



Monitoring Report



2015-2022 Results



FrieslandCampina nl
nourishing by nature

About the EU Pledge

The EU Pledge is a voluntary initiative launched by leading food and beverage companies to change food and beverage advertising to children under the age of twelve in the European Union.

The EU Pledge is a commitment made in December 2007 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 July 2021, EU Pledge was submitted to the European Commission's Code of Conduct on Responsible Business and Marketing Practices to work towards the Code's objectives and targets, notably the Code's indicative action to "apply responsible food marketing and advertising practices, e.g. by adhering to self- and co-regulatory initiatives and standards". In the context of the EU's Code of Conduct, the EU Pledge commitment is owned by the World Federation of Advertisers (WFA), which also supports the programme.

EU Pledge member companies represent over 80% of the food and beverage advertising spend in the EU. Signatories commit to changing the way they advertise to children under 13 years old through the following three central commitments:

- **No advertising of products to children under 13 years, except for products which fulfil common nutrition criteria.**
- **No product marketing communications to children in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes.**
- **To abide by the International Chamber of Commerce (ICC) Code of Advertising and Marketing Communication Practice; and the ICC Framework for Responsible Food and Beverage Marketing Communications in all marketing communications.**

The self-regulatory approach of the EU Pledge is in line with the EU Strategy on Nutrition, overweight and obesity-related health conditions, as well as the EU Audiovisual Media Services Directive, which calls on the Member States to encourage codes of conduct on audiovisual commercial communications for food and beverage products directed at children. The European Commission has welcomed the EU Pledge initiative on many occasions.

Enhanced commitments throughout the years

2012:

- a. "Advertising to children <12", previously defined as advertising to media audiences with >50% children <12, is now based on a **tougher min. threshold, at 35%**. This means that more media channels are off limits.
- b. **Company-owned websites are covered** in addition to 3rd party internet advertising. This means that company-owned websites for products that do not meet better-for-you criteria shall not be designed to appeal primarily to children <12.
- c. In November 2012, the EU Pledge announced **common nutrition criteria** for companies which so far have used company-specific criteria to determine what foods they may advertise to children under 12. These companies (13 out of 22) apply the criteria – which are overall more stringent than individual criteria used before – since 1 January 2015 across the EU.

2014:

- a. **Extension of scope:** The EU Pledge commitment was extended to cover not only TV, print, third-party internet and company-owned websites, but also radio, cinema, DVD/CD-ROM, direct marketing, product placement, interactive games, apps, mobile and SMS marketing.
- b. **Addressing creative execution:** Where no reliable audience measurement data is available, the new commitments ensure that 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 children.¹

2018:

- a. In October 2018, the **EU Pledge Nutrition Criteria White Paper**, first published end 2012 and updated in July 2015, was updated for the second time. The changes reflect members' announcement in March 2017, to reduce by 10% the sugar and sodium thresholds applicable in several product categories by the end of 2018.²
- b. The EU Pledge **accountability mechanism** was officially launched in November 2018. It gives members of the public or organizations the opportunity to question the compliance of members' marketing communications with the EU Pledge commitments. The system, developed in partnership with the European Advertising Standards Alliance (EASA) and is inspired by self-regulatory organisations' (SRO) best practice at national level.³

2020:

- a. **Revision of the EU Pledge Implementation Guidance Note:** In February 2020, the EU Pledge signatories agreed not to use influencers whose primary target audience is children under the age of 12 in relation to products which do not fulfil the EU Pledge common nutrition criteria.

2021:

- a. **Strengthened definition of children's media:** In July 2021, EU Pledge member companies extended the commitment to children under the age of 13 and lowered the audience threshold to 30% under 13s.
- b. **Revised common nutrition criteria to further limit the type of products that can be marketed to children under 13.** In addition to chocolates, candies/confectionery and soft drinks, members will not advertise ice creams and potato crisps. Member also agreed to further strengthen criteria for sweet biscuits and cakes, savoury crackers and meat-based products, and introduced an additional set of criteria for a new category: "Category 10: Plant based products: Products derived from legumes including soybeans, pulses, nuts, cereals and/or seeds: Sub-Category A: Spoonable and drinkable products, fermented or non-fermented, flavoured, fruited or plain."
- c. **Embedding qualitative requirements:** The group embedded the rules from the International Chamber of Commerce (ICC) [Code of Advertising and Marketing Communication Practice](#) and [Framework for Responsible Food and Beverage Marketing Communications](#) in all marketing communications. This will ensure, for instance, that snacks should not be presented as meals, that appropriate portion sizes are represented and that ads support rather than undermine good dietary habits.

¹ Further information about the enhanced commitments can be found here: <http://www.eu-pledge.eu/content/enhanced-2014-commitments>

² Further information about the Nutrition Criteria White Paper can be found here: https://eu-pledge.eu/wp-content/uploads/EU_Pledge_Nutrition_White_Paper.pdf

³ Further information about the accountability mechanism can be found here: <https://eu-pledge.eu/contact-and-complaints/>

Monitoring Results

The monitoring exercise in 2022 was carried out by the following independent third parties:

- Ebiquity⁴, 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, for compliance with the EU Pledge commitment.

The monitoring exercises carried out in 2015, 2016, 2017, 2018 and 2019 by the following independent third parties:

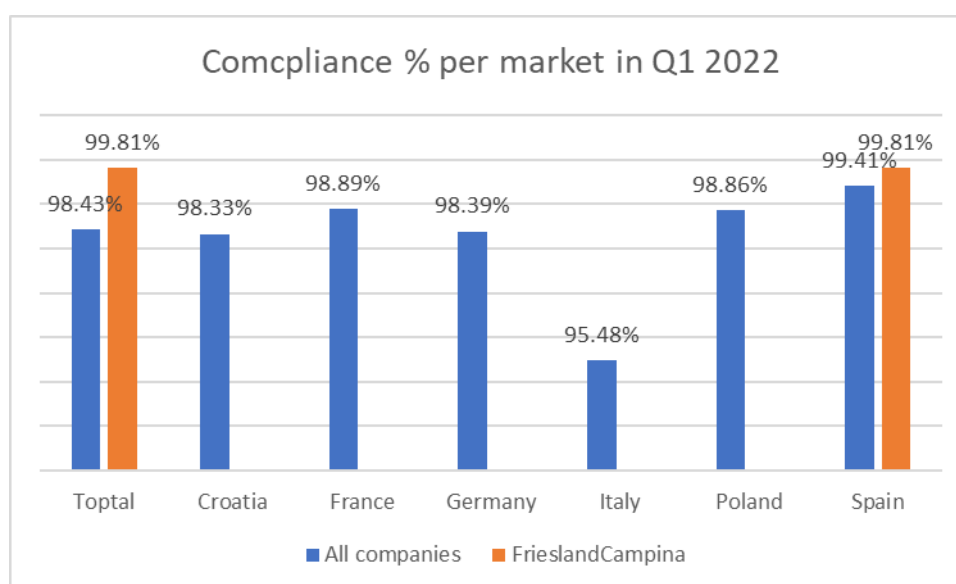
- Accenture Media Management⁵, to review EU Pledge member companies' compliance with the commitment relating to TV advertising (until 2019) and Ebiquity⁶ (since 2020);
- EASA – The European Advertising Standards Alliance, to review EU Pledge companies' branded websites, for compliance with the EU Pledge commitment.

Key results for FrieslandCampina

TV advertising compliance

2022: All TV advertising by EU Pledge member companies on Croatia, French, German, Italian, Polish and Spanish channels during the period January-March 2022 was reviewed by Ebiquity. **This is the first year that compliance was monitored against the 30% audience threshold.**

FrieslandCampina overall compliance rate with the EU Pledge was 99.81%. The average for the six EU markets monitored was at 98.19%.



2021: All TV advertising by EU Pledge member companies on Bulgarian, French, German, Italian, Polish and Spanish channels during the period January-March 2021 was reviewed by Ebiquity.

FrieslandCampina overall compliance rate with the EU Pledge was 98.80%. The average for the six EU markets monitored was at 98.84%.

⁴ Ebiquity is a leading independent marketing and media consultancy, helping brands harness the power of data, analytics, and technology to improve marketing outcomes.

⁵ 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.

⁶ Ebiquity is a leading independent marketing and media consultancy, helping brands harness the power of data, analytics, and technology to improve marketing outcomes.

2020: All TV advertising by EU Pledge member companies on Bulgarian, French, German, Italian, Polish and Spanish channels during the period January-March 2020 was reviewed by Ebiquity.

FrieslandCampina overall compliance rate with the EU Pledge was 100%. The average for the six EU markets monitored was at 98.7%.

2019: All TV advertising by EU Pledge member companies on French, German, Hungarian, Italian, Portuguese and Spanish channels during the period January-March 2019 was reviewed by Accenture.

FrieslandCampina overall compliance rate with the EU Pledge was 99.1%, slightly over the average for the six EU markets monitored (98.9%).

2018: All TV advertising by EU Pledge member companies on French, German, Greek, Hungarian Italian, Portuguese and Spanish channels during the period January-March 2018 was reviewed by Accenture.

FrieslandCampina overall compliance rate with the EU Pledge was 98.8%, very close to the average for the seven EU markets monitored (99.1%).

2017: All TV advertising by EU Pledge member companies on French, German, Hungarian, Romanian and Spanish channels during the period January-March 2017 was reviewed by Accenture.

FrieslandCampina overall compliance rate with the EU Pledge was 95.6%, slightly below the average for the five EU markets monitored (97.4%).

2016: All TV advertising by EU Pledge member companies on French, German, Hungarian, Italian, Polish, Portuguese, Spanish and Estonian channels during the period January-March 2016 was reviewed by Accenture.

FrieslandCampina overall compliance rate with the EU Pledge was 98.6%, in line with the average for the eight EU markets monitored in 2016 (98.7%).

2015: All TV advertising by EU Pledge member companies on French, German, Hungarian, Italian, Polish, Portuguese and Spanish channels during the period January-March 2015 was reviewed by Accenture.

FrieslandCampina overall compliance rate with the EU Pledge was 98.4%, in line with the average for the seven EU markets monitored in 2015 (98.5%).

Company-owned website, social media and influencer profile compliance

In **2022**, EASA reviewed 55 websites, including 2 belonging to FrieslandCampina; 145 social media pages (YouTube, Facebook and Instagram), including 3 which belonged to FrieslandCampina; and 96 influencer profiles, none of which belonged to FrieslandCampina, in 8 EU markets (Austria, Belgium, France, Germany, Italy, Romania, Spain and Sweden). FrieslandCampina compliance was **100%** as none of the FrieslandCampina websites, social media or influencer profiles were found to be in breach of the commitment.

Royal FrieslandCampina compliance rates

All 8 websites reviewed in **2015**, all 9 websites reviewed in **2016**, all 13 websites reviewed in **2017**, all 6 websites reviewed in **2018**, all 4 websites reviewed in **2019**, the 1 website reviewed in **2020**, the 2 websites reviewed in **2021** and the 2 websites reviewed in **2022** belonging to FrieslandCampina were found to be compliant with the EU Pledge.

All 6 social media pages reviewed in **2017**, all 3 social media pages reviewed in **2018**, all 9 social media pages reviewed in **2019**, the 2 social media and 3 influencer profiles reviewed in **2020**, the 5 social media and 1 influencer profiles reviewed in **2021** and the 3 social media profiles (no influencers) reviewed in **2022** belonging to FrieslandCampina were also found to be compliant.

EU Pledge compliance rates

In **2015**, the average compliance rate for the 219 websites monitored across the EU (eight countries) was 97%. In **2016**, the average compliance rate for the 250 websites monitored across the EU (ten countries) was 95%. In **2017**, the average compliance rate for the 224 websites monitored across the EU (six countries) was 99%; the compliance rate for 107 social media profiles was 98%. In **2018**, the average compliance rate for the 145 websites monitored across the EU (eight countries) was 99.3%; the compliance rate for 113 social media profiles was 97.4%. In **2019**, the average compliance rate for the 101 websites monitored across the EU (eight countries) was 97%; the compliance rate for 153 social media profiles was 96.1%. In **2020**, the average compliance rate for the 56 websites monitored across the EU (eight countries) was 98.2%; the compliance rate for 144 social media profiles was 97.2%; the compliance rate for 96 influencer profiles was 98.9%. In **2021**, the average compliance rate for the 57 websites monitored across the EU (eight countries) was 96.5%; the compliance rate for 144 social media profiles was 96.5%; the compliance rate for 96 influencer profiles was 100%.

In **2022**, the average compliance rate for the 55 websites monitored across the EU (eight countries) was 81.82%; the compliance rate for 145 social media profiles was 91.03%; the compliance rate for 96 influencer profiles was 88.89%. **This was the first year that the reviewers considered whether ads were found to be primarily appealing to children under 13, as well as whether they potentially breached the ICC Code and/or Framework.**

Next steps

After fourteen 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. The membership of the initiative has also grown from 11 to 23 member companies, to cover over 80% of food and beverage advertising spend in the EU.

The EU Pledge is a dynamic initiative. While it provides a common framework, member companies can make commitments that go beyond it, and several such as FrieslandCampina 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, applicable to all members throughout the EU, in 2012, 2014, 2017, 2020, and 2021. The latest strengthening of the EU Pledge commitment responds to a changing media landscape and societal expectations and raises the bar for food marketing self-regulation in Europe.

The 2022 monitoring was the first to measure compliance against the EU Pledge commitment as strengthened in 2021. Once again, it has shown that member companies were able to achieve high compliance levels.

The ongoing improvement in compliance rates in relation to the primary appeal of ads demonstrates members' commitment to the EU Pledge and underscores the importance of the Implementation Guidance Note released in 2016 and last updated in 2020. Embedding the qualitative requirements from the ICC Code and ICC Framework in the aggregated EU Pledge compliance figures, will support advertisers in further aligning their commercial communications with the guidelines, to market food and beverages products responsibly, regardless of the age of the audience or the nutritional profile of the product.

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.