

Annex II – EASA Compliance Report



EASA

The European Advertising Standards Alliance (EASA) is the single authoritative voice of advertising self-regulation. 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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Introduction

EASA was commissioned by the World Federation of Advertisers (WFA) and the EU Pledge Secretariat to review a number of food and beverage brand websites belonging to EU Pledge¹ member companies. The goal of the review was to determine whether the reviewed websites are compliant with the EU Pledge commitment on company-owned websites.

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

- The website features marketing communications;
- Such marketing communications are promoting food or beverage products, as opposed to a brand in general;
- Such food and beverage products meet or do not meet the EU Pledge companies' nutritional criteria;
- Such marketing communications are designed to be targeted primarily at children under 12.

In order 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 the independent reviewer of this exercise, Dr. Verónica Donoso². Advertising self-regulation experts were requested to try and think from the perspective of a child younger than twelve while reviewing brand websites 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 that would make them appealing to children younger than twelve.

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 (as defined by each company). 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.

² Verónica Donoso (PhD) is Post-doctoral researcher at the Interdisciplinary Centre for Law and ICT (ICRI), KU Leuven, iMinds. Her main areas of expertise are user experience research, children and young people's uses of new media and e-safety. Verónica has worked on a number of European and Belgian projects, including the EU Kids Online I, II and III. She also coordinated the 2nd Assessment of the Safer Social Networking Principles for the EU.

Project overview

Ten European self-regulatory organisations (SROs) were invited by EASA and the EU Pledge Secretariat to conduct the monitoring exercise in July and August 2013 in order to assess the appeal of marketer-owned websites to children under twelve. The ten 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 participating countries/SROs

Country	SRO	Date of establishment
Belgium	JEP	1974
France	ARPP	1935
Germany	DW	1972
Hungary	ÖRT	1996
Poland	RR	2006
Portugal	ICAP	1991
Netherlands	SRC	1964
Romania	RAC	1999
Spain	AUTOCONTROL	1977
UK	CAP	1962

Self-regulation experts from SROs in France, Germany, Spain and the UK reviewed 40 national brand websites of the EU Pledge company members while the SRO in Poland reviewed 39 websites including at least two websites per company, where available. SROs in Belgium, Hungary, Portugal and the Netherlands reviewed 29 national brand websites while the SRO in Romania reviewed 28 websites including at least one website per company, where available. Corporate websites³ were excluded from the exercise.

Table 2: List of the EU Pledge member companies

EU Pledge signatories	
Coca Cola	Burger King
Ferrero	DANONE
Friesland Campina	Intersnack
Mondelez International	Lorenz Snack-World
Kellogg's	Estrella-Maarud ⁴
McDonald's	Chips Group ⁵
Mars	General Mills
Nestlé (and Cereal Partners)	Zweifel Pomy-Chip
PepsiCo	Unichips-San Carlo
Unilever	

³ A corporate website is a general informational website operated by a company.

⁴ No products available in the market.

⁵ No products available in the market.

Methodology

The EU Pledge Secretariat provided EASA with all products promoted by the EU Pledge member companies in each of the markets to be monitored, indicating whether they meet or do not meet the applicable nutritional criteria. Subsequently, EASA developed a list of websites which promoted products not meeting the applicable nutritional criteria, which was used by self-regulation experts to select the websites to review. When making their selection, the reviewers 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 reviewer Dr. Verónica Donoso.

The reviewers noted if 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 if 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 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.

Beyond the 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.

For reasons of impartiality and due process the independent reviewer Dr. Verónica Donoso, knowledgeable in both digital media and youth issues, was appointed to perform the following functions:

- Verify that appropriate criteria have been set up,
- Check that due process is observed throughout,
- Sign off on the EASA report compiled from the monitoring results prior to release, and testify to the correctness of the monitoring procedure and the scoreboard.

Note from the independent reviewer

The goal of the monitoring exercise was to determine whether the websites reviewed were compliant with the EU Pledge commitment regarding company-owned websites. As the independent reviewer I helped to design a methodology that made it possible to establish, in an objective and unbiased way, whether specific (commercial) websites were appealing primarily to children under the age of twelve.

Based on existing research on online advertising and web usability with children, a number of indicators were developed. These included the presence of children's sections, games, animations or toys, as well as specific elements of the graphic user interface (GUI) with a special focus on the (perceived) user-friendliness of the website and, in particular, of the sections targeting children.

In summary, the results of this year's assessment reveal that 22 of the 343 national brand websites reviewed (6% of the websites) were considered to be in breach of the EU Pledge as they contained elements that made them appealing to children younger than 12 and promoted products to children which did not meet the nutritional criteria of the companies' pledge. Among the elements employed to determine if a website was primarily designed for children were the presence of games (53 websites), toys (12 websites) and animations (30 websites) as well as the general creative execution of the website such as ease of language and navigation. SROs also checked for the presence of age screening as a mechanism to verify the age of the user visiting the website, or specific sections of it (27 websites). In total, 28 problematic items were flagged by the SROs; 20 out of the 343 websites reviewed contained items that were in breach of national advertising codes or relevant advertising laws.

With regards to the methodology employed, it is important to note that a certain degree of subjectivity is inevitable, especially given that different reviewers evaluate different websites. To act as a counterbalance and ensure reliability and consistency across the results, several quality control checks were performed by the independent reviewer and the EASA project team at different stages of the assessment. However, the results presented in this report are based solely on an expert assessment carried out by adults, which presents some obvious limitations. I would like to stress that some aspects of the assessment would have been more accurately evaluated if children (interacting with the websites) had been involved. Another drawback of the methodology lies in the fact that each website was reviewed by only one expert at each SRO; empirical research has demonstrated that expert evaluations can be maximised when carried out by more than one individual. However, close collaboration between the SROs and the EASA team throughout the whole testing and analysis process helped to overcome this shortcoming in practice. Nevertheless, it will be important to consider these criticisms in future editions of the EU Pledge monitoring exercise.

Having acted as independent reviewer of the EU Pledge compliance monitoring exercise for three years I have had the opportunity to witness the evolution of online marketing techniques and the growing number of strategies being employed to target younger audiences. It now seems insufficient to concentrate our efforts on the mere evaluation of

isolated product websites. Products are not just being advertised through websites but also through a variety of social media and (mobile) applications. It would therefore be timely to expand future assessments to include an evaluation of new and emerging connected platforms and devices and the interactions among them. Take for example the case of Apps, whose attractive, interactive and play-orientated nature makes them easily appealing to children.

Finally, I would like to highlight EASA's professionalism and dedication during the monitoring exercise. The consistent development of EASA's experience over the last few years has ensured that a rigorous evaluation process has been applied. This is an indispensable part of carrying out an objective, critical and transparent assessment of a self-regulatory initiative like the EU Pledge. I would also like to stress the importance of monitoring exercises like EASA's EU Pledge Survey; such exercises serve to foster the effective implementation of self-regulatory practices while encouraging responsible marketing communication practices which take into account children's vulnerabilities, needs and rights.

Important note

In collaboration with the EU Pledge secretariat and the independent reviewer Dr. Verónica Donoso, EASA has taken great care to ensure that the results of this project are objective and consistent. It has done so by developing a detailed methodology that was applied by all SROs involved. However, while it may be relatively easy to determine if a website appeals to children in general, it is much harder to determine if a website is designed to appeal primarily to children younger than twelve. Therefore, despite all the measures taken to ensure objectivity, SRO's decisions retain an unavoidable degree of subjectivity, which is however limited by SROs' extensive day-to-day professional experience. Readers are requested to bear this in mind.

Executive summary

- A total of 343 national brand websites were reviewed.
- All of the websites reviewed contained product promotion.
- Out of the 343 websites, 22 were considered in breach of the EU Pledge as they contained elements, such as games, toys or animations 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.
 - 53 websites featured games that were considered to be designed to appeal primarily to under-12s
 - 30 websites contained animations that were considered to be designed to appeal primarily to under-12s
 - 23 websites exhibited licensed characters that were considered to be designed to target primarily children under-12
 - 12 websites were connected to a toy that was considered to be designed to appeal primarily to under-12s
- 20 out of the 343 websites reviewed contained items that were in breach of advertising codes or relevant advertising laws. In total 28 problematic items were flagged by the SROs.

1 Introductory remarks

1.1 General information

The table below provides an overview of the number of websites that were reviewed per country. A total of 343 websites were reviewed by self-regulation experts.

Table 3: Number of websites reviewed per country

Country	Number of websites reviewed
Belgium	29
France	40
Germany	40
Hungary	29
Netherlands	29
Portugal	29
Poland	39
Romania	28
Spain	40
UK	40
TOTAL	343

2 Findings

2.1 Product promotion

The reviewers identified product promotion on all websites reviewed.

2.2 Age screening / Parental consent

27 brand websites out of 343 reviewed contained a mechanism 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=343)

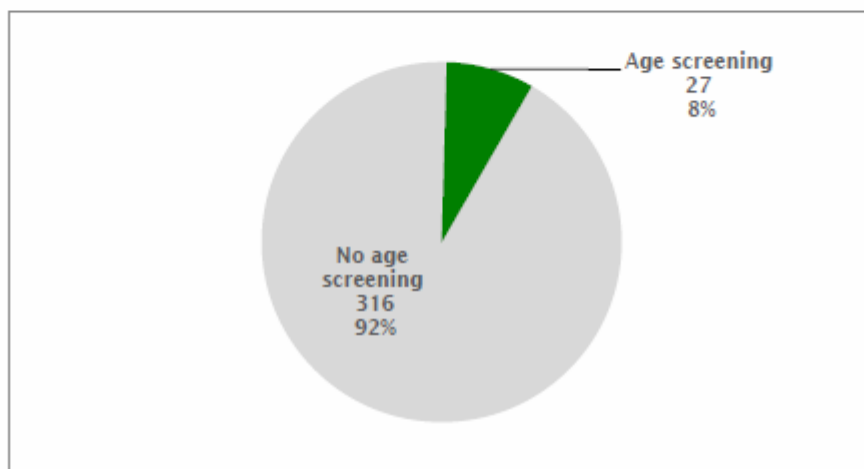
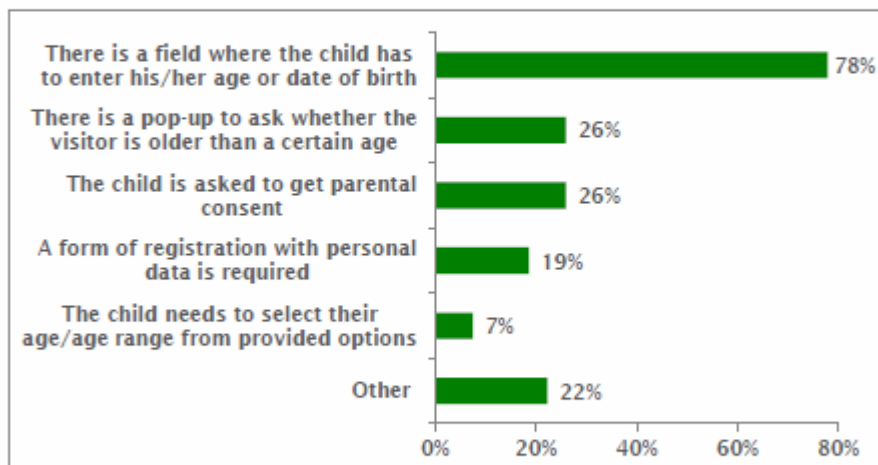


Figure 2: Types of age screening / parental consent (N=27)

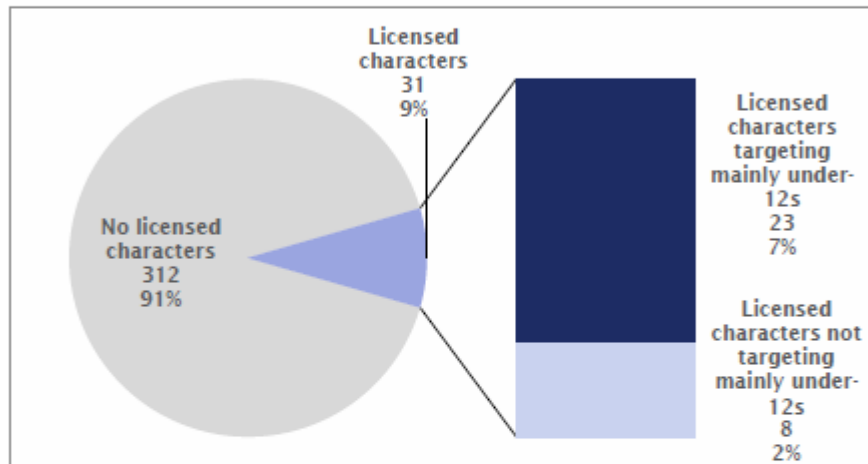


2.3 Licensed characters

The reviewers checked if the websites or the children's section(s) of the website featured "licensed characters", i.e. characters acquired externally and linked for example to movies, cartoons or sports, or if they featured movie tie-ins as a means to promote a food or beverage.

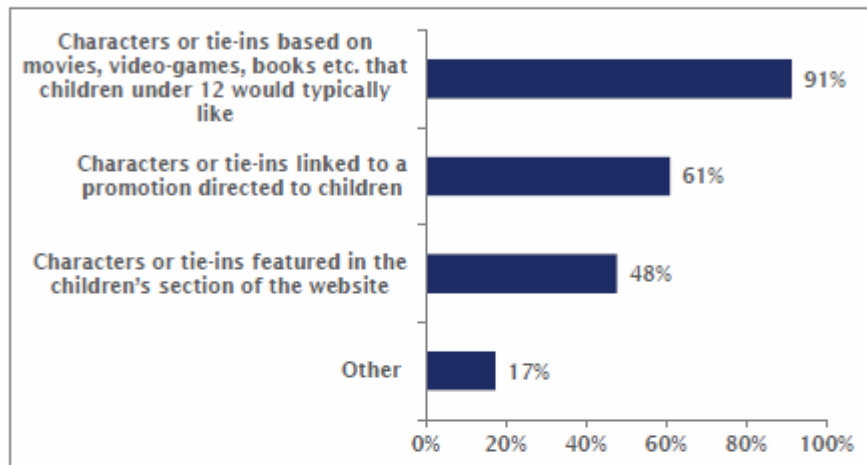
31 out of the 343 websites featured licensed characters and the reviewers considered that in 23 instances these characters or tie-ins were targeted primarily at children under-12.

Figure 3: Number of websites featuring licensed characters (N=343)



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

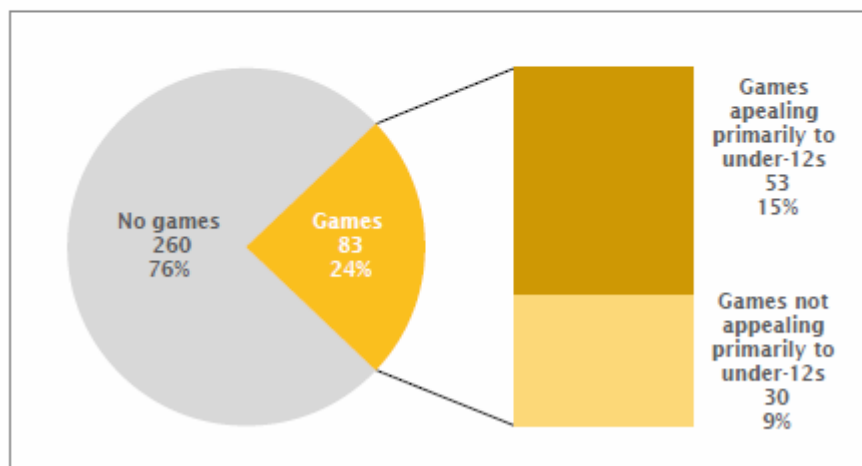
Figure 4: Main indicators for licensed characters considered primarily appealing to under-12s (N=23)



2.4 Games

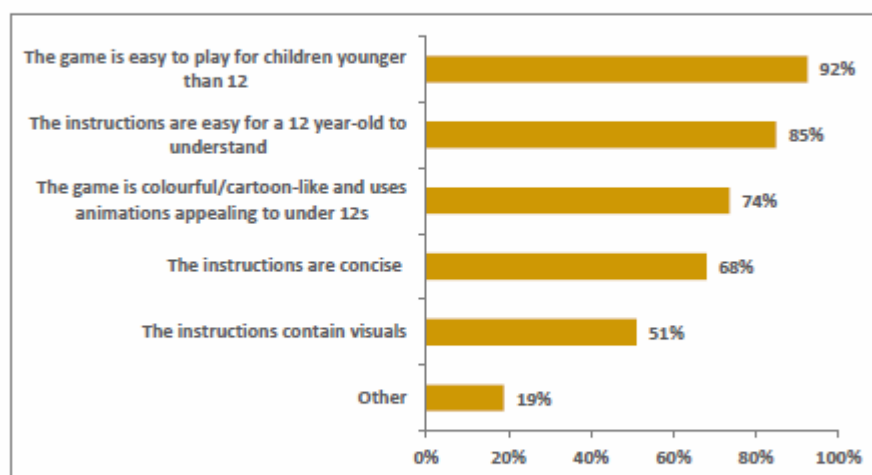
The reviewers identified games in 83 of the 343 websites reviewed and in 53 instances the reviewers considered that the games were designed to appeal primarily to under-12s. In addition, 41 of these websites used the games to promote food or beverages.

Figure 5: Number of websites featuring games (N=343)



Reasons as to why the reviewers considered the games to be appealing primarily to under-12s are featured in the following chart. The combination of several of these criteria is a strong indicator that the game is primarily appealing to young children.

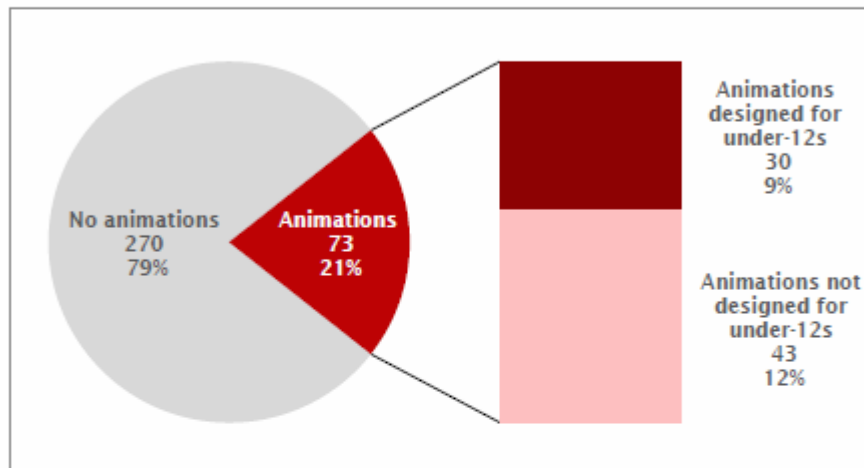
Figure 6: Main indicators for games considered primarily appealing to under-12s (N=53)



2.5 Animation and sound effects

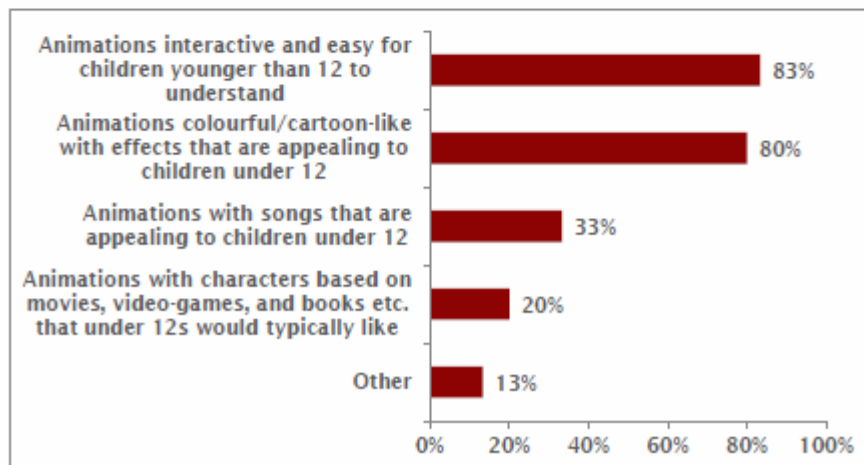
73 of the 343 websites reviewed featured animations, such as cartoons, animations depicting fantasy situations, sound effects or music. According to the reviewers, 30 of these websites used animations which primarily appealed to under-12s and 24 of these websites used the animations to promote food or beverages.

Figure 7: Number of websites featuring animation (N=343)



Reasons as to why the reviewers considered the animations/sound effects to be appealing primarily to under-12s are featured in the following chart. The combination of several of these criteria is a strong indicator that the animation/sound effect is primarily appealing to young children.

Figure 8: Main indicators for animations considered primarily appealing to under-12s (N=30)

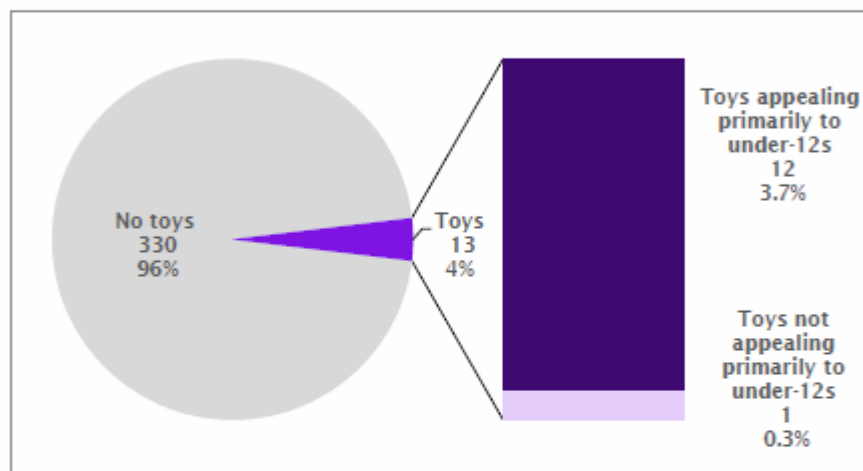


2.6 Toys/Premiums

The reviewers identified 13 websites that used toys or other premiums to promote a food or non-alcoholic beverage product. Examples of toys include figures of cartoon characters, board games, electronic devices like video game consoles and other premiums such as 3D glasses.

In 12 of the 13 cases the toys were considered to be designed to appeal primarily to children under the age of 12.

Figure 9: Number of websites featuring toys or premiums (N=343)



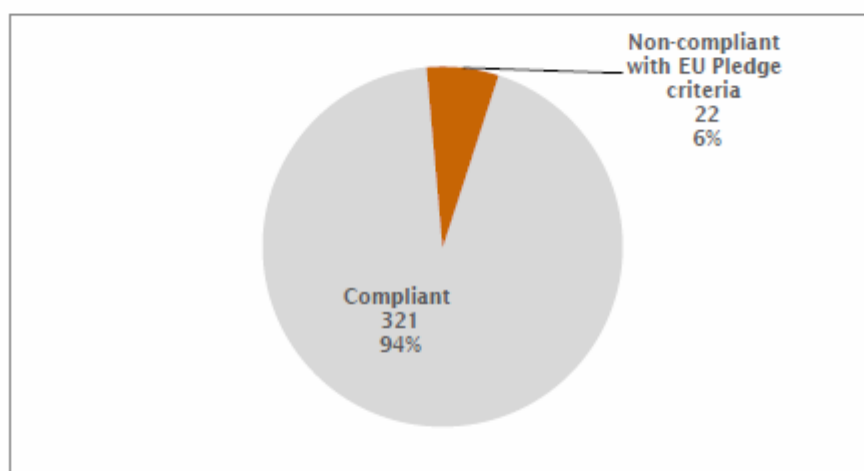
3 Compliance with the EU Pledge criteria

22 of the 343 websites reviewed were found not to be compliant with the EU Pledge.

All the previously identified elements, such as animations, games, toys or licensed characters had to be considered in conjunction with the creative execution of the website, that is the overall impression of the website design (use of colours, typeface, font size, language etc.) in order to determine whether the website was designed to target primarily under-12s and, therefore, to assess if the marketing communications were intended to appeal primarily to under-12s.

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

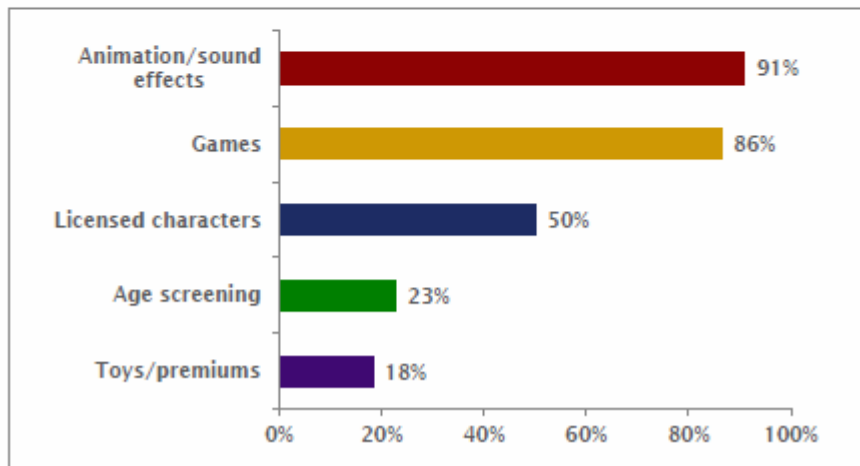
Figure 10: Number of websites in breach of the EU Pledge criteria (N=343)



20 websites that were considered as appealing primarily to children under 12 and therefore in breach of the EU Pledge featured animation while 19 websites contained games designed for under-12s. 11 websites featured licensed characters and four of them toys designed for children.

Furthermore, five websites contained an age screening mechanism.

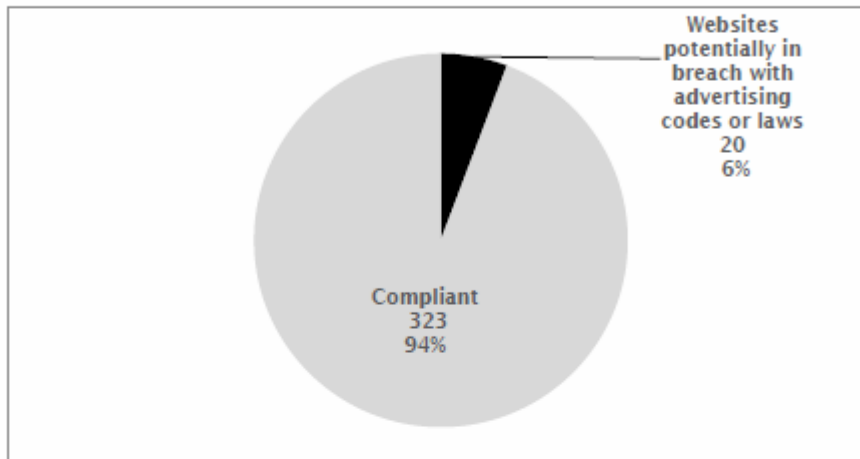
Figure 11: Main indicators of websites' appeal to under-12s (N=22)



4 Breaches of advertising codes/laws

On 20 out of the 343 websites, the reviewers identified items that were potentially in breach of advertising codes or relevant advertising laws.

Figure 12: Number of websites potentially breaching advertising codes or laws (N=343)



On these 20 websites a total of 28 problematic items were found.

Looking at the 28 items found to be likely in breach of advertising codes or laws, the main issue identified was the inappropriate age target for food advertising as seven websites were considered to be potentially in breach of the national Standards of Food Advertising Targeting Children, which specifies that food products should not be promoted directly to children younger than 12 unless the product meets nutritional criteria based on accepted scientific proofs and/or national or international nutritional recommendations.

In addition, five websites featured a sales promotion or a raffle without mentioning an expiration date. Three websites contained problematic health claims and another three elements of sales pressure.

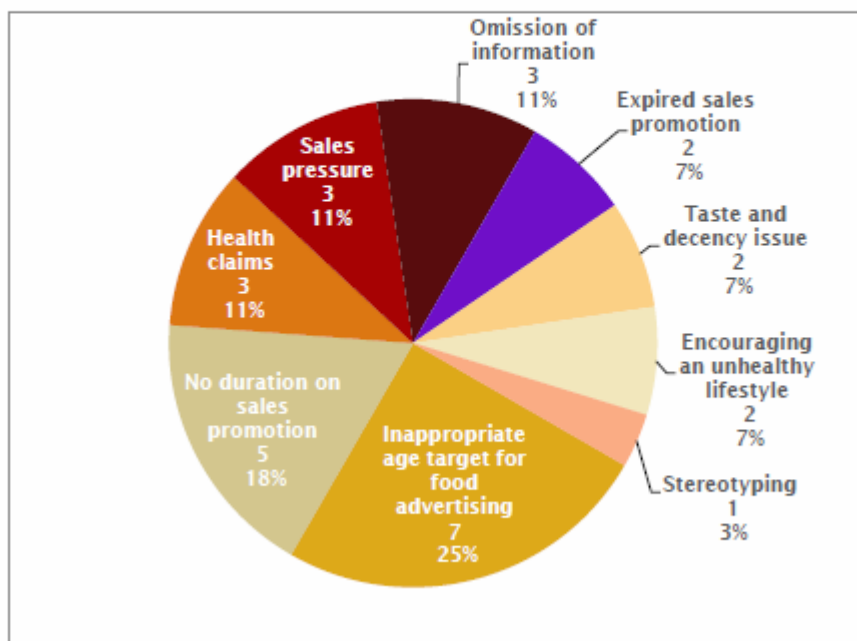
Furthermore, the reviewers flagged three websites for lacking information regarding the size reference of the promoted toys and the product promotion connected to the licensed characters featured on the website.

Two websites featured expired sales promotions and another two featured images and videos that were considered to be potentially in breach of taste and decency rules.

On two websites the reviewers identified claims that were considered as condoning or encouraging poor nutritional habits or an unhealthy lifestyle to children.

Finally, one website was found to be potentially in breach of national codes because it featured stereotyped behaviours.

Figure 13: Potential breaches of advertising codes or laws (N=28)



On the remaining 323 websites no items were found that were in breach of either advertising codes or laws.

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Nutrition Criteria

Overview



Table 1: EU Pledge Nutrition Criteria Overview

Category 1: Vegetable and animal based oils, fats and fat containing spreads & emulsion-based sauces					
Sub-category A: Vegetable & animal based oils, fats & fat containing spreads: all animal and vegetable based fats & oils used as spreads on bread and/or food preparation. ⁹					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g, except when specified otherwise</i>					
Oils and fats (all types), full & low-fat margarine, butter mélanges, solid or liquid oil/fat products for roasting and frying	≤ 85	≤ 500	≤ 33% total fat is SAFA (incl. TFA)	(5)	≥ 25% of total fat is PUFA
Sub-category B: Emulsion-based sauces: sauces that constitute only a minor component of the meal to which an emulsifying agent is added OR have a fat content ≥ 10% w/w.					
Mayonnaise, salad dressings, marinades, vinaigrettes...	≤ 85	≤ 750	≤ 33% total fat is SAFA (incl. TFA)	≤ 5	≥ 25% of total fat is PUFA
Category 2: Fruits, vegetables and seeds,¹⁰ except oil Vegetables include legumes and potatoes. Seeds include seeds, kernels, nuts. Nuts include peanuts and tree nuts.					
Sub-category A: Products of fruits and vegetables except oils & potatoes (≥ 50g fruit and/or veg per 100g of finished product) that constitute a substantial component of the meal.					
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. Nutrients delivered through ingredients (fruit and/or veg).
Subcategory B: Potato & potato products, except dehydrated potato products: all potato based dishes (≥ 50g potato per 100g of finished products) that constitute a substantial component of the meal.					
Mashed potato, gnocchi, gratin, dumplings, fried or roasted potato...	≤170	≤ 300	≤ 1.5	≤ 5	Nutrients delivered through main ingredient (potato)
Subcategory C: Potato chips and & potato based snacks, incl. dough-based products					
Potato chips/crisps	≤170	≤670	≤10% kcal from SAFA	≤ 10	Fibre : ≥3g/100g/ml; and/or ≥70% UFA/total fat
Extruded & pelleted snacks, stackable chips	≤170	≤900 ¹¹	≤10% kcal from SAFA	≤10	Fibre : ≥3g/100g/ml; and/or ≥70% UFA/total fat

⁹ Butters as defined in Council regulation (EC) 1234/2007 Annex XV, are excluded from this category because they will not be advertised towards children.

¹⁰ 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.

Sub-category D: Seeds and nuts					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g, except when specified otherwise</i>					
Salted or flavoured nuts, mixed nuts, nut-fruit mixes, peanut butter	≤200	≤670	≤10	≤ 15	Nutrients delivered through ingredients (nuts and seeds)
Sub-category E: Fruit/Vegetable based meal sauces: all fruit/vegetable based sauces (≥ 50g fruit and/or vegetable per 100g of finished products) that constitute a substantial component of the meal					
Tomato sauce, pasta sauce...	≤ 100	≤ 500	≤ 1.5	≤ 10	Nutrients delivered through ingredients (fruits and/or veg)
Sub-category F: Fruit/Vegetable based condiments: all fruit/vegetable based condiments (≥ 50g fruit and/or vegetable per 100g of finished products) that constitute only a minor component of the meal					
Tomato ketchup, chutney...	≤ 85	≤ 750	≤ 1.5	≤ 25	Nutrients delivered through ingredients (fruit and/or veg)
Category 3: Meat based products: processed meat/poultry, and meat products, consisting of minimally 50g of meat per 100g finished product					
Meatballs, salami, grilled ham, chicken fillet, sausages...	≤ 170	≤ 800	≤ 6	(≤ 5)	≥ 12% of energy as protein
Category 4: Fishery products: processed fish, crustaceans and shellfish, consisting of min. 50g of fish, crustaceans, and/or molluscs per 100g of finished product					
Cod parings, fried fillet of haddock, fish fingers, pickled mussels, tinned tuna	≤ 170 OR > 170 IF ≥ 25% total fat is PUFA	≤ 450	≤ 33% total fat is SAFA (including TFA)	(≤5)	≥ 12% of energy as protein
Category 5: Dairy products					
Sub-category A: Dairy Products other than cheeses: Must contain minimum 50% dairy (Codex Alimentarius standard)					
Milks & milk substitutes; yoghurts; sweet fresh/soft cheese; curd & quark; fermented milks; dairy desserts	≤170	≤ 300	≤ 2.6	≤ 13.5	Protein: ≥12 E% or ≥ 2g /100g or 100ml AND/OR At least 1 source of: Ca or Vit D or any Vit B
Sub-category B: Cheese and savoury dairy based products: Must contain minimum 50% dairy (Codex Alimentarius standard)					
Hard, semi-hard cheeses	≤ 85	≤ 900	≤ 15	(< 5)	At least one source of: Ca, Vit B12, Vit B2
Other cheeses, curd & quark and savoury dairy-based products	≤170	≤ 800	≤ 10	≤ 8	

¹¹ Individual ESA member companies may benefit from a longer period – up to the end of 2015 – in respect of this value, reflecting the uneven advancement of salt reduction programmes among EU member states. Should any member wish to benefit from such derogation, individual member companies shall specify this in their corporate EU Pledge commitments published on the EU Pledge website. During the additional transition period, the applicable sodium threshold shall not exceed 970mg/100g.

Category 6: Cereal based products					
Sub-category A: <u>Sweet</u> biscuits, fine bakery wares and other cereal based products: cereal must be listed as the main ingredient on the ingredient declaration.					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g, except when specified otherwise</i>					
All kinds of biscuits and cakes, cereal bars, flapjacks...	≤200	≤ 450	≤10	≤35	Fibre (≥3 g/100g) and/or whole grain (15% total ingredients) and/or 20%E from UFA and ≥70% UFA/total fat
Sub-category B: <u>Savoury</u> biscuits, fine bakery wares and other cereal based products, including dough-based products: cereal must be listed as the main ingredient on the ingredient declaration.					
Savoury crackers, extruded, pelleted & popcorn-based snacks, popcorn, pretzel products	≤170	≤900 ¹²	≤10% kcal from SAFA	≤10	Fibre : ≥3 g/100g; and/or ≥70% UFA/total fat
Sub-category C: Breakfast Cereals including porridge					
Ready to eat breakfast cereals such as cornflakes, puffed rice, porridge	≤210	≤450	≤5	≤30	Fibre (≥3g/100g) and/or wholegrain (15% whole grain per total ingredients)
Sub-category D: Cereal and cereal products except breakfast cereals, biscuits and fine bakery wares: cereal must be listed as the main ingredient.					
Bread, rusks, rice, noodles, pasta, polenta	≤340	≤500	≤5	≤5	Fibre (≥3 g/100 g) and/or wholegrain (15% of total ingredients)
Category 7: Soups, composite dishes, main course and filled sandwiches					
Sub-category A: <u>Soups</u> : 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).					
Tinned tomato soup, instant vegetable soup, soup in stand-up pouches	≤ 170	≤ 350	≤ 1.5	≤ 7.5	Nutrients delivered through ingredients (fruits and/or veg, cereals, meat, fish, milk)
Sub-category B: <u>Composite dishes, main dishes, and filled sandwiches</u> : 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	≤ 400mg	≤ 5	≤ 7.5	Nutrients delivered through ingredients (fruits and/or veg, cereals, meat, fish, milk)

¹² See footnote 3.

Category 8: Meals: The combination of items served as meal (main dish, side item (s) and a beverage) for breakfast, lunch or dinner.					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g/100ml, except when specified otherwise</i>					
Children's meals	≤510/meal ^{a)} ≤340/meal ^{b)}	≤660/meal	≤10% Kcal from saturated fats	≤20/meal (minus natural occurring sugar ^{c)} from 1 portion ^{d)} J/F/V/M/D)	Each meal must contain min. of: 1 portion ^{d)} fruit/ vegetables or/and 1 portion ^{d)} 100% juice or/and 1 portion qualified ^{d,e)} dairy product or milk or/and 1 portion ^{d)} of whole grain ^{f)}
Category 9: Edible ices: all kinds of edible ices (water ices and ice cream)					
Ice cream, water ice, ice lollies, sherbet ice	≤ 110	≤ 120	≤ 5	≤ 20	-
Exclusions (no nutrition criteria; are not advertised to children <12 by EU Pledge member companies)					
<ul style="list-style-type: none"> Sugar and sugar-based products, which include: Chocolate or chocolate products; Jam or marmalade; Sugar, honey or syrup; Non-chocolate confectionary or other sugar products¹³ Soft drinks¹⁴ 					

Notes:

^{a)} For lunch/dinner (30% energy)

^{b)} For breakfast (20% energy)

^{c)} If sugar content is higher than 20g for a meal and contains more than 1 J/F/V/M/D.

^{d)} Portions are:

- Fruits (F)/Vegetables (V): 60-80g
- 100% juice (J): 150-250ml
- Dairy (D): e.g. 30g cheese/100-150g yoghurt
- Milk (M): 150-250ml

^{e)} Meet individual category requirements

^{f)} Product qualified for a reasonable source of fiber which contains ≥ 8g whole grain

¹³ Sugar-free gum and sugar-free mints are exempted, i.e. outside the scope of EU Pledge restrictions.

¹⁴ The rationale for this exclusion is that currently some EU Pledge companies committed in 2006 not to market any soft drinks directly to children younger than 12 years old (see UNESDA commitments: <http://www.unesda.org/our-unesda-commitments-act-responsibly#year2006>). Discussions are ongoing regarding low-energy beverages. In the meantime companies that are not signatories to the UNESDA commitment will continue using their own nutrition criteria for these beverages, including fruit-based drinks. Bottled water is exempted from the EU Pledge restrictions.



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