable) to meet the core principles of the initiative. While the nutrition criteria may differ between signatories, the RCMI uses an outcomes-based approach. The criteria must align with established scientific or Australian Government Standards and only products that represent healthy dietary choices may be advertised.

The Advertising Standards Bureau (ASB) administers the complaints process for the RCMI, in conjunction with a range of other industry codes, including the AANA Code of Ethics, Code for Advertising & Marketing Communications to Children and the Food and Beverages Advertising & Marketing Communications Code. The ASB assesses complaints about food and beverage advertisements against all the Codes they administer, regardless of whether the complaint mentions the specific initiatives. This ensures even greater accountability to signatories to the RCMI.

Complaints are assessed according to the RCMI core principles on two levels:

1. whether the products represent a healthy choice
2. whether the advertisement is directed to children.

The determination of whether the products represent a healthy choice is made by an independent arbiter. The Nutritional Physiology Research Centre at the University of South Australia is the arbiter for the RCMI. The determination of whether the advertisement is directed to children is made by the ASB.

The Board of the ASB meets twice a month to consider complaints received and can also meet between meetings if the Secretariat considers that a complaint should be considered as a matter of urgency. As such, complaints against the RCMI can be dealt with in a timely manner. If the complaint is upheld, the company must stop marketing the product to children and all outcomes of ASB adjudications are listed on the ASB website.

2.2. 2010 SIGNATORIES

There were 17 signatories to the RCMI in 2010 with these companies owning some of the leading food and beverage brands in Australia (see Appendix 2). This is an increase of two signatories since 2009, with National Foods and General Mills signing in 2010. Kraft Foods purchased Cadbury in early 2010 and the Action Plan for Cadbury was subsequently incorporated into Kraft Foods'.

3. METHODS

This report documents compliance with the RCMI core principles during 2010 through three monitoring components: company reported activity; an external audit; and complaint adjudications by the Advertising Standards Board.

3.1. COMPANY REPORTED ACTIVITY

All 2010 signatories submitted reports against their Company Action Plan. Signatories reported on marketing communication activities to children and how these complied with the core principles of the RCMI. In some cases, signatories provided additional information, including details on other marketing activities and product redevelopment.

3.2. EXTERNAL AUDIT

AFGC undertook an audit of food and beverage advertisements outside of these reports. AFGC purchased three months of food and beverage television advertising data, March to May 2010, from Commercial Monitors, an independent Australian advertising information service provider. Commercial Monitors collects the information as the advertisements are screened; providing an accurate record of the levels and type of television advertising. The data covers advertising of food and beverage products on free-to-air television (including digital TV) from the five major capital cities: Adelaide; Brisbane; Melbourne; Perth; and Sydney. Overall, 92 days were included in the analysis (24 hours each day).

AFGC identified all television advertisements screened by signatories and assessed whether foods that do not meet their nutrition criteria were advertised during children’s programs (greater than 50% of the audience is aged less than 12 years and/or programs directed primarily to children). AFGC did not assess the creative content of the advertisements as this interpretive aspect is best suited to the expertise of the ASB as part of their adjudication on complaints received.

3.3. COMPLAINTS

Case reports from the ASB website were assessed and those that mentioned the RCMI identified. These reports document the nature of the complaint, the advertiser’s response and the ASB determination. Case reports from the website were cross-referenced with a summary report provided by ASB.

RCMI signatories

- | | |
|-------------------------------------------------------------------------|-----------------------------------|
| Campbell Arnott’s | Kraft Foods Australia/New Zealand |
| Cereal Partners Worldwide (Australia) | Mars Snackfood Australia |
| Coca-Cola South Pacific | National Foods Limited |
| Fonterra Australia New Zealand | Nestle Australia Limited |
| Ferrero Australia | Patties Foods |
| General Mills Australia | PepsiCo Australia |
| George Weston Foods Limited and AB Food and Beverages Australia Pty Ltd | Sanitarium Health Food Company |
| Kellogg (Aust) Pty Ltd | Simplot Australia |
| | Unilever Australasia |



4. SECOND YEAR OUTCOMES

4.1. COMPANY REPORTED ACTIVITY

4.1.1. Marketing communication activities to children

Campbell Arnott's undertook marketing communication activities for Tiny Teddy biscuits that were directed to children through television advertisements and an on-line game. The 25g single-serve pack advertised meet the healthy choices criteria used by Campbell Arnott's (Fresh Tastes @ School NSW Healthy School Canteen Criteria; Tiny Teddy biscuits are classified as 'amber' foods).

The creative theme for the marketing campaign encouraged good dietary habits and physical activity. The television advertisement was for a single 25g serve pack of Tiny Teddy biscuits and presented as being part of a healthy, balanced lunchbox; alongside a sandwich, piece of fruit and raw vegetable sticks. The advertisement was created to encourage children to take part in physical activity via its 'Get Dancing' theme. Children are encouraged to 'get dancing' and 'get moving' with the Tiny Teddy character. The interactive on-line game component focused on physical activity as opposed to consumption of the product.

Use of the Tiny Teddy animated character is permissible under the RCMI given the product meets the nutritional criteria specified by Campbell Arnott's.

Coca-Cola reported that they undertook no marketing communication activities to children under the age of 12 years during 2010.

Fonterra reported communication activities for a Western Star Cooking with Kids Challenge. While the activity was directed at parents to encourage their children to create a recipe and cook the dish together, it was screened during Toasted TV, a children's television program. This is permissible under the RCMI given that the advertisement was promoting the Western Star brand as opposed to a product within the butter and spreads range. The objectives of the activity were to help parents encourage children to learn to cook, to experience where food comes from, to help divert children from using electronic games/small screens, and to encourage varied activities during their school holidays.

Ferrero reported that they undertook no marketing communication activities to children under the age of 12 years during 2010. Of the brands advertised in Australia by Ferrero, Nutella and Kinder Surprise are largely consumed by children. In accordance with their commitment to not advertise to children, the media target for these products are Total Grocery Buyers, that is, the targeted audience profile are those responsible for household shopping. AFGC has viewed Ferrero's television media buying schedule and confirms that no advertisements were scheduled in children's programs.

In addition, the context of Ferrero's advertising and promotions seeks to reference healthy dietary choices and/or physical activity.

General Mills reported that they did not pay for, or actively undertake, marketing communication activity that targeted children under the age of 12 years. They were, however, alerted to occasions where their Betty Crocker and Nature Valley advertisements were screened during children's television programs. They report that this was undertaken without their consent as the placement was a result of bonus airtime from the TV station⁶. After being made aware of this occurrence, they provided additional instructions to their media buying agency who, on their behalf, has:

- updated additional precautionary measures on briefing forms to avoid inappropriate placement
- spoken to all TV networks

⁶ The station fills any unsold commercial airtime with advertisements at no cost to the advertiser and without their prior consent

- spoken to General Mills' creative partners about precautionary measures on material nomination forms to avoid inappropriate placement
- updated the classification of advertisements to prevent accidental exposure in children's programming.

George Weston Foods and AB Food and Beverages Australia reported that they undertook no marketing communications to children under the age of 12 years during 2010. While children under 12 years consume their products, they are not the target of their marketing activity.

Kellogg reported that they undertook no marketing communication activities to children under the age of 12 years during 2010.

Kraft Foods reported that they undertook no marketing communication activities to children under the age of 12 years during 2010. The Freddo character was used in the 'Freddo Frog & the Golden Keys' interactive adventure on the Cadbury website; however, because specific products were not actively promoted, this activity is permissible under the RCMI. In addition, the Cadbury Marketing Code was referenced at all stages of campaign development and led to a number of major refinements to both the campaign creative and execution, e.g. a shift from an initial target of early-teens to parents; stronger password and access controls around the interactive elements of the campaign; and promotion of healthy off-line activity as an integral component of the online adventure.

Mars reported that they undertook no marketing communication activities to children under the age of 12 years during 2010.

National Foods reported communication activities for GoGurt and YoGo that was directed to children.

Go Gurt was advertised on the GO! television channel between 7 February 2010 and 7 March 2010 during the programs Camp Lazio, The Jetsons, Cartoon G Style, Early Saturday Movie and Tool Academy. Go Gurt meets the healthy choices criteria used by National Foods, which includes criteria specified in state-based school canteen nutrition policies. Go Gurt is classified as a 'green' product based on its nutritional profile under each state's school canteen criteria and is registered as a green product in the Healthy Kids' Association School Canteen Product Registration Scheme.

The commercial advertised a promotion – 'Win a Snowblasted Schoolyard' – whereby a child could win their school 10 tonnes of snow for the day. Beyond the television commercial, the promotion incorporated a website that acted as a tool to submit entries and displayed images of past snow days and the winning school's experience. The site contained nutrition information for parents and details of Go Gurt's green status under the state-based school canteen criteria and School Canteen Buyers Guides. There was no point-of-sale in schools for this campaign.

This campaign aligns with the RCMI in that the product meets National Foods' nutrition criteria and the promotion was designed to encourage active play.

YoGo was advertised from 5 September to 3 October 2010 on the Nickelodeon channel on pay TV during a number of children's programs including Spongebob Squarepants, Icarly, Kids Choice TV, Lockie Leonard, Avatar: the last airbender, Jimmy Neutron and Fanboy & Chum Chum. YoGo Choc Rock and Triple Trek 100g products are classified as green in every state based on school canteen criteria. The majority of YoGo sales come from these 12 x 100g products. The YoGo Choc Rock and YoGo Swirl 150g products are classified as red in Victoria and South Australia because the energy content is 10% higher than the energy per serve criteria. However, the product is classified as green or amber in the remaining states (New South Wales, Queensland, Western Australia and the Healthy Kids' Association School Canteen Buyers Guide).

The commercial advertised a promotion – the chance for consumers to win a trip to Sydney Wildlife Park (an active, outdoor experience) with their families and displayed a pack shot of the YoGo Choc Rock 100g product on the final screen. The commercial was supported by the existing YoGo website, which has been in market for some time. Consumers could go to the website to find out more about the promotion. Beyond the information on the promotion, the website also included information on YoGo products, some interactive games and healthy eating and physical activity tips. To encourage healthy lifestyle practices, when a child reaches 30 minutes of playing the games a screen pops up that suggests they take a break / stop playing and go outside.

This campaign aligns with the RCMI in that the product focused on in the promotion meets National Foods' nutrition criteria and the promotion was designed to encourage active play. However, during the campaign it came to the attention of National Foods that there was a broad range of products displayed on the existing website, including some of the minor products that varied in their green/amber/red status across the states. Upon learning of this National Foods immediately removed these images from the website, to ensure only the 100g products were displayed. While the RCMI does not cover products displayed on company-own websites, National Foods has taken additional steps in this area.

This inconsistency occurred due to the highly complex nature of the school canteen criteria, which vary by state. National Foods makes products that are distributed nationally, and by virtue its marketing activity also crosses state borders. This experience has shown National Foods that they need to apply one standard across their products, to ensure consistency in their marketing activity and absolute adherence to their commitments.

It is the understanding of National Foods that a national school canteen criterion has been developed, and is currently being reviewed by each state government who will determine whether their state adopts it, or keeps a local guideline. Once this is decided, National Foods will then review and determine any amendments to its Company Action Plan. In the interim, and to ensure strict adherence to the National Foods Company Action Plan in its current form, all YoGo marketing activity will conform to the specifications below until a resolution is found:

- Only YoGo Choc Rock and Triple Trek 100g serve size products will be used in marketing activity
- YoGo 150g serve sizes will not be used in marketing activity.

Nestle Australia and Cereal Partners Worldwide (CPW) reported marketing communication activities for Milo cereal that was directed to children. This was through sponsorship of Nickelodeon programs (Pay TV) and a 'Top Shot' competition with three opportunities to enter over the sponsorship period (March to September 2010). The competition required children to submit a video or picture of themselves showing their skills as a Top Shot (i.e. an activity that they love whether sport, a trick or a hobby). Parental consent to enter the competition was required. Nestle also sponsored a micro site on the Nickelodeon website. Milo cereal meets the healthy choices criteria used by Nestle and CPW Worldwide (CPW Nutrition Foundation).

A premium offer of a 'flying spinner' was run in connection with Peters Billabong ice confection. The communication activity was in the context of a healthy lifestyle and the product meets the healthy choices criteria used by Nestle and CPW Worldwide.

Patties Foods reported that they undertook no marketing communication activities to children under the age of 12 years during 2010. AFGC has viewed Patties Foods' television media buying schedule and confirms that no advertisements were scheduled in children's programs.

PepsiCo reported that they undertook no marketing communication activities to children under the age of 12 years during 2010.

Sanitarium undertook a range of marketing activities for the Weet-Bix brand that targeted children. These were:

- 'Weet-Bix Kid' television commercial featuring Tim Cahill and Brett Lee
- Weet-Bix nutrition television commercials
- Weet-Bix commemorative cap promotion; undertaken on pack, in-store and through PR activity
- Weet-Bix Bites outdoor advertising campaign
- Weet-Bix Tryathlon event with PR and promotional material and school visitation programs
- Weet-Bix Kids Wiggles product endorsement on pack and marketing activity

These Weet-Bix products meet the healthy choices criteria used by Sanitarium (Corporate Nutrition Policy, which includes key nutrient benchmarks for each product category. The benchmarks are based on the Australian Dietary Guidelines and recommendations from the National Heart Foundation and the Federation of Canteens in Schools).

Marketing communication activity for the Weet-Bix brand primarily intends to inspire young Australians to make healthy eating and lifestyle choices. Promotions and events aim to encourage physical activity, such as through team and individual sports.

Sanitarium use Tim Cahill and Brett Lee as inspirational 'Weet-Bix Kids', with the aim of encouraging young Australians to start the day with a healthy breakfast to help them achieve their goals. Other popular personalities are used in their Tryathlon program as ambassadors to encourage healthy lifestyles including regular exercise and activity. The Wiggles are used to endorse the Weet-Bix Kids product on pack and in limited promotional messaging.

The school visitation program promoted the Weet-Bix Kids Tryathlon and were supervised and run in conjunction with the school program. Premium offers in the Weet-Bix Commemorative Cap promotion complied with the requirements of the RCMI.

Simplot reported that they did not pay for or actively undertake marketing communication activity that targeted children under the age of 12 years. They were, however, alerted to occasions where the Captain Birds Eye television commercial for fish fingers using an animated character was screened during 'C' classified ratings periods. They reported that this was undertaken without their consent as the placement was a result of bonus airtime from the TV station. While the product meets the healthy choices criteria used by Simplot (Fresh Tastes @ School NSW Healthy School Canteen Criteria), the use of animated characters during 'P' and 'C' periods is prohibited in the Children's Television Standards 2009, which the RCMI references in the core principles. Simplot has since instructed their media agencies to ensure that this television commercial is no longer aired in 'C' rated periods and they have developed a new commercial for their Captain Birds Eye fish fingers that is 'G' rated.

Unilever reported the Paddle Pop Lick-a-Prize Elemagika promotion that ran from September to December 2010. Paddle Pops meet the healthy choices criteria used by Unilever (Fresh Tastes @ School NSW Healthy School Canteen Criteria and the Unilever global internal nutrient criteria).

This promotion was undertaken via television (advertisement shown on pay TV and the Paddle Pop website), magazines (K-Zone and Total Girl), bus shelters and the Paddle Pop website. The promotion was on how to win and what can be won. Prizes included those related to outdoor active play, including scooters, vortex howlers, water pistols and a family holiday that included outdoor activities. The Paddle Pop Lion was only used in the representation on the front of the pack. A website was developed to enable stick code verification, which included an interactive game (with no reference to products). This form of promotion has been assessed by the ASB who deemed it to be compliant with the RCMI (case reports 75-10 and 76-10).

Lick-a-Prize point of sale communication was used in some schools (primarily high schools) at the discretion of the school's administration.

4.1.2. Specific activity

The RCMI has had a positive impact on company activities in terms of ensuring a healthy food environment for children, including:

Fonterra reported that CalciYum flavoured milk underwent label re-design of pop top bottles and UHT cartons to remove the cartoon characters.

All **Patties Foods** products and brands targeted at, and for sale in, primary schools are approved by the National Heart Foundation Tick Program and the relevant state-based school canteen associations. Their school range of products has lower saturated fat and sodium levels. Any product-related communication (such as point-of-sale) used in primary schools is approved by the school administration and related to healthy lifestyle activities.

4.1.3. Steps to meet requirements of RCMI

While not a requirement of the reporting activities, some signatories reported on the internal processes put in place to ensure compliance with their commitments to the RCMI:

Campbell Arnott's has committed to only undertake marketing communication activities to children less than 12 years for products that represent healthy dietary choices and the advertisements are presented in the context of a healthy lifestyle. To meet this commitment, Campbell Arnott's undertakes ongoing face-to-face briefings for new and existing internal stakeholders (e.g. marketers) and external creative partners (e.g. advertising agencies, media buyers). Campbell Arnott's has a component on the RCMI on internal advertising approval forms and requires that all advertisements to children be approved by the Campbell Soup Company's World Headquarters. Campbell Arnott's also undertakes a review of all relevant media placement schedules and provides written advice to media buying partners to ensure bonus spot placements adhere to their RCMI commitment.

Coca-Cola has committed to not undertake marketing communication activities to children less than 12 years. To meet this commitment, all marketing materials are submitted through an approval process that involves weekly reviews by a marketing approvals team, which comprises representatives from Legal Counsel, Public Affairs and Technical and Marketing.

Ferrero has committed to not undertake marketing communication activities to children less than 12 years. This commitment has been communicated to Ferrero management and media partners to ensure planned activities align with this commitment. Planned marketing activities are subject to review at a corporate level to ensure compliance with the requirements of the RCMI. For television advertising, Ferrero audits the spot schedule prior to the campaign to identify children's programs and make changes as required. Post-campaign, Ferrero reviews audience share reports for programs in which their advertisements screened.

Fonterra has committed to only undertake marketing communication activities to children less than 12 years for products that represent healthy dietary choices and the advertisements are presented in the context of a healthy lifestyle. To meet this commitment, the approval process for marketing communications involves staff from Nutrition, Brand Governance, Regulatory Compliance and Legal Affairs. All communication activities are signed off by the senior management team.

General Mills became a signatory to the RCMI in March 2010 and has committed to not undertake marketing communication activities to children less than 12 years. To meet this commitment they have briefed their company, in particular, the marketing department and shared their Company Action Plan with their external advertising and media buying agencies.

George Weston Foods and AB Food and Beverages Australia have committed to only undertake marketing communication activities to children less than 12 years for products that represent healthy dietary choices and the advertisements are presented in the context of a healthy lifestyle. Planned marketing activities are subject to review across the business to ensure compliance with the RCMI.

Kraft Foods has committed to only undertake marketing communication activities to children less than 12 years for products that represent healthy dietary choices and the advertisements are presented in the context of a healthy lifestyle. Their media buying schedule is planned accordingly and all advertising material is reviewed by the Corporate and Legal Affairs team prior to public release.

Following the acquisition of Cadbury in 2010, Kraft Foods is instituting new procedures to ensure all marketing concepts, including sponsorships and partnerships, abide by the RCMI (and their own internal policies) prior to implementation. (Cadbury also had a long standing policy of responsible marketing and not directing marketing to children under 12 years.)

National Foods has committed to only undertake marketing communication activities to children less than 12 years for products that represent healthy dietary choices and the advertisements are presented in the context of a healthy lifestyle. To ensure their commitment outlined in their Company Action Plan is continually applied, National Foods has an internal review process that incorporates formal approval from the Nutrition, Research and Development, Corporate Affairs and Legal teams. This process ensures their marketing activity is compliant with all relevant industry codes, laws and regulations.

PepsiCo has committed to not undertake marketing communication activities to children less than 12 years. This commitment has been communicated to their external advertising, media and promotional agencies and is part of their Internal Policies. Compliance to this process is also integrated into their internal audit process.

Sanitarium has committed to only undertake marketing communication activities to children less than 12 years for products that represent healthy dietary choices and the advertisements are presented in the context of a healthy lifestyle. This commitment has been communicated to the Sanitarium marketing teams and external agency vendors. The Sanitarium Action Plan is used to review proposed advertising material in all instances where children have been targeted or may be exposed to their content.

Simplot has committed to only undertake marketing communication activities to children less than 12 years for products that represent healthy dietary choices and the advertisements are presented in the context of a healthy lifestyle. To meet this commitment, their Action Plan has been disseminated to all employees involved in marketing, and training programs have been implemented. It is also a requirement that all advertising campaigns targeting children are reviewed against their Action Plan as part of Simplot's internal marketing and advertising approval process.

Unilever has committed to only undertake marketing communication activities to children less than 12 years for products that represent healthy dietary choices and the advertisements are presented in the context of a healthy lifestyle. To meet this commitment, all communication briefs are checked by the marketing and legal departments to ensure compliance with their RCMI agreement.

4.1.4. Other reported activity

Some signatories reported on other marketing communications and general activity related to the application of the RCMI and to encourage healthy eating and lifestyle practices:

Campbell Arnott's provides a statement on the outer packs of all Tiny Teddy products reminding consumers that the product has an 'amber' rating and that these foods can be enjoyed as part of a balanced diet but should be selected carefully. They should not dominate the menu at the expense of healthier choices. One serving a day, within the context of a healthy lifestyle and diet, is acceptable. Multiple servings should be avoided.

One of the mechanisms for determining whether a program is directed to children is the application of a 50% audience threshold of children less than 12 years. Since September 2010, **Coca-Cola South Pacific** has operated under a new self regulated audience threshold of greater than 35% children. To ensure compliance with this threshold, their media buying agency sends letters detailing this commitment to the networks and their traffic departments to ensure they are aware any activity (paid or bonus) is subject to strict guideline placements.

Fonterra reported that their marketing to children decreased in 2010 compared to 2009; in part due to the RCMI. Their 2010 activity report mentioned a campaign for Ski Smooth yoghurts that were advertised to adults via adult television programming. Other components of the campaign included magazine advertisements in women's magazine titles, promotions via bus shelters, supermarket floor decals and digital screens in shopping centres. The advertisement included children in the visuals; however, they were not screened in media directed to children, nor was the creative content of the advertisement directed to children.

AFGC has viewed the television media schedule for this advertisement and confirms that it was not shown in children's programs. Details were, however, not available of the 'bonus' airtime placement nor the family movie, which made up a very small minority of all screenings. Also, Ski yoghurts meet the Fonterra *Good Choice Guidelines* and the advertisement showed children being physically active.

Fonterra reported on a print campaign associated with Junior MasterChef. The print executions, 'The Kids are Taking over the Kitchen', were directed at adults via gourmet and cooking magazine titles, such as MasterChef and Taste, with the readership being primarily adults.

Ferrero reported that, to further strengthen their commitment to the RCMI, they have sought to minimise the potential for unapproved bonus spot programming errors by networks in programs that would fall within the scope of the RCMI. Two actions have been undertaken:

1. Ferrero has changed the CAD ratings (advertisement classification) of their Nutella and Kinder Surprise commercials from 'C' to 'W'; providing a reminder of their commitment with this 'General/Care in placement' category.
2. Ferrero has written to, and received acknowledgement from, all television networks communicating their requirements in accordance with the RCMI.

Kellogg reported a number of promotions that targeted parents and young adults through their content and media schedule. The promotions targeting parents were focused on childhood development and learning and the promotions targeting young adults were focused on encouraging physical activity.

Kraft Foods takes active steps on its Cadbury products and advertising to highlight that the products are treats that should only be consumed in moderation and as part of a healthy and balanced diet. Cadbury also offer a range of format sizes to ensure consumer choice.

Mars reported that 2010 marked the third year of their health and nutrition program known as 'Making Chocolate Better'. Various initiatives contribute to this program including:

Daily Intake Guide

Mars supports the Daily Intake Guide labelling to help consumers make informed choices and all products have the % Daily Intake thumbnail for energy on the front of pack.

Serving size

Mars acknowledges the role of chocolate in providing consumers with pleasure; however, understands that chocolate should be viewed as a treat. To support a healthy lifestyle, Mars has reduced their bar sizes to 1,050 kilojoules and made all their Fun Size bars less than 420 kilojoules. Mars King Size products have been made into two pieces to encourage responsible snacking.

Saturated fat

Mars is working towards reducing the saturated fat content of a standard Mars Bar by 22% and Milky Way Bars by 19%. Their overall goal is to remove 130-160 tonnes of saturated fat from the Australian food supply per year; achieved through the use of high oleic acid sunflower oil.

Active lifestyles

Mars promotes healthy lifestyles within their business through their participation in activities such as Associate Health Checks, Run for the Kids and Ride to Work Day. Mars is a major sponsor of the AFL Carlton Football Club, which encourages participation in sport.

Nestle and CPW Australia operates under an audience threshold of greater than 25% children.

Patties reported a number of campaigns that targeted adults and main grocery buyers. The associated media schedule, viewed by AFGC, indicated that they weren't shown in children's programs.

4.2. EXTERNAL AUDIT

Results of the external audit (March to May 2010) identified few instances in which foods that did not meet the company's nutrition criteria were shown in children's television programs (Table 1). Each of the signatories responded to AFGC regarding these occurrences and the primary reason cited for the non-compliance was due to bonus airtime being given by the TV networks. Companies are subsequently strengthening their external training and communication to ensure advertisements for HFSS foods are not inadvertently placed in children's programs. Some signatories have reclassified their advertisements, which acts as an additional mechanism to prevent incorrect placement.

In one instance, a TV station screened a different movie than scheduled, which would have been compliant with the RCMI. This was beyond the control of the signatory; however, indicates that further communication with the television networks is required.

In the case of General Mills, because they became a signatory in March 2010, their activity is likely due to previously booked media spots and campaigns. This is possible given the audit took place during March to May 2010. Action has since been implemented by General Mills to ensure the placement of the advertisements comply with the RCMI core principles in the future.

Table 1: Compliance assessment through AFGC auditing, March to May 2010 (TV advertising placement only)

RCMI Signatory	Compliance details
Campbell Arnott's	Fully compliant
Cereal Partners Worldwide (Australia)	Fully compliant
Coca-Cola South Pacific	An advertisement for Coke Minis screened three times in children's programs during the audit period, representing 2.5% of screenings for the advertisement.
Ferrero Australia	An advertisement for Nutella screened three times in a children's program during the audit period, representing 1.5% of screenings for the advertisement. An advertisement for Kinder Bueno screened twice in children's programs during the audit period, representing 0.4% of screenings for the advertisement. An advertisement for Ferrero Rocher screened once in a children's program during the audit period, representing 0.5% of screenings for the advertisement.
Fonterra Australia New Zealand	Fully compliant
General Mills Australia	An advertisement for Betty Crocker cake mix screened 55 times in children's programs during the audit period, representing 21.4% of screenings for the advertisement. An advertisement for Betty Crocker cupcake mix screened 59 times in children's programs during the audit period, representing 21.2% of screenings for the advertisement.
George Weston Foods Limited and AB Food and Beverages Australia	Fully compliant
Kellogg (Australia)	Fully compliant

Table 1 cont...: Compliance assessment through AFGC auditing

RCMI Signatory	Compliance details
Kraft Food Australia/New Zealand	<p>Three separate advertisements for Cadbury Creme Eggs were screened 44 times in children’s programs during the audit period, representing 4.9% of screenings for the advertisements.</p> <p>An advertisement for Cadbury Favourites screened twice in children’s programs during the audit period, representing 1.4% of screenings for the advertisement.</p> <p>An advertisement for Kraft Cheesybite screened 86 times in children’s programs during the audit period, representing 15.4% of screenings for the advertisement.</p>
Mars Snackfood Australia	<p>An advertisement for Starburst confectionary screened once in a children’s program during the audit period, representing 5.6% of screenings for the advertisement.</p> <p>An advertisement for M&Ms screened once in a children’s program during the audit period, representing 0.5% of screenings for the advertisement.</p>
National Foods Limited	Fully compliant
Nestle Australia Limited	<p>An advertisement for Chokito screened three times in children’s programs during the audit period, representing 0.8% of screenings for the advertisement.</p> <p>An advertisement for the Heaven ice cream screened once in a children’s program during the audit period, representing 3.8% of screenings for the advertisement.</p> <p>An advertisement for Roll Ups screened six times in children’s programs during the audit period, representing 6.0% of screenings for the advertisement.</p>
Patties Foods	Fully compliant
PepsiCo Australia	An advertisement for Red Rock potato crisps screened seven times in children’s programs during the audit period, representing 1.0% of screenings for the advertisement.
Sanitarium Health Food Company	Fully compliant
Simplot Australia	Fully compliant
Unilever Australasia	An advertisement for Lipton Ice Tea screened twice in a children’s program during the audit period, representing 0.5% of screenings for the advertisement.

4.3. COMPLAINTS

The ASB assessed a number of complaints in 2010 in relation to the RCMI, comprising those that were ‘direct’ and ‘indirect’. Direct complaints are where the complainant directly mentions the RCMI in the complaint, while indirect complaints are where the complainant does not mention the RCMI; however, because the complaint relates to the appropriateness of food or beverage advertising, the ASB assesses it against the RCMI Core Principles.

4.3.1. Upheld

Three complaints against the RCMI were upheld in 2010:

1. Oreos television advertisement (Kraft Foods)
2. Smarties '8 colours of fun' television advertisement (Nestle)
3. Choc Shoc Drumstick television advertisement (Nestle)

The nature of the complaints focused on the placement and/or the creative content of the advertisement for foods that do not represent healthy dietary choices. In all three instances the ASB determined that while the advertisements were not targeting children through their creative content, they were screened in children's programs. The signatories responded that the advertisements were inadvertently shown during children's programs through bonus airtime and they would be taking action to strengthen awareness within their companies, media agencies and the television networks regarding the RCMI principles. As an extra precaution, Kraft Foods stated that they will ensure all advertisements are rated G or W to prevent them being inadvertently placed in or adjacent to children's television programs.

Kraft Foods and Nestle mentioned these complaints in their activity reports.

4.3.2. Dismissed

Nine direct complaints against the RCMI were dismissed in 2010:

1. Allen's lollies television advertisement (Nestle)
2. Smarties '8 colours of fun' website (Nestle)
3. Television advertisement for Nestle products (Nestle)
4. Snickers television advertisement (Mars)
5. Mars bar television advertisement (Mars)
6. Kinder Surprise television advertisement (Ferrero)
7. Magnum television advertisement (Unilever)
8. Fanta television advertisement (Coca-Cola)
9. Coke television advertisement (Coca-Cola)

The nature of the complaints focused on the placement and/or the creative content of the advertisement for foods that do not represent healthy dietary choices. In all nine instances, the ASB determined that the advertisements were not targeting children in their creative content, nor were they screened in children's programs.

Two indirect complaints were dismissed in 2010:

1. Paddle Pop Lick-a-Prize television advertisement (Unilever)
2. Paddle Pop Lick-a-Prize website (Unilever)

The ASB determined that because Paddle Pop's meet Unilever's specified nutrition criteria and the promotions were not classified as premium offers, they were not in breach of the RCMI.

All case reports can be viewed at the ASB website: www.adstandards.com.au.

5. GOVERNMENT ACTION ON THE ISSUE

The Preventative Health Taskforce made the recommendation in the National Preventative Health Strategy to phase out the marketing of energy-dense, nutrient-poor (EDNP) food and beverages before 9pm in order to tackle the growing prevalence of overweight and obesity⁷. The Federal Government response acknowledged industry efforts to reduce children's exposure to EDNP food and beverages and that these will be monitored to assess their effectiveness⁸.

This report demonstrates that RCMI signatories are fully committed to meeting their commitments to the RCMI and are demonstrating due diligence to reduce their marketing of HFSS foods to children aged less than 12 years. Industry is willing to support government in their review of industry-led initiatives.

6. CONCLUSION

Overall, compliance with the RCMI in 2010 was high. Signatory reports indicated that company processes are in place to ensure adherence to their commitment to the RCMI, and reported activity was largely in line with these commitments. Results of the external audit found that there was some placement of HFSS foods in children's television programs, which was subsequently found to be largely due to the provision of bonus airtime by the TV network. In addition, there were three complaints upheld by the ASB; also due to the provision of bonus airtime.

These findings indicate the need for implementation aspects to be addressed by the signatories and to develop mechanisms for ensuring that the allocation of bonus airtime does not cause them to be in breach of the RCMI. Signatories have reported that they are acting on these findings and implementing procedures to eliminate these occurrences.

7. NEXT STAGES

AFGC has committed to purchase food and beverage television advertising data on a periodic basis to assess the activities of signatories and non-signatories against the RCMI core principles. The data will also be used to measure the frequency of advertising during children's viewing periods; a key area of concern for some. On-going monitoring of marketing communication activities against the RCMI core principles and during children's viewing periods is important to determine the extent of the current situation, changes over time, and identify any improvements required to the RCMI. AFGC will continue to encourage other food and beverage manufacturing companies to sign up to the initiative.

⁷ National Preventative Health Taskforce (2009) *Australia: the healthiest country by 2020 – National Preventative Health Strategy – the roadmap for action*, Commonwealth of Australia: Canberra.

⁸ Commonwealth of Australia (2010) *Taking Preventative Action – a response to Australia: the healthiest country by 2010 – the report of the National Preventative Health Taskforce*, Commonwealth of Australia: Canberra.

APPENDIX 1: THE RESPONSIBLE CHILDREN'S MARKETING INITIATIVE

Introduction

The Australian Food and Beverage Industry has developed this initiative to demonstrate its commitment to responsible marketing of foods and beverages to children.

The goal is to ensure that a high level of social responsibility in marketing communication and marketing food and beverage products in Australia is maintained.

This initiative will provide confidence in the responsible marketing practices via clear expectations of the form, spirit and context, and a transparent process for monitoring and review of practices. The aim is to provide a framework for food and beverage companies to help promote healthy dietary choices and lifestyles to Australian children.

This Initiative has been developed in collaboration with the AANA as part of the system of advertising and marketing self-regulation in Australia. Signatories to this initiative must also abide by:

- The AANA Code for Advertising & Marketing Communications to Children
- The AANA Food & Beverages Advertising & Marketing Communications Code
- The AANA Code of Ethics

This document outlines the minimum commitments required by signatories. Companies may choose to adopt additional commitments.

Scope

The scope of this initiative is based on the definitions of **Advertising or Marketing Communications to Children** and **Media**.

Advertising or Marketing Communications to Children is defined by the AANA Code for Advertising and Marketing Communications to Children and means advertising or marketing communications which, having regard to the theme, visuals and language used, are directed primarily to Children and are for Product.

Media means television, radio, print, cinema and third-party internet sites where the audience is predominantly children and/or having regard to the theme, visuals, and language used are directed primarily to children. In regards to television, this includes all P and C programs; all programs where more than 50% of the audience is children under 12 years; plus those G rated programs that meet the criteria above as being designed for children.

Further definitions are provided in Appendix 1.

An indicative television program list is provided in Appendix II.

Core Principles

Companies participating in this initiative will publicly commit to marketing communications to children under 12, only when it will further the goal of promoting healthy dietary choices and healthy lifestyles.

Each participant will develop an individual company action plan that outlines how they will meet the following core principles:

Advertising Messaging

Participants will not advertise food and beverage products to children under 12 in media unless:

1. those products represent healthy dietary choices, consistent with established scientific or Australian government standards

And

2. the advertising and/or marketing communication activities reference, or are in the context of, a healthy lifestyle, designed to appeal to the intended audience through messaging that encourages:
 - good dietary habits, consistent with established scientific or government criteria
 - physical activity.

Use of Popular Personalities and Characters

Participants will not use popular personalities, program characters or licensed characters in advertising primarily directed to children under 12 unless such advertising complies with the messaging options set out above. This is in addition to requirements under the Children's Television Standards 2009 covering C and P periods (CTS section 35).

Product Placement

Participants will commit to not paying for or actively seeking to place their food or beverage products in the program/editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products unless those products are consistent with healthy dietary choices under #1 above.

Use of Products in Interactive Games

Participants will commit that, in any interactive game primarily directed to children under 12 where the company's food or beverage products are incorporated into the game, the interactive game must incorporate or be consistent with healthy dietary choices under #1 above and healthy lifestyle messaging under #2 above.

Advertising in Schools

Participants will refrain from product-related communications in primary schools, except where specifically requested by, or agreed with, the school administration for educational or informational purposes, or related to healthy lifestyle activities under the supervision of the school administration or appropriate adults.

Use of Premium Offers

Participants will commit to not advertising premium offers unless the reference to the premium is merely incidental to the product being advertised in accordance with the AANA codes and the Children's Television Standards 2009 (CTS Section 33).

Individual Company Action Plans

Companies will sign up to this initiative as a minimum commitment and will develop and publish individual *Company Action Plans* that outline their specific commitments including individual nutritional standards if applicable in order to meet the core principles of this initiative.

Because companies and their product lines vary, the way companies comply with this framework will differ. However, all commitments will be consistent with the core principles outlined in this initiative.

This initiative outlines the minimum commitments required by signatories. Companies may choose to go further if they wish.

Complaints

AFGC and AANA have formulated a transparent public complaints system, managed by the Advertising Standards Bureau.

Sanctions may be imposed on participants who fail to meet their obligations under the terms of this initiative.

Compliance monitoring

Companies are required to report on their marketing communication activities to children on an annual basis. Key criteria have been established to assess how companies' activities meet the core principles outlined in this initiative.

AFGC will be responsible for coordinating the monitoring of company activities on an annual basis to confirm compliance, with resultant reports being made publically available.

Appendix I - Definitions

In this Initiative:

Marketing Communications means

- a. matter which is published or broadcast using any medium in all of Australia or in a substantial section of Australia for payment or other valuable consideration and which draws the attention of the public or a segment of it, to a product, service, person, organisation, or line of conduct in a manner calculated to promote or oppose directly or indirectly that product, service, person, organisation or line of conduct;
- b. any activity which is undertaken by or on behalf of an advertiser or marketer for payment or other valuable consideration and which draws the attention of the public or a segment of it to a product, service, person, organisation or line of conduct in a manner calculated to promote or oppose directly or indirectly the product, service, person, organisation or line of conduct, but does not include Excluded Advertising or Marketing Communications.

Excluded Marketing Communications means labels or packaging for products.

Advertising or Marketing Communications to Children is defined by the AANA Code for Advertising and Marketing Communications to Children and means advertising or marketing communications which, having regard to the theme, visuals, and language used, are directed primarily to children and are for product.

Media means television, radio, print, cinema and third-party internet sites where the audience is predominantly children and/or having regard to the theme, visuals, and language used are directed primarily to children.

Children means persons under 12 years of age.

Popular Personalities and Characters means:

- a personality or character from a C program or P program
- a popular program or movie character
- a non-proprietary cartoon, animated or computer generated character
- a popular personality.

Premium means anything offered free or at a reduced price and which is conditional upon the purchase of a children's food or beverage product.

Product is defined by the AANA Code for Advertising and Marketing Communications to Children and means goods, services and/or facilities which are targeted toward and have principal appeal to Children. In the case of the Responsible Children's Marketing Initiative, the Product is contained to food and beverages.

Appendix II - Indicative Television Program List

Under the Responsible Children’s Marketing Initiative, participants will not advertise food and beverage products to children under 12 in media unless it meets the core principles in relation to advertising messaging.

The list in Table 2 has been provided to illustrate the types of television programs covered by the initiative. This list includes all P and C programs; all programs where more than 50% of the audience is children under 12 years; plus those G rated programs that meet the criteria as being designed for children (through the themes, visuals and language used). The list in Table 3 outlines programs that are not covered by the initiative.

Note: these are indicative lists and will be updated from time to time to reflect current programming. The Advertising Standards Board makes the final determination of programs covered by the Responsible Children’s Marketing Initiative.

Table 2: Programs covered by the RCMi

Action Man A.T.O.M.	It’s Academic	SpongeBob SquarePants
Alvin and the Chipmunks	Kamen Rider Dragon Knight	Spy Kids
Animalia	Kid’s WB on Nine	Sumo Mouse
Bakugan	Kidspeak	Tamagotchi!
Ben 10: Alien Force	Kim Possible	The Ant Bully
Blinky Bill	K9	The Batman
Bubble Town Club	Lab Rats Challenge	The Book Place
Camp Lazlo	Legend of Enyo	The Fairies
Cats & Dogs	Legion of Superheroes	The Flintstones
Chaotic	Life and Times of Juniper Lee	The Jetsons
Chowder	Looney Tunes	The Marvellous Misadventures of Flapjack
Class of 3000	Maddigan’s Quest	The Perils of Penelope Pitstop
Codename: Kids Next Door	Magical Tales	The Replacements
Count Duckula	Marine Boy	The Saddle Club
Dangermouse	Mickey Mouse Clubhouse	The Shak
Dennis & Gnasher	Mortified	The Sleepover Club
Dex Hamilton	My Friends Tigger and Pooh	The Wind in the Willows
Digimon Data Squad	My Gym Partner is a Monkey	Thunderbirds
Dive Olly Dive	Oggy and the Cockroaches	Toasted TV
Dora The Explorer	Out of Jimmy’s Head	Tom & Jerry
Erky Perky	Phineas and Ferb	Top Cat
Foster’s Home for Imaginary Friends	Power Rangers	Totally Wild
Flipper	Puzzle Play	Toybox
Go, Diego Go	Ruby Gloom	Trapped
Go Go Stop	Rugrats Go Wild!	Treasure Island
G2G: Got to Go	Saturday Disney	Wacky Races
Handy Manny	Scooby-Doo (and Shaggy)	Wipeout
Hannah Montana	Scope	Wormwood
Hi-5	Sea Princesses	Yin Yang Yo!
H2O - Just Add Water	Spectacular Spiderman	Yu Gi Oh! 5 Dragons
	Spit it Out	

Table 3: Programs not covered by the RCMI

<p>The Simpsons Wipeout The X Factor Malcolm in the Middle Sunrise Today Knight Rider Wagon Train The Virginian Home and Away Neighbours The Zoo The Nanny Friends I Dream of Jeannie Bewitched</p>	<p>The Morning Show Get Smart Ready Steady Cook Masterchef Here's Lucy Deal or No Deal The A-Team Monster Garage Minute to Win It That '70s Show How I Met Your Mother Two and a Half Men The Big Bang Theory Top Gear Seinfeld</p>
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APPENDIX 2: RCMI SIGNATORIES AND MAJOR BRANDS, 2010

RCMI Signatory	Major brands
Campbell Arnott's	Tim Tam, Tiny Teddy, Shapes, Country Ladle, V8
Cereal Partners Worldwide (Australia)	Uncle Toby's Plus, Nestle Milo cereal
Coca-Cola South Pacific	Coca-Cola, Sprite, Fanta, Lift, POWERADE, Goulburn Valley
Ferrero Australia	Tic Tac, Ferrero Rocher, Kinder Surprise, Kinder Bueno, Nutella
Fonterra Australia New Zealand	Calci Yum, Nestle and Ski chilled dairy products
General Mills Australia	Latina, Old El Paso, Betty Crocker
George Weston Foods Limited and AB Food and Beverages Pty Ltd	Tip Top®, Don®, KR Castlemaine®, Abbott's Village Bakery™, Golden®, Bazaar® Breads of the World™, Bürger®, Jarrah®, Ovaltine®, Top Taste®, Mills & Ware®, Ministry of Muffins ®
Kellogg (Australia)	Kellogg breakfast cereal and snack foods
Kraft Food Australia/New Zealand	Vegemite, Cadbury Dairy Milk, Freddo, Pascall, Cherry Ripe, Philadelphia, Peanut Butter, Toblerone.
Mars Snackfood Australia	Mars®, Dove®, Maltesers® and M&M's®; Dolmio®, Uncle Ben's® and Masterfoods®, Doublemint®, Wrigley's Spearmint®, Juicy Fruit®, Orbit®, Extra®, Airwaves®, Eclipse®, Hubba Bubba®
National Foods Limited	Pura, Dairy Farmers, Berri, Daily Juice, Yoplait, Coon, Farmers Union, Dare, Moove, Masters, Big M
Nestle Australia Limited	Nestle, Nestle/Peters, Allen's, Uncle Toby's
Patties Foods	Patties, Four'n Twenty, Nanna's, Creative Gourmet, Herbert Adams
PepsiCo Australia	Smith's, Red Rock Deli, Doritos, Nobby's, Parker's, Twisties, Burger Rings, Toobs, Grain Waves, Sakata Pepsi, Gatorade, 7-Up, Mountain Dew.
Sanitarium Health Food Company	Sanitarium
Simplot Australia	Birds Eye, Chiko, Edgell, Harvest, I&J, John West, Leggo's, Seakist, Lean Cuisine
Unilever Australasia	Streets, Continental, Bertolli, Flora

Australian Food and Grocery Council

Level 2, Salvation Army House
2-4 Brisbane Avenue
Barton ACT 2600

Locked Bag 1
Kingston ACT 2604

T: (02) 6273 1466
F: (02) 6273 1477
afgc@afgc.org.au
www.afgc.org.au



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