

#### **OUR COMMITMENTS**

## IFBA Global Responsible Marketing Policy

#### IFBA members commit either to:

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

The above policy covers food and non-alcoholic beverage product marketing communications that are primarily directed to children under 13 in all covered media.

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

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

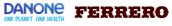
This policy will become applicable to all IFBA member companies globally by 1 January 2022.

Individual member companies may maintain or adopt specific policies that go beyond the IFBA policy.

IFBA will conduct third party monitoring to demonstrate compliance with this policy.























#### **Definitions**

**COMMON NUTRITION CRITERIA**: For the purpose of implementing the Global Responsible Marketing Policy, IFBA members commit not to advertise to children under the age of 13 the following product categories: confectionery, chocolate, soft drinks, ice cream and potato-based savoury snacks, globally (see Annex under 'Exclusions').

Other product categories can be advertised to this age group provided that the agreed common nutrition criteria (in Annex) are met. For these products, the common nutrition criteria apply as a minimum standard globally. However, locally agreed common nutrition criteria will continue to apply: (a) if they are stricter and/or cover categories of foods not addressed by IFBA; or (b) because the local pledge program criteria in the U.S. and Canada are based on the unique category definitions, dietary guidance, and regulatory/labeling practices of those markets, IFBA companies who are members of those pledge programs may continue to apply the U.S. (CFBAI) and Canadian criteria alone in those markets or may choose to apply the IFBA criteria as well. For this reason, IFBA also intends to defer compliance monitoring and enforcement to these local programs.

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

PRIMARILY DIRECTED TO CHILDREN UNDER 13: The determination of whether a marketing communication is "primarily directed to children under 13" will rely on objective audience composition data wherever such data are available. An advertisement placed contextually in programming or content will be considered to be primarily directed to children if it is expected (based on reliable audience composition data available at the time of placement) that 30% or more of the audience will be under 13 years of age¹. Conversely, where the percentage of children in the audience is expected to be under 30%, or where reliable age-screening or age-targeting techniques are used to affirmatively avoid displaying the advertisement to children, the advertisement will not be deemed to be primarily directed to children. In circumstances and media where neither reliable audience composition data nor effective age-screening or targeting techniques are available, companies will consider other factors as appropriate, which may include the overall impression of the advertising and the target demographic based on the company's media plan.

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

**PRIMARY SCHOOLS:** Menus or displays for food and beverage products offered for sale, charitable donations or fundraising activities, public service messages, and items provided to school administrators for education purposes or for their personal use are not covered.

**ICC FRAMEWORK:** The ICC code is available <a href="here">here</a> and includes specific provisions about not exploiting a child's imagination, not creating a sense of urgency, or inappropriate price minimisation and the importance of not undermining healthy lifestyles.

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<sup>&</sup>lt;sup>1</sup> For markets where audience data for this age group is not generally available, the Alliance will work to identify alternative solutions to estimate the proportion of children under 13 in the audience. This is the case for the US market, for instance, where IFBA members may apply a 27% audience threshold for children under 12 as a proxy for a 30% audience threshold for children under 13.



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# IFBA Global Responsible Marketing Policy ANNEX: COMMON NUTRITION CRITERIA

| Examples   | , fats & fat containing spreads: all animal and vegetable based fats & oils used as spreads on bread and/or food preparation.    Energy |                           |  |                         |  |  |  |
|--|---|---------------------------|--|-------------------------|--|--|--|
| Examples   | (kcal/portion*)   | (mg/100g or 100ml*)       |  | (g/100g or 100ml*)      |  |  |  |
| *Energy values are per portion and nutrient values per 100g, except when specified otherwise   |   |                           |  |                         |  |  |  |
| Oils and fats (all types), full & low-fat<br>margarine, butter mélanges, solid or liquid<br>oil/fat products for roasting and frying | ≤85   | ≤ 500                     | ≤ 33% total fat is<br>SAFA (incl. TFA) | (5)                     | ≥ 25% of total fat is PUFA   |  |  |
| <b>Sub-category B: Emulsion-based sauces</b> : sauce w/w.  | s that constitute or  | lly a minor component of  | f the meal to which an                 | emulsifying agent is a  | dded OR have a fat content <u>&gt;</u> 10%   |  |  |
| Mayonnaise, salad dressings, marinades, vinaigrettes   | <u>&lt;</u> 85  | ≤ 750                     | ≤ 33% total fat is SAFA (incl. TFA)    | <u>&lt;</u> 5           | ≥ 25% of total fat is PUFA   |  |  |
| Category 2: Fruits, vegetables and seeds, <sup>2</sup> e.  | xcept oil Vegetable   | s include legumes and po  | otatoes. Seeds include                 | seeds, kernels, nuts. N | Nuts include peanuts and tree nuts.  |  |  |
| Sub-category A: Products of fruits and vegetable meal.   | es except oils & pot  | atoes (≥ 50g fruit and/or | veg per 100g of finish                 | ed product) that const  | itute a substantial component of the   |  |  |
| Vegetable gratin, canned vegetables, baked beans, fruit compote, fruit in syrup, fruit salad   | ≤170  | ≤ 300                     | ≤1.5                                   | ≤15                     | Min. ½ portion fruit and/or veg.<br>Nutrients delivered through<br>ingredients (fruit and/or veg). |  |  |

<sup>&</sup>lt;sup>1</sup> Butters as defined in Regulation (EU) 1308/2013 Annex VII, are excluded from this category because they will not be advertised towards children.

<sup>&</sup>lt;sup>2</sup> Exemptions: 100% fruit and vegetables and their products, including 100% fruit and vegetable juices, as well as 100% nuts and seeds and mixes thereof (with no added salt, sugar or fat). These products, presented fresh, frozen, dried, or under any other form may be advertised to children without restrictions.



| Mashed potato, gnocchi, gratin, dumplings, fried or roasted potato                         | <u>≤</u> 170   | ≤ 300                              | ≤1.5  | <u>≤</u> 5                         | Nutrients delivered through main ingredient (potato)  |  |  |
|--|--|------------------------------------|---|------------------------------------|---|--|--|
| Sub-category C: Seeds and nuts   |  |                                    |   |                                    |   |  |  |
| Examples   | Energy<br>(kcal/portion*)  | Sodium<br>(mg/100g or 100ml*)      | Saturated fats<br>(g/100g or 100ml*)          | Total sugars<br>(g/100g or 100ml*) | Components to encourage   |  |  |
|  | *Energy values are per portion and nutrient values per 100g, except when specified otherwise |                                    |   |                                    |   |  |  |
| Salted or flavoured nuts, mixed nuts, nut-fruit mixes, peanut butter                       | <u>&lt;</u> 200  | ≤603                               | ≤10   | <u>≤</u> 15                        | Nutrients delivered through ingredients (nuts and seeds)  |  |  |
| Sub-category D: Fruit/Vegetable based meal sau component of the meal                       | uces: all fruit/veget  | able based sauces (≥ 50            | g fruit and/or vegetab                        | le per 100g of finished            | products) that constitute a substantial   |  |  |
| Tomato sauce, pasta sauce  | ≤100   | ≤ 450                              | ≤1.5  | ≤9                                 | Nutrients delivered through ingredients (fruits and/or vegetables)                                    |  |  |
| Sub-category E: Fruit/Vegetable based condime minor component of the meal                  | <b>nts</b> : all fruit/vegeta  | ble based condiments ( <u>&gt;</u> | ≥ 50g fruit and/or vege                       | etable per 100g of finisl          | ned products) that constitute only a  |  |  |
| Tomato ketchup, chutney  | ≤ 85   | <u>&lt;</u> 750                    | ≤1.5  | ≤ 25                               | Nutrients delivered through ingredients (fruit and/or vegetables)                                     |  |  |
| Category 3: Meat based products: all   | kinds of processed   | meat/poultry, and meat             | products, consisting                          | of minimally 50g of me             | at per 100g finished product  |  |  |
| Meatballs, salami, grilled ham, chicken fillet,<br>sausages                                | <u>≤</u> 170   | ≤ 800                              | <u>&lt;</u> 6                                 | (≤ 5)                              | ≥ 12% of energy as protein  |  |  |
| Category 4: Fishery products: all kinds of proces  | ssed fish, crustace  | ans and shellfish, consis          | ting of min. 50g of fis                       | h, crustaceans, and/or             | molluscs per 100g of finished product   |  |  |
| Cod parings, fried fillet of haddock, fish fingers, pickled mussels, tinned tuna           | ≤ 170<br>OR<br>> 170 IF ≥ 25%<br>total fat is<br>PUFA  | ≤ 450                              | ≤ 33% total fat is<br>SAFA (including<br>TFA) | (≤ 5)                              | ≥ 12% of energy as protein  |  |  |
|  |  | Category 5: Dairy                  | · ·   |                                    |   |  |  |
| Sub-category A: Dairy Products other than chees  | ses: Must contain r  | ninimum 50% dairy (Coc             | lex Alimentarius stand                        | lard)                              |   |  |  |
| Milks; yoghurts; sweet fresh/soft cheese; curd<br>& quark; fermented milks; dairy desserts | ≤170   | ≤160                               | ≤2.6  | ≤12.5                              | Protein: ≥12 E% or ≥ 2g /100g or<br>100ml<br>and/or At least 1 source of: Ca or Vit<br>D or any Vit B |  |  |



| Hard, semi-hard cheeses                         | <u>&lt;</u> 85       | ≤ 855 if SAFA ≤15          | <u>&lt; 15 if sodium &lt; </u> | ( <u>&lt;</u> 5)         | 'Source of Ca, Vit B12 or Vit B2'                |
|---|----------------------|----------------------------|--------------------------------|--------------------------|--|
| Tiara, seriii fiara offeeses                    | <u> </u>             | Or <760 if SAFA <16        | 855 Or <16 if                  | (= 0)                    | Course of ou, vit B12 of vit B2                  |
|   |                      |                            | sodium <760]                   |                          |  |
| Other cheeses, curd & quark and savory dairy-   | <170                 | < 700                      | <u>≤11</u>                     | < 8                      | 'Source of Ca, Vit B12 or Vit B2'                |
| based products                                  | <u>×</u> 170         | 2700                       | 211                            |                          | Source of Ga, VII B12 of VII B2                  |
|   |                      | Category 6: Cereal ba      | ased products                  |                          |  |
| Sub-category A: Sweet biscuits, fine bakery wa  | res and other cerea  | l based products:          |                                |                          |  |
| Examples  | Energy               | Sodium                     | Saturated fats                 | Total sugars             | Components to encourage                          |
| •   | (kcal/portion*)      | (mg/100g or 100ml*)        | (g/100g or 100ml*)             |                          |  |
|   | *Energy values a     | re per portion and nutrien | t values per 100g, exc         |                          | wise   |
| All kinds of biscuits and cakes, cereal bars,   | ≤200                 | <u>&lt;550</u>             | ≤10                            | ≤35                      | ½ serving or first ingredient a                  |
| granola bars, sweetened crackers                |                      |                            |                                |                          | F/V/D/M/WG <sup>3</sup> ; <u>OR</u> Source of an |
|   |                      |                            |                                |                          | essential nutrient                               |
| Waffles and pancakes                            | ≤300                 | ≤600                       | ≤5                             | ≤25                      | ½ serving or first ingredient whole              |
| ·   |                      |                            |                                |                          | grain, <u>OR</u> source of an essential          |
|   |                      |                            |                                |                          | nutrient   |
| Sub-category B: Savoury biscuits, fine bakery w | ares and other cere  | eal based products, inclu  | ding dough-based pro           | oducts:                  |  |
| Savoury crackers, extruded, pelleted &          | ≤170                 | <u>&lt;</u> 900            | <u>&lt;</u> 10                 | ≤10                      | ½ serving or first ingredient a                  |
| popcorn-based snacks, popcorn, pretzel          |                      | _                          | _                              |                          | F/V/D/M/WG; OR source of an                      |
| products  |                      |                            |                                |                          | essential nutrient                               |
| Sub-category C: Breakfast Cereals including po  | rridge               |                            |                                |                          |  |
| Ready to eat breakfast cereals such as          | ≤220                 | ≤725                       | ≤5                             | ≤35                      | ½ serving or first ingredient whole              |
| cornflakes, puffed rice, porridge               |                      |                            |                                |                          | grain, <u>OR</u> source of an essential          |
| 71 71 3   |                      |                            |                                |                          | nutrient   |
| Sub-category D: Cereal and cereal products ex   | cept breakfast cerea | als, biscuits and fine bak | ery wares: (Threshold          | s apply to food as recor | nstituted, ready for consumption,                |
| following manufacturer's instructions.)         | •                    |                            | •                              |                          |  |
| Bread, rusks, rice, noodles, pasta, polenta     | <u>&lt;</u> 360      | ≤500                       | ≤5                             | ≤5                       | Fibre ( <u>&gt;</u> 3 g/100 g) and/or            |
|   |                      |                            |                                |                          | wholegrain (15% of total ingredients             |
|   |                      |                            |                                |                          |  |

 $<sup>^3</sup>$  F/V/D/M/WG: Any combination of fruits, vegetables, non/low-fat dairy, meat or meat alternate, and/ or whole grains. USDA Food Group Serving Equivalents for F/V/D/M can be found in the <u>CFBAI Category-Specific Uniform Nutrition Criteria</u>, 2nd ed. To provide a ½ serving of whole-grain (WG), a food must provide ≥ 8 grams of whole grains and meet at least one of the following: 1) First ingredient a whole grain, or 2) ≥ 50% whole grains by weight of product; or 3) 50% whole grains by weight of grains.



| Category 7: Soups, composite dishes, main course and filled sandwiches   |                          |                    |                            |                          |   |  |  |
|--|--------------------------|--------------------|----------------------------|--------------------------|---|--|--|
| Sub-category A: Soups: all kinds of soups and broths containing min 1 of the following: 30g fruit, vegetables, cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion. (Thresholds apply to food as reconstituted, ready for consumption, following manufacturer's instructions.)  |                          |                    |                            |                          |   |  |  |
| Examples   | Energy<br>(kcal/portion) | Sodium per portion | Saturated fats per portion | Total sugars per portion | Components to encourage   |  |  |
| Energy values are per portion and nutrient values per 100g/100ml, except when specified otherwise  |                          |                    |                            |                          |   |  |  |
| Tinned tomato soup, instant vegetable soup, soup in stand-up pouches   | <u>≤</u> 170             | ≤315               | ≤ 1.5                      | ≤ 6.75                   | Nutrients delivered through ingredients (fruits and/or vegetables, cereals, meat, fish, milk) |  |  |
| Sub-category B: Composite dishes, main dishes, and filled sandwiches: all kinds of dishes & sandwiches containing min 2 of the following: 30g fruit, veg, cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion. (Thresholds apply to food as reconstituted, ready for consumption, following manufacturer's instructions). |                          |                    |                            |                          |   |  |  |
| Pasta salad with veg, noodles with sauce, pizza, croque-monsieur, moussaka, filled pancakes  | ≤ 425                    | ≤ 515mg            | ≤ 5                        | ≤ 7.5                    | Nutrients delivered through ingredients (fruits and/or vegetables, cereals, meat, fish, milk) |  |  |

#### **EXCLUSIONS**

The following products cannot be advertised to children under the age of 13 by IFBA member companies, globally:

- Chocolate (does not include products that may contain chocolate elements)
- Non-chocolate confectionery/candy (does not include bakery items or other desserts or non-confectionery sweet snacks such as biscuits, sweetened crackers, fruit snacks, etc.)
- All soft drinks<sup>4</sup>
- Ice cream (does not include other frozen products)
- Potato-based savoury snacks: potato crisps, including dough-based, pelleted, extruded, stackable (does not include baked potatoes or French fries).

### PRODUCTS NOT COVERED

Should a product not fall in any of the categories or exclusions above, companies will apply relevant locally agreed common nutrition criteria if available. Work is currently underway to adopt nutrition criteria for plant-based products, such as those increasingly used as alternatives to meat- and dairy-based products both in Europe (EU Pledge) and in the USA (CFBAI), and IFBA intends to follow these efforts by developing its own common nutrition criteria for this category.

<sup>&</sup>lt;sup>4</sup> Per the Marketing to Children Guidelines (2015) of the International Council of Beverages Associations (ICBA), 'soft drinks' also includes sports drinks, energy drinks, flavored and/or enhanced waters, ready-to-drink teas, and coffees. The definition does not cover plain water (mineral, source, purified, sparkling, and/or still), fruit or vegetable juice, and dairy-based beverages.