

MONITORING REPORT 2018



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EXECUTIVE SUMMARY & KEY RESULTS

BACKGROUND

The EU Pledge is a voluntary initiative by leading food and beverage companies to change food and beverage advertising to children under the age of twelve in the EU, in line with the EU Audiovisual Media Services Directive¹, which calls for codes of conduct on the marketing of certain food and beverage products to children.

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

- No advertising of products to children under 12 years, except for products which fulfil common nutrition criteria². Some EU Pledge member companies have taken the decision not to advertise any of their products to children under 12.
- No product marketing communications to children in primary schools.

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

This year, the monitoring expanded its digital scope to company-owned social media profiles on Facebook, YouTube and Instagram.

The monitoring was carried out in 2018 by the following independent third parties:

- **Accenture Media Management**³, to review EU Pledge member companies’ compliance with the commitment relating to TV advertising;
- **EASA – The European Advertising Standards Alliance**, to review EU Pledge companies’ branded websites and social media profiles, for compliance with the EU Pledge commitment.

The methodology and process of the monitoring of company-owned websites and social media profiles were reviewed by Professor Liselot Hudders, assistant professor at the Department of Communication Sciences at Ghent University and a postdoctoral fellow of the FWO at the Marketing Department and Dr Dieneke Van de Sompel, visiting Professor at the Department of Communication Sciences at Ghent University.

1 [Directive \(EU\) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in member states concerning the provision of audiovisual media services \(Audiovisual Media Services Directive\) in view of changing market realities](#)

2 Common EU Pledge nutrition criteria – for those member companies that do use nutrition criteria – entered into force across the EU on 1 January 2015. Those are available on www.eu-pledge.eu.

3 Accenture is a global management consulting, technology services and outsourcing company. Accenture Media Management helps companies measure and optimise investments in marketing, media, retail and digital. It also provides independent media auditing services, which is the function it performs with regard to the EU Pledge.

KEY 2018 RESULTS

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

- **TV: The overall compliance rate is 99.1%**

For the seventh time since the extension of the EU Pledge commitment to company-owned websites at the end of 2011, EASA - the European Advertising Standards Alliance, monitored member companies' brand websites.

For the first time since the adoption of the enhanced commitments on 31 December 2016 EASA also monitored company-owned social media profiles on Facebook, YouTube and Instagram.

224 national brand websites and 107 brand social media profiles were monitored in six EU countries. The results show that:

- **99% of websites reviewed were deemed compliant with the EU Pledge. 1 out of 145 websites was found non-compliant with the commitment.**
- **97% of social media profiles reviewed were deemed compliant with the EU Pledge. 3 out of 113 profiles were found non-compliant with the commitment.**

IMPLEMENTATION OF COMMON EU PLEDGE NUTRITION CRITERIA, FURTHER STRENGTHENED IN 2017

The EU Pledge was further strengthened through the adoption of harmonised nutrition criteria, applicable since 1 January 2015, for those companies that so far have used company-specific criteria to determine what foods they may advertise to children under 12.

The common criteria set energy caps, maximum thresholds for nutrients to limit (salt, saturated fat and sugar) and minimum requirements for positive nutrients, category by category.

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

The common nutrition criteria were revised in the course of 2017 and further strengthened in several categories, with regard in particular to applicable thresholds for sugar and salt content. The updated nutrition criteria were published in October 2018 and the changes were implemented for the most part by the end of the year⁴.

GROWTH IN MEMBERSHIP REFLECTING OVER 80% OF FOOD AND BEVERAGE ADVERTISING SPEND IN THE EU

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

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

McDonald's joined the EU Pledge in November 2011, Royal FrieslandCampina in 2012, the Quick Group in 2013 (before its acquisition by Group Bertrand in 2016) and Bel Group in 2016. Arla Foods implemented the commitment in September 2017 and is included for the first time in the monitoring programme. MOM Group joined on 1 January 2019 and will first be included next year.

With this latest addition, the EU Pledge membership counts twenty-two leading food and beverage companies. Together, EU Pledge member companies account for over 80% of food and beverage advertising spend in the EU.

4 As the strengthened nutrition criteria came into force at the end of 2018 the next monitoring report will be the first one based on the new set of criteria.

FURTHER ENHANCED COMMITMENTS

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

- **Extension of scope:** the EU Pledge initially covered commercial communications on TV, print, third-party internet and company-owned websites. Since 31 December 2016, EU Pledge member companies apply this commitment to radio, cinema, DVD/CD-ROM, direct marketing, product placement, interactive games, apps, mobile and SMS marketing.
- **Addressing creative execution:** The new policy ensures that where no reliable audience measurement data is available, advertisers consider not only the placement, but also the overall impression of the marketing communication, to ensure that if the product in question does not meet the common nutrition criteria, the communication is not designed to appeal primarily to children⁵.

This is the second year that the public monitoring of compliance with the enhanced commitments are officially carried out. Pilots were carried out in 2015 and 2016 to prepare for their entry into force.

INCREASED TRANSPARENCY

To facilitate the implementation of the new commitments, EU Pledge members adopted an implementation guidance document which outlines how the commitment applies in practice. The guidance note is publicly available on the EU Pledge website⁶.

5 Further information about the enhanced commitments can be found here:

<http://www.eu-pledge.eu/content/enhanced-2014-commitments>

6 The EU Pledge implementation guidance report is available here:

http://eu-pledge.eu/sites/eu-pledge.eu/files/misc/Implementation_Guidance_Report.pdf

ABOUT THE EU PLEDGE

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

EU PLEDGE MEMBERS

The founding members of the EU Pledge are the following companies: Burger King, Coca-Cola, Danone, Ferrero, General Mills, Kellogg, Mars, Mondelez, Nestlé, PepsiCo and Unilever. The membership has since been expanded, representing 22 leading food and beverage companies, accounting for over 80% of EU food and non-alcoholic beverage advertising spend.



The initiative is open to any food and beverage company, trade association or restaurant (chain) active in Europe and willing to subscribe to the EU Pledge commitments.

THE EU PLEDGE COMMITMENTS

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

- **No advertising of products to children under 12 years, except for products which fulfil common nutrition criteria⁷. Some EU Pledge member companies have taken the decision not to advertise any of their products to children under 12**

For the purpose of this initiative, "advertising to children under 12 years" means advertising to media audiences with a minimum of 35%⁸ of children under 12 years⁹.
- **No communication related to products in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes.**

7 Common EU Pledge nutrition criteria – for those member companies that do use nutrition criteria – entered into force across the EU on 1 January 2015 and were updated in January 2019. All applicable guidelines are published as part of the individual company commitments under the EU Pledge on www.eu-pledge.eu.

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

9 The rationale for this threshold is the strong degree of academic consensus that by the age of 12 children develop their behaviour as consumers, effectively recognise advertising and are able to adopt critical attitudes towards it. Although children between the ages of 6 and 12 are believed to generally understand the persuasive intent of advertising, care should be taken because they may not have a fully developed critical understanding.

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

Since the initiative was launched, all participating companies have made their individual corporate commitments within the framework of the EU Pledge programme. All founding member company commitments, published on the EU Pledge website (www.eu-pledge.eu), were implemented across the EU by 31 December 2008¹⁰. Members that joined the EU Pledge in 2010 implemented the commitment by the end of that year. McDonald's and Friesland Campina implemented the commitment upon joining, in January and September 2012 respectively. Amica Chips implemented the commitment in 2014, and the Bel Group in 2016. Arla Foods joined in September 2017 and was therefore not included in this year's monitoring exercise.

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

THIRD-PARTY MONITORING

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

This is the ninth monitoring exercise. All previous Monitoring Reports are available on www.eu-pledge.eu.

In 2018, EU Pledge member companies commissioned the following independent third parties to monitor implementation of the EU Pledge commitments:

- **Accenture Media Management¹¹**, to review EU Pledge member companies' compliance with the commitment relating to food and beverage advertising on TV.
- **EASA – The European Advertising Standards Alliance¹²**, to review EU Pledge companies' brand websites and social media profiles, for compliance with the EU Pledge commitment.

The EASA monitoring programme was externally reviewed by Professors Liselot Hudders and Dienneke Van de Sompel from Ghent University (Belgium).

10 In case of mergers or acquisitions, an agreed transition period is allowed for the implementation of measures taken under the EU Pledge.

11 Accenture is a global management consulting, technology services and outsourcing company. Accenture Media Management helps companies measure and optimise investments in marketing, media, retail and digital. It also provides independent media auditing services, which is the function it performs with regard to the EU Pledge.

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

COMPLIANCE MONITORING: TV ADVERTISING

OBJECTIVE AND SCOPE

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

“*No advertising of products to children under 12 years, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international guidelines. For the purpose of this initiative, “advertising to children under 12 years” means advertising to media audiences with a minimum of 35% of children under 12 years.*”

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

For this exercise, seven sample EU markets were chosen: **France, Germany, Hungary, Italy, Greece, Portugal and Spain.**

The intent has been to cover a number of new markets each year, within the limits of data availability and affordability, so as to assess performance in as broad a sample of Member States as possible. Some markets have been covered repeatedly in order to provide a benchmark.

METHODOLOGY

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

The data provides detailed statistics about advertising spots: advertiser, product, channel, programme, date and time of broadcast, estimated audience and demographic breakdown – typically including the segment 4-12 years of age.

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

For all these spots, audience composition at the time of broadcast was analysed on the basis of national ratings data. This allowed Accenture to isolate ads aired at a time when more than 35% of the audience was composed of children under twelve years of age.

All spots for products that EU Pledge member companies have committed not to advertise to children under twelve, aired at times when the audience was composed of over 35% children under twelve, were deemed non-compliant with the EU Pledge.

RESULTS

The overall compliance rate was as follows:

99.1% of signatories' TV advertising spots were compliant with the EU Pledge commitment

This figure is comparable to those reported in previous years in different markets (2013 compliance rate: 98.1%, 2014: 98.5%, 2015: 98.6%, 2016: 98.7%; 2017: 97.4%). The detailed compliance rates reported by Accenture per market can be found in the Accenture presentation included in this report.

STATISTICAL ANOMALIES AND OVERSTATEMENT OF NON-COMPLIANCE

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

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

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

All non-compliant spots were nonetheless included in the reported non-compliance rates for the sake of transparency and simplicity.

FOLLOW-UP

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

COMPLIANCE MONITORING: COMPANY-OWNED WEBSITES AND COMPANY-OWNED SOCIAL MEDIA PROFILES

In 2011, EU Pledge members decided to **enhance their framework** voluntary commitments by **improving the coverage of the commitment in the online sphere**. Since its inception, the EU Pledge commitment has applied to advertising on TV, print media and third-party internet advertising. In January 2012, **EU Pledge member companies extended their commitment to company-owned websites**. By extending the coverage of the commitment to cover both third-party online advertising and brand websites, the EU Pledge covers online marketing comprehensively. Since 2016 the EU Pledge commitment covers all digital marketing communications, **including social networking sites and mobile apps**.

METHODOLOGY

The European Advertising Standards Alliance (EASA) was commissioned to undertake a compliance audit of EU Pledge branded websites and company-owned social media profiles.

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

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

A methodology with a 'consumer-oriented approach' was drawn up by the EASA secretariat in collaboration with the EU Pledge Secretariat and the independent reviewers of this exercise, Professors Liselot Hudders and Dienneke van de Sompel.

National self-regulatory organisations for advertising (SROs) from eight countries (Belgium, Bulgaria, France, Germany, Italy, Spain and Sweden) were asked to review a selection of EU Pledge member companies' national brand websites which promoted products not meeting the applicable nutrition criteria. The eight chosen SROs represent different systems in terms of size, geographical location and maturity.

Each SRO was asked to review a total of 20 national brand websites and 12 to 15 social media profiles, depending on the size of the market, including at least one or two websites per company, where available, in November and December 2018. SROs could review national brand websites as well as promotional websites set up by the companies, but not the main corporate websites as these are by definition intended more to inform the public rather than to provide services and entertainment, and their content is generally not aimed at children. 20 national brand websites were reviewed in Belgium, France, Italy and Spain. Experts from the German SRO reviewed 22 national EU Pledge company brand websites. Due to limited availability, Bulgaria reviewed 17 marketer-owned websites, Greece 14 and Sweden 12.

The Belgian, German, Italian and Spanish SROs reviewed 12 social media profiles, while Bulgaria, France and Greece and Sweden respectively reviewed 15, 11, 18 and 21 social media profiles.

COUNTRY	WEBSITES	FACEBOOK	YOUTUBE	INSTAGRAM	SM	TOT
JEP - BELGIUM	20	7	1	4	12	32
NCSR - BULGARIA	17	7	4	4	15	32
ARPP - FRANCE	20	6	2	3	11	31
DWR - GERMANY	22	3	4	5	12	34
SEE - GREECE	14	6	7	5	18	32
IAP - ITALY	20	1	5	6	12	32
AUTOCONTROL - SPAIN	20	4	4	4	12	32
RO. - SWEDEN	12	8	5	8	21	33
TOTAL	145	42	32	39	113	258

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

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

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

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

In addition, SROs monitored EU Pledge company owned mobile applications to determine whether these were primarily appealing to children under 12 and in breach of the enhanced EU Pledge commitment.

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

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

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

MONITORING RESULTS

A total of 145 national brand websites and 113 company-owned social media profiles were reviewed, all of which contained product promotion.

Out of these 145 websites, 1 website was found not to comply with EU Pledge commitment, as it was deemed to be designed to be of particular appeal to children under 12 and promoting products that did not meet the nutrition criteria of the EU Pledge member companies.

Out of the 113 company-owned social media profiles reviewed, 3 were found in breach of the EU Pledge commitment.

5 out of the 145 websites reviewed contained items that were in breach of advertising codes or relevant advertising laws. In total 17 problematic items were flagged by the SROs.

6 out of the 113 social media profiles reviewed contained items that were in breach of advertising codes or relevant advertising laws. In total 17 problematic items were flagged by the SROs.

99% of the company-owned websites reviewed were in compliance with the EU Pledge commitment.

97% of the brand social media profiles reviewed were compliant with the EU Pledge commitment.

FOLLOW-UP

The four instances of non-compliance with the EU Pledge commitment were reported to the EU Pledge member companies concerned, allowing them to take corrective action in a timely manner.

REVISION OF THE EU PLEDGE COMMON NUTRITION CRITERIA

In October 2018, the EU Pledge Nutrition Criteria White Paper, first published in 2012 and updated in July 2015, was updated for the second time. The changes reflect members' announcement in March 2017, two years after the implementation of the common nutrition criteria, to reduce by 10% the sugar and sodium thresholds applicable in several product categories by the end of 2018.

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

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

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

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

The "nutrients to limit" - sodium, saturated fat and total sugars – were chosen on the basis of widely available evidence that they are of public health concern because population average intakes are in excess of those recommended or desirable for health. The common nutrition criteria entered into force on 1 January 2015. In line with the framework approach of the EU Pledge, whereby companies must meet a common benchmark but can go beyond if they wish, member companies may use different nutrition criteria than the common criteria, but on condition that they are demonstrably more stringent than the common ones.

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

In 2017 EU pledge members agreed to strengthen the criteria by further reducing the sugar and sodium thresholds for several categories. The following changes, which are mostly applicable since the end of 2018, were agreed:



Breakfast Cereals

10% sugar reduction
(end 2019)



**Potato Chips
Extruded/Pelleted Snacks**

10% sodium reduction
(end 2019)



Seeds & Nuts

10% sodium reduction



Meal Sauces

10% sodium reduction
+ 10% sugar reduction



**Dairy Products Other
Than Cheeses**

10% sugar reduction
+ sodium reduction
(300 to 160mg)



**Cheese
Savoury Dairy-based
Products**

5% sodium reduction



**Cereal & Cereal Products
Except Breakfast Cereals,
Biscuits and Fine Bakery Wares**

10% sodium reduction



Meals

10% sugar reduction



Soups

10% sodium reduction
+ 10% sugar reduction

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

The changes described above were incorporated and published on the EU Pledge website in October 2018.

LAUNCH OF AN ACCOUNTABILITY MECHANISM

In 2017, the EU Pledge also agreed to develop an [accountability mechanism](#) to give members of the public or organizations the opportunity to question the compliance of members' marketing communications with the EU Pledge commitment. The mechanism takes stock of best practice in advertising self-regulation at national level and is inspired by successful experience in Norway.

The system, developed in partnership with the European Advertising Standards Alliance (EASA), was officially launched in **November 2018** after a six-month pilot. It was presented to the EU Platform for Diet Physical Activity and Health on 1 June 2018.

The adjudication part is administered by EASA and the decisions are taken by a [Panel of nine experts from advertising standards organisations](#)¹³ appointed by EASA. Non-EU-Pledge-related complaints can still be submitted at national level against national advertising standards, through EASA's ad self-regulation network.

All [decisions and corrective actions](#) are publicly available on the EU Pledge website.

A 12 STEP-BY-STEP GUIDE TO THE ACCOUNTABILITY MECHANISM

1 Members of the public/organisations are invited to fill in [a complaint form](#) available on the EU Pledge website. The form is available in English, French and German but can be completed in any EU language. Complainants are requested to upload a screenshot or a photo of the ad that they think might be in breach of the EU Pledge. None of their personal information, including name and email addresses, are shared with third-parties, including the experts involved and EU Pledge members.

2 Once the complainant has completed and submitted the form, she/he receives an email from the Secretariat.

3 The EU Pledge Secretariat assesses whether the complaint falls within the scope of the EU Pledge commitment and responds to the complainant within 10 working days.

4 If the complaint falls outside the scope of the [EU Pledge commitment](#) (if it is not related to a marketing communication for a non-compliant product or if it is related to a company which is not a signatory), it is not further processed.

5 If the complaint is within the scope of the commitment it is sent anonymously to an external Panel of 3 experts (selected from a pool of 9 experts appointed by the [European Advertising Standards Alliance - EASA](#)). The 9 experts come from advertising standards organisations but are appointed in their own name.

6 The Panel renders a decision within 20 working days following reception of the complaint from the EU Pledge Secretariat.

7 The EU Pledge Secretariat communicates the decision to both sides (the complainant and the company concerned).

8 Both sides have 10 working days to appeal it under the following conditions:

- Additional evidence;
- Evidence of a substantial flaw of procedure and/or adjudication.

¹³ The nine experts come from the national advertising self-regulatory organisations in Bulgaria (NCSR), France (ARPP), Germany (DWR), Hungary (ÖRT), Ireland (ASAI), Spain (AUTOCONTROL), Sweden (RO.), the Netherlands (SRC) and the UK (ASA/CAP), but are appointed in their own name. They are remunerated by EASA for their work.

9 In the case of a valid appeal from one or both sides, the complaint is sent to an appeal panel of 3 experts (the majority of which was not part of the original Panel which provided the first decision) which renders a decision within 15 working days.

10 The Secretariat informs both parties of the decision.

11 If the company is found to be in breach, it has 15 working days to amend its marketing communication and to provide evidence of the corrective action. Failure to comply triggers further action and sanctions.

12 All decisions and corrective actions are published on the EU Pledge website.

CONCLUSIONS AND NEXT STEPS

After **ten years of independent third-party monitoring**, the EU Pledge has been able to demonstrate a high level of member companies' compliance with their commitments, as well as a significant change in the balance of food advertising to children in the EU towards options that meet common nutrition criteria, further strengthened in 2017. The membership of the initiative has also grown from 11 to **22 member companies**, to cover **over 80% of food and beverage advertising spend in the EU**.

The EU Pledge is an evolving initiative aimed at addressing the dynamic marketing and media environment in the EU. While it provides a common framework, member companies can make commitments that go beyond it, and several do. Since its launch, most of the founding member companies have stepped up their corporate commitments, tightening the way they define advertising to children, **broadening the scope of their actions and strengthening the nutrition criteria**.

In the same spirit and following constructive dialogue with stakeholders, the **EU Pledge enhanced its framework** voluntary commitments in **2012** and **2014**, applicable to all members throughout the EU. The decision announced in **2017** to strengthen the common nutrition criteria follows the same line.

Once again, the 2018 monitoring has shown that member companies were able to achieve **high compliance levels** with the enhanced commitments. The ongoing improvement in compliance rates for company-owned websites and social media profiles evidences members' commitment to the EU Pledge and points to the usefulness of the implementation guidance¹⁴ released in 2016.

The newly launched **accountability mechanism** complements compliance data with additional external scrutiny and insight on company breaches. Importantly, the system brings the possibility to check and improve compliance in all covered media and all member states, going beyond the coverage of the annual monitoring.

Beyond monitoring compliance, EU Pledge signatories have launched a **dialogue with online platforms** under the leadership of the World Federation of Advertisers. The goal is to further reduce children's online exposure to products which do not meet the EU Pledge nutrition criteria. This fruitful collaboration is ongoing, and progress will be reported in next year's report.

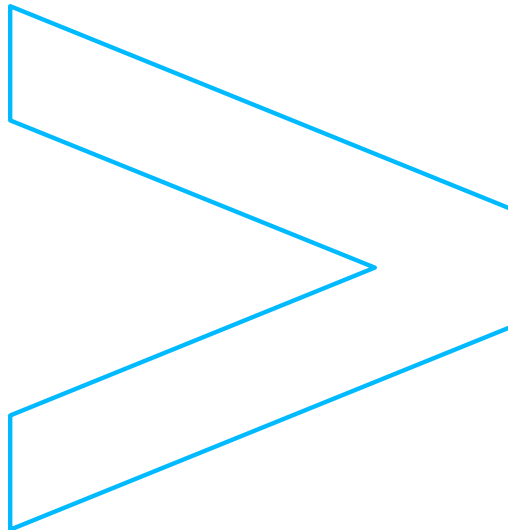
EU PLEDGE

Advertising to Children Commitment
Compliance and Change Management
Report 2018



ACCENTURE
MEDIA
MANAGEMENT
Global Scale. Custom Results.

1. TV COMPLIANCE MONITORING
2. APPENDICES



ACCENTURE
MEDIA
MANAGEMENT
Global Scale. Custom Results.

TV METHODOLOGY

- Assess EU Pledge member companies' compliance with the following commitment:

"No advertising of products to children under 12 years, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines. For the purpose of this initiative, "advertising to children under 12 years" means advertising to media audiences with a minimum of 35% of children under 12 years."

- Seven sample EU Pledge markets were chosen for monitoring: France, Germany, Greece, Hungary, Italy, Portugal and Spain. All spots aired in these markets in Q1 2018 were reviewed for audience composition at time of broadcast. Spots for products not meeting nutritional criteria and reporting an audience >35% children under 12 were deemed non-compliant.
- EU Pledge member companies covered: Amica Chips, Arla Foods*, Bel Group, Burger King, The Coca Cola Company, Danone, Ferrero SpA, General Mills, Intersnack, Kellogg's, Mars Inc, McDonalds, Mondelez, Nestle, PepsiCo, Royal FrieslandCampina, Unichips and Unilever.

TV METHODOLOGY

- The following total number of spots were analysed-

Country	Total Spots	Total Spots for Restricted Products
France	49,854	39,493
Germany	43,798	39,694
Greece	23,820	15,887
Hungary	206,171	181,874
Italy	221,171	171,538
Portugal	20,402	15,202
Spain	178,524	117,601
TOTAL	743,740	581,289

TV METHODOLOGY

- The TV advertising the compliance rates in this report are provided in two forms:
- **For all spots aired:** this is the formal EU Pledge 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 35% or more children under 12. A list of these spots, where applicable, is provided in this report. 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 EU Pledge compliance results nonetheless, in view of transparency and simplicity of external communication.

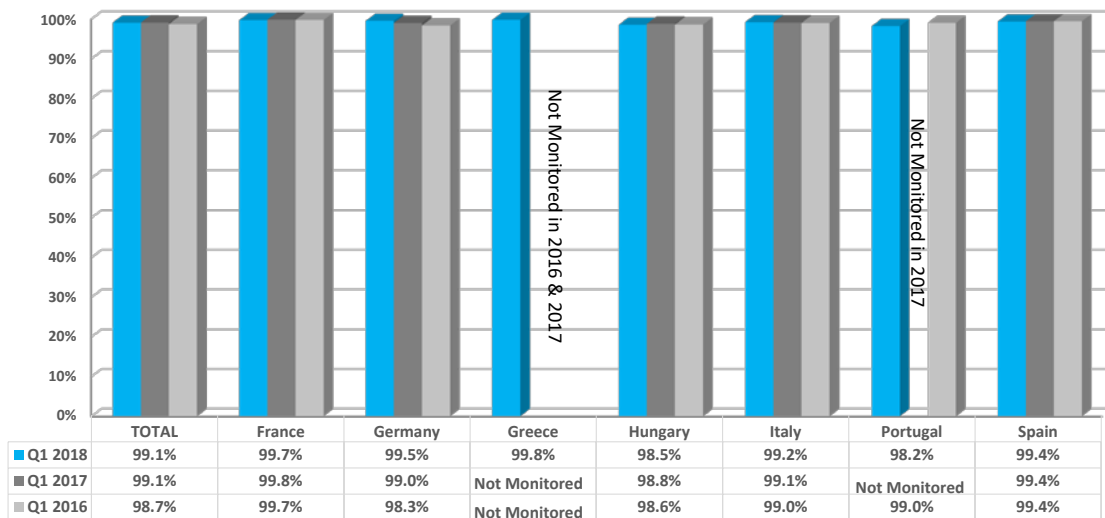
TV METHODOLOGY

- **Statistical anomalies and overstatement of non-compliance**

It is worth noting that of the vast majority of spots found technically non-compliant (i.e. achieving an under-twelve audience share above 35%, regardless of the time of broadcast and of the adjacent programme), only a few can be considered to be certainly in breach of the spirit of the EU Pledge commitment, i.e. broadcast in or around children's programmes as such. Most spots included as non-compliant in this report are spots broadcast in or around general/ adult programmes that were reported in national ratings data as displaying a share of children under 12 above 35%. The reason for this discrepancy is that audience statistics for programmes and advertising spots with a small audience – included in these monitoring results – are not reliable: a small audience means a small sample of households, rendering the demographic analysis of the audience unreliable. For statistical reliability, marketers typically exclude advertising spots below 1 Gross Rating Point (GRP). GRPs are the measure of television ratings. They are calculated in relation to the target audience – children under 12 for the purposes of this analysis. In this case a spot with less than 1 GRP is a spot that reaches less than 1% of the under-12 audience in the country in question. These spots often display an implausible share of under-12 viewers: e.g. a spot during a sports programme broadcast at 2am shows a child audience of 100%. This is the result of statistical anomalies. 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.

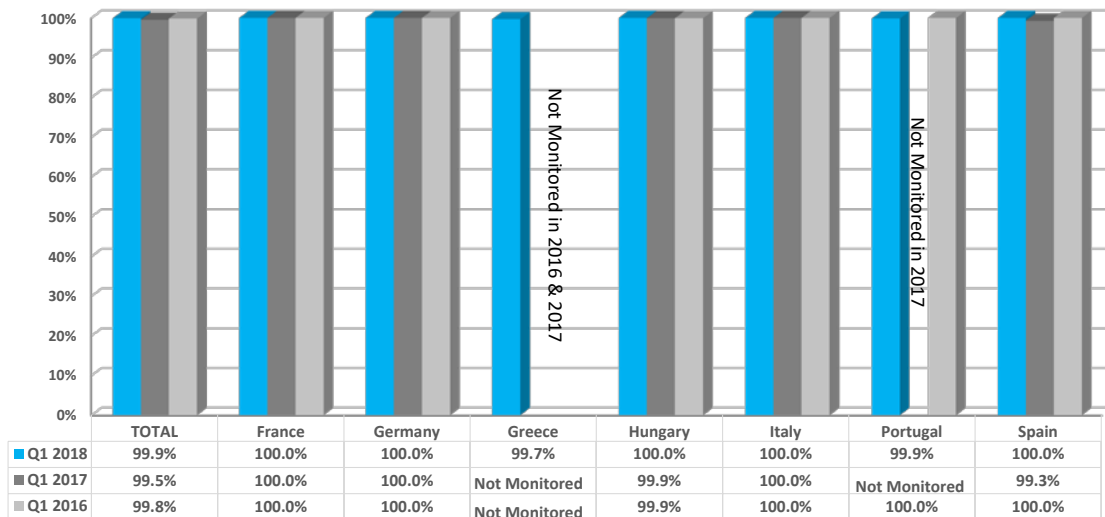
OVERALL COMPLIANCE RESULTS- ALL SPOTS

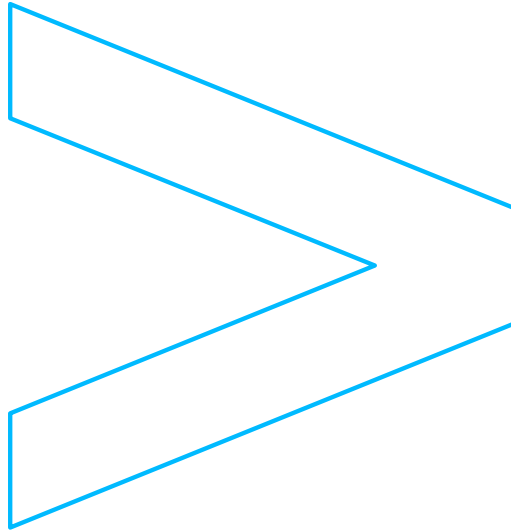
Compliance % by market Q1 2018 v Q1 2017 & Q1 2016



OVERALL COMPLIANCE RESULTS- SPOTS > 1 GRP

Compliance % by market Q1 2018 v Q1 2017 & Q1 2016 for spots GRP > 1





1. TV COMPLIANCE MONITORING
2. APPENDICES

ACCENTURE
MEDIA
MANAGEMENT
Global Scale. Custom Results.

TV DEFINITIONS

- **Spot** - Each individual advertising activity - the airtime used by the advertiser
- **Restricted products** - Products that do not meet the advertiser's nutritional criteria for marketing to children
- **Profile** - Demographic breakdown of the audience at spot level, with regard to children under 12
- **Impacts (Impressions)** - Number of times a message is seen by the audience
- **GRP (Gross Rating Point)** - Percentage of the target audience reached by an advertisement, multiplied by the frequency that the audience sees it.

*For example, a TV advertisement that is aired 5 times reaching 50% of the target audience, would have 250 GRPs
($GRP = 5 \times 50\%$)*

TV CHANNELS MONITORED

France	C8+	FRANCE 3	M6	NT1
	CHERIE25	FRANCE 5	MULTIDOC	NUMERO 23
	CSTAR	GULLI	NRJ12	PUISSANCE TNT
	FRANCE 2	HD1	TMC	TF1

Germany	ARD	N-TV	SAT.1 Gold	TLC
	COMEDY C	PRO7	ServusTVD	VIVA
	Disney Channel	Pro7 MAXX	sixx	VOX
	DMAX	RTL	SkySpoNews	WELT
	KABEL 1	RTL II	SPORT1	ZDF
	Nick	RTL+	SUP RTL	
	NITRO	SAT.1	Tele 5	

Greece	ALPHA	EPT 2	NICKELODEON+	STAR
	ANTENNA	MAKTV	NOVA CINEMA1	
	epsilon	MEGA	NOVA SPORTS1	
	EPT 1	NICKELODEON	SKAI	

TV CHANNELS MONITORED

Portugal	AXN	Fox Life	RTP1	TV Record
	AXN Black	Globo	RTP3	TVI
	BIGGS	Hollywood	SIC	TVI24
	CMTV	National Geographic	SIC Mulher	
	Disney Channel	Panda	SIC Noticias	
	Fox	RTP Memória	SIC Radical	

Hungary	AMC	GALAXY4	MUZIKA TV	SPEKTRUM
	ATV	HISTORY	NAT GEO WILD	SPEKTRUM HOME
	AXN	HUMOR+	NATIONAL GEOGRAPHIC	SPILER1 TV
	BOOMERANG	ID	Nick JR	SPORT1
	CARTOON NETWORK	IZAURA	NICKELODEON	SPORT2
	COMEDY CENTRAL	KIWI TV	OzoneTv	STORY4 (EX STORY5)
	COMEDY CENTRAL FAMILY	LICHI TV	PARAMOUNT	Super TV2
	COOL	LifeTv	PRIME	TLC
	DISCOVERY CHANNEL	M1	RTL Gold	TRAVEL Channel
	DOQ	M2	RTL II	TV PAPRIKA
	DUNA TV	M3	RTL KLUB	TV2
	DUNA WORLD	M4 Sport	RTL Spike	TV4 (EX STORY4)
	Ex FOX [14.03-18.04]	M5	RTL+	VIASAT3
	F+	MINIMAX	SLAGER TV	VIASAT6
	FEM3	MOZI+	Sony Max	ZENE BUTIK
	FILM CAFE	MTV Hungary	Sony Movie Channel	
	FILM MANIA	MUSIC CHANNEL	SOROZAT+	

TV CHANNELS MONITORED

Italy	Rai 1	Rai 2	Rai Premium	Canale 5	Rai 3
	Rai News 24	Rai 4	La7	Rete 4	Nove
	Tgcom 24	Real Time	Real Time +1	Italia 1	La7d
	Mediaset Extra	La5	Top Crime	Iris	Rai Movie
	Premium Sport/HD	Premium Sport 2/HD	Premium Calcio 1	Animal Planet	Vh1
	Comedy +1	Dmax	Sky Uno	Giallo	Discovery Travel e Living
	ID Investigation Discovery	Focus	Dmax +1	Sky Uno +1	Premium Action
	Cielo	NatGeo People	Studio Universal	Premium Crime	Premium Stories
	Discovery Channel	Fox Life	Joi	Premium Cinema	Discovery Science
	Discovery Channel +1	Fox Life +1	Gambero Rosso Channel	Eurosport 2	Cinema Emotion
	Tv8	Lei	Lei +1	Eurosport/HD	Premium Cinema Comedy
	Cinema Energy	Comedy Central	Paramount Channel	Radio Italia Tv	Italia 2 Mediaset
	Sportitalia	Sky Cinema Hits	Fox Animation	Fox Comedy	Sky Super Calcio
	Sky Cinema Comedy	Sky Sport 2	Sky Sport Moto GP	Crime+Investigation HD	Sky Cinema Uno
	Sky Cinema +24	Sky Cinema +1	Sky Cinema Passion	Fox Crime/HD	Fox Crime +1
	Dove Tv	AXN/HD	AXN +1	Sky Calcio 6	National Geographic
	National Geographic +1	Fox Crime +2	AXN Sci-Fi	Sky TG24 (DTT)	Frisbee
	K2	Sky TG24 Primo Piano	Sky Sport 3	Sky Meteo24	NatGeo Wild +1
	Fox/HD	Fox +1	NatGeo Wild	History HD	History +1
	Sky Cinema Cult	Sky Sport Plus	Fox Sports Plus Sat	Sky Cinema Family	Sky Cinema Family +1
	Sky Calcio 8	Nickelodeon +1	Nickelodeon	Nick Jr.	Boing
	Nick Jr. +1	Super!	Rai Gulp	La 3	Sky TG24 (DTH)
	Sky Atlantic	Sky Atlantic +1	Teen Nick Music Party	Premium Calcio 2	Sky Sport F1
	Sky Sport 1	Sky Calcio 5	Sky Calcio 2	Sky Calcio 1	Sky Calcio 4
	Sky Sport Mix	Sky Calcio 9	Fox Sports Sat	Rai Sport	Rai Sport 2
	Cartoonito	Sky Sport 24			

TV CHANNELS MONITORED

Spain	#0	COSMOPOLITAN	GOL	NICKELODEON
	8TV	CRIMEN + INVESTIGACION	HISTORIA	NOVA
	A3	CSUR-AND	IB3	ODISEA
	AMC	CUATRO	LA SEXTA	PARAMOUNT CHANNEL
	AND-TV	CYL7	LAOTRA	REAL MADRID HD
	ARAGON TV	DARK	MEGA	SOMOS
	ATRESERIES	DECASA	MOVISTAR ACCION	SUNDANCE TV
	AXN	DISCOVERY	MOVISTAR CINE ESPAÑOL	SUPER3/33
	AXN WHITE	DISNEY CH +1	MOVISTAR COMEDIA	SYFY
	BEIN LIGA	DISNEY CHANNEL	MOVISTAR DCINE	T5
	BEIN MAX1	DISNEY XD	MOVISTAR DEPORTES 1	TELEDEPORTE
	BEIN SPORTS	DIVINITY	MOVISTAR DEPORTES 2	TEN
	BEMADtv	DKISS	MOVISTAR ESTRENOS	TNT
	BLAZE	DMAX	MOVISTAR GOLF	TRECE
	BOING	ENERGY	MOVISTAR PARTIDAZO	TV MEDITERRANEO
	BOM	ESPORT3	MOVISTAR SERIES	TV3
	C.SUR	ETB1	MOVISTAR SERIES XTRA	TVG
	CALLE 13	ETB2	MOVISTAR XTRA	VIAJAR
	CANAL COCINA	ETB4	MTV ESP	XTRM
	CANAL HOLLYWOOD	EUROSPORT	NATIONAL GEOGRAPHIC	3/24
	CANAL HOLLYWOOD +1	FDF	NEOX	
	CMM	FOX	NGC WILD	
	COMEDY CENTRAL	FOX LIFE	NICK JR	

AGE GROUP DEFINITIONS

Country	All Persons	Children Under 12
France	all Indiv	Under 12's
Germany	A 3+	Kids 4-12
Greece	Age 3+	Age 4-12
Hungary	Total Individuals	All 4-12
Italy	all indiv	Under 12's
Portugal	All individuals	Under 12
Spain	Ind. 4+	Ind 4-11

2018



EU PLEDGE SURVEY TOP LINE REPORT

EASA

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

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

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February 2019

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Introduction

EASA was commissioned by the EU Pledge Secretariat to review a number of food and beverage brand websites and social media profiles belonging to the EU Pledge ¹ member companies and independently check compliance with the EU Pledge criteria as well as SR codes and national laws.

The goal of the project was to determine whether the reviewed company-owned websites, and social media profiles were compliant with the relevant EU Pledge commitment.

Compliance with the EU Pledge commitment, for brand websites and social media profiles, is determined on the basis of whether:

- The website or social media profile features marketing communications;
- If these marketing communications promote food or beverage products, as opposed to a brand in general;
- Such food and beverage products meet or do not meet the EU Pledge common nutritional criteria;
- Such marketing communications are designed to be targeted primarily at children under 12.

Advertising self-regulation experts were requested to **try and think from the perspective of a child younger than 12** while reviewing brand websites and social media profiles and keep in mind what a child of this age would find interesting and attractive. Special attention had to be paid to specific aspects of the websites and social media profiles that would make them appealing to under-12s.

In order to offer unbiased, independent and accountable results, a 'consumer-oriented approach' has been drawn up by the EASA Secretariat in collaboration with the EU Pledge Secretariat and Dr. Verónica Donoso, the independent reviewer of the exercises that were conducted between 2011-2016. The 2017 methodology was adapted by EASA, the EU Pledge

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

Secretariat and Professors Liselot Hudders² and Dienneke Van de Sompel³, independent reviewers of this exercise. The role of the independent reviewers is to verify that appropriate criteria have been set up in the methodology, perform quality check on SROs' reviews, testify to the correctness of the monitoring procedure, and sign off on the EASA top line report

Project Overview

Experts from 8 European self-regulatory organisations (SROs) were invited by EASA and the EU Pledge Secretariat to conduct the monitoring exercise assessing the appeal of marketer-owned websites and social media profiles to children under 12. The 8 chosen SROs represent different systems in terms of size (big vs. small SROs), location (geographical coverage) and maturity (new vs. old systems).

Table 1: List of the participating countries/SROs

Country
JEP - Belgium
NCSR - Bulgaria
ARPP - France
DWR - Germany
SEE - Greece
IAP - Italy
AUTOCONTROL - Spain
Ro. - Sweden

² **Liselot Hudders** is an assistant professor at the department of communication sciences at Ghent University and a postdoctoral fellow of the FWO at the marketing department. She teaches courses on Consumer Behavior, Communicative Skills and Organizational Psychology and she serves as ad hoc reviewer for journals as Journal of Happiness Studies, Journal of Adolescence, and Journal of Brand Management and for conferences as EMAC, and ICORIA. She participated in many international conferences and published in various international journals. Her research interests include Persuasive Communication, Consumer Behavior and Advertising Literacy. Her research focus lays on how consumption affects an individual's well-being. In particular, she is conducting research on how materialism and luxury consumption, green consumption practices, and food consumption may contribute to an individual's happiness (both for children and adults). In addition, she investigates how children and youngsters cope with (new) advertising techniques. She is particularly interested in 1) how minor's advertising literacy can be improved, using advertising cues and advertising literacy training sessions and 2) how parental mediation and peer influences moderate these effects.

³ **Dienneke Van de Sompel** is a visiting professor at the Department of Communication Sciences at Ghent University. She obtained a PhD in Applied Economic Sciences ("Insights in children's consumer related activities and reactions to advertising") in 2016 at the department of Marketing, Faculty of Economics and Business Administration of Ghent University. The dissertation explored two touch points children have with consuming, namely play activities and advertising exposure. She has worked as a research and teaching assistant at the marketing department of the Faculty of Economics and Business Administration of Ghent University and the department of Business Administration and Public Administration of University College Ghent, where she has given courses such as Marketing planning, Marketing strategy, Sales management etc. Dienneke is interested in research combining the domains of Communication sciences, Psychology and Marketing and she specifically centers her research on children's Consumer behaviour and the effects of Advertising on children. Her research looks for example into how consumerism has an effect on children (for example on the development of materialistic goals, purchase intentions, ad preferences). She also works on projects that examine the effects of advertising cues (such as exposure to attractive models) on children's self-esteem and well-being.

Self-regulation experts from the 8 SROs reviewed a sample of 258 items, including national brand websites⁴ and social media profiles⁵ of EU Pledge company members.

Table 2: Number of websites and social media profiles reviewed per country

Country	Websites	Facebook	YouTube	Instagram	SM	Tot
JEP - Belgium	20	7	1	4	12	32
NCSR - Bulgaria	17	7	4	4	15	32
ARPP - France	20	6	2	3	11	31
DWR - Germany	22	3	4	5	12	34
SEE - Greece	14	6	7	5	18	32
IAP - Italy	20	1	5	6	12	32
AUTOCONTROL - Spain	20	4	4	4	12	32
Ro. - Sweden	12	8	5	8	21	33
Total	145	42	32	39	113	258

Below is a list of the EU Pledge member companies.

Table 3: List of the EU Pledge member companies

Company
Amica Chips
Arla Foods
Bel Group
Burger King
Coca-Cola
Danone
Ferrero
General Mills
Intersnack
KiMs
Kellogg's
Lorenz Snack-World
Mars
McDonalds Europe
Mondelēz
Nestlé
PepsiCo
Royal FrieslandCampina
Unichips - San Carlo
Unilever
Zweifel Pomy-Chips

⁴ Where available, at least 1 website per company.

⁵ Influencers' profiles were monitored as part of the pilot exercise.

Methodology

The EU Pledge Secretariat provided EASA with a list of all products promoted by the EU Pledge member companies in the selected markets. The list indicated whether these products met the applicable nutritional criteria set out in the EU Pledge Nutrition White Paper. From this, EASA compiled a list of websites and social media profiles that promoted products that did not meet the nutritional criteria. Based on EASA's list the self-regulatory experts selected websites and social media profiles to review. When making their selection, reviewers were requested to consider products popular amongst children in their country.

To offer unbiased, independent and accountable results, a 'consumer-oriented approach' was drawn up by the EASA Secretariat in collaboration with the EU Pledge Secretariat and Dr. Verónica Donoso, the independent reviewer of the 2011-2016 exercises. The methodology was revised in 2017 by EASA, the EU Pledge Secretariat and the current independent reviewers Professors Liselot Hudders and Dienneke Van de Sompel.

The questionnaire for the **websites** asked the self-regulatory experts if the website being reviewed contained elements such as games/entertainment activities⁶, animations/sound effects/videos, licensed characters⁷ and toys, and to decide if these were in their view primarily designed for children under 12. Reviewers then had to judge if these elements, in conjunction with the creative execution of the website (i.e. simplicity of language, use of font size and typeface, use of colours, etc.), were clearly intended to make the marketing communication(s) on the website primarily appealing to under-12s.

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

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

⁶ A game/entertainment activity is an activity engaged for diversion or amusement. A non-exhaustive list of games/entertainment activities are: online interactive games, casual/social games, puzzles, board games, role-playing games, trivia, card games, racing, arcade, colouring sheets, activity sheets, do it yourself activities, etc.

⁷ Characters acquired externally and linked for example to movies, cartoons or sports.

The questionnaire for the **social media profiles** asked the experts if the reviewed profiles featured licensed characters, games/entertainment activities, contests and promotional events, and to decide if the reviewed profiles were primarily designed for children under 12.

Reviewers then had to judge if these elements, in conjunction with the overall look and feel of the social media profile, were clearly intended to make the marketing communication(s) primarily appealing to under-12s.

Beyond compliance of websites with the EU Pledge and primary appeal of social media profiles to children under 12, the experts also flagged any items on the websites and social media profiles reviewed that potentially breached any applicable advertising codes or relevant legislation.

The following were considered:

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

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

Note on the Methodology

In collaboration with the EU Pledge Secretariat and independent reviewers Professors Liselot Hudders and Dieneke Van de Sompel, EASA has taken great care to ensure that the results of this project are objective and consistent. They have - as explained above - developed a detailed methodology which was applied by all self-regulatory experts when assessing brand websites and social media profiles.

However, although it may be relatively easy to determine if a website or a social media profile appeals to children in general, it is much harder to determine if a website or a social media profile is designed to **appeal primarily to children younger than 12**. As a result, the decisions of the self-regulatory experts retain an unavoidable degree of subjectivity, although it is informed by their extensive day-to-day professional experience. Readers are requested to bear this in mind.

Executive Summary

Brand-Owned Websites:

- A total of 145 national brand websites were reviewed;
- Out of the 145 websites, 1 was considered in breach of the EU Pledge criteria as it contained elements, such as entertainment activities or games, toys used as premiums or animations, videos, sound effects designed primarily for under-12s, as well as language, text or navigation clearly intended to make the marketing communications on the website appealing primarily to under-12s;
- Out of the 145 reviewed websites, 7 contained items that were in breach of advertising codes or relevant advertising laws. In total, 9 problematic items were flagged.

Brand-Owned Social Media Profiles:

- A total of 113 social media profiles were reviewed;
- Out of 113 reviewed social media profiles, 3 were considered in breach as they were deemed appealing primarily to children under 12 due to elements, such as videos/photos, entertainment activities/games, contests/competitions/promotional events, licensed characters as well as language addressed to children under 12 and encouraging their active participation;
- Out of the 113 reviewed social media profiles, 6 contained items that were in breach of advertising codes or relevant advertising laws. In total, 17 problematic items were flagged.

1. Brand-Owned Websites

Sample of Brand-Owned Websites

A total of 145 websites were reviewed by the experts. The table below provides an overview of the number of websites that were reviewed per country.

Table 4: Number of websites reviewed per country (N=145)

Country	Websites
JEP - Belgium	20
NCSR - Bulgaria	17
ARPP - France	20
DWR - Germany	22
SEE - Greece	14
IAP - Italy	20
AUTOCONTROL - Spain	20
Ro. - Sweden	12
Total	145

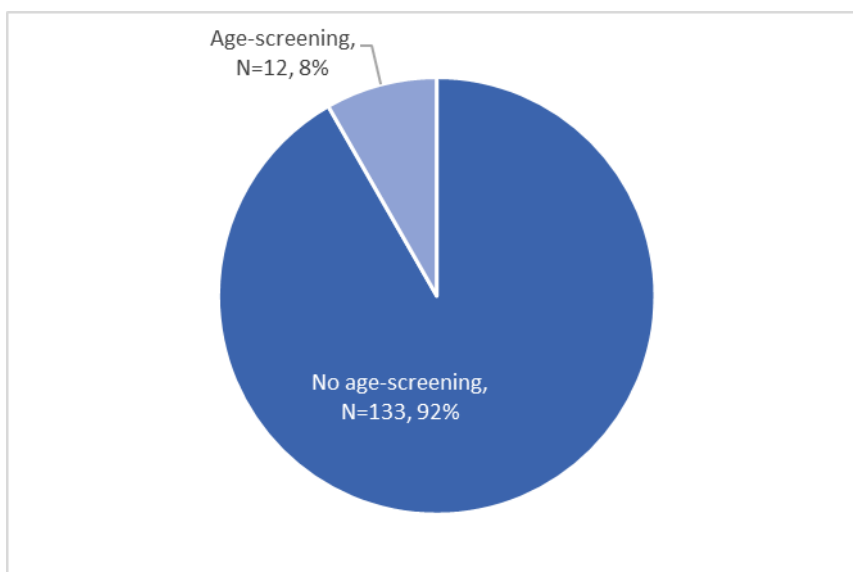
Product Promotion

The reviewers identified product promotion on all 145 websites reviewed. All reviewed websites featured at least 1 product that did not meet the common nutritional criteria.

Age screening/Parental Consent

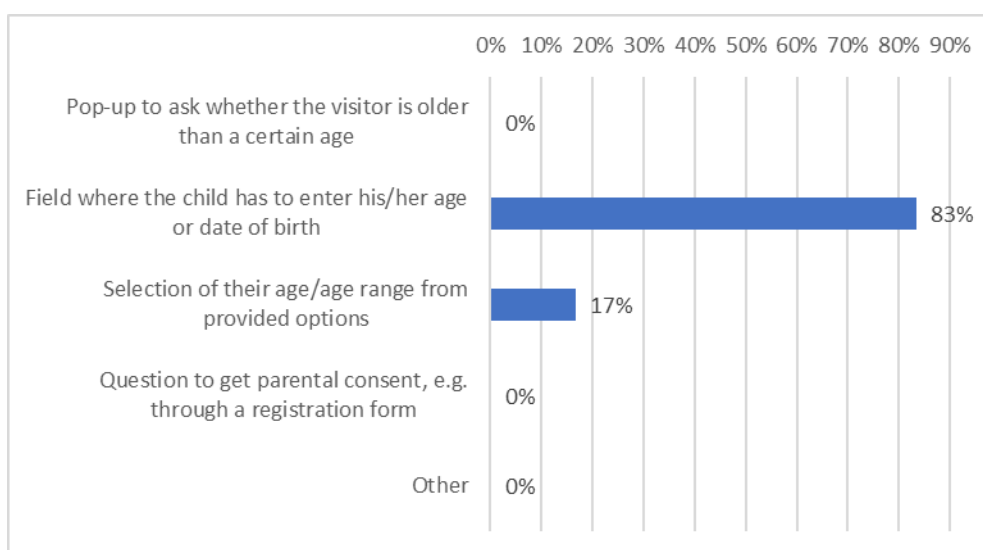
12 out of 145 websites reviewed contained mechanisms to screen the age of the website visitor. Methods ranged from a field where the visitor had to enter his/her date of birth to a pop-up asking whether the visitor was older than a certain age.

Figure 1: Number of websites featuring age screening (N=145)



Below is an overview of the age screening's methods.

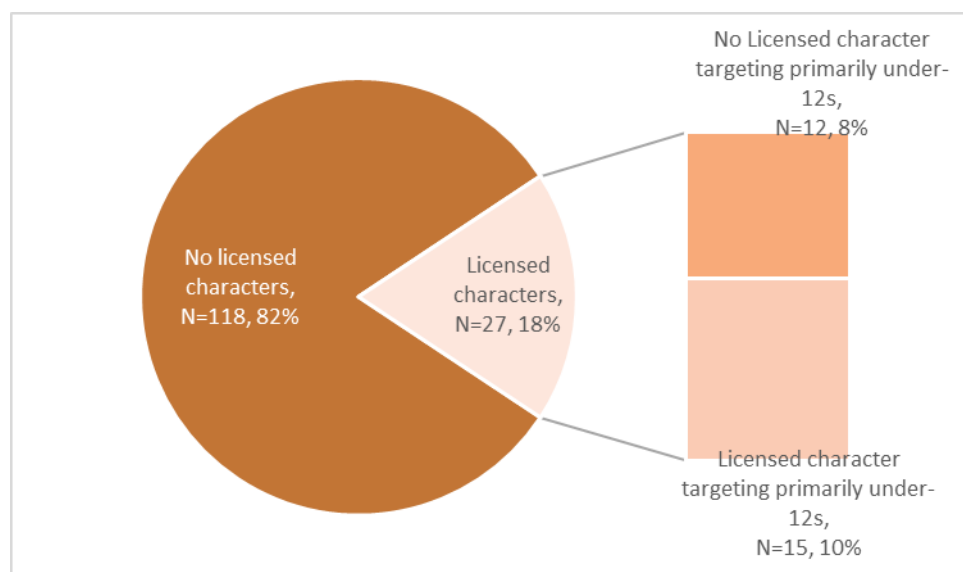
Figure 2: Types of age screening (N=12)



Licensed Characters/Tie-ins/Celebrities

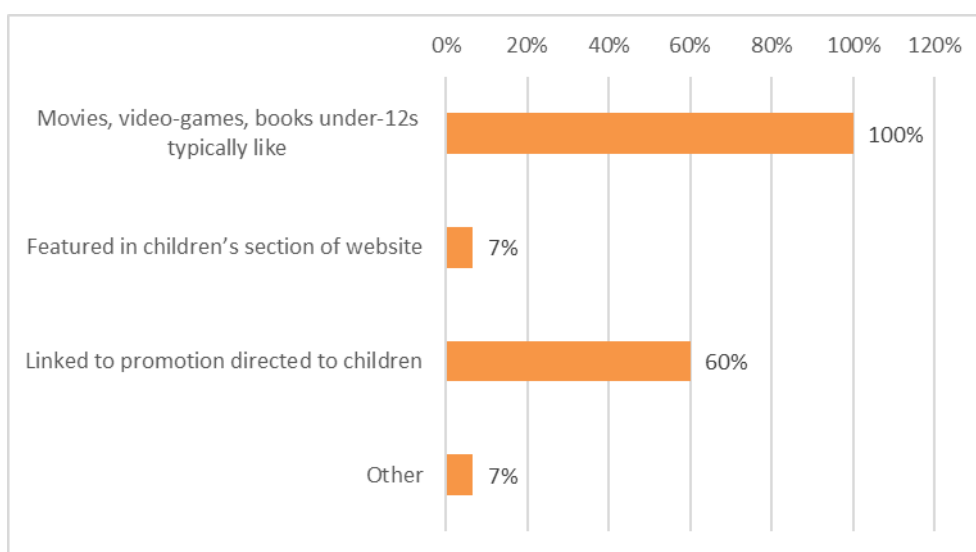
The reviewers checked if the websites or the children's section(s) of the website featured licensed characters or movie tie-ins as means to promote food or beverage products. 27 out of 145 websites featured licensed characters/tie-ins. In 15 instances, the reviewers considered these characters/tie-ins as designed to target primarily under-12s. In addition, 10 of these websites used the licensed characters/tie-ins to promote food or beverage products.

Figure 3: Number of websites featuring licensed characters/tie-ins (N=145)



Reasons as to why the reviewers considered the licensed characters/tie-ins to be appealing primarily to under-12s are featured in the following chart (Figure 4). The combination of several of these criteria is a strong indicator that the licensed character is primarily appealing to young children.

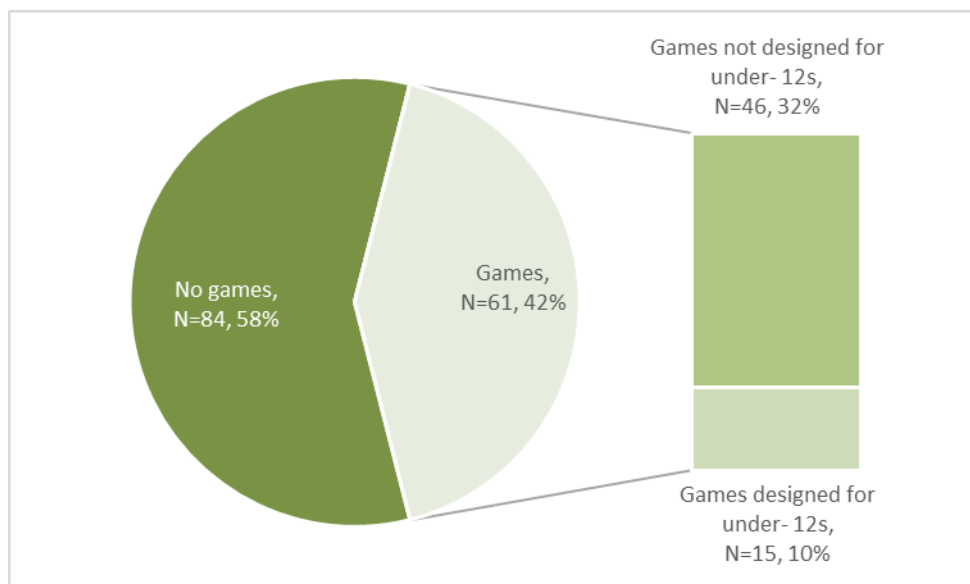
Figure 4: Main indicators for licensed characters/tie-ins considered primarily appealing to under-12s (N=15)



Games/Entertainment Activities

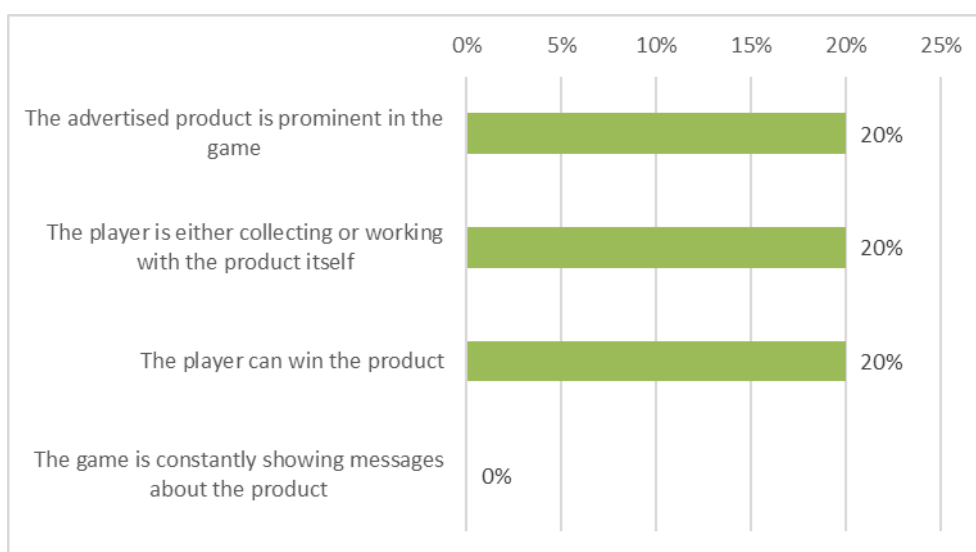
The reviewers identified entertainment activities/games on 61 reviewed websites. In 15 instances, the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s.

Figure 5: Number of websites featuring entertainment activities/games (N=145)



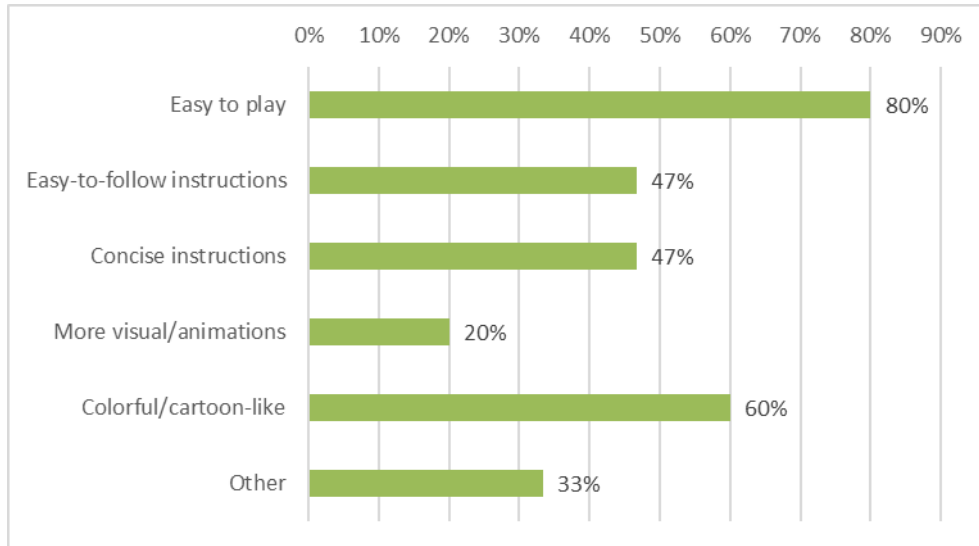
5 of these websites used the entertainment activities/games to promote food or beverage products to children. Reasons as to why the reviewers considered the entertainment activities/games to be used as a means to promote a food/beverage product to children under 12 are featured in the following chart (Figure 6).

Figure 6: Main indicators for entertainment activities/games used as a means to promote a food/beverage product to children under 12 (N=5)



In addition, reasons as to why the reviewers considered the entertainment activities/games to be appealing primarily to under-12s are featured in the following chart (Figure 7). The combination of several of these criteria is a strong indicator that the entertainment activity/game is primarily appealing to young children.

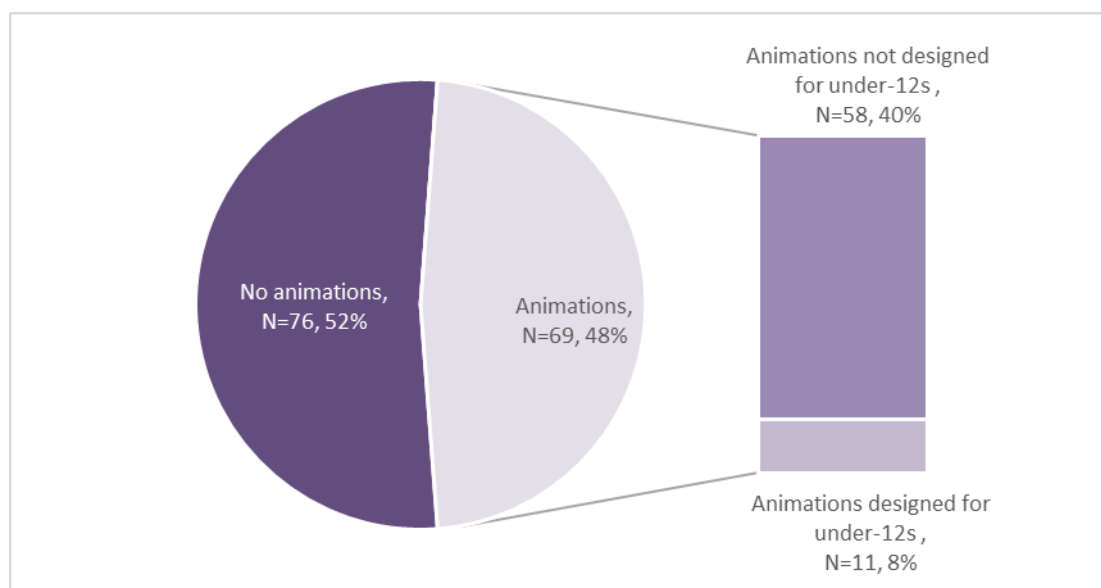
Figure 7: Main indicators for entertainment activities/games considered primarily appealing to under-12s (N=15)



Animation/Sound Effects/Videos

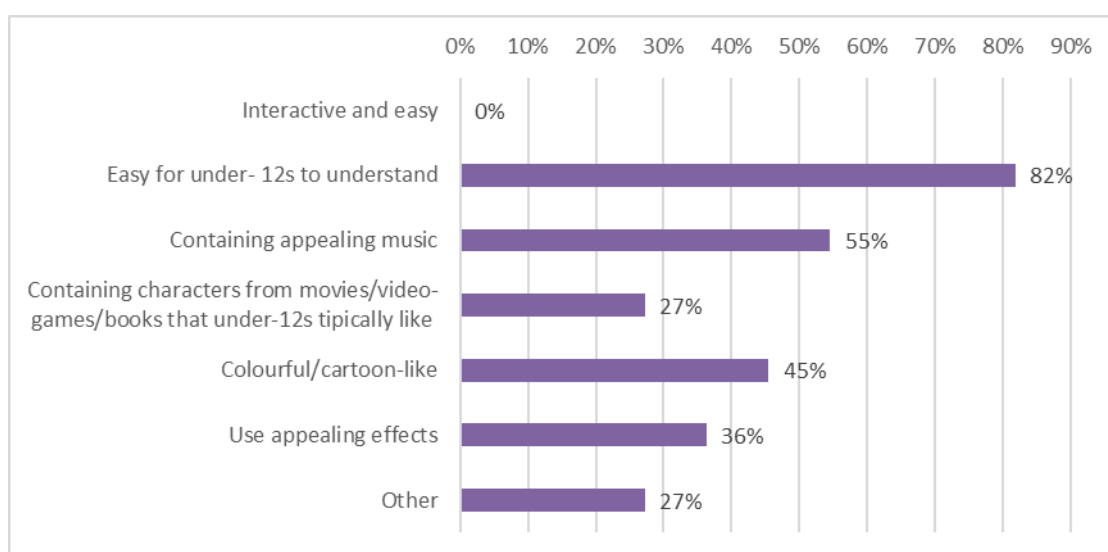
69 of the 145 reviewed websites featured animations such as cartoons, animations depicting fantasy situations, sound effects or videos. According to the reviewers, 11 of these websites featured animations, sound effects or videos which were designed to appeal primarily to under-12s. In addition, 10 of these websites used these animations, sounds effects or videos to promote food or beverage products to children.

Figure 8: Number of websites featuring animation, sound effects or videos (N=145)



Reasons as to why the reviewers considered the animations, sound effects or videos to be appealing primarily to under-12s are featured in the following chart (Figure 9). The combination of several of these criteria is a strong indicator that the animations are primarily appealing to young children.

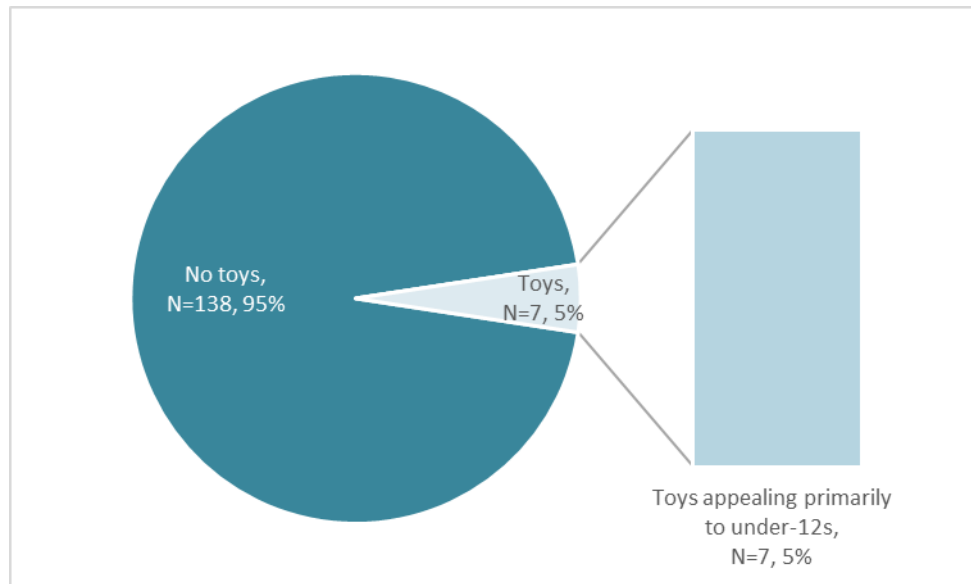
Figure 9: Main indicators for animation/sound effects/ videos considered primarily appealing to under-12s (N=11)



Toys Used as Premiums/Prizes

The reviewers identified 7 websites that used toys as premiums to promote a food or non-alcoholic beverage products. In all 7 cases, the toys were considered to be designed to appeal primarily to under-12s.

Figure 10: Number of websites featuring toys used as premiums (N=145)



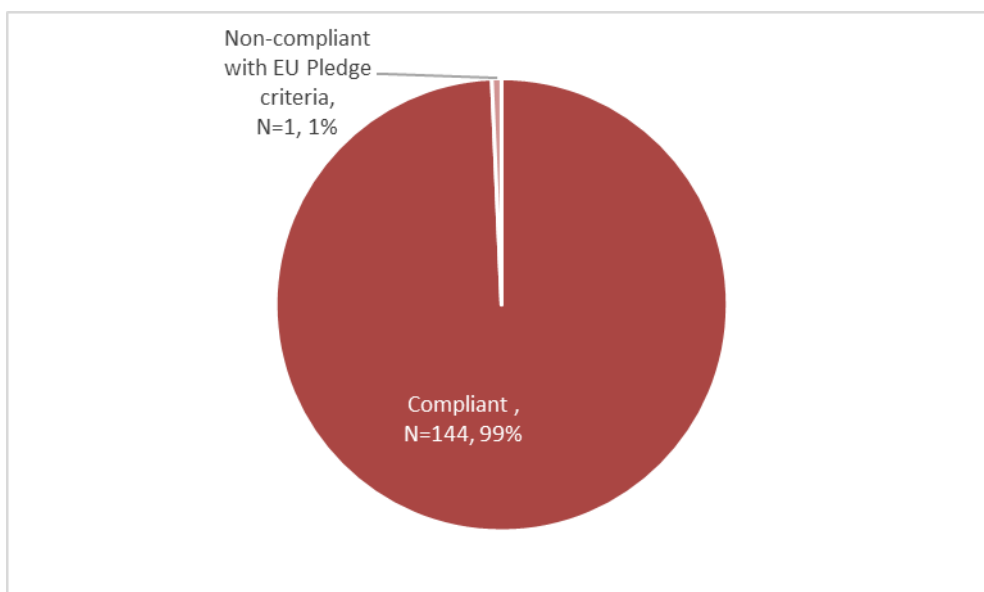
Compliance with the EU Pledge Criteria

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

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

After careful review, the experts concluded that 144 out of 145 reviewed websites were found to be compliant with the EU Pledge commitment.

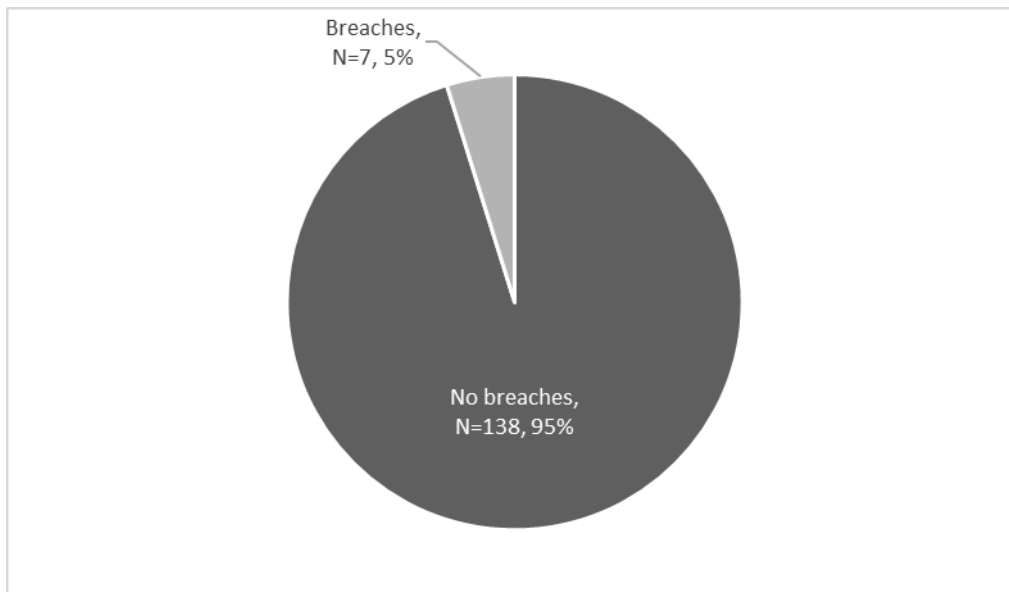
Figure 11: Compliance with the EU Pledge criteria (N=145)



Compliance with Advertising Codes/Laws

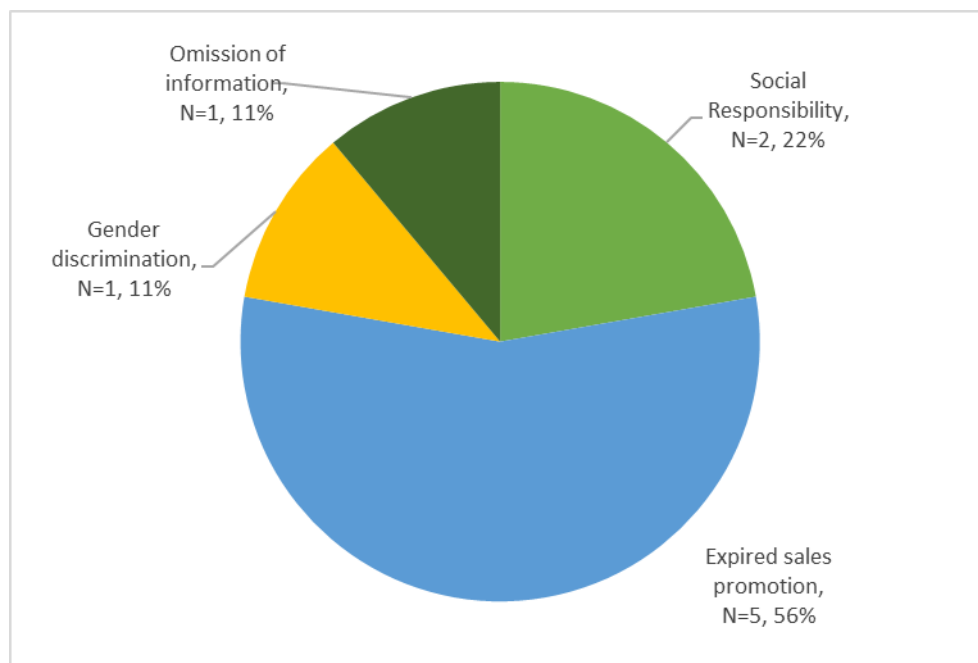
On 7 out of 145 websites, the reviewers identified items that were considered as potentially in breach of advertising codes and/or relevant advertising laws.

Figure 12: Compliance with advertising codes/laws (N=145)



On these 7 websites, a total of 9 problematic items were found.

Figure 13: Potential breaches of advertising codes/laws (N=145)



In 5 cases, the reviewers found on the websites sales promotions that had already expired at the time of the review.

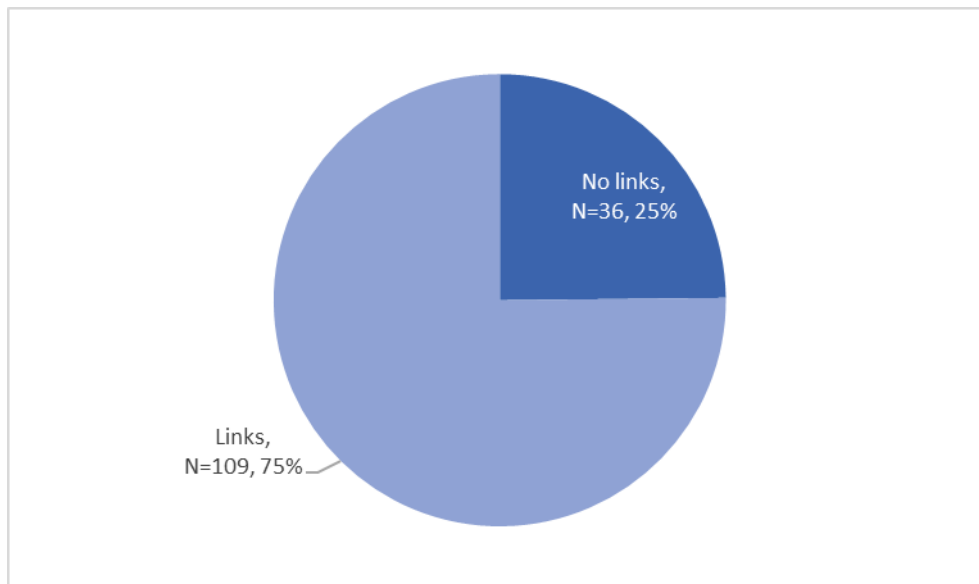
Furthermore, the reviewers flagged 1 website as it omitted important information on the toys that were part of the promotion. Another website was flagged for gender discrimination.

Finally, 2 websites were flagged for containing inappropriate role models for children (social responsibility).

Links to social media profiles

109 of the 145 reviewed websites include links to social media sites – either brand-owned or influencers profiles (Facebook, YouTube, Instagram, Snapchat, etc).

Figure 14: Potential breaches of advertising codes/laws (N=145)



2. Brand-Owned Social Media Profiles

Sample of Brand-Owned Social Media Profiles

A total of 113 social media profiles were reviewed by experts. 42 out of the 107 reviewed profiles were brand-owned Facebook pages, while 32 were brand-owned YouTube channels and 39 were brand-owned Instagram profiles. The table below provides an overview of the number of social media profiles that were reviewed per country.

Table 5: Number of social media profiles reviewed per country (N=113)

Country	Facebook	YouTube	Instagram	SM
JEP - Belgium	7	1	4	12
NCSR - Bulgaria	7	4	4	15
ARPP - France	6	2	3	11
DWR - Germany	3	4	5	12
SEE - Greece	6	7	5	18
IAP - Italy	1	5	6	12
AUTOCONTROL - Spain	4	4	4	12
Ro. - Sweden	8	5	8	21
Total	42	32	39	113

Product Promotion

The reviewers identified product promotion on all the 113 reviewed social media profiles. All the reviewed profiles featured at least 1 product that did not meet the common nutritional criteria.

Licensed Characters/Tie-ins/Celebrities

34 out of the 113 reviewed social media profiles featured “licensed characters”. In 12 instances, these characters/tie-ins were considered to be designed to target primarily children under 12. In addition, 9 of these social media profiles used the licensed characters/tie-ins to promote food or beverage products.

Figure 15: Number of social media profiles featuring licensed characters, tie-ins or celebrities (N=113)

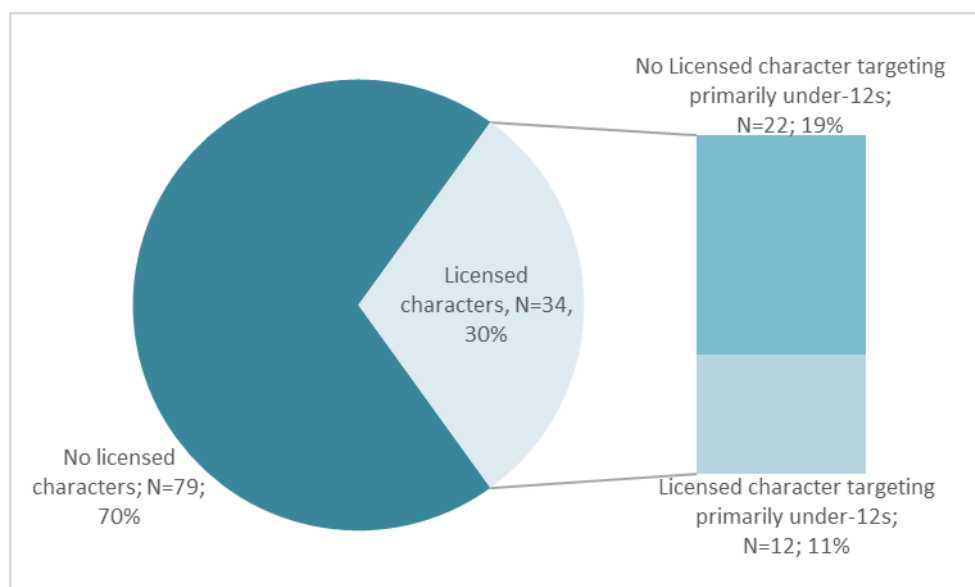
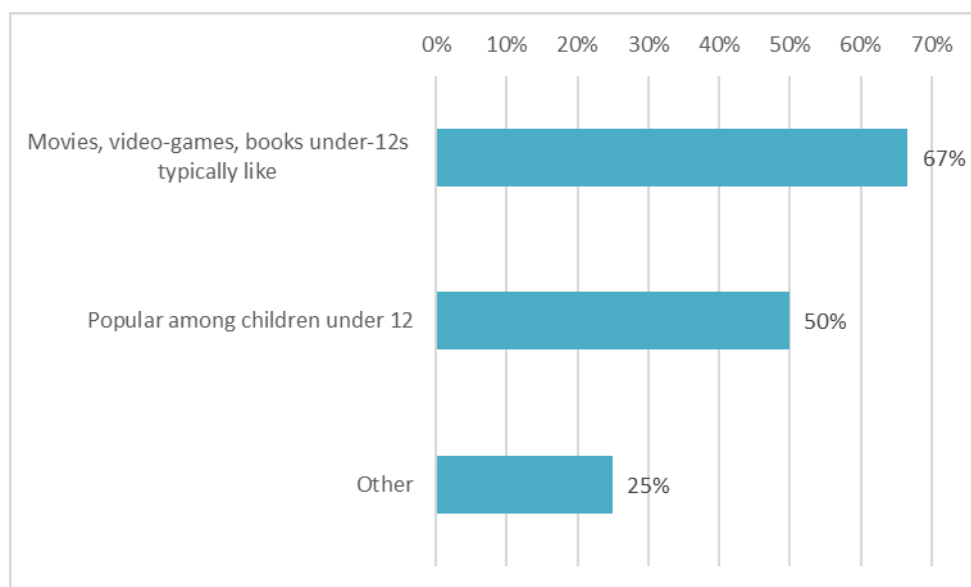


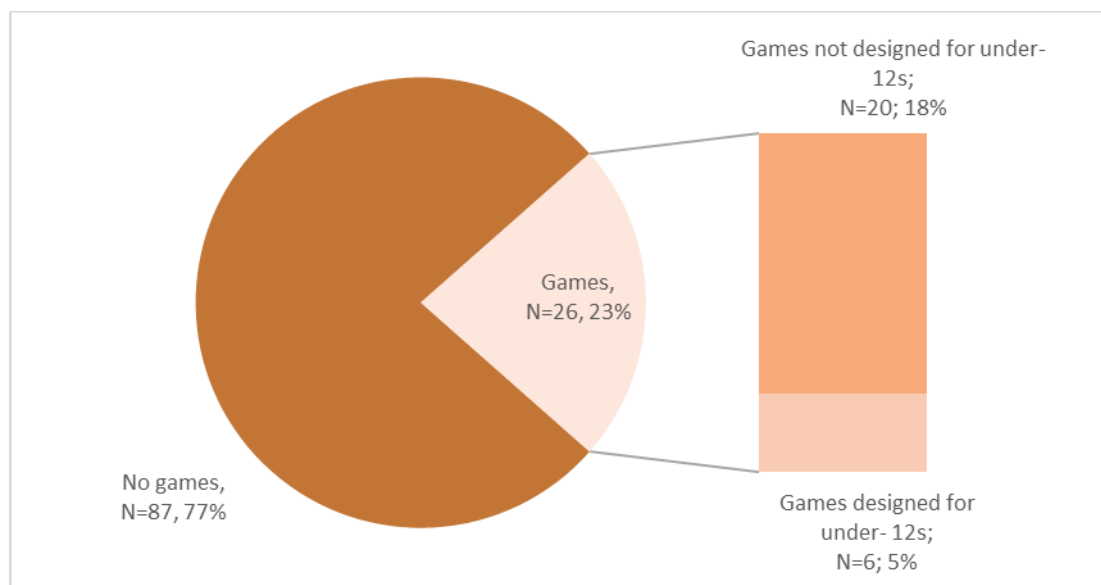
Figure 16: Types of licensed characters, tie-ins or celebrities featured in the social media profiles (N=34)



Games/Entertainment Activities

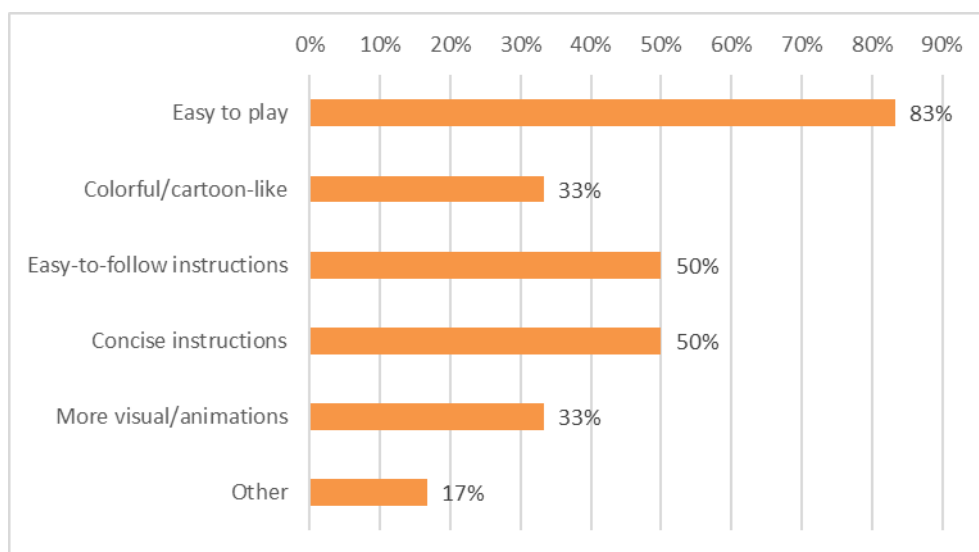
The reviewers identified entertainment activities/games on 26 of the 113 reviewed social media profiles. In 6 instances, the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s. In addition, 5 of these profiles used the entertainment activities/games to promote food or beverage products to children.

Figure 17: Number of social media profiles featuring entertainment activities/games (N=113)



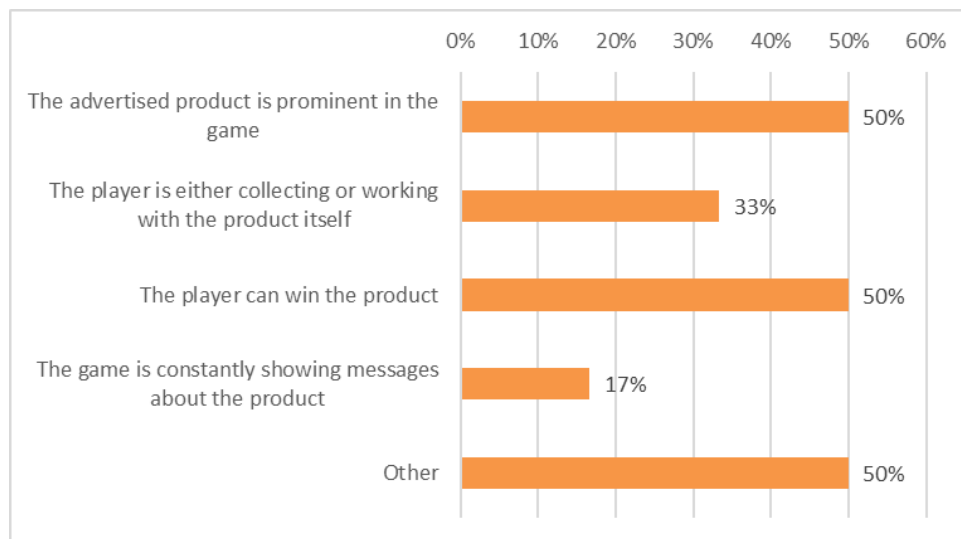
Reasons as to why the reviewers considered that the entertainment activities/games were primarily appealing to children under 12 are featured in the following chart (Figure 18).

Figure 18: Main indicators for entertainment activities/games considered primarily appealing to under-12s (N=6)



Reasons as to why the reviewers considered that the entertainment activities/games were used to promote the advertised product to children under 12 are featured in the following chart (Figure 19).

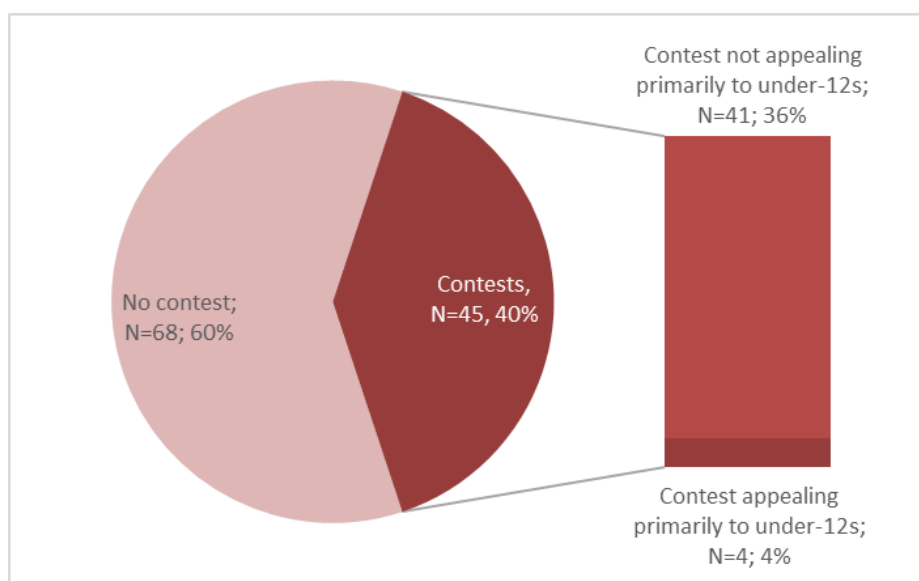
Figure 19: Main indicators for entertainment activities/games used to promote product to under-12s (N=5)



Contests/Competitions/Promotional events

45 out of the 113 reviewed social media profiles included contests or competitions or promotional events. In 4 cases, the reviewers considered that these contests/competitions/promotional events were appealing primarily to children under 12. In all 4 cases, the contests/competitions/promotional events were used as a means to promote a food/beverage product to children under 12.

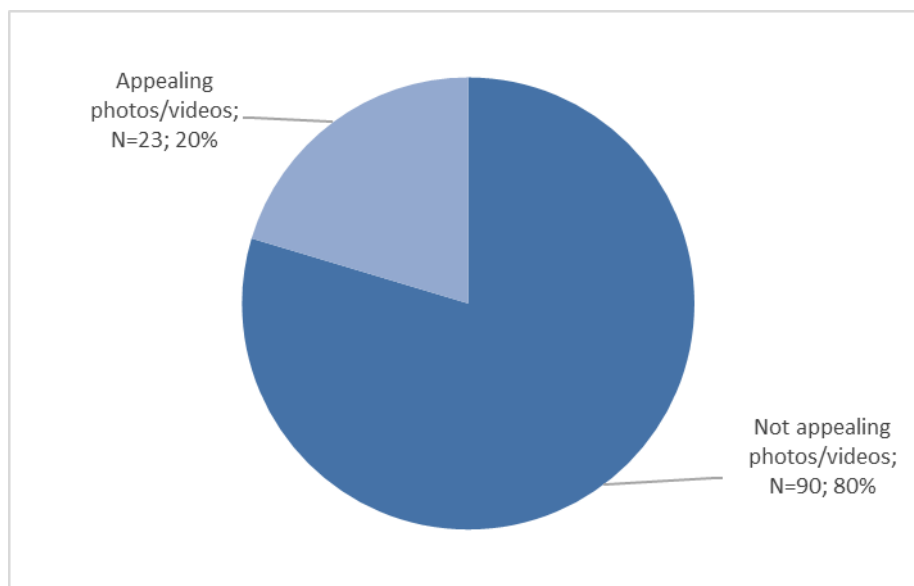
Figure 20: Number of social media profiles featuring contests/competitions (N=113)



Videos/Photos

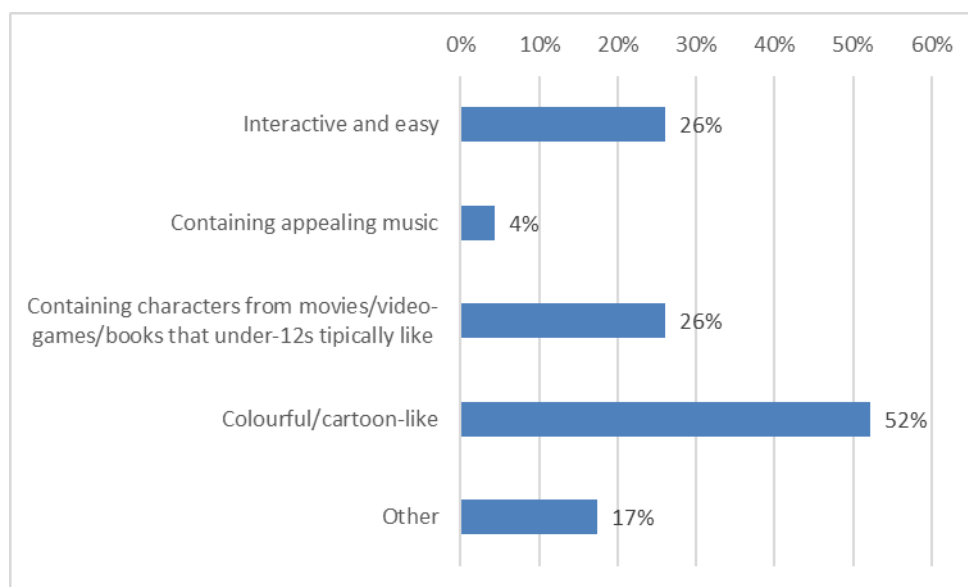
23 of the 113 reviewed social media profiles featured videos and/or photos that were considered to be primarily appealing to under-12s. 13 of these profiles used videos and/or photos to promote food or beverage products to children.

Figure 21: Number of social media profiles featuring videos/photos (N=113)



Reasons as to why the reviewers considered the videos and/or photos as primarily appealing to children under 12 are featured in the following chart.

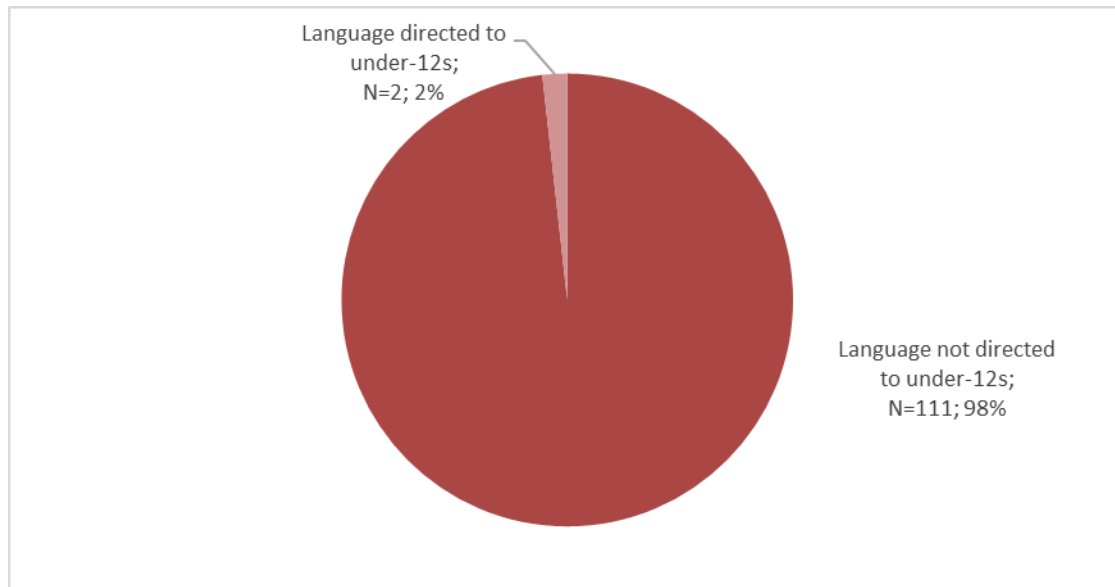
Figure 22: Main indicators for videos/photos considered primarily appealing to under-12s (N=23)



Language/Interaction

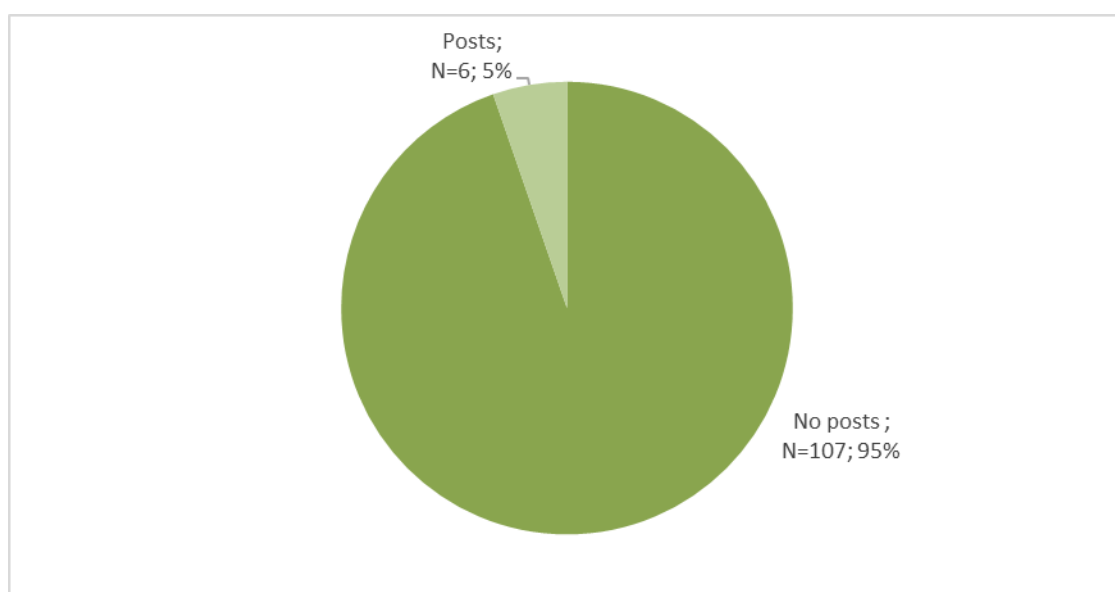
2 of the 113 reviewed social media profiles used language that was deemed as directed at children under 12, as it was considered plain and easy to understand by under-12s, as well as directly addressing under-12s.

Figure 23: Number of social media profiles using language directed at children under 12 (N=113)



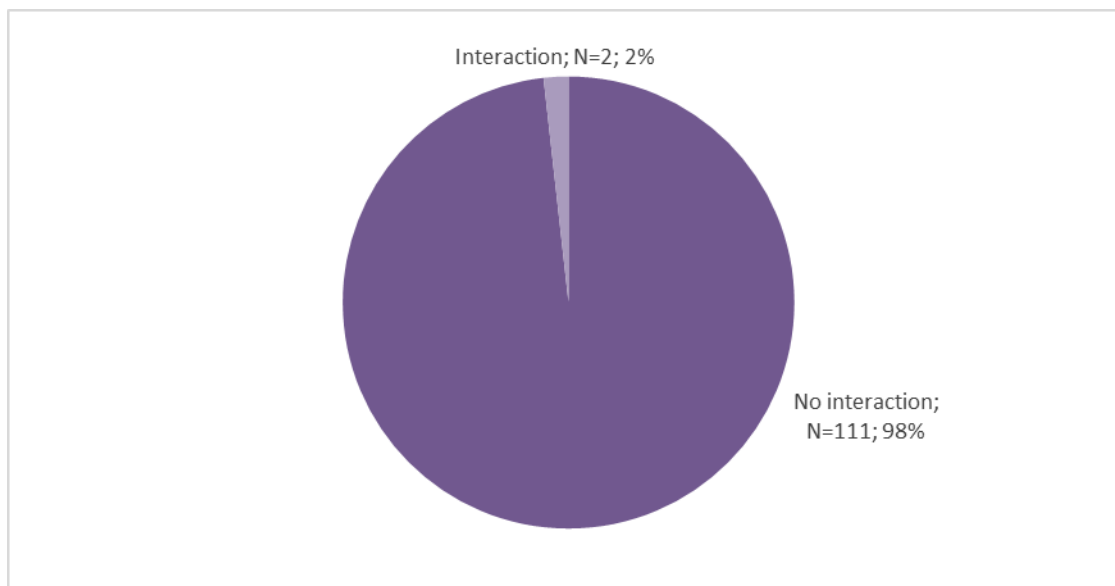
In 6 other social media profiles, the reviewers identified posts and comments which were likely to have been made by children younger than 12.

Figure 24: Number of social media profiles including any posts/comments/interactions from children under 12 (N=113)



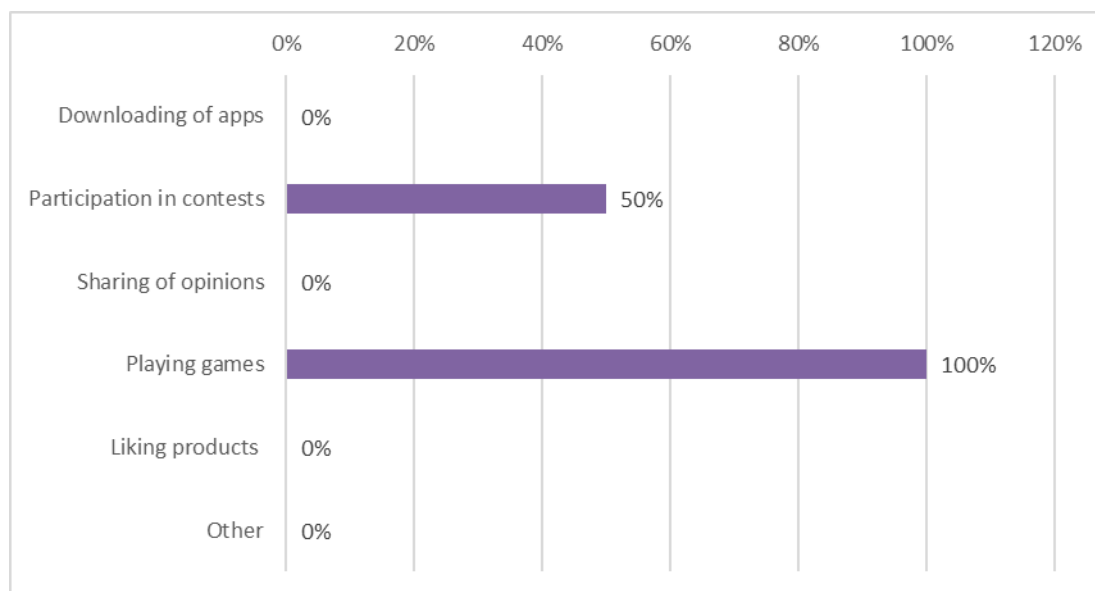
According to the reviewers, 2 out of 113 reviewed social media profiles seemed to encourage the interaction and active participation of children under 12.

Figure 25: Number of social media profiles encouraging interaction and/or active participation of children under 12 (N=113)



Reasons as to why the reviewers considered that the social media profiles seemed to encourage interaction and active participation of children under 12 are featured in the following chart.

Figure 26: Main indicators for encouraging interaction and/or active participation of children under 12 (N=2)

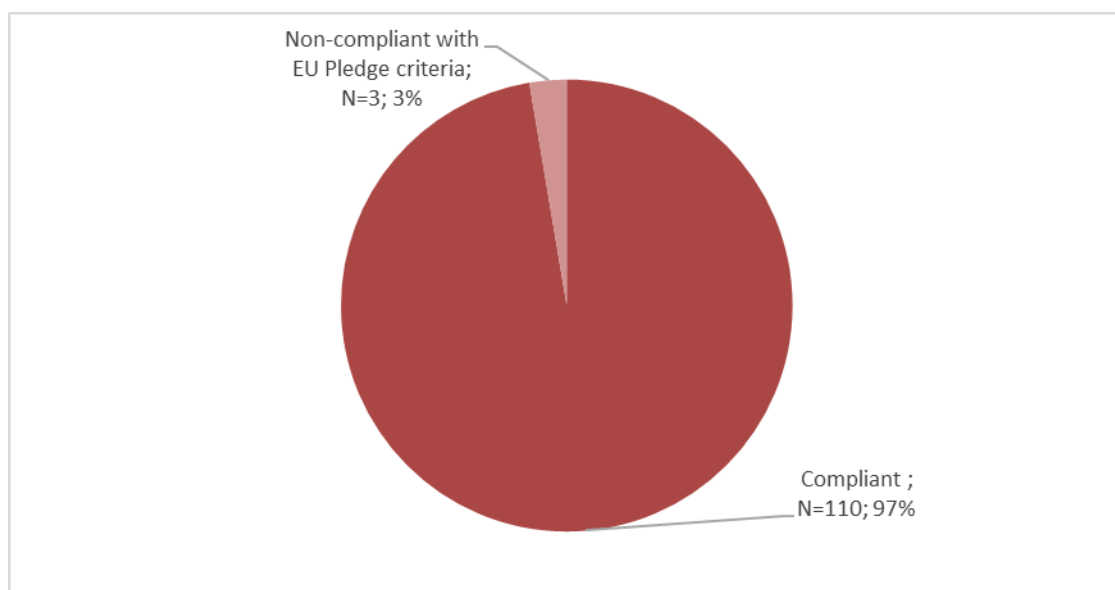


Primary Appeal of Brand Social Media Profiles to under-12s

In order to determine whether a social media profile was designed to target primarily under-12s, and subsequently to assess if the marketing communications were intended to appeal primarily to under-12s, all previously identified elements had to be considered. This included the presence of videos/photos, entertainment activities/ games, contests/competitions and promotional events or licensed characters as well as the language and/or level of interaction of the page.

After careful assessment, the reviewers decided that 3 out of the 113 reviewed social media profiles were primarily appealing to children under 12.

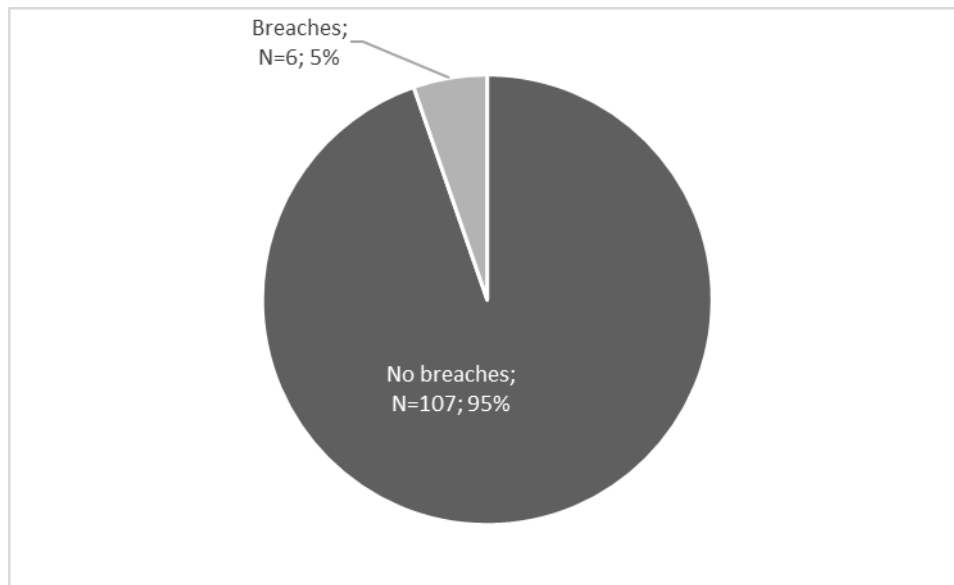
Figure 27: Number of social media profiles primarily appealing to under-12s (N=113)



Compliance with Advertising Codes/Laws

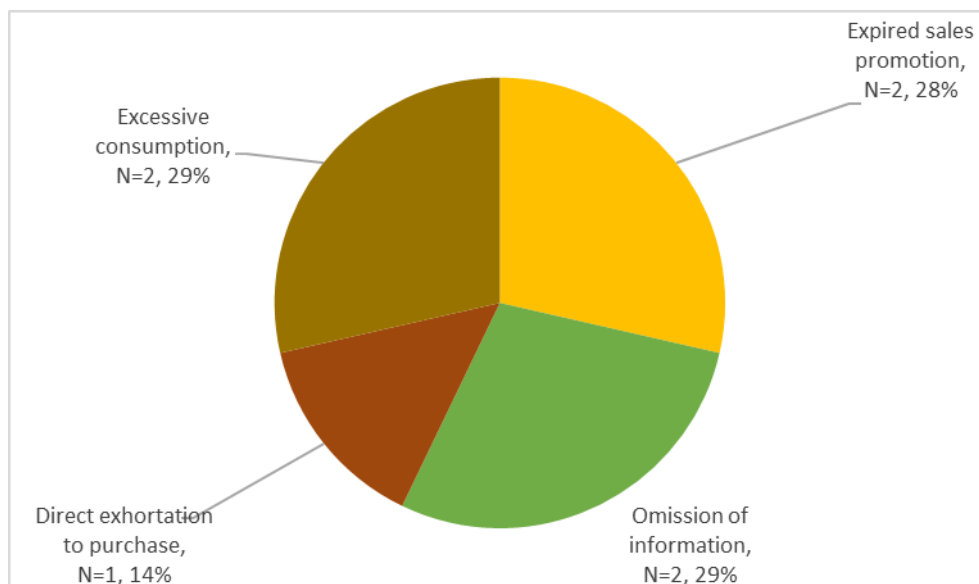
6 out of the 113 reviewed social media profiles featured items that were considered to be potentially in breach of advertising codes or relevant national advertising laws.

Figure 28: Compliance with advertising codes/laws (N=113)



On these 6 social media profiles, a total of 7 problematic items were found.

Figure 29: Potential breaches with advertising codes/laws (N=7)



2 social media profiles promoted and encouraged excessive portions and consumption, whereas one social media profile included direct exhortation to purchase the advertised products.

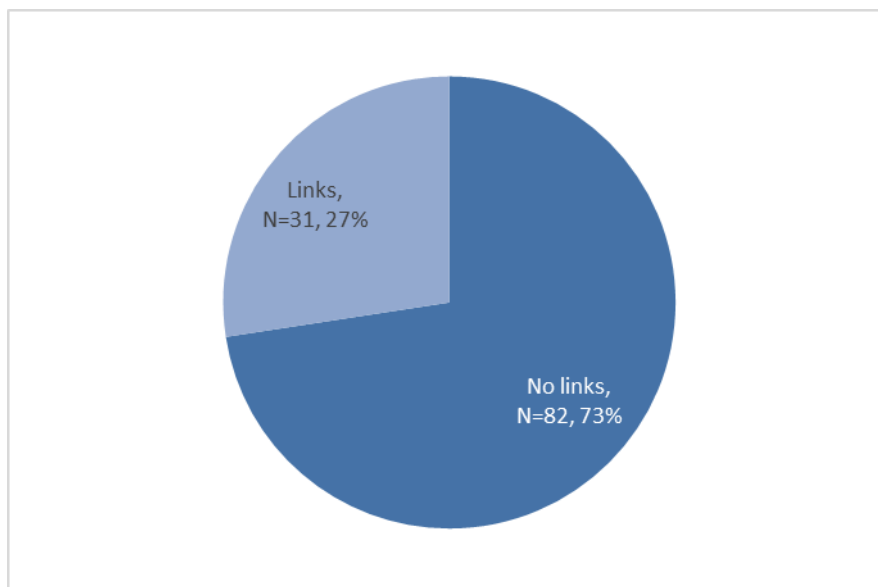
In 2 cases, the reviewers found on the social media profile sales promotions that had already expired at the time of the review.

Finally, the reviewers flagged 2 cases of omission of information, such as lack of size reference of the toys and products, or information on conditions and expiration dates of the advertised promotions.

Links to other social media profiles

31 of the 113 reviewed social media profiles included links to other social media sites – either brand-owned or influencers profiles (Facebook, YouTube, Instagram, Snapchat, etc).

Figure 30: Links to other social media profiles (N=113)



Note from the Independent Reviewers

1. Critical Notes on the SROs' review based on an Analysis of Inter-Coder Reliability

1.1 Research Methodology and Sample

A total of 145 websites, 113 social media pages (39 Instagram, 32 YouTube and 42 Facebook), and 40 profile pages of influencers (32 Instagram, 2 YouTube and 6 Facebook) from 8 different countries were reviewed by SROs based on a standardized coding scheme. An independent team of reviewers at Ghent University double coded 25% of these pages (based on a random selection, $N = 73$) to check the quality and reliability of the coding. In addition to this random selection, the independent reviewers also double-coded all cases for which breaches were found by the SROs ($N = 4$). This eventually resulted in a total of 37 websites, 30 company owned social media pages (10 Instagram, 8 YouTube and 12 Facebook) and 10 influencer profile pages (8 Instagram and 2 Facebook) that have been coded by the Ugent team.

The coding occurred based on the coding scheme and all data were entered in SPSS. Subsequently, the inter-coder reliability between the coding of Ghent University and the SROs was analysed in SPSS Statistics by calculating *Cohen's Kappa*. The closer the Cohen's Kappa is to one, the more agreement in coding between the independent coder and the SROs' coding; the closer the Cohen's Kappa is to zero, the more disagreement there is between the coders⁸. The results were further discussed in the team and are reported in this note. The results of the Cohen's Kappa analysis show a general reliability of .75 for the websites, .68 for the social media profiles and .40 for the influencer profiles. This indicates a good agreement for the websites, a good agreement for the social media profiles and a fair agreement for the influencer profiles. Below we explain the reasons that may explain the (minor) disagreement in coding:

- Firstly, some disagreement can be explained due to the *difference in timing* between the reviews of the independent coders and the SROs (a delay of one month and a half). In that period, there may have been some changes to the websites/ social media. For example, competitions, videos, etc., could have been added or removed.
- A second point is the *difference in language*. The different languages form a barrier when it comes to evaluating the language used on the websites and social media profiles. All content has been translated by the coders, however, small nuances might have been missed which could have led to a different end result. Also, each SRO coded cases for its own country, which might also generate differences in coding across SROs. The independent coding team coded cases across countries and was able to compare these different cases and evaluate them accordingly.

⁸ Cohen's Kappa is a measure used to assess inter-rater reliability in nominal data and compares to what extent the observations of two coders can be perceived as being alike. By doing so, measurement errors can be reduced. More agreement between the values of two coders (which is related to values closer to 1) indicates that there is more consensus about the question between the coders. Cohen, J. (1960). *A coefficient of agreement for nominal scales. Educational and psychological measurement*, 20(1), 37-46.

- The third point is about the reviews of the *posts by the influencers*. The difference in coding can be explained by the fact that the SROs only found one or two branded posts while the independent reviewers found three or more posts containing a product.
- Finally, depending on the interpretation of the concept “**primarily appealing under 12**” nuances between codes might arise. It is sometimes difficult to estimate what a child under 12 finds appealing. Therefore, it is possible that the SROs find something not attractive for children under 12, but the independent reviewers think differently.

1.2 Inter-coder reliability analysis of company-owned websites

The results of the inter-coder reliability for the websites are reported in **table 14** below. Thirty-seven websites were coded by the independent reviewers, 36 of these sites were randomly selected from the full list and one website was deliberately included because breaches were found by the SROs.

The results of the inter-coder reliability between the work of the SROs and of the independent coders show a good agreement. Our analysis confirmed the findings for the one website that was flagged as being in breach by the SROs. Additionally, the independent-coding team flagged 2 more websites as being in breach. These websites contained several elements that were not in line with the EU Pledge criteria. For example, cartoon-like animations and information that tried to persuade children to buy products by offering them gifts.

Based on our independent analysis on a random subsample of 37 websites, we also concluded that at least 3 more website, that were not flagged by the SROs, additionally contained elements that appealed to young children. These websites were not entirely in breach with the EU Pledge but were in breach with at least 1 element. As such, the independent reviewers did not flag them as red but gave them the color orange because some of the elements on the website seemed to be designed to target children. For example, these websites included a game that could easily be played by children under 12.

1.3 Inter-coder reliability analysis of social media profiles (Instagram, Facebook and YouTube)

Table 15 (below) provides an overview of the Cohen’s Kappa of the coding of the social media sites. Thirty social media sites were double coded by the independent reviewers. Three of them were deliberately included because breaches were found by the SROs, 27 of them were randomly selected from the full list.

When examining the questions separately, all Cohen’s Kappa appear to be medium to high, indicating good reliability, except for the question concerning contests/competitions. We will report our findings below.

First, we discussed the finding on the 3 social media sites that were signaled in breach with the EU Pledge by the SROs. We double-checked the coding for these sites and agreed on two social media sites being in breach while one social media site was flagged orange. The two social media sites we agreed on, contained videos appealing to young children, visual lay-outs that were appealing (e.g., showing colorful, happy and child-targeted pictures) pictures of branded characters making the profile very appealing to young children, licensed characters or

advertising for products tie-ins that were appealing to children etc. We however believe that one social media site which was flagged did not primarily appeal to children but to teen-agers. Therefore, this social media site was flagged orange instead of red by the independent reviewers.

We further flagged two additional social media pages that we believed really appeal to young children. This mainly because of colorful images or videos and the use of contests or language that stimulate interaction with children younger than 12. We also added the color orange to four social media sites which we believe should not be flagged red but are situated in a gray zone. These social media pages mainly target parents - therefore they do not directly appeal to children when strictly following the Pledge. The content however is easy enough to be understood by children, the recipes and craft activities might stimulate pester power and some of the posts are clearly directed at children.

1.4 Inter-coder reliability analysis of influencer social media profiles (Instagram, Facebook & YouTube)

Table 16 (below) provides an overview of the Cohen's Kappa of the coding of the influencer profiles. The SROs provided a list of 40 influencer profiles in red. The independent reviewer selected a random sample of 10 influencer profiles.

Only one of the ten profiles that were double coded was primarily appealing to children under twelve. This profile was also flagged by the SROs. The influencer was a child himself and the content on the profile was designed for children under twelve. There were several posts and stories about products of a certain brand, but the influencer did not disclose any of the posts. Therefore, the profile is in breach with the EU-Pledge.

Next to the one profile targeting children there was one influencer targeting parents. He posted pictures of his child with the product and recommended the product used in the post as suitable for children. The SROs did not consider this profile as targeting parents.

Additionally, the independent reviewers flagged four other influencers. They were not primarily targeting children under 12 but they did not disclose any promotional posts according to the independent reviewers. Some SROs did consider the reference to the brand in a post as a disclosure. However, the independent reviewers did not share the opinion.

2. General Conclusions

Based on our analysis, we formulate some general concerns and conclusions:

- **Overall assessment**

Overall, the majority of the analyzed websites and social media pages are primarily designed for teenagers and adults. The general look and feel give the impression that the pages are not primarily targeting children. Only a few websites and social media pages made their content specifically attractive for children.

- **Appealing character of brand characters to young children**

In many of the websites and profiles, branded characters stimulate the child-like character of the site (animal or human-like characters). Because of this, no breach is officially coded in the coding system (as branded characters are not included in the Pledge). However, we believe that including these characters in the site makes the site particularly appealing to young children. Accordingly, we suggest that brands should try to adjust these characters so that they appeal to older consumers instead of the young ones (as several brands already do). These brand characters are often portrayed in a funny situation or are designed to be liked by children. Brand equity characters are also marketing tools and even more powerful ones for children under 12. For example, a study by McGale, Halford, Harrold and Boyland (2016) showed that using a brand equity character on food packaging evokes unhealthy food choices in children⁹.

- **Childish videos and animations may cause confusion about the primary target group**

While some sites were clearly not primarily designed to appeal to children under 12, they still contained several elements which can be found attractive by young children. Accordingly, in our analysis, we distinguished between sites who were primarily targeting children (flagged as red) and sites which contained different elements that might be appealing to young children (flagged orange).

Despite the fact it may occur that the general look and feel of the websites or social media pages do not specifically appeal to young children, some elements (e.g., pictures, videos, games, recipes) often give the impression that it is targeting young children. For example, often sites do not use language that is clearly directed at children, but they contain recipes specifically designed to target children. Some sites are clearly directed at older children (teenagers) however also children around the age of 10-11 might be visiting these sites and find them appealing.

- **A strong focus on parents is debatable**

Some brands mainly used their websites to convince parents of the suitability of the product for their children. The websites tried to persuade the parents that their children were considered as target group by adding textual and/or visual elements to the website. Although this is in agreement with the commitments of the EU Pledge, we make a plea for a cautious use

⁹ McGale, L. S., Halford, J. C. G., Harrold, J. A., & Boyland, E. J. (2016). The influence of brand equity characters on children's food preferences and choices. *The Journal of Pediatrics*, 177, 33-38. doi: 10.1016/j.jpeds.2016.06.025

of such tactics. For instance, claims need to be put in such a way that they are clear to parents and provide correct information that is fully comprehensible to them and not misleading (e.g. 'Do you have everything ready for your children?' or 'play these games with your little children'). Additionally, adding recipes and pictures of children to the websites or social media pages, may make those pages also appealing for the young children (even when the general tone of voice and textual elements are mainly targeting parents).

- **Influencer Marketing should be disclosed correctly**

Most influencers included in the sample did not primarily target children under 12. However teenagers are also a vulnerable target group and should not be misled. Many influencers did not disclose the branded post properly which makes it very difficult for children and teenagers to critically process the post. Another group of influencers did disclose their branded posts but the disclosure was not clear. For example, an influencer wrote a little text and added in the middle of text 'in collaboration with'. All branded posts should be disclosed in a transparent and correct way.

- **An ethical use of offline sponsoring and product packaging is necessary**

In a final note, we would like to state that offline sponsoring tactics are more often used to target young children and families. This is also debatable and should be included in the commitments of the EU Pledge. Similar to tactics added on product packaging (e.g., links to digital games and collection actions in product packages).

Table 14: Inter-coder reliability websites (Cohen's Kappa)

<i>Main questions of the website survey</i>	<i>Cohen's Kappa</i>
<i>Do the website or sections of the website, have an age-screening/parental consent mechanism aimed at verifying the age of visitors before allowing the access</i>	.91
<i>Does the website feature licensed characters/tie-ins/celebrities (i.e. celebrities or fictional characters which are not owned by the company)</i>	.64
<i>If yes, are the licensed characters/tie-ins/celebrities targeted primarily at an under-12 audience</i>	.67
<i>If yes, are the licensed characters/tie-ins/celebrities used as means to promote a food/beverage product to children under 12</i>	.62
<i>Does the website feature any type of games and/or other entertainment activities such as puzzles, card games, racing, recipes, colouring or activity sheets, "Do it yourself" type of activities, etc.-</i>	.57
<i>If yes, are the games/entertainment activities designed for children younger than 12</i>	.69
<i>Does the website feature animations (i.e. cartoons, animations depicting fantasy situations) and/or music/sound effects and/or videos</i>	.71
<i>If yes, are the animations and/or sound effects and/or video used designed to appeal primarily to under-12s</i>	.66
<i>Does the website feature toys used as premiums/prizes to promote a food/beverage product- Please don't include cases where toys are an inherent part of the food product.</i>	.38
<i>Are they designed to appeal primarily to children younger than 12</i>	.44
<i>Taking into account your answers to all the previous questions and all the aspects of a website's design like language/text/navigation, do you think that the website is clearly intended to be primarily appealing to children under 12</i>	.48

Table 15: Inter-coder reliability social media profiles (Cohen's Kappa)

<i>Main question of the Social Media Survey</i>	<i>Cohen's Kappa</i>
<i>Is the content of the social media site accessible without registration/logging in?</i>	.474
<i>Is the language used on the social media platform clearly directed at children under 12?</i>	.634
<i>Do you think the social media profile encourages the interaction and/or the active participation of children under 12?</i>	.634
<i>Does the social media platform feature licensed characters/ movie tie-ins/ celebrities (i.e. celebrities or fictional characters which are not owned by the company, e.g. sports athletes, actors, celebrities, or fictional characters linked to movies/entertainment, e.g. Shrek, Harry Potter?</i>	.561
<i>Are the licensed characters/tie-ins/celebrities targeted primarily at an under-12 audience?</i>	.474
<i>Does the social media profile feature any type of games and/or other entertainment activities such as puzzles, card games, racing, recipes, colouring or activity sheets, "Do it yourself" type of activities, etc.?</i>	.857
<i>Are the games/entertainment activities designed for children younger than 12 (i.e. are they easy enough to be played/performed by children younger than 12)?</i>	.535
<i>Does the social media profile feature videos/photos?</i>	.520
<i>Is the product featured in the videos/photos, i.e. are the videos/photos used as means to promote a food/beverage product to children under 12?</i>	.516
<i>Does the social media profile feature contests/competitions?</i>	.308
<i>Are the contests/competitions used to appeal primarily to under-12s?</i>	.211
<i>Taking into account your answers to all the previous questions and all the aspects of a social media profile, do you think that the profile is clearly intended to be primarily appealing to children under 12?</i>	.630

Table 16: Inter-coder reliability influencer profiles (Cohen's Kappa)

<i>Main question of the Influencer Survey</i>	<i>Cohen's Kappa</i>
<i>Is the food/beverage product non-compliant ?</i>	.16
<i>If the product is non-compliant, do you think the way it is advertised by the influencer could be considered primarily appealing to children under 12?</i>	.33
<i>Are there any disclosures in the post/video (i.e. paid partnership with, hashtags used by the influencer #ad, #sponsored, etc)?</i>	.23
<i>Does the influencer use any of the following techniques that appeal to children under 12?</i>	-0.8 (not significant)
<i>Do you think the influencer is targeting children under 12 in his/her post/video?</i>	.40
<i>Do you think the influencer is targeting parents of children under 12 in his/her posts/videos (indirectly addressing parents to buy unhealthy products their children)?</i>	.30



EUROPEAN ADVERTISING STANDARDS

ALLIANCE

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