

EU Pledge's response to Foodwatch Germany report

On 24 August, Foodwatch Germany released a report which claims that the EU Pledge initiative - whose objective is to reduce children's exposure to food and beverage advertising - is ineffective, as signatories allegedly continue advertising "unhealthy" food products to children. The report makes numerous erroneous and misleading claims, such as:

- 1. Most products analysed fail to meet the WHO Europe nutrient profile model, therefore the EU Pledge is ineffective:** The Foodwatch report gives the impression that the 281 food and beverage products analysed – out of which 29 met WHO Europe nutrient profile model - can be advertised to children by signatories, and that therefore the EU Pledge programme does not deliver on its promise. This is clearly misleading. The EU Pledge provides a [common set of nutrition criteria](#) based on European and international guidance, to determine whether products can be advertised to children under 12. This essential fact was not taken into account by the authors of the report.

The EU Pledge criteria have been [independently assessed](#) by the European Heart Network, which found them to be at least as strict as the statutory nutrient profiling system applicable in the UK. Additionally, due to their portfolio, some EU Pledge member companies have decided not to advertise any of their products to children under 12 at all. As a result, none of the EU Pledge member companies advertise chocolate, confectionery or soft drinks to children. This, alone, represents over 50 products out of the 281 products analysed by Foodwatch.

- 2. The EU Pledge does not cover all marketing activities:** The EU Pledge commitment covers TV, internet, company-owned websites and print advertising. Last year, signatories [announced](#) the extension of the Pledge's scope both in terms of the media covered as well as the creative execution. Packaging and point-of-sale activities will remain out of the scope of the programme as we believe food purchasing decisions are taken by adults and not by children themselves; adults serve as gatekeepers when exposed to packaging or point-of-sale communications. The EU Pledge policy also does not cover brand equity characters which are part of a brand's intellectual property. However, the EU Pledge provides a common benchmark - individual companies can go further if they wish to.
- 3. The EU Pledge should apply to children up to 15 years old:** All of the government-led reviews of the existing academic research conducted in the context of the debate on food marketing communications have identified the appropriate age cut-off at 12 years.
- 4. Self-regulatory approaches such as the EU Pledge do not cover the entire market:** The 21 EU Pledge signatories represent over 80% of the food and beverage advertising expenditure in the EU. Efforts are made in order to recruit new members and to promote the extension of the commitments to a broader range of players at national level. Similar initiatives joined by local players have been launched in Belgium, Portugal, Romania, Hungary, as well as Switzerland.

The report also gives the impression that WHO Europe nutrient profile model is an established benchmark. In fact the model is only a recommendation which has so far not been adopted by any government. The model is based on the conceptual premise that it is desirable to exclude all but the "healthiest" products. The main consequences are that the model excludes several entire food and beverage categories - including many which can deliver positive nutrients - and disincentives reformulation.

The model does not recommend applying a specific age threshold or which marketing platforms or techniques to cover. These are both Foodwatch Germany recommendations only.

Finally, it is essential to highlight that the EU Pledge has demonstrated a significant impact to date in reducing children's exposure to food and beverage advertising, as evidenced by [annual independent third-party monitoring](#):

- The average child under twelve in the EU today sees 88% less ads than in 2005 for products that do not meet EU Pledge nutrition criteria in or around children's programmes (where 35% or more of the audience is composed of children).
- The reduction in children's exposure to advertising for these products across all TV programming, regardless of genre and broadcast time, is 52% since 2005.
- Irrespective of the nutrition criteria, the data show that children today are exposed on average to 42% less TV advertisements for all food and beverage products marketed by EU Pledge member companies, across all programming since 2005.