

**Reporting Company Compliance with Global Responsible Marketing
Policy
2022**



Table of Contents

Introduction	3
Towards more responsible food marketing communications.....	3
Transparency and accountability	3
Our commitment	5
Details of our commitment.....	5
Key Results	6
Compliance Monitoring	6
TV advertising.....	6
Digital advertising	6
Exposure Monitoring	6
TV advertising	7
Methodology.....	7
Market by market results.....	8
Digital advertising	10
Methodology.....	10
Market by market results.....	11
Exposure Monitoring: The Digital Avatar Project (2021)	13
Methodology.....	13
Results.....	13
Market by market data	14
Conclusion.....	17

Introduction

In October 2018, the UN World Health Assembly adopted a political declaration that invited the private sector to actively contribute to the prevention of non-communicable diseases (NCDs), by, amongst other actions, *"committing to further reduce the exposure of children to and impact on them of the marketing of foods and beverages high in fats, in particular saturated fats and trans-fats, sugars or salt, consistent with national legislation, where applicable"*.

Since the onset, members of the International Food and Beverage Alliance (IFBA) have united around the objective of changing the way food and beverage products are advertised to children. The global IFBA policy on marketing, applied by all IFBA members in all countries where they operate, is in line with the aims of the [2010 WHO Set of Recommendations on the Marketing of Foods and Non-alcoholic Beverages to Children](#), and provides minimum criteria for advertising and marketing communications directed to children under 13 years that are paid for, or controlled by, IFBA companies in every country where they market their products.

Towards more responsible food marketing communications

Since its establishment in 2008, IFBA has been championing voluntary food industry action to improve nutrition and health outcomes. IFBA recognises the need for responsible marketing practices as an important element in addressing NCDs. Companies therefore agreed, in 2021, to a strengthened [Global Responsible Marketing Policy](#) and to a monitoring framework looking at compliance with these new rules in markets around the world. The new policy, which entered into force 1 January 2022, differs in five key areas from its 2014 predecessor:

1. **The policy now extends to children under the age of 13**, rather than 12 years, aligning with the International Chamber of Commerce (ICC) definition of a child.
2. The definition of children's media has been tightened by defining the audience as **30% under 13**, rather than 35% under 12.
3. A set of **global common nutrition criteria** has been introduced, which governs what products can be advertised to children under 13, where member companies choose to do so.
4. **Influencer marketing** has been added to the range of media covered.
5. The policy embeds the qualitative requirements from the [ICC Framework for Responsible Food and Beverage Marketing Communications](#) which ensure, for instance, that snacks should not be presented as meals, that appropriate portion sizes are represented, and that ads support — rather than undermine — good dietary habits. These rules apply to advertising to all audiences, also beyond children.

Members of IFBA also committed to conducting third party monitoring to demonstrate compliance with the policy.

Transparency and accountability

IFBA members have committed to ensuring transparency and accountability in the implementation of their commitments. In 2022, Ebiquity was commissioned to carry out the independent monitoring of IFBA member companies' compliance with their commitment on **television and digital advertising**. In essence, Ebiquity measured compliance with IFBA companies' commitment not to advertise any

products, or those that don't meet the common nutrition criteria, on media where children under the age of 13 make up 30%, or more, of the audience.

List of covered countries per medium

TV	Digital
Colombia	Germany
South Africa	Vietnam
Japan	Indonesia
New Zealand	Mexico
India	Australia

In addition to measuring IFBA companies' compliance with the Global Responsible Marketing Policy, IFBA also contracted Nielsen to **estimate children's online exposure** to advertising for food and beverages high in fat, sugar or salt (HFSS).

Our commitment

IFBA members commit either to:

- Only advertise products to children under the age of 13 years that meet common nutrition criteria¹ which are based on accepted science-based dietary guidance; or
- Not to advertise their products at all to children under the age of 13 years.

The above policy covers food and beverage product marketing communications² that are primarily directed to children under 13³ in all covered media⁴.

In addition, IFBA members agree not to engage in food or beverage product marketing communications to children in primary schools, early childhood education centers and children's care service centers.

IFBA members further commit to the [International Chamber of Commerce Framework for Responsible Food and Beverage Marketing Communications](#) in all their marketing communications.

Details of our commitment

In relation to TV advertising, IFBA member companies use an audience threshold to determine whether the communication is primarily targeted at under-13s. This means that they do not broadcast advertisements for food products which do not meet the nutrition criteria during programmes where children under 13 represent more than 30% of the audience.

IFBA member companies also do not place adverts for non-compliant products on online media where the same audience threshold is reached, according to best available industry data.

¹ For the purpose of implementing the Global Responsible Marketing Policy, IFBA members commit not to advertise to children under the age of 13 the following product categories: confectionery, chocolate, soft drinks, ice cream and potato-based savoury snacks, globally (see Annex under 'Exclusions'). Other product categories can be advertised to this age group provided that the agreed common nutrition criteria (in Annex) are met. For these products, the common nutrition criteria apply as a minimum standard globally. However, locally agreed common nutrition criteria will continue to apply: (a) if they are stricter and/or cover categories of foods not addressed by IFBA; or (b) because the local pledge program criteria in the U.S. and Canada are based on the unique category definitions, dietary guidance, and regulatory/labeling practices of those markets, IFBA companies who are members of those pledge programs may continue to apply the U.S. (CFBAI) and Canadian criteria alone in those markets or may choose to apply the IFBA criteria as well. For this reason, IFBA also intends to defer compliance monitoring and enforcement to these local programs.

² "Marketing communications" means paid advertising or commercial sales messages for food and beverage products, including marketing communications that use licensed characters, celebrities and movie tie-ins. Company-owned, brand equity characters are not covered by the policy.

³ The determination of whether a marketing communication is "primarily directed to children under 13" will rely on objective audience composition data wherever such data are available. An advertisement placed contextually in programming or content will be considered to be primarily directed to children if it is expected (based on reliable audience composition data available at the time of placement) that 30% or more of the audience will be under 13 years of age. Conversely, where the percentage of children in the audience is expected to be under 30%, or where reliable age-screening or age-targeting techniques are used to affirmatively avoid displaying the advertisement to children, the advertisement will not be deemed to be primarily directed to children. In circumstances and media where neither reliable audience composition data nor effective age-screening or targeting techniques are available, companies will consider other factors as appropriate, which may include the overall impression of the advertising and the target demographic based on the company's media plan.

⁴ "Covered media" means TV, radio, print, cinema, online (including social media and other online platforms and sites, including company-owned websites and video-sharing platforms such as YouTube), direct marketing, product placement, interactive games, outdoor marketing, mobile marketing and contracted influencers. Packaging, in-store and point of sale as well as forms of marketing communications which are not under the direct control of the brand owner, such as user-generated content, are not covered by this policy.

Key Results

Compliance Monitoring

Ebiquity, the world leader in media investment analysis, was commissioned to review IFBA member companies' activities on TV and digital, to assess their compliance with the media placement rules (not placing ads for any products, or those that do not meet common nutrition criteria, in media where children under 13 make up 30% or more of the audience).

TV advertising

- Five sample IFBA countries were chosen for monitoring: Colombia, India, Japan, New Zealand, and South Africa.
- All spots aired in Q1 2022 were reviewed for audience composition at time of broadcast. Total number of spots analysed: 1,888,129.
- The overall compliance rate with the IFBA commitment was **91.3%**
- Looking only at spots with at least 1GRP and daytime (06.00-20.59), compliance was **99.84%**

Digital advertising

- Five sample IFBA markets were chosen for monitoring: Australia, Germany, Indonesia, Mexico and Vietnam.
- All impressions were served in these markets during the month of April of 2022. Total number of impressions analysed: 2,268,046,317.
- The overall compliance rate with the IFBA commitment was **99.82%**.

Exposure Monitoring

Independent research firm Nielsen was commissioned to measure the online advertising exposure to children when it comes to food and beverages high in fat, sugar or salt (HFSS). The study, commissioned by the World Federation of Advertisers and IFBA, was conducted using avatars that mimic the real browsing behaviour of children online.

- The study looked at 100 primary URLs across both desktop and mobile devices, in Belgium, Brazil, Czech Republic, Denmark, Ireland, Japan, Mexico, Netherlands, Nigeria, Philippines, South Africa and Spain. The study only captured non-logged-in environments.
- The study ran for 21 days between 7th and 27th Oct 2021, resulting in a total of 33,600 hits per country, for a total of 403,200. The total number of ads captured by all avatars is 121,232.
- Only **1.45%** of ads served to the child avatar was for HFSS products, according to Nielsen's classification model.

TV advertising

Methodology

Ebiquity was tasked with assessing IFBA member companies' compliance with the following commitment: *"Only advertise products to children under the age of 13 years that meet common nutrition criteria which are based on accepted science-based dietary guidance; or not to advertise their products at all to children under the age of 13 years"*.

Five sample IFBA countries were chosen for monitoring: Colombia, India, Japan, New Zealand and South Africa. All spots aired in these countries in Q1 2022 were reviewed for audience composition at time of broadcast. Spots for either any products, or those not meeting nutritional criteria and reporting an audience >30% children under 13, were deemed non-compliant.

Total number of spots analysed in Q1 2022

Country	Total No. Spots	Total Spots for Restricted products
Colombia	37,162	31,676
India	1,769,245	1,629,292
Japan	14,484	13,716
New Zealand	25,496	18,740
South Africa	41,742	41,184
All	1,888,129	1,734,608

Compliance rates in this report are provided in two forms:

- **For all spots aired:** this is the formal IFBA compliance rate.
- **For daytime (06h00-20h59) spots with at least 1 GRP:** This second measure of compliance is intended to help member companies identify genuine breaches, i.e. instances where spots for restricted products were placed in or around daytime programmes reaching 30% or more children under 13. The demographic audience breakdown for spots below 1 GRP is often unreliable, due to small audience size. These spots and those broadcast at night-time are included in the overall IFBA compliance results nonetheless, in view of transparency and simplicity of external communication.

Statistical anomalies and overstatement of non-compliance: Of the vast majority of spots found technically non-compliant, only a few can be certainly in breach of the spirit of the IFBA commitment. These spots often display an implausible share of under-13 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.

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.

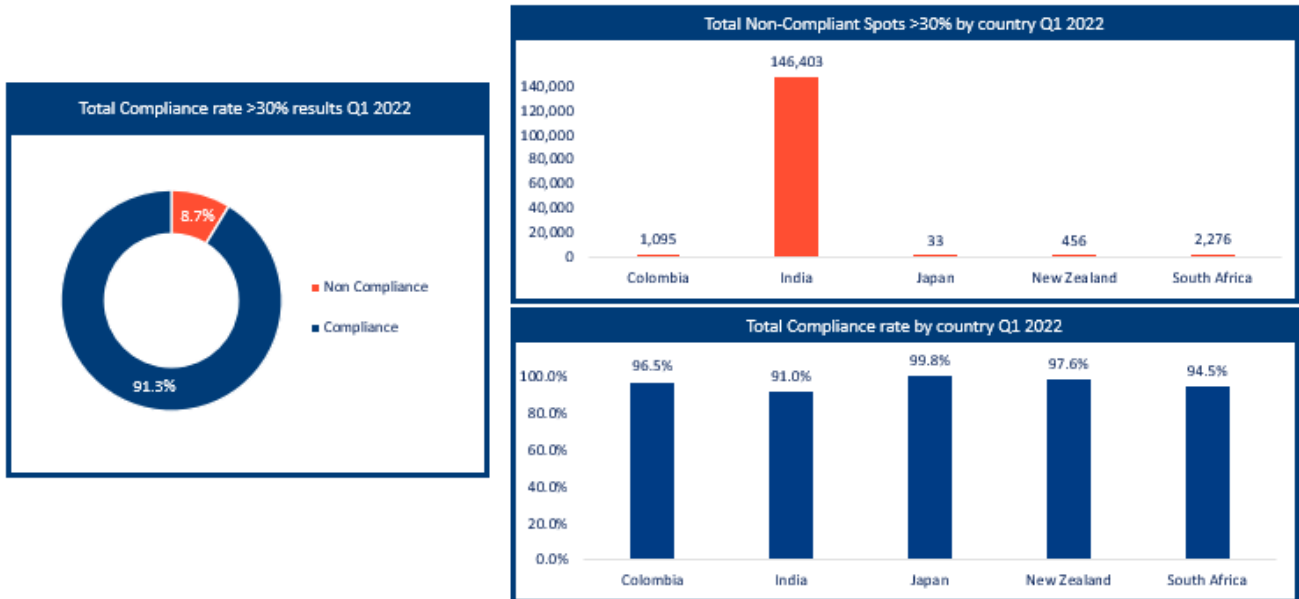
For statistical reliability, marketers typically exclude advertising spots below 1 Gross Rating Point (GRP). All non-compliant spots were nonetheless included in the report for the sake of transparency and simplicity, even though they are, at worst, examples of “technical” non-compliance.

Market by market results

Q1 2022 Aggregate results, all countries: All Spots (all GRPs, all time)

All advertisers	Total Spots	Total Spots for Restricted products	Non-compliant spots (spots for restricted products with children profile >30%)	Non-compliance rate (% Spots for restricted products with children profile >30%)	Compliance rate
Colombia	37,162	31,676	1,095	3.5%	96.5%
India	1,769,245	1,629,292	146,403	9.0%	91.0%
Japan	14,484	13,716	33	0.2%	99.8%
New Zealand	25,496	18,740	456	2.4%	97.6%
South Africa	41,742	41,184	2,276	5.5%	94.5%
All countries	1,888,129	1,734,608	150,263	8.7%	91.3%

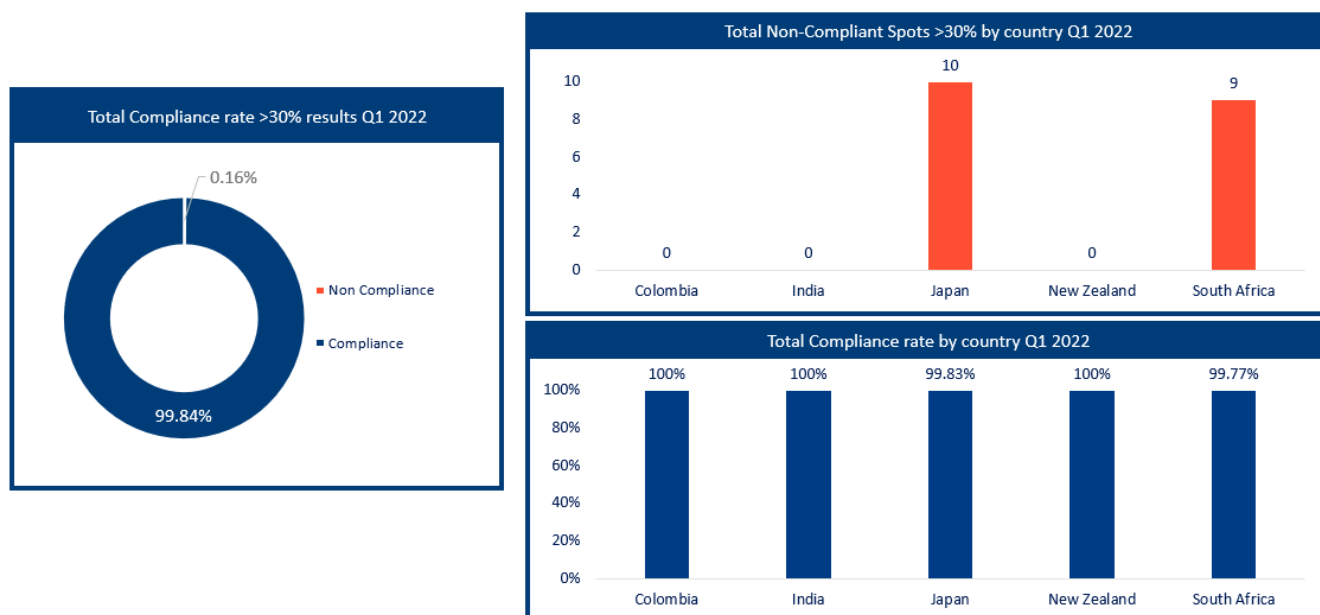
Q1 2022 Aggregate results, all countries: All Spots (all GRPs, all time)



Q1 2022 Aggregate results, all countries: Daytime spots > 1 GRP (Daytime: 06.00-20.59)

All advertisers	Total Spots	Total Spots for Restricted products	Non-compliant spots (spots for restricted products with children profile >30%)	Non-compliance rate (% Spots for restricted products with children profile >30%)	Compliance rate
Colombia	85	85	0	0%	100%
India	602	561	0	0%	100%
Japan	6,308	5,760	10	0.17%	99.83%
New Zealand	1,543	1,126	0	0%	100%
South Africa	4,130	3,995	9	0.23%	99.77%
All countries	12,668	11,527	19	0.16%	99.84%

Q1 2022 Aggregate results, all countries: Daytime spots with > 1 GRP (Daytime: 06.00-20.59)



Digital advertising

Methodology

For digital advertising, five sample IFBA markets were chosen for the monitoring: Australia, Germany, Indonesia, Mexico and Vietnam. All impressions were served in these markets in April of 2022. The domains on which impressions appeared were reviewed for audience composition.

Impression data was extracted directly from Ad-Verification platforms (Integral Ad Science, DoubleVerify or MOAT, depending on the platform used by advertiser).

Comscore provided data on domains with where, based on panel data, the percentage of 6-12 year-old unique visitors on the websites exceed 30% of unique visitors. The monitoring period was October 2021 until March 2022; a domain exceeding the 30% threshold in any of the six months was considered restricted.

Campaigns for products not meeting the common nutrition criteria, and reporting a domain-level audience of >30% of children between ages 6-12, were deemed non-compliant.

Total number of spots that were analysed in April 2022:

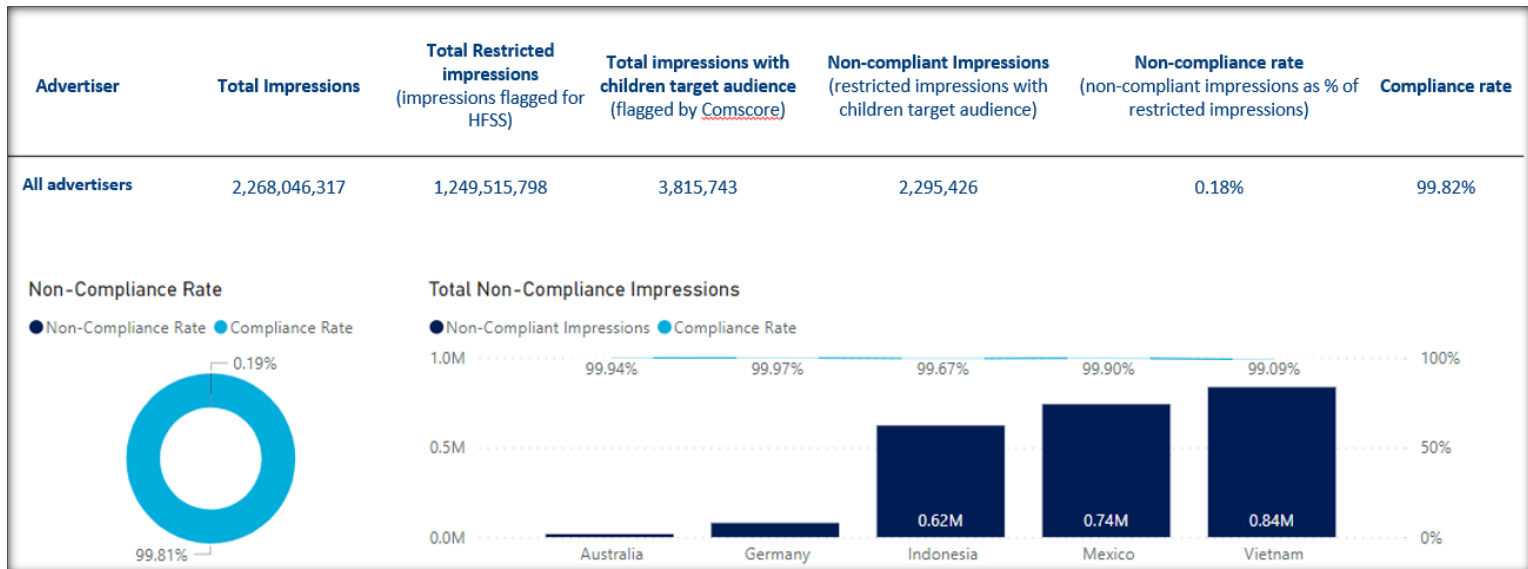
Country	Total impressions	Total impressions for Restricted products
Australia	4,940,196	4,923,098
Germany	25,038,590	25,038,590
Indonesia	88,285,573	88,285,573
Mexico	236,547,647	211,332,423
Vietnam	25,380,737	25,380,737
Total	380,192,743	354,960,421

Market by market results

All markets on aggregate show a 99% or higher compliance rate.

Indonesia and Vietnam showed the highest non-compliance rates with 0.33% and 0.91% respectively. Germany and Australia both show less than 0.1% non-compliance.

The aggregate results show a compliance rate of 99.82% across markets



The aggregate results show compliance rates of 99% for all five markets

Market (All advertisers)	Total Impressions	Total Impressions flagged for HFFS	Total Impressions flagged by Comscore	Non-Compliant Impressions	Non-Compliance Rate	Compliance Rate
Australia	77,207,342	27,909,622	37,434	16,902	0.06%	99.94%
Germany	309,958,431	225,604,016	140,169	78,755	0.03%	99.97%
Indonesia	512,768,088	186,323,567	1,641,701	622,172	0.33%	99.67%
Mexico	1,210,253,674	718,199,327	1,003,487	741,147	0.10%	99.90%
Vietnam	157,858,782	91,479,266	992,952	836,450	0.91%	99.09%
Total	2,268,046,317	1,249,515,798	3,815,743	2,295,426	0.18%	99.82%

Exposure Monitoring: The Digital Avatar Project (2021)

Given the mandate of the World Health Assembly to “*further reduce the exposure of children to and impact on them of the marketing of foods and beverages high in fats, in particular saturated fats and trans-fats, sugars or salt*”, the International Food and Beverage Alliance also contracted research firm Nielsen to estimate levels of children’s exposure to online advertising for so called HFSS foods and beverages.

Methodology

The avatars are online profiles that follow the typical browsing activity of their age group (children under the age of 13, teenagers aged 13-17, adults, and a neutral/control profile), to capture the ads that the age group typically would encounter online. Nielsen tracks advertising activity across a media universe of 100 distinct URLs (websites/YouTube) in 12 nominated markets.

This created 1,600 hits a day per country. We ran the avatars for 21 days between 7th – 27th Oct 2021, resulting in a total of 33,600 hits per country, for a total of 403,200.

The media universe was formulated as a mix of sites and channels popular with – and having content/genre affinity with – teen and child audiences, as well as top-ranking sites & channels, to achieve a simulation of the average browsing habits in each country. **The avatars can only access non-logged in environments**, which is why the sample of URLs is limited to third-party websites and YouTube (“walled gardens” such as TikTok, Instagram, Facebook, etc. cannot be covered).

By calculating the average number of impressions served per site visit, Nielsen could determine the average number of site visits that the child avatars would have to make to encounter one HFSS ad.

To define HFSS, Nielsen bases its classification on the UK media and communications regulator Ofcom’s [nutrient profiling model](#). However, certain product categories such as yoghurt and breakfast cereal, some of which meet the Ofcom criteria depending on their exact nutritional composition, were automatically classified as HFSS (see table below). This resulted in a slight over-representation of HFSS ads vis-à-vis the Ofcom model.

HFSS Categories					
Breakfast Cereal	Chips & Potato Products	Fast Food	Morning Goods	Pudding & Dairy Desserts	Sweet Biscuits
Butters & Spreads	Chocolate Confectionary	Ice Cream	Nuts	Soft Drinks	Yoghurts
Cakes	Complete Main Meals (Ready Meals)	Juice Drinks	Pizza	Stocks / Sauces / Dips	
Cheese	Crisps & Savoury Snacks	Milk Drinks	Processed Foods	Sugar Confectionary	

Results

The **global results** of the study were that:

- Just **1.45%** of ads served to children online are for HFSS products;
- On average, a child is served only one HFSS ad per **228** websites visited;

- Nielsen concluded that this would translate to a child being served only one HFSS ad every **10 hours 59 minutes** spent online.

Market by market data

By calculating the average number of impressions served per site visit, we can determine the average number of site visits that the child avatars would have to make to encounter one HFSS ad.

Avg. no of ad impressions calculated as: No. of all Ad Impressions / Total No. of URLs Visited

	No. of <u>all</u> Ad Impressions	No. of HFSS Ad Impressions	No. of Ad Impressions per single HFSS Ad Impression	Total No. of URL Visits by Child Avatar	Avg. No of Ad Impressions per URL visit	Avg. no. of site visits needed to be served one HFSS ad
Belgium	1,365	33	41	8,400	0.16	255
Brazil	3,435	10	344	8,400	0.41	840
Czech Republic	1,437	3	479	8,400	0.17	2,800
Denmark	1,787	29	62	8,400	0.21	290
Ireland	1,854	12	155	8,400	0.22	700
Japan	3,030	31	98	8,400	0.36	271
Mexico	3,575	44	81	8,400	0.43	191
Netherlands	2,434	26	94	8,400	0.29	323
Nigeria	3,449	49	70	8,400	0.41	171
Philippines	3,235	137	24	8,400	0.39	61
South Africa	2,675	60	45	8,400	0.32	140
Spain	2,317	9	257	8,400	0.28	933
All Markets	30,593	443	69	100,800	0.30	228

Percentage of ads seen by 'child avatar'

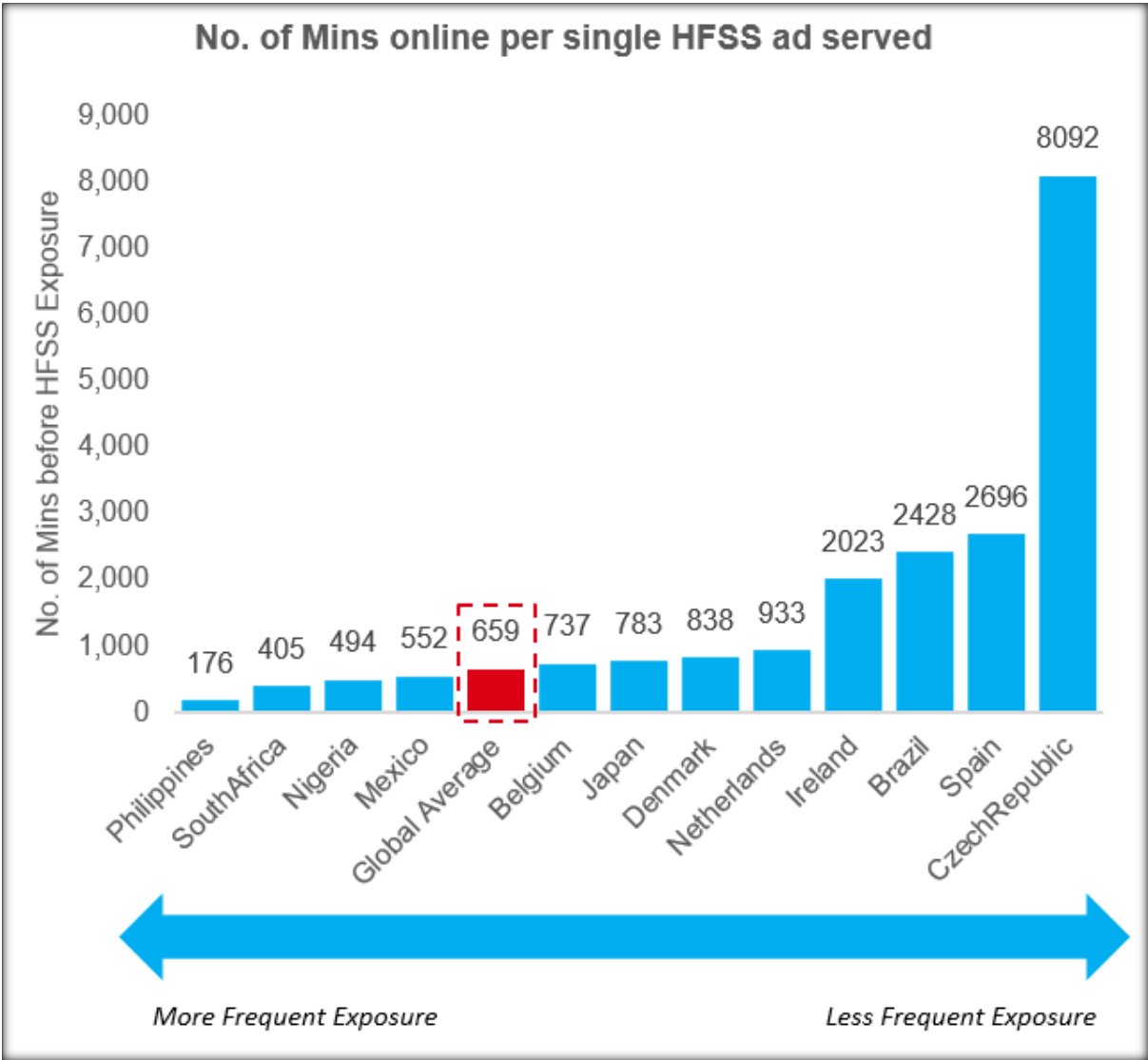
Ads seen by CHILD AVATAR ONLY			
	% of ads that are HFSS		
	2021		
Global	1.45%		
EU	1.53%		

Ads seen by CHILD AVATAR ONLY by MARKET			
	% of ads that are HFSS		% of ads that are HFSS
	2021		2021
Belgium	2.42%	Mexico	1.23%
Brazil	0.29%	Netherlands	1.07%
Czech Republic	0.21%	Nigeria	1.42%
Denmark	1.62%	Philippines	4.23%
Ireland	0.65%	South Africa	2.24%
Japan	1.02%	Spain	0.39%

Using Nielsen data from our Desktop @ Home panels, Nielsen calculated an 'average child user' from their audiences. This usage data comes from households in Australia, Germany, Italy, United Kingdom and the United States during the full month of Oct-21 using a desktop PC within the home, and does not include mobile/tablet browsing.

Due to a different market scope and timeframe, the Desktop @ Home panel data is not directly comparable with the findings of our Digital Avatar Study. However, by using it to create average values, Nielsen calculated an estimated overall amount of time a child would need to spend online to be served one HFSS ad.

Age Range	Panel Size	Page Views	Total Minutes (Mins)
Ages 2 – 12	17,172	1,874,601	5,431,316
Across 17,172 panellists, the average figures are as follows:			
Average per child	1	109	316
Therefore, an average child visits 109 pages in 316 mins			
Our data shows that, globally, an average child would see an HFSS ad every 228 pages . The calculation for average amount of time spent online per one HFSS ad exposure is as follows:			
(316 / 109) = 2.89		2.89 mins per page (or 2 mins 53 seconds)	
2.89 * 228		659 minutes	
Globally, on average, a child would see an HFSS ad every 659 minutes , or 10 hours 59 mins			



Conclusion

While members of the International Food and Beverage Alliance can demonstrate high levels of compliance with the Global Responsible Marketing Policy, companies remain committed to continuing to strengthen the policy and undergo third-party audits also in the years to come.

Companies acknowledge that future audits must continue to explore new, innovative ways of measuring children's exposure to marketing on emerging social media, streaming and gaming platforms, utilising best available technologies.