

Companies

FRONERI

FRONERI is fully compliant with all applicable laws governing marketing communication to children and the commitments that licensors have taken.

Nestlé branded products:

Nestlé has signed the EU Pledge. All Nestlé ice cream branded kid's products with communication support to children, have been compliant with EU Pledge commitments.

From 2018 Nestlé branded kid's products produced by FRONERI follow the latest Nestlé policy and guidance on communication to children:

- No direct marketing communication to children below 12 years old
- Limit existing kid's characters to educate and highlight a healthy and active lifestyle

Disney branded products:

Disney branded ice cream kids' products, produced by FRONERI, are not advertised.

GENERAL MILLS – HÄAGEN DAZS

General Mills has its own child marketing policy since 2006 and it is refreshed and updated annually. The company guidelines are the following:

- Regardless of the nutritional profile of the product, General Mills don't and won't do: marketing in schools (and school-related settings) through high school, advertising to children under 6, product placement in media/content directed to children under 12, social media marketing directed to children under 13;
- If the product fails nutrition standards for child marketing (EU pledge nutrition standards for Europe; cf. below), General Mills don't and won't do: advertising to children under 12, interactive games / digital marketing directed to children under 12, promotions / premiums directed to children under 12, on-pack tie-ins with movies, games, etc. that are primarily directed to children under 12;
- When a product meets the nutrition standards, General Mills can do the things lists in (B) above. But even then, General Mills is subject to the commitments in (A) above, plus some additional commitments: respect "balance, moderation, and exercise", comply with all applicable laws and protect child privacy.

In 2007, General Mills became a founding member of the EU Pledge initiative, in which currently 22 leading food and drink companies have voluntarily agreed to only advertise products that meet specific nutrition criteria to children under age of 12.

One year after, the International Food Beverage Alliance (IFBA) of which General Mills is a charter member, has globally committed to change how and what they advertise to children under 12 years and encourage such initiative to spread across the world, at regional and national levels.

LEONE

LEONE fully complies with relevant and applicable legislation related to marketing communications to children, as well as with guidelines and commitments of licence or other brand owners.

Leone's commitments include:

- no advertising to children under 7 years of age,
- no influencers or celebrities can be used to promote ice creams to children under 7 years of age,
- no marketing communications, events or donations targeting pre-school institutions or pre-school related settings,
- only products that comply with nutrition criteria for child marketing (EU pledge nutrition standards) can be communicated to children between 7-13 years of age,
- no digital communications to children younger than 13 years,
- responsible communications promoting active and healthy life-style, including informed decisions about product purchases.

MARS

MARS was one of the first companies to launch a responsible marketing code back in 2007, called Mars Marketing Code (MMC). MARS is transparent about its code compliance internally and externally.

The company actively surveys other industry players' codes and marketing behavior to ensure that it is exceeding industry standards where it matters most.

The company reviews and updates its MMC every three years, to ensure that its commitments align with developments in the external environment and that its code remains a 'living document'.

MARS' marketing code applies to all marketing and communications for human food products and comprise a range of commitments, including:

- No advertising to children younger than 12 years of age, or under 13 years for digital communications. Based on the scientific evidence, the company believe it cannot identify and understand the persuasive intent of advertising.
- The company is equipping parents and careers with the information they need to make decisions about what's right for their children's diet.
- No use of celebrities and licensed characters that appeal to children under the age of 12. M&M'S® Character Guidelines focus the actions and speech of the characters toward an audience older than 12 years of age, and the company emphasizes their mature personalities and adult characteristics through all communications.
- The company will not engage in joint promotions / partnerships linked to themes and events where its logos would be used on material intended solely for children under 12.
- The company promotes responsible promotions that don't target children or encourage anti-social behavior.
- The company ensures cross-promotions, licensing agreements and partnerships with quick service restaurants support the World Health Organization (WHO) guidance that consumers limit their intake of added sugars to no more than 10% of their total energy intake.

UNILEVER

In 2003, Unilever was one of the first companies to apply its own Global Principles to the marketing and advertising of all its food and drink products. These were most recently updated in July 2017. These principles include specific requirements for the marketing of foods and beverages directed to children. Unilever doesn't market to children under the age of six. Marketing to children between the ages of six and 12 is restricted to products that meet (i) Unilever's Highest Nutritional Standards, or (ii) any common industry criteria Unilever are committed to, such as in the EU Pledge, and (iii) any criteria set by public authorities. Unilever's restrictions on marketing to children apply to all forms of marketing and advertising including packaging and labelling, television and radio advertising, consumer promotions, in-store activities, PR materials, online activity (including both company-owned websites and third party websites), all forms of social media and digital advertising, apps, online games and direct marketing; and all other forms of communication (e.g. cartoon characters, product placements, advergames, free gifts/toys, etc.)

For ice cream Unilever's Highest Nutritional Standards are: ≤110 kcals per serving; ≤3g saturated fat per serving; ≤20g added sugars per 100g or 12g total sugar per portion.

In addition to its Global Principles, Unilever has played a major role in promoting industry-wide voluntary initiatives to advocate responsible marketing to children under 12. Since 2008, for example, Unilever has promoted industry Pledges such as the EU Pledge, and Unilever supports and adheres to all Pledges around the world.

In 2008, Unilever also became one of the founding members of the International Food & Beverage Alliance (IFBA). IFBA was set up to make a series of commitments to the World Health Organization. These commitments were updated in 2014, and include responsible advertising to children, nutrition labelling and product reformulation.

National Industry Associations

BELGIUM - FEBELGLACES

FeBelGlaces, the Belgian Ice Cream Association, has recommended since 2014 its members to sign up to Belgian Pledge <https://www.belgianpledge.be/fr> which is a full transposition to the national level of the EU Pledge commitments.

Following this recommendation, the branded ice cream companies Ijsboerke, Jacques Ijs, Unilever and Van Gils Sweet Creations signed the Belgian Pledge and committed

- 1) not to market or advertise ice creams to children under 12 years unless the product complies with the prescribed nutritional criteria for ice cream which are an energy content < 110 kcal/portion, saturated fat < 5g/100g or 100ml, added sugar < 20g/100g or 100ml,
- 2) not to engage in ice cream marketing communications to children in primary schools except where specifically requested by, or agreed with, the school administration for educational purposes.

FRANCE – AEG

ANIA, of which AEG (Association Des Entreprises Des Glaces) is member, signed with the French public authorities an audio-visual charter to promote good eating habits and regular physical activity on TV : <http://www.csa.fr/Television/Le-suivi-des-programmes/La-sante-et-le-developpement-durable/La-charte-alimentaire2>.

The charter was signed a first time in 2009 and has been renewed in November 2013 for 5 years. The goal is to empower the advertising to the attention of the youngest and to develop the visibility of promotional and educational messages on good eating habits and physical activity.

Two axes have been especially developed by operators:

- Strengthening the responsible approach taken for food advertising by adopting new recommendation on food behaviour with the French Professional Regulatory Authority for Advertising (<https://www.arpp.org/actualite/adoption-de-la-nouvelle/>);
- Regular funding of short education programs adapted to young audiences to short education programs adapted to young people to promote good life, nutrition and physical activity behaviours.

In 2016, the application report of the audio-visual charter shows that the provisions have been respected:

_ 2174 hours of programs promoting healthy eating and physical activity were broadcast on television, 399 hours more than in 2015 (+ 22%);

_ programs devoted to a healthy lifestyle have been widely taken up on catch-up TV.

<http://www.csa.fr/Television/Le-suivi-des-programmes/La-sante-et-le-developpement-durable/La-charte-alimentaire2/Le-bilan-de-la-charte-alimentaire>

GERMANY - BDSI

The BDSI supports the Code of Practice for Commercial Food Advertising of the German Advertising Standards Council (DW) which has been in force since 1 July 2009. According to these, for example, food advertising may not directly call upon children to buy or consume any products.

<http://www.werberat.de/lebensmittel>

<http://www.zaw.de/zaw/zaw/publikationen/pdf/29-11-11-ZAW>

BDSI ice cream companies respect the DW Code of Practice. The BDSI has communicated to its ice cream members the EUROGLACES recommendation to join the EU-Pledge.

BDSI ice-cream companies respect the BDSI position on the Debate concerning a Regimentation of Advertising to Combat Overweight.

The BDSI has issued a Statement of Position on the Debate concerning a Regimentation of Advertising to Combat Overweight.

For example:

"Food advertising is already sufficiently regulated today. It is subject to numerous statutory and voluntarily imposed regulations which equally apply to online advertising. Among other things, these stipulate that

- in Germany, children's TV and radio programmes and corresponding web platform programmes may not be interrupted by advertising;
- advertising must be made clearly distinguishable as such to children;
- food advertising may not directly call upon children to buy or consume any products"

ITALY - UNIONE ITALIANA FOOD

During EXPO 2015 in Milan, AIDEPI (since 2019 called 'UNIONE ITALIANA FOOD') signed the voluntary Code of the Ministry of Health "*Guidelines for the commercial communication relating to food and drink for the protection of children and proper nutrition*". This Code defines basic rules on the correct advertising of food to children taken from the Advertising Self-Regulatory Code applied by the National Institute of Self-regulation of Advertisement (Istituto di Autodisciplina Pubblicitaria - IAP), without any kind of threshold-based system that could lead to an unjustified classification between bad and good foods.

In 2017 an [overview of case law](#) regarding self-disciplinary action in Italy showed that advertisements for food product marketing are rarely in breach of Article 11 of the "Children and Adolescents" Code and even recently Guidelines have been amply implemented.

THE NETHERLANDS - NVC

In addition to the EU Pledge (see above) a specific national agreement is subjected to all advertisement and marketing of any (ice cream) product (retail and or branded ice cream)) (see for link: www.reclamecode.nl/nrc/pagina.asp?paginalD=277%20&deel=2). The agreement forbids:

- any advertising to children up to 7 yrs. old; and
- only allows advertising to children 7 up to 13 yrs. old if foods comply with nutrition criteria. For ice creams these are: energy < 110 kcal /portion, saturated fat < 5g/100ml or 100gram, sugar <20 gram/100ml or 100 grams.

The code applies to all forms of media except for materials at point of sale and packaging material. A yearly monitoring checks compliance to the national agreement: last monitoring a 100% compliance was monitored (for our members). See:

<https://www.reclamecode.nl/adverteerder/default.asp?paginalD=92&hID=3>

Soon (summer 2019, probably) the National code will be adjusted to forbid the use of any licensed media character on ice cream targeted to children.

UK ASSOCIATION – FDF ICC

The FDF ICC (Food & Drink Federation Ice Cream Committee) recommends that its members sign up to the EU Pledge. Two of the three ICC members: Unilever and General Mills, have signed up.

The third member, FRONERI, is not able to sign up as a significant proportion of their production is for other brand owners.

The UK advertising industry is governed by strict codes of practice which contain robust provisions relating to children. Foods and drinks that do not meet a specific nutrient profile are not allowed to be advertised to children. The codes are self-regulatory and cover advertising in all mediums including TV, print, and digital.
