

# THE U.S. CHILDREN'S FOOD AND BEVERAGE ADVERTISING INITIATIVE FACT SHEET

RIGOROUS COMMITMENTS ▪ HEALTHIER FOODS

FALL 2006 – SPRING 2011



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Council of Better Business Bureaus

## CFBAI Participants



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More information on the CFBAI is available on BBB’s website at <http://www.bbb.org/us/children-food-beverage-advertising-initiative/info/>, or contact Elaine D. Kolish, Vice President and Director of the CFBAI at [ekolish@council.bbb.org](mailto:ekolish@council.bbb.org)

# Introduction

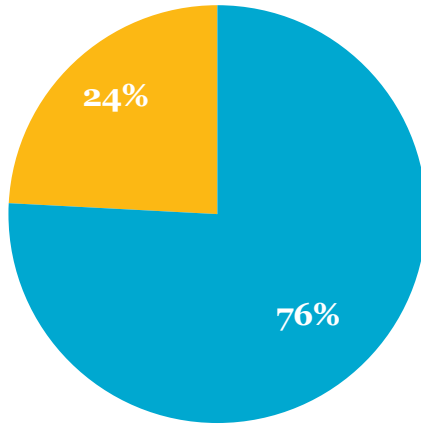
In the United States, as in virtually every corner of the world, stopping and reversing the epidemic of childhood obesity is a serious challenge requiring multiple strategies and interventions. Recognizing the need for the involvement of all segments of society, the Council of Better Business Bureaus (BBB) and the participants in the Children’s Food and Beverage Advertising Initiative (CFBAI) are working to be a part of the solution and to support the efforts of parents and schools in promoting healthy diets and lifestyles.

This Fact Sheet describes the significant programmatic changes that have occurred since BBB started the program in 2006 and the steady progress that has been made in improving the nutritional profile of products that CFBAI participants depict in advertising primarily directed to children under 12.

**HISTORY AND GOALS.** BBB and 10 leading food and beverage companies launched the CFBAI in November 2006 to shift the mix of child-directed advertising messaging to include advertising for healthier or better-for-you foods and/or healthy lifestyle messaging at least half the time. The Institute of Medicine’s 2005 report, “Food Marketing to Children: Threat or Opportunity” (IOM Report), and the Federal Trade Commission had urged that industry self regulation do more to address concerns about food and beverage advertising. IOM specifically had recommended that food and beverage companies “*shift their advertising and marketing emphasis to ... foods and beverages that are substantially lower in total calories, fats, salt and added sugars, and higher in nutrient content.*” (IOM Report at 11). The participants all exceeded the original 50% commitment requirement and now the program requires a 100% commitment (i.e., all covered child-directed advertising must be for healthier foods).

**PROGRAM EXPANSION AND DEVELOPMENT.** Since the program was launched it has grown to 17 participants from 10 and these participants represent the vast majority of child-directed advertising in the U.S. In the spring of 2010, CFBAI conducted an informal study of products advertised on children’s programming. We found that 79% of the ads were participant ads. We also found, as illustrated in Figure 1, that food ads represented a small portion of the total, with ads for sedentary entertainment more prevalent than food ads (roughly twice as many).

**Figure 1:** Food Compared to Non-Food Ads (Spring 2010)



■ Non-Food Ads (n=1094)  
■ Food Ads (n=344)



# Expanded CFBAI Requirements As Of January 2010

**A**fter an in-depth programmatic review CFBAI conducted in 2009 with the participants, CFBAI significantly expanded the program. The expanded requirements went into effect in January 2010. The program's core requirements for advertising primarily directed to children under 12, and how they have changed since inception, are described below.

## COMMITMENT LEVEL

- Advertising of only healthier products 100% of the time, or no advertising
  - > **New:** Increased from 50%
  - > **New:** Eliminated healthy lifestyle messaging as a compliance option (but such messaging still encouraged)

## ADVERTISING COVERAGE

- Traditional measured media: TV, radio, print, Internet (3rd party and company-owned sites), including advergames
- **New:** Ads on mobile media, such as cell or smart phones
- **New:** Ads on video games rated "Early Childhood" or labeled as child-directed
- **New:** Ads on DVDs of child-directed "G" rated movies and similar types of DVDs
- **New:** Word of mouth advertising that is primarily child directed

## CONTENT RESTRICTIONS

- Licensed characters, movie tie-ins (**new**), and celebrity use (**new**) in covered advertising limited to healthier products

## PRODUCT PLACEMENT RESTRICTIONS

- Paying for or actively seeking product placement in child-directed program/editorial content is not permitted

## ELEMENTARY SCHOOL ADVERTISING RESTRICTION

- No advertising to children in elementary schools (pre-K (**new**) through 6th grade)
  - > Certain activities such as charitable fundraising are exempt. To learn more about the Initiative's Elementary School Principles, view CFBAI's fact sheet on this at <http://www.bbb.org/us/children-food-beverage-advertising-initiative/info/>.

# The Pledges

**S**ome participants choose not to engage in child-directed advertising. Others use meaningful, science-based nutrition standards to govern their child-directed advertising decisions

The program is dynamic, with participants reformulating and innovating products on an ongoing basis. Since inception some participants also have revised their standards to make them even more rigorous by adding or strengthening limits for certain nutrients or by adding positive nutrient requirements. The CFBAI-led Nutrition Science Review that was held on Feb. 2–3, 2011 may result in additional changes to participants’ standards or use of a different approach.

## COMPANIES NOT ENGAGING IN CHILD-DIRECTED ADVERTISING

Cadbury Adams USA	The Hershey Co.
The Coca-Cola Co.	Mars, Inc.

## COMPANIES USING MEANINGFUL, SCIENCE-BASED NUTRITION STANDARDS

Burger King Corp.	McDonald’s USA
Campbell Soup Company	Nestlé USA
ConAgra Foods, Inc.	PepsiCo, Inc.
The Dannon Company	Post Foods
General Mills Inc.	Sara Lee Corp.
Kellogg Company	Unilever
Kraft Foods Global, Inc.	

## NUTRITION STANDARDS’ CHARACTERISTICS

- Largely based on Dietary Guidelines for Americans 2005 and FDA’s definitions for “healthy,” “low” or “reduced”
- “35, 10, 35” is a common theme ( $\leq 35\%$  fat,  $\leq 10\%$  sat fat,  $\leq 35\%$  total sugars by weight or calories)
  - > Some variations in sugar criterion
  - > Most have sodium standards

# Meaningful Nutrition Standards Have Improved Products Advertised To Children

## AD FOCUS HAS SHIFTED

- More than **100** products advertised to children reformulated **or** created to meet nutrition standards
  - > Some products reformulated several times
  - > Other products discontinued or no longer advertised
- Product names and packaging may be the same, but what is in the box has changed

## CALORIES

- Virtually every individual product under 200 calories
- No entrées/main dishes exceed 350 calories
- No meals higher than 600 calories

## SODIUM

- Pre-CFBAI some products had > 900 mg sodium
- Now highest is 760 mg; most far less, with many companies using FDA “healthy” levels (480 mg for individual foods and 600 mg for entrées/meals) or lower limits

## SUGARS

- Pre-CFBAI some cereals had as much as 15 or 16 grams per serving
- 21 of 25 cereals currently contain  $\leq 10$  grams per serving; limit is 12 grams

## FATS

- $\leq 2$  g or  $\leq 10\%$  calories sat fat; Trans fat limits generally 0 g labeled
- A number of products reformulated to reduce fats to meet limits and one QSR switched to fat free from 1% fat milk

## NUTRIENT COMPONENTS TO ENCOURAGE

- More fiber & Vitamin D in products (nutrients of public health concern in the U.S.)
- More whole grains content

### 2010 CFBAI SNAPSHOT OF NUTRIENT COMPONENTS TO ENCOURAGE.

A CFBAI informal review of participant product ads during 38.5 hours of children's programming found that 87% of the ads were for products that provided a "good" source (10% Daily Value) of at least one nutrient shortfall in kids' diets or a half serving of a food group to be encouraged.<sup>1</sup>

### ADDITIONAL FINDINGS REGARDING PARTICIPANT ADS

- **Apples.** 24% included apples or applesauce
- **Milk.** 21% included low or fat-free milk
- **Vegetables.** 8% were for products that included  $\geq \frac{1}{2}$  serving of vegetables
- **Whole Grains.** 25% were for products/meals with  $\geq 8$  g or 50% whole grains
- **Yogurt Products.** 12% featured or included low-fat yogurt products



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<sup>1</sup> The nutrient shortfalls in children's diets according to the 2005 Dietary Guidelines for Americans are Vitamin E, magnesium, potassium, calcium, and fiber. Food groups or food components to encourage are fruits, vegetables, low or fat-free dairy, and whole grains. Thirty of the 42 child-directed *products* (71%) advertised during this time met the study criteria. Products that did not meet the study criteria may have contained 10% DV of other essential vitamins and minerals, or a smaller quantity of whole grains.

# 2011 Cereal Nutrient Snapshot

Cereals are one of the most frequently advertised products to children. Accordingly, we are providing a separate snapshot on their nutritional characteristics and changes since the program began. Currently, participants have listed 25 cereals that they may advertise to children (others may meet their nutrition standards but are not included in their children’s media plans).

## OVERVIEW<sup>2</sup>

- All contain ≤ 130 calories
- Virtually all meet FDA’s definition for “healthy”
- The vast majority are a “good” (10% Daily Value) source of Vitamin D (a nutrient of public health concern), and contain other essential vitamins & minerals
- Two-thirds of the cereals provide ≥ 8 grams of whole grains

Before the CFBAI some cereals advertised to children had 15 to 16 grams of sugars per serving. Under CFBAI, participants committed to advertise only cereals with no more than 12 grams added sugars per serving (or a comparable limit based on percentage of calories or weight). This required many products to be reformulated to meet that limit. Those reformulation and innovation efforts have continued. Since 2007, sugar reductions have ranged from about 10% to more than 25%.<sup>3</sup> Now, as seen in Figure 2, the vast majority of cereals advertised to children contain no more than 10 grams of sugars per serving. Further reductions are planned.

**Figure 2:** Sugar Content of Cereals, 2009–2011

Year	2009	2010	2011
≤ 10 g/serving	40%	52%	84%
11 g/serving	22%	36%	8%
≤ 12 g/serving	38%	12%	8%

<sup>2</sup> Independent research has consistently shown that frequent cereal eaters tend to have healthier body weights than those who don’t eat cereal frequently — both kids and adults. They also get more needed nutrients, and eat less fat, cholesterol, and sodium than those who don’t eat cereal.

<sup>3</sup> During this period some participants also discontinued certain products or stopped advertising them to children.

## CFBAI Harmonizes “Child-Directed” Advertising Definitions

When participants join the CFBAI, they are required to submit a proposed pledge that describes how they intend to meet the CFBAI’s requirements. A threshold element of each pledge is defining what the participant means by “advertising primarily directed to children under 12.” Although participants were honoring the spirit as well as the letter of their pledges and, despite facially different definitions, had substantially similar practices, in 2010 CFBAI worked with the participants to substantially harmonize the definitions of “advertising primarily directed to children under 12.”

**WHAT HAS CHANGED.** Now all participants use a threshold no higher than 35% children under 12 in the audience or explicitly include the 35% threshold in their multi-factorial definitions.<sup>4</sup>

- 3 participants moved to 35% from 50%
- 1 using an “index” measure moved to 35%
- 2 using multi-factorial analyses added 35% as an explicit factor

## CFBAI Now Monitors Compliance With Policies On Not Engaging In Advertising Primarily Directed To Kids Under Six

When we started the program six participants had policies on not directing advertising to young children. Our goal is to change, not reduce, advertising so CFBAI does not require that its participants not engage in advertising primarily directed to children under age six.

In 2010, we asked the participants to consider adopting such policies.

**WHAT HAS CHANGED.** With our encouragement five additional companies have adopted or codified such policies in their pledges. Because a majority (11) of the participants now has such policies, CFBAI will monitor and report on compliance with them starting in 2011.<sup>5</sup> With these companies and the four that do not engage in advertising primarily directed to children under age 12, there are now 15 companies that are not engaging in advertising primarily directed to younger children.

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<sup>4</sup> Cadbury is currently using a 50% threshold but has been acquired by Kraft Foods and will be subject to its pledge and 35% definition by 2012.

<sup>5</sup> Two companies also changed their definitions to 35% from 50% children under six, and the 35% standard is prevalent (one participant is at 50%).

# Setting The Record Straight

**T**he numerous program changes and the steady, ongoing improvements in foods in child-directed advertising demonstrate that CFBAI is meeting its promise to be a dynamic program that would change and expand over time. Fair and unbiased reviews of the program help CFBAI focus its efforts.

At the same time, some reviews ignore or discount the significant and radical changes that have taken place. **Before** the CFBAI almost anything went regarding *what* was advertised.<sup>6</sup> **Now**, science-based nutrition standards guide participants on what to advertise. In addition, four companies, one continuing its historical practice and three making new CFBAI commitments, are not engaging in child-directed advertising.

While certainly there is still room for improvement, self regulation is changing the landscape of child-directed food advertising. To assist policymakers in assessing self-regulation, below we provide a different perspective on two reviews that erroneously suggest that self-regulation is not making a significant difference in what is advertised to children.

## 1. “The Impact of Industry Self Regulation on the Nutritional Quality of Foods Advertised on Television to Kids.”<sup>7</sup>

This report was commissioned by Children Now and issued in December 2009. It categorized food ads based on whether they were for a “Go, Slow, or Whoa” food (as outlined in a table originally issued by the U.S. Department of Health and Human Services for a heart healthy diet and subsequently used for general dietary guidance). The study contended that there has not been much progress in self regulation based on the authors’ categorization of foods in 2005, 2007 and 2009.

We believe the conclusions are erroneous because they are based on a flawed analytical tool and advertising coding that overlooked the positive nutritional contributions of certain products and meals. A key deficit of the “Go, Slow, Whoa” categorization system is that it directly conflicts in some instances with the U.S. 2005 Dietary Guidelines for

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<sup>6</sup> BBB’s Children’s Advertising Review Unit’s longstanding guidelines for responsible advertising to children addressed only *how* products, such as foods, should be advertised. CFBAI now addresses *what* foods may be advertised. CARU’s Guidelines can be found at <http://www.bbb.org/us/children-advertising-review-unit-guidelines/>.

<sup>7</sup> Kunkle D *et al.* The data was collected between February 1, 2009, and April 15, 2009.

Americans (DGAs) — the leading source of dietary guidance in the U.S. — and is not entirely consistent with the DGAs at other times. Most importantly, this tool does not allow for evaluation of improvements within products.

Our analysis of a 2010 sample of ads, which looked at whether the ad was for or *included* a “Go” food, showed that kids watching children’s TV programming *regularly, not rarely*, as the report authors had contended, see ads for “Go” foods such as milk, yogurt, apples, applesauce, and vegetables (as a separate component within a meal, or as part of a combination product, such as canned pasta).

We believe, however, that evaluating the incremental changes being made on an ongoing basis is preferable to looking at whether a product fits into one of three overly-broad categories that are not fully aligned with the DGAs.

## 2. “Cereal F.A.C.T.S: Evaluating the Nutrition Quality and Marketing of Children’s Cereals.”

The Rudd Center for Food Policy and Obesity published this report in October 2009. One of the report’s conclusions was that 10 cereals heavily advertised to children on TV and the Internet had the so-called “worst nutrition profile,” based on a nutritional profiling system used outside the U.S.<sup>8</sup> This and other conclusions led the Center to believe that self regulation is not effective.

We respectfully disagree. In our view, it is important to look at progress over time. As noted, when the program started comprehensive nutrition standards were not commonplace. Under CFBAI, to advertise cereals (and other products), participants ensure their products meet meaningful, U.S. science-based nutrition standards, including sugar limits. These standards are driving change.

When advertised in 2009, all participant cereals referenced in the report met applicable standards and collectively they were better nutritionally than earlier versions. As shown in Figure 2, they have continued to improve.

To illustrate this progress further, we are separately addressing the 10 cereals with the so-called “worst” nutrition profiles. Since the product data were collected, 8 out of 9 of these cereals have been reformulated (or further reformulated). These cereals and

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<sup>8</sup> Harris JL *et al.* The data for the report was collected in May 2009.

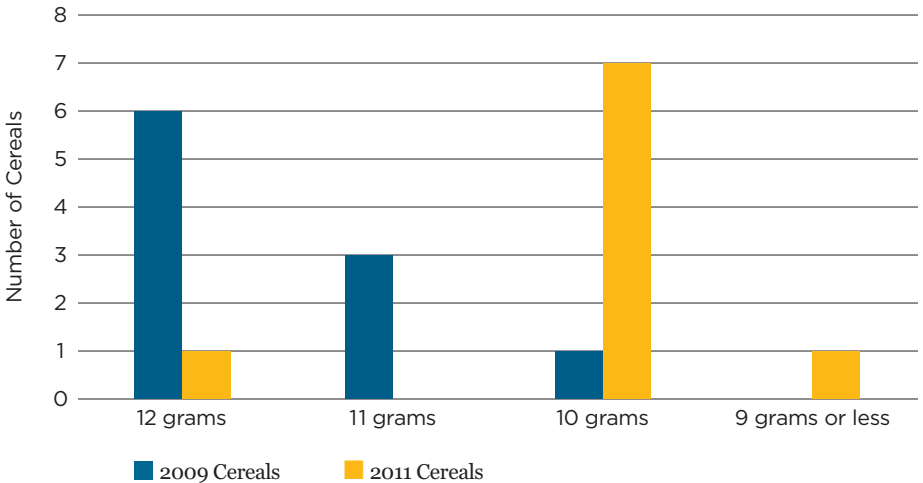
changes that have made to them are discussed in the Nutrient Snapshot and in Figure 3 below. (One of the 10 cereals is no longer marketed to children under 12 so the analysis is based on the current formulations of the remaining nine cereals.)

### NUTRIENT SNAPSHOT

- All contain  $\leq 130$  calories and  $\leq 1$  gram sat fat
- 3 cereals were reduced in sodium since 2009; all contain  $\leq 220$  mg sodium
- All provide  $\geq 10\%$  of at least one nutrient of public health concern, as identified by the 2010 Dietary Guidelines for Americans<sup>9</sup>
- Virtually all meet FDA’s definition for “healthy”
- 7 cereals have  $\geq 8$  grams ( $\geq 1/2$  serving) whole grains<sup>10</sup>

As illustrated in Figure 3, the sugar content of these cereals has been reduced. In 2009 most had 12 grams of sugars per serving, now most have 10 grams or less per serving.

**Figure 3:** Sugar Content in 2009 Compared to 2011



<sup>9</sup> These are: potassium, fiber, calcium and Vitamin D.

<sup>10</sup> Whole grains are an important food component that is not credited as a positive nutrient in the nutrient profiling system the Center used. That system provides “credit” for fiber. The Dietary Guidelines for Americans 2010 advise getting the recommended daily intake for fiber, and consuming 48 grams of whole grains each day because whole grains have nutritional benefits that go beyond fiber content. The DGAs highlight eight grams of whole grains per serving as a significant contribution to daily intake.

## Conclusion

The CFBAI participants are keenly aware that childhood obesity is a significant global problem and that children's health is at stake. Although advertising to children is only one of many complex factors that influence whether children have healthy body weights, the CFBAI participants are committed to being a part of the solution.

Through their commitments, the CFBAI participants either are not engaging in advertising primarily directed to children under 12 or are using meaningful nutrition standards to govern their child-directed advertising. These standards have resulted in significant changes in the foods advertised to children. Specifically, as the IOM had recommended, extensive reformulation and innovation efforts have led to reductions in calories, fats, sodium and sugars in products advertised to kids. At the same time the nutrient density of the products being advertised also is improving.

CFBAI's participants have accomplished much. Yet we recognize that there continues to be room for improvement, and we will continue our efforts to change food advertising to children.





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