THE CHILDREN'S FOOD & BEVERAGE ADVERTISING INITIATIVE IN ACTION

A REPORT ON COMPLIANCE AND IMPLEMENTATION DURING 2009

DECEMBER 2010

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Letter from the President

With a mission to advance trust in the marketplace, the Council of Better Business Bureaus (BBB) has helped ensure that consumers and businesses can engage in that marketplace with honesty and fairness for almost 100 years. The Children's Food and Beverage Advertising Initiative (CFBAI) is one of the well-recognized self-regulatory programs that BBB's national headquarters oversees. BBB's programs provide objective, transparent and impartial oversight for consumers, businesses, donors, and charities. The CFBAI's mission is unique among BBB's programs as it is designed to address concerns about food marketing to children and obesity.

BBB and 10 leading food and beverage advertisers launched the CFBAI in 2006 to change the mix of advertising messages directed primarily to children under 12 to healthier dietary choices and lifestyles. This report, the Initiative's third, describes participants' excellent 2009 compliance record. As in past years, there were only a few instances of non-complying products appearing in advertising directed to children under 12. The report also summarizes the significant efforts CFBAI participants made during 2009 to grow and strengthen the program.

The CFBAI has evolved and expanded each year. In 2009, the Initiative grew to 16 members, up from 15 the prior year, and it increased membership again during 2010 and now has 17 participants. Further, as a result of an extensive review conducted during 2009, the Initiative significantly expanded the program's requirements, effective January 1, 2010. Most importantly, because of the use of meaningful nutrition criteria, during 2009 the nutritional profile of foods shown in child-directed advertising continued to improve through reformulation and innovation. While certainly there is still room for improvement, the foods the participants advertise to children today are lower in calories, fats, sugars and sodium and contain more positive nutrients than just a few short years ago.

As envisioned by its founders, the CFBAI is proving to be a dynamic self-regulatory program that helps to address the enormous and complicated problem of childhood obesity, a problem which certainly remains unsolved. This report demonstrates the adaptability of the program and the sincerity of its participants' commitment to being part of the solution. We expect the program to continue to evolve in the coming year, as the Initiative holds a Nutrition Science Review in early 2011 to consider the latest scientific and regulatory guidance on nutrition science and diet. Although the outcome of that review cannot be known now, this endeavor is just one more way that the participants are showing how serious they are about ensuring that the nutrition criteria that guide their decisions about what products they advertise to children continue to be meaningful and consistent with current government recommendations and scientific principles. BBB will continue to support, guide and monitor the innovative efforts of the program.

Stephen A. Cox
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Executive Summary

This is the third report that the Council of Better Business Bureaus (BBB) has issued regarding how the commitments of participants in the Children's Food and Beverage Advertising Initiative (CFBAI) are changing food marketing to children. We are pleased to report that the CFBAI participants' compliance with their commitments during 2009 was excellent. This report also explains how CFBAI commitments have changed the nutritional profile of foods advertised to children under 12. During 2009 the nutritional profile of foods advertised to kids further improved through reformulation and innovation. This report also describes the significant programmatic changes that the CFBAI has undertaken since our last progress report.

In keeping with BBB and the founders' intent, the CFBAI has evolved and expanded over time in the strength and reach of our commitments and the extent of our membership. An extensive review during 2009 resulted in several significant program changes that became effective this year. In particular, the original requirement that participants commit that at least 50% of their child-directed advertising in covered media be for better-for-you products was raised to 100%. This means that providing healthy lifestyle messaging is not an option for meeting the 100% advertising commitment.

CFBAI also significantly expanded the program's Core Principles to cover newer and emerging social media. During 2010, we also achieved substantial harmonization of the definitions of "advertising primarily directed to children under 12." Additionally, because more participants adopted a policy to not engage in advertising primarily directed to children under six and such policies are now prevalent, the CFBAI will monitor and report on them.

Finally, the original level of significant participation has grown to 17 from 10 participants. In addition to the continued growth of our membership, CFBAI participants continue to represent a substantial portion of child-directed food and beverage advertising. Our informal analysis of food and beverage advertising on children's television programming conducted in 2010 found that over 75% of the total food and beverage ads were for participants' products.

2009 Highlights

Added New Participants. During 2009, Post Foods joined the CFBAI and its pledge became effective on the date that it joined in October 2009. In 2010, Sara Lee Corporation joined the Initiative.

Continued the Excellent Compliance Record. Sixteen pledges were implemented in 2009 — Burger King Corporation; Cadbury Adams USA LLC; Campbell Soup Company; The Coca-Cola Company; ConAgra Foods, Inc.; The Dannon Company Inc., General Mills Inc.; The Hershey Company; Kellogg Company; Kraft Foods Global, Inc.; Mars Snackfoods US, LLC; McDonald's USA, LLC; Nestlé USA; PepsiCo, Inc.; Post Foods LLC; and Unilever. Once again, participants demonstrated the seriousness of their commitments through their excellent compliance record. There were only a handful of occurrences involving non-CFBAI approved products appearing in advertising to children under 12.

- **Television**. One issue arose when internal miscommunication at a local station led to a few instances of advertising for products not on one company's approved list appearing during syndicated children's programming. The company carefully reviewed the circumstances and implemented additional procedures to prevent the re-occurrence of the problem. Network errors also resulted in a few instances of non-approved product advertising.
- **Internet**. Occasionally advertising in this medium raised some issues relating to how companies distinguished child and adult-targeted

parts of company-owned websites. In a few instances mistakes occurred as a company brought a product line or brand into full pledge compliance. In some other instances a company mistakenly referred to a brand rather than a specific qualifying product in a few banner ads.

- **Radio**. Two companies self-reported a few instances of advertising on Radio Disney that were non-compliant. In one case, miscommunication with a media buying agency resulted in the airing of two ads that mentioned a non-qualifying product. The company has taken steps to prevent this from occurring again. Another participant's Radio Disney ad referred to a product line that included non-approved products rather than a specific CFBAI-approved product within that line. The ad aired for only a short time before the company detected the issue and corrected it.

Enhanced the Nutritional Profile of Foods Advertised to Kids. During 2009, participants continued to not just meet but to exceed their nutrition standards. Several participants strengthened their nutrition guidelines, and many participants reformulated products to reduce fats, sodium and sugars. Nutritional progress highlights include the following:

- *Burger King Corp*. transitioned to fat-free milk from low-fat milk in 2009 in all of its restaurants, resulting in a significant reduction in fat in approved Kids Meals that feature milk and for all milk-drinkers at BKC. One of BKC's new Kids Meals included chicken tenders that had been reformulated to reduce their sodium content to meet the company's CFBAI nutrition guidelines.
- *Campbell* strengthened its nutrition guidelines in 2010 with new sodium restrictions for its pasta and baked snacks categories. Campbell also announced that it had reduced sodium in its iconic Tomato Soup by 32%. Now all Campbell soups advertised to kids under 12 meet the FDA "healthy" limit for sodium.
- *General Mills* announced in December 2009 that it was committing to reduce to single digits the sugar in all of the cereals that it advertises to kids. Since then, the company has taken steps toward achieving that goal. Today, the company's approved products range from 9 to 11 grams of sugar, all under the 12 gram limit set in its CFBAI nutrition standard. The two cereals added to its approved product list in 2009 had 10 grams of sugar and the new cereal added in 2010 contained only 9 grams of sugar.
- *Kellogg* reformulated three cereals advertised to kids in 2009 to provide a good source of fiber as part of its company-wide initiative to increase the fiber content of its cereals. In addition, two of its kid-directed cereals now provide at least 8 grams of whole grains per serving (a one-half serving).

During 2010 we conducted an analysis of a snapshot of 38.5 hours of advertising on children's programming, a follow-up to the "Nutrition Snapshot" that we conducted for the first time in 2009. We found that less than a quarter of the ads were for foods in 2010, with ads for sedentary entertainment far more prevalent than food ads (we did not compare food and non-food ads in 2009). We also noted that the participants' products and ads as a percentage of the total food and beverage ads increased from last year, to 79% from 70%. We also found that participants' advertised products contribute important nutrient shortfalls or food groups to encourage in children's diets.

- **Positive nutrition snapshot**.
  - — More than three-quarters of participant child-directed food advertising was for products providing at least 10% of the Daily Value (DV) of one shortfall nutrient (potassium, fiber, calcium, magnesium and Vitamin E) or a half-serving of a food group to encourage.
  - — More than half of these products provided two or more such nutrients or food groups.
- **Food groups to encourage snapshot**.
  - — *Fruit*. 64 or 24% of ads included apples or applesauce.

— *Dairy*. 55 or 21% of ads included milk and 31 or 12% of ads featured low-fat yogurt products.

— *Vegetables*. 22 or 8% of ads were for products that included at least a half serving of vegetables.

— *Whole Grains*. 71 or 27% of ads were for products or meals that included at least 8 grams of whole grains/50% whole grains.

Strengthened the Core Principles. A review CFBAI and its participants conducted during 2009 resulted in significant expansions to the program. Participants agreed to the following changes:

- **Increasing the advertising commitment to 100%**. Now, *all* advertising primarily directed to children under 12 in covered media must be for healthier dietary choices or better-for-you products. Alternatively, a participant may choose not to engage in advertising primarily directed to kids under 12.
- **Eliminating healthy lifestyle messaging as a compliance option**. Participants can no longer meet their advertising commitment through healthy lifestyle messaging.
- **Expanding the limitations on the use of licensed characters in covered advertising to include celebrities and movie tie-ins**. All such use must be consistent with a participant's advertising commitment.
- **Extending the media the Initiative's advertising principle covers**. In addition to traditional media, covered advertising now includes:
  — Child-directed interactive games provided free or at nominal charge;
  — Video and computer games rated "EC" or labeled for children under 12;
  — DVDs of G-rated movies and other non-rated DVDs that are primarily directed to children under 12;
  — Mobile media (cell phones, PDAs); and
  — Word of mouth advertising.

Harmonized Audience Definition Standards. In 2010 we substantially harmonized the definitions of advertising primarily directed to children. Now, virtually all participants are using a threshold no greater than 35% children 2-11 in the audience as their definition of advertising primarily directed to children under 12 for measured media. In addition, more participants have committed to not advertise to children under six. Accordingly, although such a policy is not a CFBAI requirement, because such policies are now prevalent CFBAI will monitor and report on them.

Communicated CFBAI Performance and Progress. To further serve the core CFBAI goals of transparency and accountability, we are using a variety of tools to communicate with opinion leaders and the public about the program. These include an electronic newsletter that reports on program news, pledge developments, and changes in products that are being advertised to children, and Fact Sheets that provide program information in a summary fashion. In 2009-2010 we also submitted public comments to government regulators in response to requests for comment about food advertising to children. As in the past, CFBAI representatives frequently gave speeches in public forums and conducted briefings for industry members and others involved in addressing childhood obesity.

Looking Ahead

We are looking ahead to a very active future. In particular, we will continue our efforts to expand the already significant membership of the Initiative. We also are planning to hold a Nutrition Science Review in early 2011. We will be reviewing the forthcoming 2010 Dietary Guidelines for Americans and other important reports on nutrition and diet to consider their implications for the nutrition standards that participants currently use.

I. Introduction

Childhood obesity is a national challenge requiring multiple strategies and interventions. In recognition of the seriousness of the problem and the need for the involvement of all segments of society, BBB and its participants are working to be a part of the solution. This report describes the progress that CFBAI participants made during 2009 in fulfilling CFBAI's goal of changing the mix of products in advertising that is primarily directed to children under 12 ("child-directed") to include healthier products, and provides our assessment of their compliance with their pledges. It also describes the significant programmatic changes achieved since the CFBAI issued its last report in October 2009.[1]

Part II of this report provides a brief history of the CFBAI, the changes to the program's Core Principles that have occurred since the program's inception, and a summary of our outreach activities.

Part III focuses on the positive nutritional developments and product changes related to participants' nutritional standards that have occurred over the last year.

Part IV discusses the marketplace of food advertising directed to children under 12 and how it is changing. It explains the changes participants have made to their definitions of advertising primarily directed to children under 12 that resulted in substantial harmonization of these definitions. It also describes how additional participants have adopted policies to not engage in advertising primarily directed to children under age six. Now 11 participants have such policies, and four others have policies to not engage in advertising primarily directed to children under age 12.

Part V explains how we assess the participants' compliance with their pledges and why we have concluded that overall compliance is nearly 100%. It describes the minor, company-specific compliance issues that arose during 2009 and what steps were taken to rectify those problems.[2]

Part VI outlines our plans for the CFBAI in 2011 and beyond.

Endnotes

[1] "A Report on Compliance and Implementation During 2008" (hereafter "CFBAI 2008 Report" or "2008 Report"). This Report and other CFBAI materials are available on our website at http://www.bbb.org/us/children-food-beverage-advertising-initiative/info/.

[2] This year's report does not include company-by-company sections. These have been omitted because our prior Reports comprehensively have detailed how each company has disseminated information about its pledge and trained all applicable staff about how to comply. The Report does include, however, a brief assessment of the pledge implementation and compliance efforts of Post Foods. Its pledge became effective in October 2009 and therefore its compliance implementation efforts have not been described previously.

II. About the CFBAI

The CFBAI has changed significantly since the program was first announced in November 2006. Since that time, the number of participants has grown to 17 from 10. Meaningful nutrition guidelines now govern what foods participants advertise to children and five participants no longer advertise soft drinks or candy to children. CFBAI accomplished further changes in 2010, with major enhancements to the Core Principles. In January the Principles began covering newer and emerging social media, and a 100% advertising commitment became the requirement. In September 2010 we substantially harmonized the definitions of advertising primarily directed to children. This Section briefly summarizes the history of the Initiative and discusses the recent expansions to the Core Principles. Further information about the audience definition developments is provided in Section IV.

A. History of the Children's Food and Beverage Advertising Initiative

BBB and 10 leading food and beverage companies launched the CFBAI in November 2006. The goal of the Initiative was to shift the mix of child-directed advertising messaging so that it would include advertising for healthier or better-for-you foods and/or healthy lifestyle messaging at least half the time. The program responded to recommendations from the Federal Trade Commission (FTC) and Institute of Medicine (IOM) that self regulation do more to address concerns about food and beverage advertising to children in light of the national problem of childhood obesity.[3] In its December 2005 report, "Food Marketing to Children: Threat or Opportunity" (IOM Report), IOM had recommended that food and beverage companies shift their child-directed advertising emphasis to foods and beverages that are lower in calories, fats, salt and added sugars, and higher in nutrient content.[4] Similarly, the FTC had recommended, in April 2006, that BBB determine if advertising self regulation could do more to address concerns about how foods are marketed to kids.[5]

As a CFBAI participant, each company is responsible for developing an individual commitment or pledge addressing the program's five core principles. Participants agree to BBB oversight and monitoring of their pledges and to be held accountable for failure to comply with their pledges. In July 2007, BBB announced the pledges of its then 11 participants at a joint FTC/Health and Human Services (HHS) Forum.[6] Since then, six additional companies have joined the Initiative. All the pledges are available on BBB's website.

Under the original core principles, the participants agreed to:

- Devote at least 50% of their advertising primarily directed to children under 12 on covered media to better-for-you products and/or to healthy lifestyle messages;
- Reduce the use of third-party licensed characters in such advertising unless the advertising is for better-for-you foods or healthy lifestyle messaging;
- Not pay for or actively seek to place their food products in editorial/programming content primarily directed to children under 12 for the purpose of promoting the sale of those products;
- Incorporate better-for-you foods or healthy lifestyle messaging in interactive games that integrate a company's food products; and
- Stop advertising their branded foods in elementary schools (this limitation does not apply to charitable fundraising, displays of food products, public service messaging or items given to school administrators).

B. The CFBAI's Enhanced Core Principles

A thorough programmatic review that we conducted during 2009 resulted in major changes to the basic program and significant expansions of the scope of media covered under the program. The CFBAI announced these changes in December 2009 and they became effective on January 1, 2010.[7]

100% Advertising Commitment Now Required. The original principles required that participants commit to devote *at least half* of their advertising to better-for-you products and/or to messages that encourage good nutrition or healthy lifestyles. All participants, however, exceeded the baseline requirements and pledged either that 100% of their advertising would be for healthier products or not to engage in child-directed advertising. CFBAI's Core Principles now require that all participants commit to devote 100% of their TV, radio, print, Internet and other covered advertising primarily directed to children under 12 to better-for-you products.[8] This means all new participants have to commit to only better-for-you product or no child-directed advertising and no existing participant may lessen its commitment.

Healthy Lifestyle Messaging not a CFBAI Compliance Option. Now the advertising commitment can be met solely through healthier dietary choices or better-for-you products. Although the participants will continue to support and promote healthy lifestyles, providing healthy lifestyle messaging is no longer an option for meeting the 100% commitment requirement.

Scope of Advertising Commitment Expanded. Recognizing that other means, venues and channels could be used for child-directed advertising, the CFBAI expanded the Core Principles as follows:

- ***Extended limitations on the use of licensed characters in covered advertising*** to include celebrities and movie tie-ins, which must be consistent with a participant's advertising commitment;
- ***Expanded venues covered by the Initiative*** beyond advertising that is primarily directed to children under 12 on traditional measured media (TV, print, radio and company-owned and third-party child-directed websites) to include new and emerging advertising venues and channels on the following:
  - — Interactive games that are child-directed in all formats that are provided free or at nominal charge (includes advergames);
  - — Video and computer games rated "EC" or labeled for children under 12;
  - — DVDs of G-rated movies and other non-rated DVDs that are primarily directed to children under 12;
  - — Mobile media (cell phones, PDAs); and
  - — Word of mouth advertising.

C. CFBAI Outreach Activities

The CFBAI provides objective and transparent oversight of Initiative actions and public information about our goals and program developments. Our outreach efforts in 2009 and 2010 included the following:

- **Newsletters**. A periodic e-newsletter supplements our updating and posting of charts summarizing the participants' nutrition standards and the products that meet those standards that may be featured in child-directed advertising. These newsletters summarize the individual pledges, amended pledges and product information that we post on BBB's website.
- **Fact Sheets**. In late 2009 we began publishing Fact Sheets that summarize different aspects of the program or CFBAI-approved products. These periodically updated publications include the Cereal Facts, Nutrition Snapshot, Program Summary and CFBAI Requirements Fact Sheets, all of which are available on the CFBAI website.
- **Public comments**. The CFBAI filed public comments with the Federal Communication Commission (FCC),[9] the FTC[10] and the White House Task Force on Childhood Obesity.[11]
- **Briefings and speeches**. Over the last year, we conducted dozens of briefings on the CFBAI and the effectiveness of our self-regulation efforts. Many of these presentations were part of our ongoing outreach to non-CFBAI members of the food and beverage industry to encourage them to join the CFBAI. We also spoke at many conferences.

CFBAI Director Elaine Kolish Speaking at the International Dairy Show, Sept. 14, 2010
From left to right: Cary Frye (International Dairy Foods Assoc.), Keith Fentonmiller (FTC), Elaine D. Kolish, Embola Ndi (Disney).

Endnotes

[3] *See* 2008 Report at 3-4 for a more complete description of the history of the CFBAI.

[4] IOM Report at 11.

[5] Additional information about the FTC's interest in food marketing to children and its recommendations for self regulation can be found in the CFBAI 2008 Report at n.17.

[6] "Weighing In: A Check-Up on Marketing, Self-Regulation, and Childhood Obesity." See BBB Press Release dated July 18, 2007, available at http://www.bbb.org/us/children-food-beverage-advertising-initiative/info/.

[7] A complete copy of the Enhanced Core Principles can be found in Appendix A.

[8] Participants also agreed to expand their commitment not to advertise in elementary schools to children in pre-K.

[9] CFBAI filed a comment and a reply comment in the FCC's Notice of Inquiry (NOI), "Empowering Parents and Protecting Children in an Evolving Media Landscape." Our comment addressed questions posed in the NOI regarding the role of the CFBAI in addressing the challenge of childhood obesity. Comments filed in the proceeding are available online at http://www.fcc.gov/cgb/ecfs (Docket No. 09-194).

[10] Our comment in the FTC's Food Industry Marketing to Children and Adolescents proposed information collection offered suggestions on information to include in its nutritional analyses so that the positive nutritional changes in food marketing to children that have occurred could be captured. CFBAI comment available at http://www.ftc.gov/os/comments/foodmktgkids-2/index.shtm.

[11] The Initiative's comment focused on the role that advertising self regulation is playing in supporting parents in making good choices for their families and promoting physical activity among children. CFBAI Comment to the White House Task Force on Childhood Obesity, filed March 23, 2010.

III. Positive Nutrition Developments

During the last several years, participants have reformulated or newly created more than 100 products to meet nutrition standards. Some products have been reformulated more than once as companies seek to improve the nutrition profile of products advertised to kids through incremental and regular enhancements. In 2009, under the CFBAI's leadership, participants again demonstrated their ongoing commitment to improving the nutritional profile of the foods they advertise to children under 12.

Improvements have taken place in many products and have involved many nutrients. Recently introduced CFBAI-approved products have been reduced in sodium, fats, and sugars. Other new or reformulated CFBAI-approved products feature positive nutrients or food groups, including fiber, fruits, vegetables, whole grains and calcium. For example, in the cereal category significant reformulation efforts have reduced sugars and increased positive nutrients. Other product categories such as quick serve kids' meals also have experienced substantial nutritional changes. In addition, many participants are taking broad, company-wide steps to improve further their general product portfolios over the next several years.[12]

This section discusses participants' nutrition standards, recent product developments, and a report on CFBAI's snapshot of foods advertised to children on children's TV programming.

A. Participants' Nutrition Standards

The CFBAI permits participants to use, subject to BBB approval, company-specific nutrition standards to define better-for-you foods as long as their criteria are consistent with established scientific and/or government standards and recommendations.[13] The nutrition standards are generally based on HHS/U.S. Department of Agriculture (USDA) 2005 Dietary Guidelines for Americans (2005 DGAs) and Food and Drug Agency (FDA) standards, such as its definition of "healthy" and "low."[14] The flexibility afforded under the CFBAI promotes program participation and recognizes that reformulation challenges vary. Together, the program's flexibility and rigor stimulates competition among participants in setting and updating their standards, and in their reformulation efforts.

The familiar 35-10-35 metric is a common theme (i.e., no more than 35% calories from fat, no more than 10% calories from sat fat, and no more than 35% calories or weight from sugar). Most standards also include sodium limits. In addition, as discussed below, the vast majority of foods participants advertise to children on TV provide at least a half-serving of a food group to encourage (fruits, vegetables, low-fat dairy and whole grains) or a good source (10% DV) of a nutrient identified in the 2005 Dietary Guidelines as a shortfall in children's diets (potassium, fiber, calcium, magnesium and Vitamin E). Other products generally provide other important nutrients, such as Vitamin D,[15] or food groups to encourage in smaller amounts. Virtually every individual food in the program is under 200 calories,[16] no entrees exceed 350 calories and no meals exceed 600 calories.

B. Positive Evolution of Participants' Products and Pledges

The nutrition profile of products advertised to children under 12 under the CFBAI has continued to evolve. Five companies revised their pledges in 2009: one to cover certain in-store marketing; one to remove the option to use healthy lifestyle messaging in connection with its 100% advertising commitment (although the company had never used this option); and three to enhance their nutrition guidelines. Additionally, to meet their existing nutrition criteria, many participants reformulated existing products or introduced new products that meet their CFBAI-approved standards.[17] Examples of company-specific

changes in advertising and products are provided in Appendix G.

Below is a summary of positive pledge and product developments.

Burger King Corporation. During 2009 BKC made a variety of changes to its pledge.

- **Fat-Free Milk**. BKC transitioned to fat-free milk from low-fat milk in all of its restaurants nationwide. This beverage is included in two of its approved advertised meals. As a result of the switch to fat-free milk, the fat content of BKC's Macaroni and Cheese Kids Meal is down to 5.5 grams from 8 grams (to 15% of calories from 21%).[18] (Of course, now all BKC milk-drinkers also are getting less fat as a result of the switch.)
- **Complying Meals**. BKC introduced three more meals that meet its nutrition criteria in 2009, each of which includes fat-free milk or calcium-fortified apple juice and BK® Fresh Apples Fries.[19] One of the newly compliant meals, the Chicken Tenders® meal, includes tenders that had been reduced in sodium by about one-third to meet BKC's CFBAI nutrition standard.
- **In-Store Merchandising**. BKC committed to advertise only pledge-approved Kids Meals or approved individual side dishes or beverages through "In-Restaurant Merchandising."[20]

Campbell Soup Company. Campbell reduced the sodium content of many products it advertises to children in 2009 and 2010.

- **Soup**. Since 2009, Campbell has advertised to children only soups that have no more than 480 mg sodium, a level that meets the FDA's sodium criterion for use of the term "healthy" for individual foods.[21] It reduced sodium in its popular Tomato Soup to 480 mg from 710 mg, a 32% reduction, in August 2009. The soup previously qualified as a pledge-approved product based on its nutrient content (it contains a full serving of vegetables and 10% DV of Vitamin C).
- **Pasta**. It further reduced the sodium content in its pasta category by 5 to 10% and set 600 mg as its criteria under its 2010 pledge. Campbell's pasta products now meet FDA or USDA's standard for "healthy" main dishes. Each serving also provides a full serving of vegetables.
- **Baked Snacks**. It reduced the sodium in its Flavor Blasted Goldfish baked snack crackers from 300-320 mg to 250-280 mg sodium per serving as of April 2010. Campbell also reformulated its Goldfish Grahams to meet its CFBAI nutrition standard, reducing the saturated fat content to 1 gram from 2 grams.

ConAgra Foods. It reformulated almost all of its pledge-qualifying Chef Boyardee pasta products to reduce sodium and/or fat to meet its June 2009 implementation date for this product line. These products also provide at least 10% DV of two nutrients and at least a half-serving of vegetables, or whole grains.

General Mills. As a result of its product reformulation and innovation efforts, the company already has reduced the sugar in many of the cereals advertised to kids today to 10 or 11 grams per serving, down from 12 to 15 grams per serving.[22] In 2009 it added two additional cereals to its list of pledge-approved products, both of which contain only 10 grams of added sugar, well under its 12 gram sugar guideline. In December 2009 it announced a commitment to reduce further the sugar content of the cereals it advertises to children to single digits per serving. The cereal added to its CFBAI-approved product list in 2010 contains only 9 grams of sugar. In addition, all of its kids' cereals contain at least 8 grams of whole grains.

Kellogg Company. It announced in June 2009 that nearly 80% of its U.S. ready-to-eat cereals will be a good or excellent source (20% DV) of fiber by the end of 2010. As part of this effort, several cereals advertised to children under 12 were reformulated to provide 10% of the DV of fiber, and started appearing in stores in 2009. The company also

reformulated its Apple Jacks and Froot Loops cereals to contain at least 8 grams of whole grains per serving (a half-serving).

Kraft Foods Global, Inc. In 2009, the company amended its pledge, stating it would be transitioning away from its Sensible Solutions criteria to even more rigorous nutritional criteria. It also added more beverages, cheese products and convenient meals to its approved product list in 2009. Several beverages contain a full serving of fruit, others provide 100% of the DV of Vitamin C, 10% DV of calcium and 25% less sugar than other leading juice drinks. Other beverage products provide a low-calorie and sugar-free source of hydration for children. The new cheese and convenient meal products provide 10 to 20% of the DV of calcium or potassium, and some of the meals are a good source of fiber. All three nutrients are shortfalls in children's diets.

Mars. It amended its pledge, as of January 1, 2010, to include bubblegum (reflecting its acquisition of the Wm. Wrigley Jr. Company) and rice products, thus expanding the scope of products the company does not advertise to children under 12. Its pledge already covered snack food and confectionary products.

Nestlé USA. It updated its nutrition criteria to include limits on fat, saturated fat, sodium, and added sugars and to require that all product categories provide at least 10% DV of one nutrient. It also added new beverages to its product list.

- **New Milk Product**. The company added a calcium-fortified low-fat milk product to its approved product list. This milk product provides 40% of the calcium DV, 10% more than regular low-fat milk.
- **New Juice Product**. It added a 90 calorie sparkling juice beverage that consists of 70% fruit juice and 30% water. This product also provides one serving of fruit.

PepsiCo. It added two granola bars to the company's approved product list with its amended 2010 pledge. The bars contain no more than 100 calories and provide a half-serving of whole grains per serving. In 2009 PepsiCo briefly advertised two varieties of its reformulated Cap'n Crunch ready-to-eat cereals. The cereals had been reformulated to meet its nutrition criteria and FDA's "healthy" definition.[23]

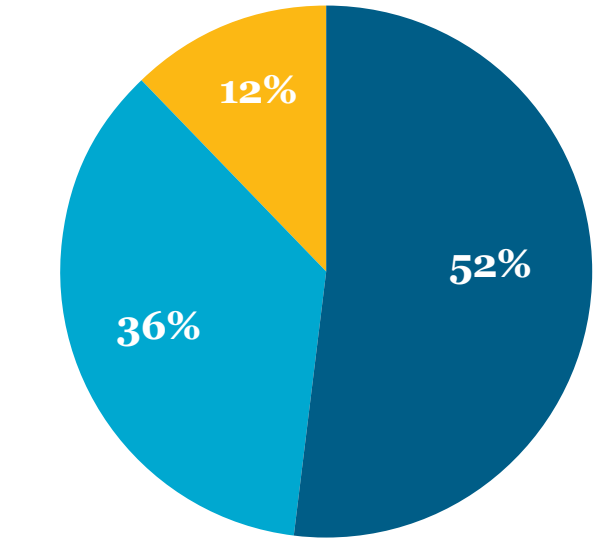
Post Foods. Prior to joining the Initiative in October 2009, Post reformulated its advertised cereals so that all provide an excellent source of Vitamin D. Post's cereals also meet the FDA definition of "healthy." All of Post's cereals contain no more than 11 grams sugar per serving.

In addition to specific *products* that have undergone nutritional changes, certain entire product *categories* have been reformulated since the inception of the Initiative. Below we describe and show changes in two categories: cereals and quick serve kids' meals.

Cereal Category. The nutritional profile of cereals CFBAI participants advertise to kids has significantly changed, particularly with regard to sugar content. Before CFBAI some cereals advertised to kids had as much as 16 grams of sugar per serving. As Figure 1 illustrates, all program cereals now contain no more than 12 grams of sugar per serving, and most contain far less.[24] In addition, the cereals have strong nutritional characteristics, including:

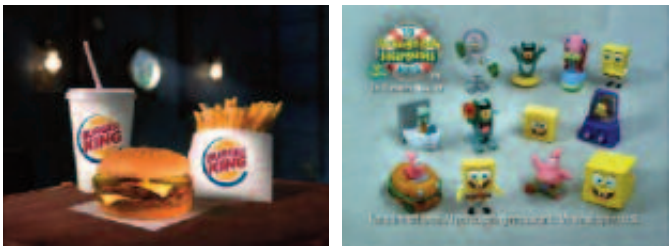
- All contain fewer than 130 calories;
- Virtually all meet FDA's definition for "healthy;"
- The vast majority are a good source of Vitamin D;
- Two-thirds of the cereals provide at least 8 grams of whole grains.

Figure 1: Sugar Content of Cereals Participants May Advertise to Kids



Quick Serve Kids' Meal Category. Another product category that has undergone significant changes over the years is quick serve kids' meals advertised to children. The changes in BKC and McDonald's pre-CFBAI and CFBAI advertised meals are striking, as illustrated in Figures 2-4. BKC's pre-CFBAI 2004 advertised Kids Meal included a double cheeseburger, French fries, soft drink and a toy, as seen in Figure 2.

Figure 2: Burger King Corp. 2004 Kids Meal (pre-CFBAI)



Under the CFBAI, all BKC Kids Meals now advertised to children meet strict nutritional criteria. The meal depicted in Figure 3, one of four currently permitted under its pledge, is only 330 calories (well under its limit of 560), has less than 15% fat, and 525 mg sodium. It provides a full serving of fruit, 48% of the DV of calcium and 19% DV of potassium (both shortfall nutrients). Since the introduction of the product in July 2008, BKC has sold more than 29 million servings of its BK® Fresh Apple Fries.

Figure 3: Burger King Corp. 2009 Kids Meal (CFBAI)

As seen in Figure 4, McDonald's original Happy Meal from 1979 featured fries and a soda and contained 630 calories. The current chicken nugget Happy Meal (also depicted in Figure 4) contains only 395 calories,[25] features sliced apples and low-fat white milk, thus providing two food groups recommended for increased consumption (fruit and low-fat dairy),[26] as well as 30% of a child's daily need for calcium. More than 100 million orders of Apple Dippers have been purchased in Happy Meals since January 2008.

Figure 4: Changes in McDonald's Advertising

1979 – 630 Calories

2009 – 395 Calories

C. Positive Nutritional Contribution of Products Advertised to Children: May–June 2010 Kids' TV Programming Study Results

We analyzed advertising that appeared during 38.5 hours of children's television programming that aired during May-June 2010, a follow-up to a similar analysis that we conducted and reported on in 2009.[27] As in our 2009 analysis, we determined whether products provided at least a good source of one or more shortfall nutrients for children (calcium, potassium, fiber, magnesium or Vitamin E), or provided at least a half-serving of fruit, vegetables, low-fat dairy or eight grams of whole grains (i.e., food groups the 2005 DGAs recommend for increased consumption).[28] In addition, this year we considered whether 50% of the grains in participants' grain-containing products were whole grains.

As a preliminary matter, our analysis showed that food ads accounted for only 24% of the total amount of ads during kids' programming. We also found that ads for sedentary entertainment were far more prevalent than foods ads (roughly twice as many).[29] Of the food ads, the participants' products and ads continued to represent a substantial percentage of the total. Specifically, as seen in Figure 5, 79% of the *ads* were for participants' products (271 of 344 total *ads*) and 73% of the *products* were participants' products (45 out of the 62 *products* advertised).[30] The 2010 results showed a small increase in participant advertising and share of total products compared to non-participant advertising and products in 2009.[31] All the participants' child-directed products were compliant with their pledges and met their own BBB-approved nutrition standards.[32]

Figure 5: Analysis of Advertising During 38.5 Hours of Children's Programming: Comparison of CFBAI Participant and Non-CFBAI Participant Advertising

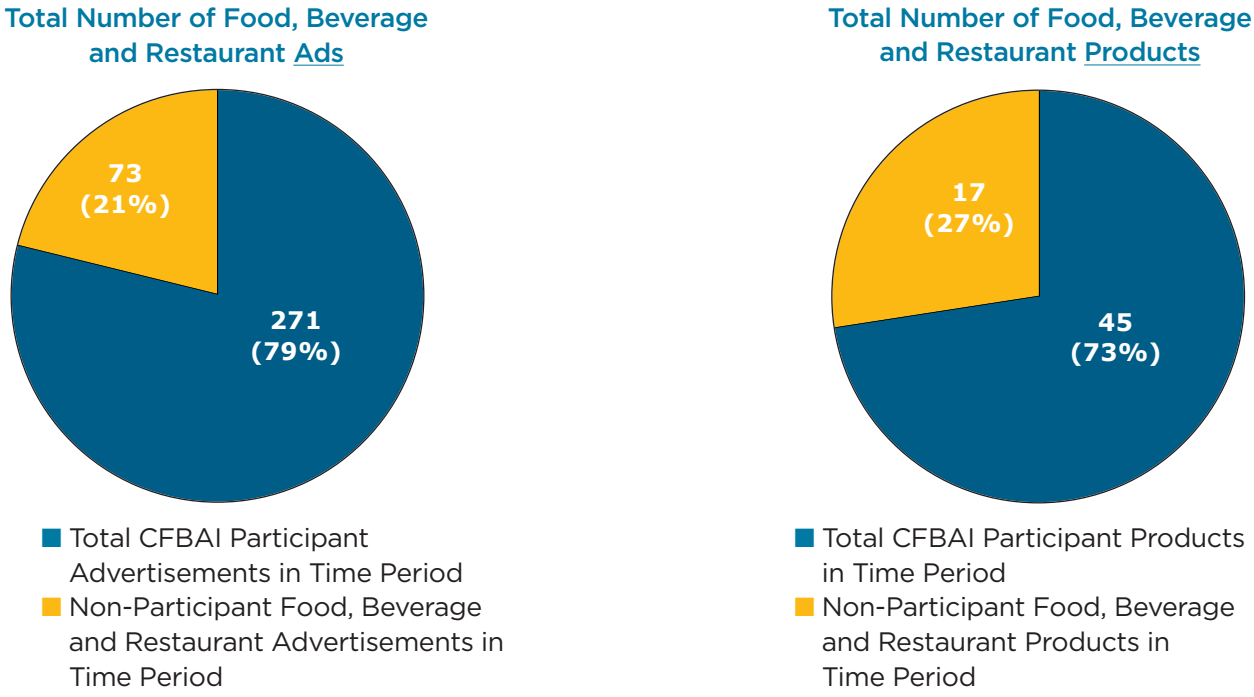
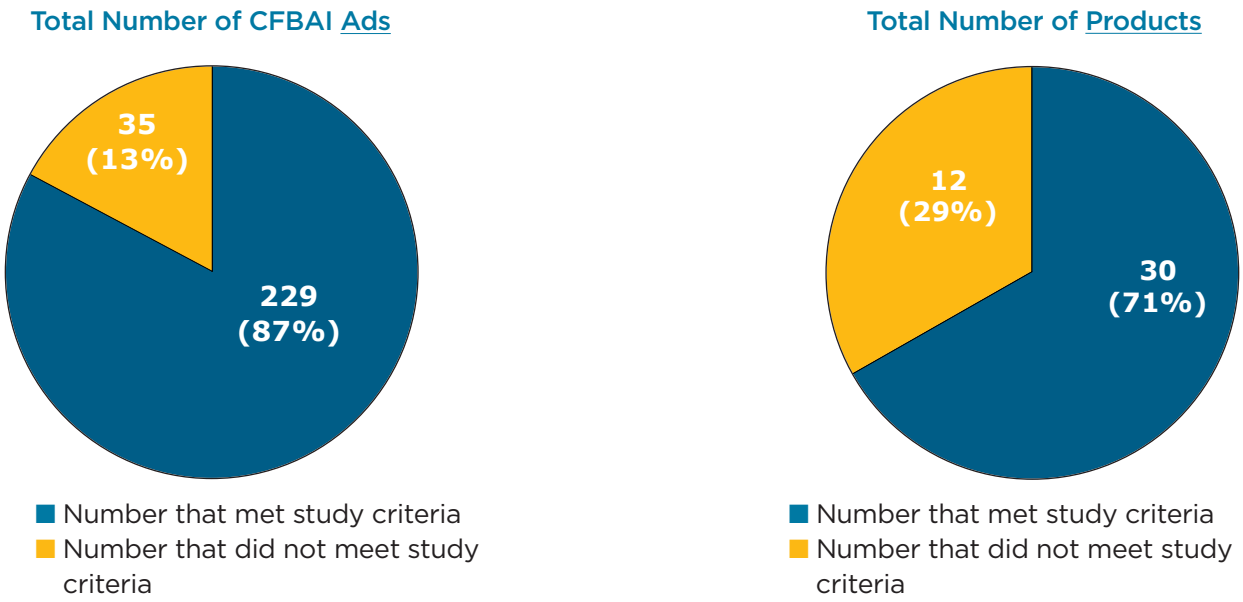


Figure 6: Analysis of Advertising During 38.5 Hours of Children's Programming: CFBAI Participant Child-Directed Ads/Products That Provide at Least a Good Source of a Nutrient Shortfall for Children or a Food Group to Encourage



As seen in Figure 6, 87% of participants' child-directed advertising and 71% of the products provided at least a good source of one shortfall nutrient or a food group to encourage. These results are very comparable to those we reported in 2009, when we found that 83% of ads and 67% of products met this standard.[33] Moreover, this year we found that more than half of this group met the study criteria in at least two ways.

We observed some company-specific nutrition enhancements, as well. For example, we found General Mills advertised seven cereals on TV in both 2009 and 2010. The sugar content of four of these seven cereals (representing 33 ads) has been reduced by one gram of sugar per serving each since our 2009 study. Three of the four cereals that Kellogg advertised in 2010 now provide a good source of fiber and two provide at least 8 grams whole grains per serving (a half-serving), which they did not at the time of our 2009 analysis.

Our analysis showed that participant ads included the following:

- Apples. 64 or 24% included apples or applesauce.
- Milk. 55 or 21% included milk.
- Vegetables. 22 or 8% were for products that included at least a half-serving of vegetables.
- Whole Grains. 71 or 27% were for products or meals that included at least 8 grams of whole grains/50% whole grains.
- Yogurt Products. 31 or 12% featured low-fat yogurt products.

Overall these results showed that ads directed to children under 12 by CFBAI participants usually are for or include nutrient dense foods that also meet reasonable limits on calories, fats, sugars and sodium. These positive changes have occurred with company-specific nutrition guidelines that CFBAI permits. We also looked at whether participants' products advertised on TV to kids meet third-party standards, as discussed below.

First, we evaluated whether a product contains no more than 35% calories from fat, no more than 10% calories from sat/trans fat, and no more than 35% added sugar by weight as well as positive nutrients.[34] We then re-did the analysis substituting 12 grams added sugar in place of the 35% by weight criterion. We found that:[35]

- 55% of participants' ads met the 35-10-35 criteria;[36] and
- 83% of participants' ads met this standard when we used a 12 grams added sugar per serving limit rather than a 35% by weight sugar standard.

Second, we looked at whether the ads were for or included a "Go" product as described in a table developed by HHS. The Go, Slow, Whoa table describes a "Go" food as one that is low in fat or sugar and can be eaten almost anytime. Although this tool has severe limitations for measuring the steady, incremental change that is the program's goal,[37] it has been used to evaluate the progress of self regulation.[38] We believe, however that the results reported by others do not capture the progress that is occurring under the CFBAI at least in part because of the way the researchers apparently coded participants' ads. Accordingly, we coded ads in our snapshot based on whether the ad was *for or included* a "Go" product.

Our study showed that kids watching children's television programming *regularly*, not *rarely*, as previously reported, will see food ads that feature or include "Go" foods such as milk, yogurt, apples, applesauce, and vegetables (as a separate dish within a meal, or as part of a combination product, such as canned pasta).[39] We continue to believe, however, that the most appropriate way to measure change under self regulation is to look at the meaningful nutrition standards that the participants are using, the reductions that are occurring in nutrients to limit, and the increases in positive nutrients and food groups to encourage in products advertised to kids.

Endnotes

[12] For example, Campbell has committed to substantial sodium reductions across its products lines (Jan. 11, 2010 press release, available at www.campbellsoupcompany.com); ConAgra Foods has committed to reducing salt across its portfolio (including brands that advertise or may advertise to children under 12) by 20% by 2015; General Mills committed in December 2009 to further reduce the sugar content of cereals advertised to children to single-digit grams per serving; Kellogg announced that the vast majority of its U.S. ready-to-eat cereals will be at least a good or excellent source of fiber by the end of 2010; in March, Kraft Foods reported plans to reduce sodium by an average of 10% across its North American portfolio over the next two years and, in July 2010 announced that it will double the whole grain content of its Nabisco crackers over the next three years. Thirteen participants also are members of the Healthy Weight Commitment Foundation (HWCF), which in May 2010 announced a goal of reducing calories in the marketplace by 1.5 trillion by 2015 (press release available at www.healthyweightcommit.org/news/Reduce.Annual.Calories.) The calorie-reduction initiative is part of HWCF and its members' multi-pronged effort to help American families reduce the calories they consume while increasing the calories they expend. The 13 CFBAI participants, Campbell Soup Company; The Coca-Cola Company; ConAgra Foods, Inc.; General Mills Inc.; The Hershey Company; Kellogg Company; Kraft Foods Global, Inc.; Mars; Nestlé USA, Inc.; PepsiCo, Inc.; Post Foods, LLC; Sara Lee Corp.; and Unilever, are part of a larger group that includes other manufacturers, associations, food retailers, and foundations that are partnering to reduce obesity, especially childhood obesity, by 2015.

[13] BBB employs as a consultant a distinguished Registered Dietitian with a Ph.D. She regularly assists the CFBAI in evaluating the participants' nutrition criteria and products.

[14] A synopsis of Participants' Nutrition Standards is attached as Appendix B. A lengthier discussion regarding how participants define their better-for-you products is available in CFBAI's 2008 Report.

[15] The Report of the Dietary Guidelines Committee on the Dietary Guidelines for Americans, 2010 ("DGAC Report") identifies Vitamin D as an under-consumed nutrient for children and adults. DGAC Report at D2-21.

[16] Two peanut butters are at 210 calories.

[17] Appendix C lists participants' approved products.

[18] The meal's sodium content, while well under BKC's 600 mg limit, is slightly higher now (525 vs. 505 mg), reflecting the higher sodium content of fat-free milk.

[19] In July 2010, BKC introduced a breakfast meal for kids, the Kids Breakfast Sandwich, which includes an egg and cheese on an English muffin, with calcium-fortified apple juice and BK® Fresh Apples Fries with low-fat caramel dipping sauce.

[20] "In-Restaurant Merchandising" means commercial messages that are primarily directed to children under 12 at BKC restaurants that are printed on merchandising elements such as door decals, under counter banners, Kids Meals bags and Kids crowns.

[21] During 2007-2008, many of Campbell's kids' soups were qualified as better-for-you on the basis that they had 25% less sodium than a reference product. During 2009 Campbell also could advertise its 25% Less Sodium Chicken Noodle Soup, based on its sodium reduction compared to other leading soups, although it did not feature this product in advertising primarily directed to children under 12. Campbell's 2010 pledge no longer provides for qualification on this basis.

[22] Appendix G includes a depiction of the sugar reduction of some of General Mills cereals that are on the CFBAI approved product list.

[23] Although Gatorade and some Frito-Lay products meet its nutrition standards, PepsiCo's 2010 pledge states it does not plan to advertise these products to children under 12 in 2010.

[24] Only three cereals contain 12 grams of sugar per serving. Last year the list contained 14 cereals with 12 grams of sugar per serving. Eleven of those cereals have been taken off the list.

[25] The hamburger Happy Meal with Apple Dippers with low-fat caramel dip and low-fat white milk contains 455 calories.

[26] About one-third of Happy Meals sold include apples, milk, and/or apple juice, according to the company.

[27] See CFBAI 2008 Report at 13-15.

[28] *Dietary Guidelines for Americans 2005* at 5-6, *available at* www.healthierus.gov/dietaryguidelines. The Whole Grain Council discusses what constitutes a serving of whole grains at http://www.wholegrainscouncil.org/whole-grains-101/what-counts-as-a-serving.

Endnotes, contnued

[29] This finding is consistent with the results reported in the more comprehensive 2007 FTC Bureau of Economics Staff Report, which found that ads for sedentary entertainment (which included ads for TV programming or movies, games and toys) outnumbered food ads approximately two to one. "Children's Exposure to TV Advertising in 1977 and 2004," FTC Bureau of Economics Staff Report (June 2007) at 64, available at http://www.ftc.gov/opa/2007/06/childrenadsstudy.shtm.

[30] The number of ads is greater than the number of products because some products were advertised multiple times.

[31] Specifically, 79% of total ads were participant ads in 2010 compared to 70% in 2009, and participants' share of total products advertised increased to 73% from 68% in 2009.

[32] Due to a network mistake, several adult-targeted ads of one participant mistakenly aired during children's programming. The products did not fall under any of the participant's product categories for which it has established nutrition criteria. Although we did not include these products in the nutritional analysis, two products would meet our study's nutrition criteria, and the other products contain vegetables and fruits in smaller amounts than specified in our study.

[33] Although many products from the 2009 data sample also were in the 2010 results, the 2010 data sample also included products not found in the 2009 data.

[34] This analysis was based on the standard the Center for Science in the Public Interest (CSPI) used in a report that analyzed food ads on 28 hours of Nickelodeon programming. See "Better-For-Who? Revisiting company promises on food marketing to children" (Nov. 2009) ("CSPI 2009 Report") at 7. As in the CSPI study, we did not include participants' ads for beverages. We counted all relevant positive nutrients whether they were added to the product or naturally occurring.

[35] The 12 grams of added sugar per serving limit was adopted as part of CSPI's negotiated settlement with Kellogg in 2007. At that time, CSPI praised the 12 gram standard and urged other food companies to adopt it. See "Kellogg Makes Historic Settlement Agreement, Adopting Nutrition Standards for Marketing Foods to Children," CSPI Press Release (June 13, 2007), available at http://www.cspinet.org/new/200706141.html. We included this analysis for informational purposes because of the weight that CSPI has given this standard.

[36] CSPI reported that 28% of CFBAI participant ads (and only 2% of non-CFBAI participants' ads) met its standard. We do not know exactly why the two studies' results differ so greatly, but several factors may play a role. First, CSPI looked at advertising in 2009, while our sample is from May-June 2010. Accordingly, more reformulated and/or new products may be in the 2010 sample. Second, the nutritional criteria in the CSPI standard vary according to product category. It is possible that we placed a product in a different product category than CSPI for nutritional analysis purposes. Third, CSPI's report notes that it did not include brand ads, a category it described as ads "with little or no depictions of food." CSPI 2009 Report at 7. We included all ads that included food, and thus it is possible that we included ads CSPI excluded.

[37] The table was originally developed for those looking for heart-healthy choices and over the years has come to be used for general dietary guidance. However, the guidance is not entirely consistent with the government's leading source of dietary guidance, the DGAs, and in some instances conflicts with the DGAs. Further, because it is a listing of food groups, it inherently cannot track the progress of reductions in calories, fats, sugars or sodium that are occurring in foods that participants advertise to children.

[38] Kunkel, McKinley, Wright "The Impact of Industry Self-Regulation on the Nutritional Quality of Foods Advertised on Television to Children" ("Children Now Report") (Dec. 2009) at 6.

[39] The ads also may have depicted "Slow" or "Whoa" foods. Our coding, however, recorded whether "Go" foods were included in the ad.

IV. The Marketplace of Food Advertising to Children Under 12

When participants join the CFBAI, they are required to submit a proposed pledge that describes how they intend to meet the CFBAI's "Core Principles." A threshold element of each pledge is defining what the participant means by "advertising primarily directed to children under 12." In our past reports, we have explained why the CFBAI did not seek to set a uniform standard when the Initiative was started and how participants' definitions have worked well to define child-directed advertising.[40] Notwithstanding our findings that participants tended to advertise their better-for-you products or not advertise during the same programming, concern regarding facially different definitions persisted.

As described in Part A below, we have worked with participants to set a goal that definitions include or not exceed a threshold of 35% children 2-11 in the audience. We used 35% as the threshold because that is the percentage that BBB's Children Advertising Review Unit (CARU) has traditionally used, along with other factors, in determining whether advertising is children's advertising under its program. As a result of these efforts, we have substantially harmonized the definitions.

Although not a CFBAI requirement, six participants had pre-existing policies to not advertise to children under age six. Because this is not a CFBAI requirement, we have not monitored compliance with those policies. Some participants, however, voluntarily submitted information about their compliance with those policies and we reported on those submissions in our prior reports. This year, as described in Part B, five additional participants adopted such policies. Because such policies are now prevalent among the participants, we have agreed to monitor and report on compliance with such policies.

Part C of this section describes trends that recent studies have identified in children's exposure to food advertising. This discussion also assesses the continued significant role played by CFBAI participants in the marketplace of food advertising during children's television programming, which is still the primary venue for advertising to kids under 12.

A. Defining Advertising Primarily Directed to Children Under 12

Most of the participants' definitions of "advertising primarily directed to children under 12" are tied to audience composition percentages.[41] This means that their CFBAI-approved foods may be advertised, or that no advertising may be placed, on programming that has at least "x" percentage children ages 2-11 in the audience. Following a comprehensive review by CFBAI of the existing definitions and after extensive discussions with participants, in September 2010 CFBAI announced amendments to the pledges of many CFBAI participants regarding their respective definitions of advertising primarily directed to children under 12.[42] As a result of these changes, 15 of the 17 CFBAI participants now use or include a 35% audience percentage in their definitions.

Three participants reduced their definitions from a 50% to a 35% standard, one participant that had used an "index" measure changed to a 35% standard, and one company that used a multi-factorial analysis added the 35% audience definition to its analysis. The CFBAI's newest member, Sara Lee Corporation, has committed to using a 35% threshold. Five companies already used a 35% threshold, and others have a lower threshold. Cadbury Adams, which uses a 50% audience definition, has been acquired by Kraft Foods and will be covered by Kraft Foods' pledge and 35% definition no later than January 1, 2012. PepsiCo continues to use a multi-factorial analysis that is very rigorous and that always has included consideration of audience demographics.

The voluntary change by many to a threshold no higher than 35% and the well-implemented policies of others to limit advertising to better-for-you products or avoid advertising on children's programming regardless of the percentage of children in the audience shows that the spirit as well as the letter of pledges is being honored.

B. New Company-Specific Policies Regarding Advertising to Children Under 6

When they joined the Initiative, many participants had long-standing policies not to target advertising to children under six,[43] and several companies reported on their compliance with this policy. The CFBAI urged participants to consider such policies as part of their review of issues related to the definition of advertising primarily directed to children under 12. As a result, five additional participants adopted or codified existing policies not to engage in advertising primarily directed to children under six,[44] and two companies with existing policies strengthened their audience definitions to 35% from 50%.[45] A policy of not advertising to children under six is not, however, a CFBAI requirement. But, now that such policies are prevalent, with 11 companies having policies not to engage in advertising primarily directed to kids under six, the CFBAI will monitor and report on these commitments.[46] Of course, participants that choose to advertise to children under six will advertise only their CFBAI better-for-you foods.

C. The Changing Marketplace of Food Advertising to Children

The participants represented a substantial portion of child-directed food and beverage advertising at the inception of the Initiative, and they continue to do so. At the outset, the 10 original participants were estimated to represent at least two-thirds of the television advertising expenditures for food and beverage advertising to children in 2004.[47] Since then, an analysis conducted by Georgetown Economic Services (GES) indicates that food, beverage and restaurant advertising from participants (15 companies at the time of the GES Report) represented more than 80% of the food, beverage and restaurant advertising that children 2-11 saw on children's programming during 2007.[48] Additionally, other groups that have looked at food advertising on children's television programming have reported that a substantial majority of food ads are CFBAI participants' ads.[49] CFBAI's informal analysis of food and beverage advertising conducted in 2009 and 2010, discussed in Section III of this Report, also found that the overwhelming majority of food ads were for participant products, as well as the vast majority of total products. The percentage of the child-directed advertising market the participants represent is not, of course, a static number or one that automatically increases with the addition of new participants.[50] But there is little question that CFBAI participants represent the majority of advertisers who engage in child-directed food and beverage advertising on TV and in other major media.

Although it is not our goal to reduce food advertising to children, but to change it, we believe any discussion of the impact of self-regulatory efforts should consider the ongoing reductions in food advertising to kids, which began declining even before the Initiative launched. For example, an FTC Report found that the amount of food and beverage ads children are exposed to declined significantly between 1977 and 2004, as did the amount of child-directed food and beverage ads.[51] More recent data show this trend is continuing, with further declines from 2004 to 2008. Specifically, a recent GES study noted that children viewed 31% fewer ads for food, beverages and restaurants on children's programming from 2004 to 2008, with the average child seeing 60% fewer ads for snacks and 82% fewer ads for cookies during children's TV.[52] Other sources also have noted declines in child exposure to advertising for many food and beverage categories.[53] The overall decline in food advertising to children and the relative percentage of food advertising as a proportion of the total amount of advertising to children under 12 is important to consider when assessing food advertising to children.

Endnotes

[40] Even prior to the Initiative, many of the participants needed definitions because they had policies to subject child-directed advertising to additional legal review. Many also are long-time CARU supporters, committed to engaging in responsible and ethical advertising to children. Some of them also use the pre-screening advertising services that CARU offers supporters. More information on how CARU and CFBAI, two separate, but complementary, children's self-regulatory programs work together to promote responsible advertising and healthy diets and lifestyle is explained in a fact sheet attached as Appendix D.

[41] The overwhelming majority of advertising directed to children under 12 takes place on measured media — TV, print, radio and Internet — for which Nielsen Co. and others provide specific demographic data. Determining whether advertising is primarily directed to children under 12 in non-measured media, where there may not be demographic data, typically involves assessing the net impression of the ad or site, including the overall effect of the content, language, graphics, pictures and features.

[42] A summary of these changes is provided in Appendix E.

[43] Six companies (General Mills, Kellogg, Kraft Foods, Nestlé, Post and Unilever) had existing policies to not direct advertising to children under six, and four companies (Cadbury, Coca Cola, Hershey and Mars) do not engage in advertising primarily directed to children under 12 and thus do not engage in advertising primarily directed to children under six.

[44] The five companies are BKC, Campbell (which codified an existing policy in its pledge), ConAgra Foods, Dannon and PepsiCo. The participants' under 6 policies are summarized in Appendix E.

[45] General Mills and Kellogg strengthened their policies.

[46] We previously have observed that many participants do not engage in child-directed advertising during weekday school hours, when the primary child audience is preschool age. See 2008 Report at n. 61.

[47] *See* BBB Press Release dated July 18, 2007, available at http://www.bbb.org/us/children-food-beverage-advertising-initiative/info/.

[48] *See* BBB Press Release dated Jan. 14, 2009 at http://www.bbb.org/uschildren-food-beverage-advertising-initiative/info/.

[49] For example, CSPI's 2009 Report found that 74% of Nickelodeon television food ads during a 28-hour period in 2009 were by CFBAI companies. CSPI 2009 Report at 7.

[50] A number of factors affect any estimate of the Initiative's marketplace penetration. For example, since they joined the Initiative, some participants have stopped advertising to children, and others have done less advertising than before. The amount of advertising by non-participants also will vary.

[51] *See* FTC's Report, "Children's Exposure to TV Advertising in 1977 and 2004" (June 1, 2007), available at http://www.ftc.gov/os/2007/06/cabebw.pdf.

[52] "GMA: More than Two-Thirds of the Advertisements Seen by Children and Teens Today Promote More Nutritious Foods and Healthy Lifestyles" (March 9, 2010), press release available at www.gmaonline.org/news. The GMA data was presented at the FTC Forum "Sizing Up Food Marketing and Childhood Obesity" (Dec. 15, 2009), available at http://ftc.gov/bcp/workshops/sizingup/presentations/Sophos.pdf.

[53] A Rudd Center Report noted declines of 25% in child exposure to advertising for all food and beverage products (excluding restaurant advertising), with declines of 45% or more in three categories traditionally advertised extensively to children (sweet snacks, carbonated beverages and candy). Rudd Center for Food Policy & Obesity, "Trends in Television Food Advertising: Progress in Reducing Unhealthy Marketing to Young People?" (Feb. 2010) at 4. A July 2010 article comparing ad exposure rates for children in three age groups (ages 2-5, 6-11 and teens 12-17) between 2003 and 2007 also noted sharp declines in exposure in most categories, with exposure to fruit drinks and regular soft drinks decreasing the most in the beverage category for all three age groups, and exposure to candy bar and cookie ads falling the most in the sweets category. There were also significant increases in bottled water and diet soda ad exposure, although the greatest increases were in exposure to full-service and fast food restaurant advertising. *See* Powell, Szczypka, and Chaloupka. "Trends in Exposure to Television Food Advertisements Among Children and Adolescents in the United States," Arch. Pediatr. Adolesc. Med., Vol. 164, No. 7 (July 2010) at 3-5.

V. Evaluation of Pledge Compliance

During 2009, the second full year of the CFBAI, 15 of the now 17 CFBAI participant pledges were fully implemented. The pledge commitments of the 16th participant, Post Foods, went into effect in October 2009 when the company joined the Initiative.[54] The CFBAI has found excellent compliance during 2009 by all participants with their CFBAI pledge commitments, with only a few minor problems that companies promptly addressed. In addition, we note that other evaluations of advertising directed to children reported near perfect compliance with CFBAI pledge commitments.[55]

This year's review found a handful of issues related to television advertising, and a few instances of problems with Internet advertising, both on company-owned websites and on third-party sites, that included or referred to non-approved products. There also were a handful of technical violations related to Internet advertising as one company brought one of its brands into compliance with its pledge and transitioned to featuring its qualifying products within the brand exclusively. None of these compliance issues represented egregious or willful pledge violations, and these problems were quickly addressed.

We believe that the high degree of compliance during the three years in which the Initiative has been operational is due to several factors. First, CFBAI is a voluntary effort and the companies that choose to participate are highly motivated to comply with their commitments. Second, our review of three years of compliance reports has found that participants engage in very thorough and ongoing efforts to educate their employees and agents regarding their respective pledge commitments. Third, the compliance reporting process itself is a useful tool for internal auditing.

Below we outline our methodology for assessing participants' compliance, which is similar to the methodology employed in our two previous progress reports, and discuss the few compliance issues that occurred during 2009. In light of the several years of excellent compliance and our prior reports, we are not providing an extensive and detailed company-by-company description of each company's respective training and compliance programs. However, we do provide an individual assessment of Post Food's pledge implementation because this is its first reporting year.

A. Methodology

To assess participants' compliance with their pledges, the CFBAI conducted independent monitoring of measured media and company-owned websites, and an in-depth assessment of detailed reports each participant submitted.[56] We also reviewed a report assessing advertising in media directed to children during 2009 that Accenture prepared for the International Food & Beverage Alliance (IFBA), which includes many CFBAI members.[57] The CFBAI followed-up with participants as needed on compliance issues we identified from our monitoring, which is described in more detail below.

Television Advertising. Television continues to be the predominant form of advertising to children, and the overwhelming majority of advertising to children under 12 takes place on the cable networks that devote most, if not all, of their programming to this age group.[58] The broadcast networks' child-targeted programming chiefly occurs in their Saturday morning dayparts. To assess compliance on television programming, we relied on several sources, as well as the Accenture report. First, we reviewed the results of monitoring that CARU independently conducts on an ongoing basis.[59] Second, we reviewed a random sample of advertising data on programming popular with children during the third and fourth quarters of 2009 that we obtained from The Nielsen Company.

Radio Advertising. CFBAI staff periodically listened to Radio Disney, which is generally recognized as the only radio programming primarily directed to children under 12.

Print Advertising. CFBAI staff examined all food and beverage ads in approximately 70 issues of seven print titles popular among children under 12.[60]

Internet Advertising. CFBAI staff also monitored an extensive list of third-party websites primarily directed to children under 12. Our list was based on sites that participants report using as well as sites that are facially directed at children or reported in the media as child-directed sites. We also periodically reviewed participants' websites, focusing on sites and micro-sites primarily directed to children under 12.

B. Compliance Assessment

Our review indicates that all of the companies were in substantial compliance with their pledges. We identified some technical problems (i.e., problems that did not involve the advertising to children under 12 of foods that did not meet participants' nutrition guidelines)[61] and a few compliance problems. This section of the report describes, by category, those issues we found during 2009. The categories are based on the pledge commitment requirements (i.e., Advertising in Measured Media and Company-Owned Websites, Interactive Games, Product Placement and Advertising in Elementary Schools).

1. Advertising in Measured Media and Company-Owned Websites

a. *Television advertising*. Even though television advertising represents the vast majority of advertising conducted, we found, as did the Accenture Report, very few problems.[62] On those occasions when our monitoring picked up a non-approved product in an ad, we followed-up with each company. In almost all instances, we found that there were not any compliance issues. As discussed in previous Reports, most of these instances involved unpredictable variations between the historical audience demographics at the time the advertising was purchased and when the ad aired.[63]

Advertisers generally make their media-buying decisions based on audience demographics for the prior year, and CFBAI accordingly assesses compliance based on time of purchase data (when audience composition is the basis of the participant's definition). The discrepancy between predicted and actual demographics occasionally can result in non-approved products appearing in advertising during programming that meets a participant's definition of advertising directed to children under 12. Because participants, as permitted, rely on audience composition based on information at time of purchase to direct ads to teen or adult audiences, not children 2-11, such ads do not violate their commitments.

We observed this time-of-purchase/time-of-airing discrepancy this year when our Nielsen data indicated that several adult or teen-targeted programs during the nick@nite programming block on the Nickelodeon network drew unexpectedly high under 12 audiences at the time-of-airing.[64] We observed advertising by several participants for products not on their CFBAI approved product lists during two programs, and followed-up with the relevant companies. Some companies reported that they purchased the media time based on daypart demographics, as is the industry practice, and at the time-of-purchase the under 12 demographic was below their audience thresholds. Others informed us that they had instructed the network not to place adult-targeted ads until a later hour in the evening on nick@nite, but the network mistakenly ran a few such ads earlier in the evening. Under these circumstances, the airing of these ads were not pledge violations.

Companies take great care regarding their ad placements to avoid such occurrences. For example, companies generally monitor their time-of-airing demographics carefully, and often will adjust their media buys to avoid advertising on specific programs or hours within dayparts even though it is possible the programs are within dayparts that do not meet their thresholds. One company even amended its internal guidelines to ensure that its ad placements avoided transition times between one program and the next when it was discovered that the transition time came close to, but did not cross, the company's threshold. As a result of this diligence, instances of non-approved product advertising on programming that meets participants' thresholds are rare.

Companies also honor the spirit, not just the letter, of their pledges in other ways. For example, although The Coca Cola Company used a 50% K2-11 audience benchmark at time of purchase, it also avoided media buys on networks or other media that skewed primarily to K2-11, even though certain programs or dayparts on the network may not have met its 50% threshold (now changed to 35%).

Other than time-of-purchase versus time-of-airing issues, we found only a couple of problems and most were attributable to third parties, not the company.

- *Local syndicate error*. BBB found several instances when General Mills' ads for products not on the company's CFBAI approved product list aired during a kids' programming block in a local market.[65] The company's investigation indicated that the ads appeared in error. Because of miscommunication within the station, a local station had expanded the company's original adult programming buy to include an hour of time during a kids' programming block. To correct this error, General Mills sought and obtained written acknowledgement by the local broadcaster that it is not to air General Mills' adult-directed advertising within child-directed programming. In addition, the company reported that it added provisions to its syndication agreements. Its buying agency also has instituted new procedures to ensure that ad placement on local stations adheres to its pledge commitments, including identifying the children's program schedule of each network supplying shows to local stations and adding those shows to the list subject to General Mills' advertising guidelines.

- *Network errors*. Several participants reported that a children's network did not follow instructions, on a small number of occasions, to restrict the airing of non-approved products until certain times in the evening. As a result, several adult-targeted ads for non-approved products aired during programming that met the companies' respective thresholds. McDonald's reported that several adult-targeted ads also appeared during holiday specials on ABC Family when that network did not follow restrictions the company had placed on airing such ads during these specials, based on their historical audience composition.

b. *Company-owned websites and Internet advertising primarily directed to children under 12*. Our monitoring of company-owned sites and popular third-party websites, and our review of the materials submitted by participants, found very good compliance.[66] There were only a few minor issues, which were quickly resolved:[67]

- *Kellogg Company's* pledge commitments regarding company-owned websites were implemented in 2009.[68] In 2009, the kid's section of the Pop-Tarts site initially included downloads of a few commercials for products that did not meet the company's nutrition guidelines. These ads were removed, and games and equity characters that included product names also were removed. In 2010, Kellogg removed the

brand from its list of products that could be advertised to kids and, after discussion with CFBAI staff, the company has decided to take down the kids' section of the Pop-Tart website site in the near future.

- *Kraft Foods* reported that several Lunchables promotional banner ads referred generally to the brand but did not identify a qualifying product. The company re-emphasized to the brand that banners ads directed to kids should include a product on their approved list rather than generally referencing the brand.

- *ConAgra Foods* mistakenly included one non-CFBAI approved Chef Boyardee product in the children's section of the company-owned website www.chefboyardee.com. This product was not advertised to children under 12 in measured media and has been removed from the children's section of the website.[69]

- *Burger King Corp*. conducted an adult-targeted sweepstakes related to the Kids Choice Awards where the adult-focused registration page was accessed from the ClubBK website, which is both child- and parent-directed,[70] and referenced codes found on a non-approved product. In subsequent promotions, the company revised the website to indicate even more clearly when promotions were directed to adults and ensured that the site only featured entry codes with approved products.

c. *Print advertising*. We identified no issues involving print advertising to children under 12. The Accenture Report also noted there were no instances of non-compliant products in the children's print titles it reviewed.

d. *Radio advertising*. Kraft Foods self-reported one instance in which a radio ad for Regular Kraft Singles did not include the word "Regular" to modify "Kraft Singles." It stopped the ad, added the modifier "Regular" and resumed the ad with the properly qualified product name. Campbell Soup reported that as a result of miscommunication with its media buying agency two mom-targeted ads that mentioned a soup not on the company's approved list aired on Radio Disney. The company has taken steps to work with its agency to ensure that this does not happen again. We found no other issues related to kid-directed radio advertising.

2. Licensed Characters

We found that participants used third-party licensed characters in conjunction with the advertising of only approved products in compliance with their CFBAI pledges. As of 2010, companies have expanded this commitment to include the use of celebrities and movie tie-ins in advertising to children under 12.

3. Interactive Games

In 2009, the CFBAI Core Principles required that where food or beverage products are incorporated into interactive games directed to children under 12 the games must include foods that meet the company's nutrition guidelines or healthy lifestyle messages.[71] These games are typically found on the company's own child-directed website, although some companies sponsor games on third-party websites or as a part of banner advertising on third-party sites. As in past years, we found excellent compliance with this pledge requirement. Kraft Foods reported that two Lunchables advergames that appeared on a third-party website initially referred only to the Lunchables brand but were revised to refer to a qualifying product.

4. Product Placement

Participants commit to not seek out or pay for product placements (of even their healthier products) in the editorial/entertainment content of any media primarily intended for children under 12 for the purpose of promoting those products. Companies reported that they met this commitment.

However, because directors independently may use products as stage dressing, our participants' commitments cannot guarantee that child-directed entertainment products will not include participants' food and beverage products, although we expect that this CFBAI requirement reduces product placements in child-directed media. Mars reported, for example, that it was offered a product placement opportunity for one of its brands in connection with a family-oriented animated movie. Although it declined the offer, the product was nevertheless featured in the movie without the company's knowledge or permission.

5. Advertising in Elementary Schools

The CFBAI requires that participants commit not to advertise branded food and beverage products to children in elementary schools. The CFBAI's limitation does not apply to displays of food and beverage products, charitable fundraising activities, public service messaging, or items provided to school administrators. These activities fall outside the CFBAI's objective of restricting advertising or commercial sales messages for food and beverage products directed to children in elementary schools.[72] There was excellent compliance with this commitment during the reporting period.

We observed that the companies that reported on activities covered by these exceptions made only minimal use of product messages, company equity characters or brand images.[73] Several participants continued to offer fund-raising opportunities in partnership with schools. Campbell's Labels for Education program, which donates equipment and education supplies to schools based on their redemption of proof of purchases, revamped its school collection boxes to remove any mention of the company or its brands. The collection boxes for General Mills' Box Tops for Education program similarly do not contain product messages or brand depictions. These programs, and other participants' fundraising support, provide substantial funds for schools. Pictures of the Campbell and General Mills' redemption boxes appear in Figure 7.

Figure 7: Redemption Boxes

General Mills Collection Bin

Campbell Collection Bin

As we reported last year, Kraft Foods participates in a program run by the company Terracycle, which recycles or "upcycles" used product wrappers, including juice pouches, into items such as tote bags and umbrellas, and then offers them for sale.[74] Terracycle provides collection receptacles to participating organizations, which receive money based on the number of packages they collect. The program and related materials are covered by the fundraising exception. Nevertheless, in response to an inquiry, in 2009 Kraft Foods revised a flyer intended for teachers found in the adult section of the Capri Sun website to eliminate brand references except to the extent necessary to identify the specific types of packages that are a part of the Terracycle program. When Kraft Foods learned that Terracycle had decided to upcycle all pouches it receives, the company decided it would not include any brand mentions in school materials going forward.

C. Post Foods

Post Foods' pledge commitments became effective on October 1, 2009, at the time it joined the Initiative.

Nutrition Guidelines. Post Foods' nutrition guidelines contain calorie, fat, sat fat, trans fat, sodium and added sugar limitations, and require that products provide at least 10% DV of fiber, 8 grams of whole grains, or a good source of at least six essential vitamins or minerals. The company reformulated the cereals it advertises to kids so that they now all provide an excellent source of Vitamin D.

Pledge Training. Post reported that it communicated its pledge obligations to key company personnel responsible for marketing to children, including the Vice President of Marketing, the Director and Product Managers of Kids Brands, the Director of Media, and outside agencies.

Marketing to Kids After October 1. Post reported that during the reporting period it advertised only two of its approved cereals on television. The company maintains two company-owned websites that contain advertising primarily directed to children under 12: www.postopia.com and www.beeboy.org. These websites refer only to products meeting its nutrition criteria, and these are the only products featured in interactive games on the websites. Post did not advertise on third-party Internet sites during the fourth quarter. The company reported that it uses licensed characters (the Flintstone characters) in child-directed advertising for two of its CFBAI-approved products, and that it complied with the CFBAI product placement and elementary school advertising commitments.

Endnotes

[54] Sara Lee Corporation joined the Initiative in September 2010, so this Report does not cover it.

[55] For example, CSPI's review of advertising on Nickelodeon in 2009 concluded that "100% of CFBAI ads adhered to each company's own nutrition standards." CSPI 2009 Report at 7. A report published by Children Now in December 2009 also found that "all participants in the [CFBAI] have complied with all aspects of their commitments regarding nutritional guidelines." Children Now Report at 24.

[56] Each participant submitted a comprehensive report that included either extensive documentation or summaries regarding what products it had advertised to children under 12 and where those ads had run. Our 2008 Report provided a detailed description of the information requested, which is virtually identical to the compliance information sought for this Report. *See* 2008 Report at 19. Therefore that information is not repeated here.

[57] IFBA commissioned Accenture to monitor its members' compliance with their children's advertising commitments. Accenture monitored 12 markets (including the U.S.) for television and print advertising in the first and second quarters of 2009, and six markets (including the U.S.) for Internet advertising during the third quarter of 2009. The Accenture report is available online at IFBA's website, www.ifballiance.org/.

[58] These networks are: Nick, Nicktoons, Cartoon Network, Disney XD (formerly Toon Disney).

[59] CFBAI gratefully acknowledges the assistance of CARU staff in this effort. CARU staff monitor children's television programming on an ongoing basis and send CFBAI a listing of the food and beverage product advertising they observe with a notation of the program, network and time of day the ad appeared.

[60] CARU maintains subscriptions to most of the titles and sends CFBAI all food and beverage products ads. CFBAI staff also separately reviewed other children's magazines that were available in local libraries.

[61] One company did not submit products to BBB for review or inclusion on its list prior to advertising them to children. This is a technical issue rather than a substantive problem because the products advertised in fact met the company's nutrition guidelines.

[62] Accenture analyzed ads that aired between February and April 2009 on programming where more than 50% of the audience was children under 12. The report found a compliance rate in the U.S. of 99.93%. The very slight non-compliance is the result of the inclusion of ads that ran between 9 pm and 6 am where occasionally more than 50% of the audience consisted of children under 12. The report states that these occurrences represented statistical anomalies caused by small audience sizes.

[63] Our 2008 Report discussed the time-of-purchase versus time-of-airing issues at length. *See* 2008 Report at 23-24.

[64] These shows aired after 9 pm on a Wednesday and a Friday evening.

[65] These products included chocolate chip cookies, light soups, steamed vegetables and taco shells.

[66] A listing of company-owned, child-directed websites can be found at Appendix F. Many sites include images of unbranded foods, which also are permitted under the CFBAI principles. For example, BKC's ClubBK site, ConAgra Foods' Kid Cuisine site and several of General Mills' kid-directed websites feature generic food items such as fruit, dairy and other foods. General Mills also maintains two websites, www.choosebreakfast.com and www.mightygiants.com, that feature only generic images of food.

[67] Our finding is consistent with the Accenture Report, which reviewed popular websites and found only one non-compliant product advertised on one children's website during its June-August 2009 review. Accenture Report at 3.

[68] The company's pledge requires that it employ age-screening and seek parental consent on kid-targeted websites that include products not on its approved list. In addition, the pledge commits that products featured in any online activity would be only foods that meet Kellogg's nutrition standard.

[69] The Chef Boyardee Pizza Kit was inadvertently left on a downloadable feature on the website. In 2009 ConAgra Foods removed the Pizza Kit from its list of products meeting its pledge nutrition guidelines because the kits did not fit into a delineated category of ConAgra Foods' nutrition guidelines. In addition, as we reported last year, in 2009 ConAgra Foods revised the landing page of www.kidcuisine.com to more clearly distinguish the respective adult/parent and kid sections and took quick action to remove references to and images of a non-qualifying SKU in a game on the website. A 2009 Monsters v. Aliens movie promotion related to the Kid Cuisine products included online game instructions that mentioned a non-qualifying product, which the company promptly removed.

[70] Although the company included age-screening to prevent access to the promotion by kids under 12, the age screening mechanism briefly failed to work properly for some users, a programming glitch the company promptly corrected.

[71] Of course, this does not mean that companies *must* include a company's food products, and some companies do not include their products in games. For example, McDonald's and Burger King Corp. do not incorporate their respective branded food or beverage products in interactive games directed to kids under 12.

[72] The CFBAI issued a Fact Sheet on the Elementary School Principles in 2009 to provide greater clarity about the scope and coverage of the CFBAI's restriction on advertising branded food and beverage products to children in elementary schools. The Fact Sheet explains that the CFBAI takes an expansive view of the scope of the elementary school setting, covering the entire elementary school, not just the classrooms. To view the Fact Sheet, visit http://www.bbb.org/us/children-food-beverage-advertising-initiative/.

[73] Due to pre-pledge contract obligations, the Nestlé Push-Up brand engaged in limited in-school activity in the spring of 2009 and its website included classroom materials that featured product depictions. The promotion ended in September 2009.

[74] Terracycle, not Kraft Foods, sells the items created from recycled packaging.

VI. Looking Ahead

The significant enhancements to the Core Principles during the last year, the extensive harmonization of audience definitions, the strengthening of nutrition standards, product improvements, and an increase in the number of program participants show that the CFBAI is meeting its goal to change the landscape of food advertising to children. Although much progress has been made, there continues to be room for further improvement.

To ensure that the Initiative continues to support the national goal of reducing childhood obesity, the CFBAI will focus on two tasks in the coming months. First, we will continue to seek to increase the number of companies participating in the program. Second, we plan to hold a formal review as a group to assess anticipated nutrition science and regulatory guidance and developments. Of course, we will continue to maintain our outreach to and consider feedback about the Initiative from government agencies, non-governmental organizations, and others.

Expanding CFBAI's Reach. The CFBAI continues to reach out to non-participants to increase our representation in the marketplace. Although our current members already represent the majority of food advertisers on television, which is the dominant form of advertising to children under 12, we are hopeful that we can further increase our impact.

Continuing to Ensure that Nutrition Standards Are Meaningful and Relevant. Through their pledge commitments, CFBAI participants have committed to advertising only products that meet their company-developed nutrition standards. These standards have resulted in significant changes in the foods advertised to children both with regard to reductions in nutrients to limit and increases in positive nutrients and food groups to encourage. Specifically, extensive reformulation efforts have resulted in significant reductions in calories, fat, sodium and sugars in many products advertised to kids. At the same time, the nutrient density of the products participants advertise to kids is improving with many providing shortfall nutrients (or other essential vitamins and minerals) and food groups to encourage.

The CFBAI Core Principles require that the standards participants use be "consistent with established scientific and/or government standards." Many participants base their criteria on the 2005 DGAs. Because the government will be updating its dietary advice for citizens through the 2010 DGAs at the end of this year, we will be conducting a Nutrition Science Review in early 2011. This review will provide our participants an opportunity to consider, as a group, the implications for our standards of any changes in that and other nutrition science guidance, particularly the work of the Interagency Working Group. We also will consider the encouragement we have received to adopt uniform nutrition criteria.

We continue to be mindful that childhood obesity is a national epidemic 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.

Appendix A — CHILDREN'S FOOD AND BEVERAGE ADVERTISING INITIATIVE PROGRAM AND CORE PRINCIPLES STATEMENT

I. Introduction

Companies engaged in advertising and marketing food and beverage products have developed this self-regulatory initiative for advertising such products to children under 12. The goal of this initiative is to use advertising to help promote healthy dietary choices and healthy lifestyles among American children. While it remains the primary responsibility of parents to guide their children's behavior in these areas, industry members are voluntarily pursuing this initiative as a means of assisting parents in their efforts.

This document was first issued in November 2006 when the Council of Better Business Bureaus (BBB) and 10 charter companies launched the Children's Food and Beverage Advertising Initiative (CFBAI). During 2009, BBB and 15 of the then 16 participants reviewed the program and made a number of enhancements to the scope of the advertising commitments, reflected in the Second Edition of this document, which became effective on January 1, 2010.[1] This, the Third Edition of the CFBAI Program and Core Principles Statement, contains additional information about the definition of "advertising primarily directed to children under 12." A number of participants have revised their definitions and now an audience threshold of no higher than 35% children 2-11 is generally being used.

This document consists of four parts. Part II describes the Core Principles. All participants agree to make commitments that are consistent with these principles. Part III describes the administrative elements of the program. Part IV describes an additional commitment regarding not advertising to children under six that some participants have made and that the CFBAI has agreed to monitor and oversee.

II. Core Principles

Companies participating in this initiative will publicly commit to advertising that will further the goal of promoting healthy dietary choices and healthy lifestyles to children under 12. These commitments will be set forth in an individual "Pledge" for each participant. Because companies and their product lines vary, company commitments also will vary. All commitments, however, will be consistent with the following Core Principles:

A. Advertising, Interactive Games, Licensed Character, Product Placement and Elementary School Requirements

(1) **Advertising Primarily Directed to Children Under 12.** Participants will commit that all "advertising primarily directed to children under 12" will be for healthy dietary choices, or better-for-you products, in accordance with company-developed standards that are consistent with established scientific and/or government standards.[2]

Measured Media. This principle applies to advertising in measured media:

- Television
- Radio
- Print
- Internet (third-party websites).

Child-Directed Content. This principle also applies to advertising that is primarily directed to children on:

- Company-owned websites or micro-sites primarily directed to children under 12
- Video and computer games that are rated "Early Childhood" or "EC," which are inherently primarily directed to children under 12, and other games that are age-graded on the label or packaging as being primarily directed to children under 12

- DVDs of movies that are rated "G" whose content is primarily directed to children under 12, and other DVDs whose content is primarily directed to children under 12.

Mobile Media and Word of Mouth. This principle also applies to advertising that is primarily directed to children under 12 on cell phones, PDAs, and through word of mouth.[3]

(2) **Use of Products in Interactive Games**. Participants will commit that, in any interactive game provided free or at nominal charge (in whatever format, online, disk or cartridge) primarily directed to children under 12 where the company's food or beverage products are incorporated into the game, the interactive game will incorporate or be accompanied by healthy dietary choices or better-for-you products.

(3) **Use of Licensed Characters, Celebrities and Movie Tie-Ins**. Participants will commit that the use of third-party licensed characters, celebrities (including athletes) and movie tie-ins in advertising primarily directed to children under 12 will be consistent with their advertising commitments.[4]

(4) **Product Placement**. Participants will commit to not paying for or actively seeking to place their food or beverage products in the program/editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products.

(5) **Advertising in Elementary Schools**. Participants will commit to not advertising branded food or beverage products in elementary schools, pre-K through 6th grade.[5]

B. Definitions

The participants are permitted, within reasonable limits and subject to CFBAI review and approval, to define "advertising primarily directed to children under 12" and the nutrition standards that determine what products may be depicted in such advertising. Below we summarize the types of approaches that participants are using and provide examples of established scientific and/or government standards that companies may use to define healthy dietary choices or better-for-you products.

(1) **Advertising Primarily Directed to Children under 12**.

- For "measured" media this means advertising in dayparts for which children 2-11 constitute 25% to 50% of the audience at the time of the media buy, depending upon the participant. An audience threshold of no higher than 35% is used by most participants. Some participants also include supplemental measures to identify "advertising primarily directed to children under 12."[6]
- For advertising in non-measured media, determinations will be made in accordance with standards established by the company or set forth in its pledge. Participants may use an analysis of factors, including the overall impression of the advertising, the target demographic based on the company's media plan, actions taken to restrict child access, such as age-screening, and the audience definition for measured media. For example, participants may consider the percentage of children under age 12 viewing in-cinema G-rated movies that are now on DVDs, the content developer's designation and description of the expected target of mobile or PDA content, or the percentage of children viewing TV content that has been adapted for mobile media.

(2) **Standards for Determining What Are Healthy Dietary Choices or Better-for-You Products**. Examples of established scientific and/or government standards that companies may use to define healthy dietary choices or better-for-you products include:

- FDA defined "healthy" foods [21 C.F.R. 101.65(d)(2)]
- Products that qualify for an FDA authorized health claim [21 C.F.R. 101.70-101.83]
- Products meeting FDA/USDA criteria for claims of "free," "low," or "reduced" for calories, total fat, saturated fat, sodium or sugar
- Products that qualify for the USDA Healthier School Challenge Program criteria for Sales/Service of A La Carte and/or Vended Items
- Principles addressing recommended consumption by children under 12 under USDA Dietary Guidelines and MyPyramid
- Products representing a portion control option, such as products advertised and sold in a package size of 100 calories or less.

C. Implementation

Each Pledge will include an implementation schedule for each commitment made by the participant.

III. Administration and Oversight

(1) **Pledge Development**. Company Pledges, including the specific commitments that will identify the healthy dietary choice or better-for-you product criteria, are established in consultation with the BBB-administered CFBAI program.

(2) **Monitoring and Enforcement**. The program is responsible for monitoring company commitments. Monitoring includes the review of advertising materials, product information, and other information as reasonably requested by the program administrator (submitted on a confidential basis) to confirm participant compliance. The program also responds to public inquiries relating to compliance.

The program provides, by contract, for the expulsion of a company that does not comply with its Pledge after being given notice and an opportunity to bring its conduct into compliance, and notice of any expulsion to regulatory authorities such as the Federal Trade Commission under appropriate circumstances.[7]

(3) **Public Reports**. The program publicly issues reports detailing its activities, including any expulsions or notices of such to regulatory authorities.

(4) **Periodic Program Reviews**. The program originally planned to review its procedures and the overall impact of this initiative after the new program had been operational for at least three years. The expanded Core Principles reflected in the Second Edition of this document were the result of an extensive review that occurred ahead of the planned 2010 review. The Third Edition reflects changes that individual participants made during 2010. The program will continue to conduct periodic reviews, but recognizes the need for a reasonable interval between reviews to allow participants to implement and assess the operation of any program enhancements. Accordingly, the program, in consultation with the participants, will conduct reviews at least once every three years.

IV. Advertising to Children Under Six Years Old

The CFBAI does not require that participants adopt policies regarding not engaging in advertising primarily directed to children under age six. Prior to the creation of the CFBAI, however, a number of

participants had corporate policies that prohibited advertising directed to children under six years old (of even their healthier choices), and they maintained these policies after becoming participants in the CFBAI. During 2010, other participants also individually and voluntarily adopted such policies. Now the majority of participants have policies that are reflected in their CFBAI pledges on not engaging in advertising primarily directed to children under six. Although such policies are not required, CFBAI has agreed to monitor and report on compliance with these policies when they are incorporated into a participant's pledge.[8]

1st Edition, Nov. 2006; 2nd Edition, Nov. 2009; 3rd Edition, Sept. 2010

Endnotes

[1] Post Foods joined the CFBAI on October 1, 2009, after the review was substantially completed and thus did not participate in the review.

[2] Participants also are encouraged to disseminate healthy lifestyle messaging. This could include messaging that encourages:

- Physical activity, or
- Good dietary habits, consistent with established scientific and/or government standards, such as USDA Dietary Guidelines and MyPyramid.

[3] The commitment regarding word of mouth advertising refers to advertising where a participant provides incentives (financial or otherwise), product samples or other support to individuals or groups who are not employees to promote consumption of branded food or beverage products or to promote discussion of such products and the advertising is primarily directed to children under 12.

[4] This commitment applies to the advertising discussed in the advertising principle above. It does not apply to other marketing channels, such as point of sale materials or packaging (provided that the packaging does not appear in advertising primarily directed to children under 12). This commitment also does not apply to the use of company-owned characters.

[5] This commitment does not apply to displays of food and beverage products, including materials that identify the products that are being offered for sale, charitable fundraising activities, public service messaging, items provided to school administrators for their personal use, and charitable donations to schools.

[6] The company pledges specify the audience percentage, and other factors, where applicable, that the company uses to determine whether advertising is "primarily directed to children under 12." The effective dates of changes to the definition vary by participant but all new policies will be in effect no later than January 1, 2011. Visit the CFBAI's website at http://www.bbb.org/us/children-food-beverage-advertising-initiative/ for a summary of each participant's current definition. Audience demographics will be based on reliable third-party information on media impressions or other relevant metrics at the time the advertising is purchased.

[7] Under the contracts, BBB will give participants at least 30 days prior written notice before termination for cause and 60 days prior written notice for termination without cause. (The participants also have the right to terminate their participation upon prior written notice.) Specifically, when appropriate, BBB will notify a participant in writing of substantial noncompliance and give the participant a reasonable opportunity to bring its conduct into compliance. Upon termination BBB may refer the matter to appropriate regulatory authorities. BBB will give a participant notice prior to making the termination and referral public.

[8] The effective dates of new policies vary by participant. By January 1, 2011 all new policies will be in effect. Visit the CFBAI's website at http://www.bbb.org/us/children-food-beverage-advertising-initiative/ for a summary of each participant's current definition of child-directed advertising, which also includes a listing of such policies.

Appendix B — BBB Children's Food and Beverage Advertising Initiative: Synopsis of Participants' Nutrition Standards (Sept. 2010)

Participants	Calories* (per serving/meal)	Fat*[1]	Sodium*	Sugars	Positive Nutrients/ Food Group to Encourage*
Burger King Corp.					
Kids Meal	≤ 560	**Total Fat** < 30% kcal **Sat Fat** < 10% kcal **Trans Fat** No Added	≤ 600 mg	≤ 10% of kcal added	≥ 10% DV of at least two shortfall nutrients
Cadbury Adams					
Does not engage in food and beverage product advertising primarily directed to children under 12.					
Campbell Soup Company					
Soup	≤ 150	**Total Fat** ≤ 3g **Sat Fat** ≤ 1g & ≤ 15% kcal **Trans Fat** 0g Labeled	≤ 480 mg	≤ 12g (excluding f/v/dairy)**	≥ 1 serving of vegetables or 10% DV of a vitamin or mineral
Canned Pasta	≤ 300	**Total Fat** w/o meat ≤ 35% kcal w/meat ≤ 10g **Sat Fat** w/o meat ≤ 10% kcal w/meat ≤ 4.5g **Trans Fat** w/o meat Labeled 0g w/meat Labeled ≤ 0.5g, provided only from meat or dairy	≤ 600 mg (eff. July 2010)	≤ 12g (excluding f/v/dairy)**	≥ 1 serving of vegetables or one-ounce equivalent of whole grains, plus 10% DV of 2 or more nutrients
Baked Snacks (≤ 100 kcal portion control products also qualify)	≤ 170	**Total Fat** ≤ 35% kcal **Sat Fat** ≤ 10% kcal **Trans Fat** 0g Labeled	≤ 290 mg (eff. April 2010)	≤ 12g (excluding f/v/dairy)**	Not Specified [≥ 50% of grains are whole grains in some products]
The Coca-Cola Company					
Does not engage in food and beverage product advertising primarily directed to children under 12.					

* "Requirements" are specified in the nutrition chart. If there are no requirements regarding nutrients to limit, current nutrient amounts are noted in brackets. If there are no positive nutrient "requirements" but a product contains a positive nutrient or food groups to encourage, it is noted in brackets. Some participant standards require that a product provide at least a good (10% DV) or excellent (20% DV) source of one or more nutrients, or a "shortfall nutrient for children," or a functional benefit and/or contain at least a half serving of a food group to encourage (fruits, vegetables, whole grains and fat-free or low-fat dairy). "Shortfall nutrients for children" mean calcium, potassium, fiber, magnesium and vitamin E — nutrients identified by the 2005 Dietary Guidelines for Americans as being a shortfall in children's diets. For fruits and vegetables, a half serving equals ¼ cup. For dairy, a half serving is 4 ounces and for whole grain a half serving is 8 grams.

** Excluding f/v/dairy means excludes sugars naturally occurring in fruits, vegetables and dairy.

*** Criteria only for advertised product categories.

[1] "0g" trans fat means less than 0.5g trans fatty acids per serving, excluding conjugated trans-fatty acids such as naturally occurring Conjugated Linoleic Acid (CLA). Under FDA's regulatory scheme, naturally occurring trans fat and added trans fat from partially hydrogenated fat are not distinguished. Trans fat occurs naturally in trace amounts in meat and dairy products. "No added" trans fat means no trans fat from non-animal sources. Some participants also set or rely on third-party standards that limit cholesterol. For simplicity sake, cholesterol limits are not included here.

Participants	Calories* (per serving/meal)	Fat*[1]	Sodium*	Sugars	Positive Nutrients/Food Group to Encourage*
ConAgra Foods* **					
Meals	≤ 500	**Total Fat** ≤ 35% kcal **Sat Fat** ≤ 10% kcal **Trans Fat** 0g Labeled	≤ 760 mg	≤ 25% of kcal added	≥ 10% DV of 3 nutrients ≥ ½ serving vegetables or fruit or 8g of whole grain
Canned Pasta	≤ 350	**Total Fat** ≤ 35% kcal **Sat Fat** ≤ 10% kcal **Trans fat** 0g Labeled	≤ 750 mg	≤ 25% of kcal added	≥ 10% DV of 2 nutrients ≥ ½ serving vegetables or fruit or 8g of whole grain
Peanut Butter, Nuts and Seeds	≤ 210	**Total Fat** Not Specified [Products currently contain ≤ 17g] **Sat Fat** Not Specified [Products currently contain ≤ 3g] **Trans Fat** 0g Labeled	≤ 480 mg	≤ 25% of kcal added	≥ 10% DV of 1 nutrient ≥ 1 ounce equivalent of meat and beans
The Dannon Company					
Yogurt, Dairy Snack and Drinkable Dairy Products[2]	Not Specified [Products currently ≤ 120]	**Total Fat** ≤ 25% kcal (≤ 30% kcal for products labeled for children ages 2-3) **Sat Fat** < 10% kcal or ≤ 1g **Trans Fat** 0g Labeled	≤ 230 mg	≤ 12.5g added	≥ 10% DV of calcium
General Mills[3]					
FDA "Healthy"	≤ 175	**Total Fat** ≤ 3g **Sat Fat** ≤ 15% kcal & ≤ 1g **Trans Fat** 0g Labeled	≤ 480 mg	≤ 12g (exclusive of f/v/dairy)**	≥ 10% DV of vitamin A, vitamin C, calcium, iron, protein or fiber
General Mills Criteria	≤ 175	**Total Fat** Not Specified **Sat Fat** ≤ 2g **Trans Fat** 0g Labeled	≤ 230 mg cereal/snack ≤ 480 mg side/main dish	≤ 12g (exclusive of f/v/dairy)**	≥ ½ serving of whole grain, fruit, vegetables or fat-free or low-fat dairy
Hershey Company					
Does not engage in food and beverage product advertising primarily directed to children under 12.					
Kellogg Company					
All Products	≤ 200	**Total Fat** Not specified **Sat Fat** ≤ 2g **Trans Fat** 0g Labeled	≤ 230 mg	≤ 12g (excluding f/v/dairy)**	Not Specified [Cereals provide essential vitamins and minerals and some provide ≥ 10% DV of fiber]

[2] The criteria is based on "per labeled serving" to ensure that the "portion size" is recognized and thus ensure that the criteria is both "occasion" and "age" appropriate.

[3] Under General Mills' pledge, products must meet either FDA's criteria for "healthy" per labeled serving, or General Mills' own guidelines for Healthy Dietary Choices. Although not addressed in FDA's criteria for "healthy," General Mills also applies restrictions on calories, trans fat and sugars, on items that qualify as "healthy" per labeled serving.

Participants	Calories* (per serving/meal)	Fat*[1]	Sodium*	Sugars	Positive Nutrients /Food Group to Encourage*
Kraft Foods Global, Inc.* [4]**					
100% Fruit Juice	Not Specified [Products currently contain ≤ 100]	**Total Fat** ≤ 3g **Sat Fat** ≤ 1g **Trans Fat** 0g Labeled	≤ 240 mg	0g added	≥ 10% DV of vitamin A, C, E, calcium, potassium, fiber or magnesium OR ½ serving of fruit, vegetables, whole grains or fat-free/low-fat milk products
Beverages	≤ 40 ≤ 20 must only meet nutrients to limit	**Total Fat** ≤ 3g **Sat Fat** ≤ 1g **Trans Fat** 0g Labeled	≤ 140 mg	Not Specified	≥ 10% DV of vitamin A, C, E, calcium, potassium, fiber or magnesium OR ≥ ½ serving of fruit, vegetables, whole grains or fat-free/low-fat milk products
Snack Foods and Sweets	≤ 160	**Total Fat** ≤ 35% kcal **Sat Fat** < 10% kcal **Trans Fat** 0g Labeled	≤ 240 mg	≤ 25% of kcal added	≥ 10% DV of vitamin A, C, E, calcium, potassium, fiber or magnesium OR ½ serving of fruit, vegetables, whole grains or fat-free/low-fat milk products
Entrees, sandwiches, main dishes, and meal replacements	≤ 450	**Total Fat** ≤ 35% kcal **Sat Fat** < 10% kcal **Trans Fat** 0g Labeled	≤ 600 mg	≤ 25% of kcal added	≥ 10% DV of vitamin A, C, E, calcium, potassium, fiber or magnesium OR ≥ 1 serving of fruit, vegetables, whole grains (half of the grains must be whole) or fat-free/low-fat milk products
Cheeses and Cheese Substitutes	Not Specified [Products currently ≤ 70]	**Total Fat** ≤ 3g **Sat Fat** ≤ 2g **Trans Fat** 0g Labeled	≤ 240 mg	≤ 25% of kcal added	≥ 10% DV of vitamin A, C, E, calcium, potassium, fiber or magnesium, OR ½ serving of fruit, vegetables, whole grains or fat-free/low-fat milk products
Mars					
Does not engage in food and beverage product advertising primarily directed to children under 12.					
McDonald's USA					
	≤ 600	**Total Fat** ≤ 35% kcal **Sat Fat** ≤ 10% kcal **Trans Fat** Not Specified [0g Chicken McNugget meal: No added[2] Hamburger meal]	Not Specified [560 mg Chicken McNugget meal: 680 mg Hamburger meal]	≤ 35% total by weight	Not Specified [Meals provide a serving of fruit and low-fat white milk. Both meals provide ≥ 40% DV of calcium, ≥ 10% DV of vitamin A and ≥ 320% DV of vitamin C.]

[4] In 2009 Kraft Foods announced that it is transitioning from its Sensible Solution criteria to the Smart Choices Program criteria (listed here) over a three-year period. During this period products may qualify under either set of standards. Currently, some products in the "Beverages" and "Cheese and Cheese Substitutes" categories qualify under Sensible Solution (SS) criteria (which are not listed here). Under SS criteria, these products may qualify if they meet affirmative criteria or are "low" or "reduced by ≥ 25%" in calories, sugars, sodium, sat fat, or fat. When beverages and cheeses qualify as "low" or "reduced" other SS criteria may apply. See www.kraftrecipes.com/kf/healthyliving/sensiblesolution/nutritioncriteria.aspx.

Participants	Calories* (per serving/meal)	Fat*[1]	Sodium*	Sugars	Positive Nutrients/ Food Group to Encourage*
Nestlé USA					
100% Juice and Sparkling Flavored Juice Beverage	≤ 170 (Calories vary by variety due to natural variations in sugar content)	**Total Fat** 0g **Sat Fat** 0g **Trans Fat** 0g	≤ 70 mg	No added	≥ 10% DV of at least 1 nutrient
Choc. Ready to Drink & Powdered Flavored Milk[5]	≤ 170	**Total Fat** ≤ 3g **Sat Fat** ≤ 2g **Trans Fat** 0g Labeled	≤ 140 mg	≤ 12.5g added	≥ 10% DV of at least 1 nutrient
Calcium Fortified Low-Fat Milk	≤ 100	**Total Fat** ≤ 2.5g **Sat Fat** ≤ 1.5g **Trans Fat** 0g Labeled	≤ 125 mg	No added	≥ 10% DV of at least 1 nutrient
Push-Up/Frozen Dessert	≤ 100	**Total Fat** ≤ 3.5g **Sat Fat** ≤ 2g **Trans Fat** 0g Labeled	≤ 70 mg	≤ 12.5g added	≥ 10% DV of at least 1 nutrient
PepsiCo, Inc.* **					
Snacks (Products also qualify if ≥ 25% less in calories, fats, sugars, or sodium than a reference food)	Not Specified [Products currently ≤ 100]	**Total Fat** ≤ 35% kcal **Sat Fat** ≤ 1g **Trans Fat** 0g	≤ 270 mg	≤ 25% of kcal added	Not Specified [Products contain 8 grams of whole grains]
Post Foods					
Cereals	≤ 200	**Total Fat** ≤ 3g **Sat Fat** ≤ 1g **Trans Fat** 0g	≤ 230 mg	≤ 12g (excluding f/v/dairy)**	≥ 10% DV fiber OR ≥ 8g whole grain OR A good source of ≥ 6 essential vitamins or minerals
Unilever					
Popsicles	≤ 110	**Total Fat** Not Specified **Sat Fat** ≤ 2.5g per serving **Trans Fat** < 2% of kcal excluding CLA[2]	≤ 1.6 mg/kcal or ≤ 100mg/ serving	≤ 25% total by weight and ≤ 20% added by weight	Not Specified [Frozen dairy products provide one-quarter to one-third of a serving of low-fat dairy]
Peanut Butter	Not Specified [Products currently ≤ 190]	**Total Fat** Not Specified **Sat Fat** ≤ 10% kcal or ≤ 33% of total fat **Trans Fat** < 2% of kcal excluding CLA[2]	≤ 1.6 mg/kcal or ≤ 100mg/ serving	≤ 25% of kcal total or ≤ 7g/100g of added	Not Specified [Most products contain ≥ 10% DV of a shortfall nutrient]

[5] Powdered flavored milk is evaluated against the criteria "as consumed," once reconstituted in fat-free or low-fat milk. For the powdered flavored milk category, on label dual nutrition facts information is provided for "as purchased" and "as prepared." Reconstitution instructions call for low-fat milk. The total sugars value for the "as purchased" would be equal to added sugars in this case. Under FDA rounding rules, the nutrition facts panel may declare up to 13 grams of total sugars and still meet the criteria outlined above.

Appendix C — BBB Children's Food and Beverage Advertising Initiative: Food and Beverage Products that Meet Participants' Approved Nutrition Standards[1]

I. Introduction

As of August 2010, when this listing was last updated, the Initiative had 16 participants. The other 12 have pledged that 100% of their advertisements to children under 12 in measured media (television, print, radio, and third-party internet sites) and in less traditional media (word of mouth advertising, mobile media, advergames, video/computer games and DVDs for G rated movies) will be better-for-you foods, as defined by nutrition standards based on government or other accepted standards that the BBB has approved.

II. Participants who are not engaged in food and beverage product advertising primarily directed to children under 12:

1. Cadbury Adams, USA, LLC
2. The Coca-Cola Company
3. Hershey Company
4. Mars Snackfoods US, LLC

III. Participants engaged in better-for-you product advertising primarily directed to children under 12:

1. Burger King Corp.
2. Campbell Soup Company
3. ConAgra Foods, Inc.
4. The Dannon Company
5. General Mills Inc.
6. Kellogg Company
7. Kraft Foods Global, Inc.
8. McDonald's USA
9. Nestlé USA
10. PepsiCo, Inc.
11. Post Foods
12. Unilever

Burger King Corp.[2]

Mac & Cheese Kids Meal

- KRAFT® Macaroni & Cheese
- BK® Fresh Apple Fries, low-fat caramel dipping sauce
- HERSHEY'S® Fat-Free White Milk

Hamburger Kids Meal

- Hamburger
- BK® Fresh Apple Fries, low-fat caramel dipping sauce
- Calcium-fortified MINUTE MAID® Apple Juice

4-pc CHICKEN TENDERS® Kids Meal

- 4-pc CHICKEN TENDERS®
- BK® Fresh Apple Fries, low-fat caramel dipping sauce
- HERSHEY'S® Fat-Free White Milk

Kids Breakfast Muffin Sandwich Kids Meal

- Kids Breakfast Muffin Sandwich (Egg, American Cheese and an English Muffin)
- BK® Fresh Apple Fries, low-fat caramel dipping sauce
- Calcium-fortified MINUTE MAID® Apple Juice

In addition, the side dish and beverages may be advertised individually.

[1] These products may be the subject of advertising directed primarily to children under 12 based on original and supplemental or amended pledges.

[2] On April 27, 2009, Burger King Corp. transitioned from HERSHEY'S® 1% Low-Fat White Milk to HERSHEY'S® Fat-Free White Milk in BURGER KING® restaurants nationwide. As of that date, the KRAFT® Macaroni & Cheese advertised Kids Meal and the CHICKEN TENDERS® advertised Kids Meal included HERSHEY'S® Fat-Free White Milk.

Campbell Soup Company

Soups
- Campbell's Tomato
- Campbell's Chicken & Stars
- Campbell's Double Noodle
- Campbell's Dora the Explorer Shaped Pasta with Chicken
- Campbell's Chicken NoodleO's
- Campbell's Goldfish Shaped Pasta with Chicken
- Campbell's "Cars" Shaped Pasta with Chicken
- Campbell's Mega Noodle
- Campbell's Shrek Shaped Pasta with Chicken
- Campbell's Chicken Alphabet
- Campbell's Goldfish Shaped Pasta and Meatballs
- Campbell's Curly Noodle
- Campbell's Condensed Soup – Princess

Canned Pastas
- Campbell's SpaghettiOs Plain
- Campbell's SpaghettiOs with Meatballs
- Campbell's SpaghettiOs plus Calcium
- Campbell's SpaghettiOs – Princess Shapes with Meatballs
- Campbell's SpaghettiOs – Princess Shapes

Snack Crackers
- Pepperidge Farm Goldfish Cheddar
- Pepperidge Farm Goldfish Made with Whole Grain
- Pepperidge Farm Flavor Blasted Goldfish – Xtra Cheddar
- Pepperidge Farm Flavor Blasted Goldfish – Xplosive Pizza
- Pepperidge Farm Flavor Blasted Goldfish – Racing Ranch
- Pepperidge Farm Flavor Blasted Goldfish – Slammin' Sour Cream and Onion
- Pepperidge Farm Goldfish Mix Up Adventures
- Pepperidge Farm Goldfish – Colors
- Pepperidge Farm Goldfish – Chocolate Goldfish Grahams
- Pepperidge Farm Goldfish – Honey Goldfish Grahams
- Pepperidge Farm Goldfish – Cinnamon Goldfish Grahams
- Pepperidge Farm Goldfish – Vanilla Goldfish Grahams

ConAgra Foods, Inc.

Frozen Meals[3]
- Kid Cuisine Deep Sea Adventure Fish Sticks
- Kid Cuisine KC's Primo Pepperoni Double Stuffed Pizza
- Kid Cuisine Carnival Corn Dog
- Kid Cuisine Bug Safari Chicken Breast Nuggets
- Kid Cuisine Twist & Twirl Spaghetti & Mini Meatballs
- Kid Cuisine Pop Star Popcorn Chicken
- Kid Cuisine Dip and Dunk Toasted Ravioli
- Kid Cuisine Cowboy KC's Ham and Cheese Ropers
- Kid Cuisine Fiesta Chicken and Cheese Quesadillas
- Kid Cuisine All-Star Chicken Breast Nuggets
- Kid Cuisine Magical Cheese Stuffed Crust Pizza
- Kid Cuisine KC's Constructor Cheeseburger
- Kid Cuisine Cheese Blaster Mac-n-Cheese
- Kid Cuisine Karate Chop Chicken Sandwich
- Kid Cuisine Campfire Hotdog

Peanut Butter
- Peter Pan Creamy peanut butter
- Peter Pan Crunchy peanut butter
- Peter Pan Creamy Whipped peanut butter
- Peter Pan Reduced Fat Creamy peanut butter
- Peter Pan Reduced Fat Crunchy peanut butter
- Peter Pan Plus Creamy peanut butter
- Peter Pan Honey Roast Creamy peanut butter
- Peter Pan Honey Roast Crunchy peanut butter

Canned Pasta
- Chef Boyardee Microwave Bowls - Rice with Chicken and Vegetables
- Chef Boyardee ABC's & 123's Plain in sauce
- Chef Boyardee Dinosaurs Plain in sauce
- Chef Boyardee Mini O's
- Chef Boyardee Big Beef Ravioli
- Chef Boyardee Mini Bites Micro Beef Ravioli
- Chef Boyardee Forkables Sports
- Chef Boyardee Forkables Sea Life

[3] Occasionally, certain brands, such as Kid Cuisine, will launch short-term promotions showcasing special, temporary products that will be available only for a limited time. Such products, if advertised to children under 12, will meet ConAgra Foods' Pledge nutrition guidelines, and where feasible, ConAgra will update the Pledge product list to reflect these short-term items.

The Dannon Company , Inc.

Dairy Products

- Danonino Dairy Snack
- Danimals Low-fat Yogurt (Crush Cup and Coolision)
- Danimals Drinkable Smoothies
- Dannon Plain Nonfat Yogurt
- All Natural Low-fat Yogurt
- Activia Lowfat Yogurt
- Activia Light Non-fat Yogurt
- Activia Fiber
- Light N Fit Nonfat Yogurt
- Light N Fit Dairy Based Smoothie
- Danactive Light Probiotic Cultured Dairy Drink
- NutriDay
- Greek Fruit on the Bottom
- Greek Plain

General Mills Inc.

Cereals

- Cinnamon Toast Crunch
- Cocoa Puffs
- Cocoa Puffs Combos
- Cookie Crisp
- Honey Nut Cheerios
- Lucky Charms
- Chocolate Lucky Charms
- Reese's Puffs
- Trix
- Frosted Cheerios
- Cookie Crisp Sprinkles
- Chocolate Cheerios

Yogurts

- Yoplait Go-Gurt (all flavors)
- Yoplait Splitz (all flavors)
- Yoplait Trix (all flavors)

Snacks

- Fruit by the Foot (all flavors)
- Fruit Roll-Ups (all flavors)
- Fruit Roll-Up Stickerz (all flavors)
- Fruit Gushers Flavor (all flavors)
- Fruit Shapes (all flavors)

Kellogg Company

Cereal

- Apple Jacks®
- Corn Pops®
- Froot Loops®
- Froot Loops® Reduced Sugar
- Kellogg's® Frosted Flakes®
- Kellogg's® Frosted Flakes® Reduced Sugar
- Kellogg's® Rice Krispies®

Snacks

- Keebler® Gripz® Variety 14 Pack (Sunshine® Cheez-It®, Keebler® Chips Deluxe®, Keebler® Grahams® Cinnamon)
- Keebler® Gripz® Chips Deluxe®
- Keebler® Gripz® Grahams® (Chocolate Chip)
- Yogos® Bits (all flavors)[4]

[4] Yogos® Bits contain approximately 1g of sugar from fruit.

Kraft Foods Global, Inc.

100% Fruit Juice
- Capri Sun 100% Juice (all flavors)

Beverages
- Kool-Aid Singles (all flavors)
- Kool-Aid Sugar Free (all flavors)
- Kool-Aid Fun Fizz Drink Drops (all flavors)
- Capri Sun Roarin' Waters (all flavors)
- Capri Sun Juice Drinks (all flavors)
- Capri Sun Sunrise Juice Drinks (all flavors)

Snack Foods and Sweets
- Nabisco Teddy Grahams (all flavors)
- Ritz Bits Cracker Sandwiches – Peanut Butter Chocolatey Blast
- Honey Maid Bees Grahams – Honey
- Honey Maid Grahams – SpongeBob SquarePants
- Kraft Macaroni and Cheese Baked Cheese Crackers – Parmesan Crunch
- Cheese Nips Crackers – SpongeBob SquarePants

Cheeses and Cheese Substitutes
- Kraft Singles Swiss Pasteurized Prepared Cheese Product
- Kraft Singles Sharp Pasteurized Prepared Cheese Product
- Kraft Singles American Pasteurized Prepared Cheese Product (19g and 21g)
- Kraft Singles Melt Downs Products (Nacho, Pizza and Taco Flavors)

Entrees, Sandwiches, Main Dishes, and Meal Replacements[5]
- Kraft Macaroni & Cheese Shapes
- Kraft Macaroni & Cheese Spirals
- Kraft Easy Mac Macaroni & Cheese Dinner – Original Flavor
- Kraft Macaroni and Cheese Dinner – Cheddar Explosion
- Kraft Macaroni and Cheese Dinner – Cups, Cheddar Explosion
- Kraft Macaroni and Cheese Dinner – Cups, Toy Story
- Kraft Macaroni and Cheese Dinner – Cups, Spongebob
- Kraft Macaroni and Cheese Dinner – Microwavable Animal Shapes
- Kraft Macaroni and Cheese Dinner – Microwavable Extreme Cheese
- Lunchables – Chicken Dunks
- Lunchables– Cheese Pizza with Water
- Lunchables – Turkey and Cheddar Sub with Water
- Lunchables Basic Sub – Turkey and Cheddar
- Lunchables Fun Pack – BBQ Chicken Shake Up
- Lunchables Basic Sub – Breaded Chicken Nuggets and Mozzarella
- Lunchables Basic Sub – Sliced Chicken and American
- Lunchables Fun Pack – Turkey and Mozzarella Cracker Stacker

McDonald's, USA

Chicken McNuggets Happy Meal
- 4 Piece Chicken McNuggets
- Apple Dippers with Low-Fat Caramel Apple Dip
- 1% Low-Fat White Milk

Hamburger Happy Meal
- Hamburger
- Apple Dippers with Low-Fat Caramel Apple Dip
- 1% Low-Fat White Milk

[5] The content of *Lunchables* products may vary from time to time. Although the main component will remain the same, Kraft Foods may periodically modify the treat and/or drink (e.g., *Capri Sun Roarin' Waters* switched for *Capri Sun* 100% fruit juice). The product's nutritional profile, however, will always stay within the boundaries of the *Sensible Solution* criteria or the *Smart Choices Program* criteria. For the most current information about *Lunchables* products' content, consult the Kraft Foods' website at www.kraftfoods.com.

Nestlé USA

100% Fruit Juice
- Nestlé Juicy Juice (all flavors)

Sparkling Flavored Juice Beverage
- Nestlé Juicy Juice Sparkling Flavored Juice Beverage

Chocolate Flavored Milk and Powder
- Nesquik Ready to Drink Chocolate Low-Fat Milk No Sugar Added
- Nesquik Powder Chocolate – 25% Less Sugar
- Nesquik Powder Chocolate – No Sugar Added

Calcium Fortified Low-Fat Milk
- Nesquik Calcium Fortified Low-Fat Milk

Push Up Frozen Dessert
- Nestlé Push Up Variety Pack
- Nestlé Push Up Rainbow
- Nestlé Push Up Laffy Taffy
- Nestlé Push Up Nesquik Milk Chocolate/Double Chocolate Swirl

PepsiCo, Inc.[6]

Snacks
- Quaker Chewy 25% Less Sugar Granola bars
- Quaker Chewy 90 Calorie Granola bars

Post Foods

Cereals
- Fruity Pebbles
- Cocoa Pebbles
- Honey-Comb
- Alpha-Bits
- Cupcake Pebbles
- Marshmallow Pebbles

[6] PepsiCo has hundreds of products that meet its *Smart Spot* criteria. It chooses, however, to feature only a handful of products in child-directed advertising.

Unilever

Popsicles
- Screwball Cherry
- Big Stick Cherry/Pineapple
- Lick A Color
- Bubble Gum Swirl
- Cotton Candy Swirl
- Creamsicle Bar
- Creamsicle Pop
- No Sugar Added Creamsicle
- Low-Fat Creamsicle
- Dora the Explorer
- Popsicle Dora The Explorer
- Firecracker Jr.
- Firecracker Red, White & Blue
- Firecracker with Exploding Candy Tip
- Firecracker Sour
- Fudgsicle Bar
- Fudgsicle Pop
- Fudgsicle 100 Calorie Giant Fudge Bar
- Fudgsicle Triple Chocolate
- Low Fat Fudgsicle
- Fat Free Fudgsicle Bar
- No Sugar Added Fudgsicle
- Sugar Free Healthy Bunch
- Popsicle Shot Cookies and Cream
- Lemon Lime Shots
- Super Sour Shots
- Popsicle Sugar Free LifeSaver Pops
- Mega Missile Red White & Blue
- Mega Missile Firecracker
- Pop-Ups Reckless Rainbow Sherbet
- Pop-Ups Orange Burst
- Popsicle Juice Scribblers
- Slow Melt Pops
- Snow Cone
- Spiderman
- Nick Toons SpongeBob SquarePants
- Popsicle SpongeBob SquarePants Pop-Ups
- SpongeBob Banana Splits Shots
- Popsicle Super Heroes Meet Super Villains
- Popsicle Super Twins Orange, Cherry, Grape, Lime
- Swirlwinds
- Slow Melt Ice Age
- Jolly Rancher

Peanut Butter

- Skippy Natural Creamy Peanut Butter
- Skippy Creamy Peanut Butter
- Skippy Reduced Fat Creamy Peanut Butter
- Skippy Roasted Honey Nut Creamy Peanut Butter
- Skippy Natural Super Chunk Peanut Butter
- Skippy Super Chunk Peanut Butter
- Skippy Reduced Fat Super Chunk Peanut Butter
- Skippy Roasted Honey Nut Super Chunk Peanut Butter

Appendix D — BBB's Children's Self-Regulation Programs: Fact Sheet on CFBAI and CARU

Two separate industry self-regulation programs work together to foster trust in the marketplace by promoting advertising of healthier foods and beverages and truthful, responsible advertising to children under 12 years old.

	Children's Food and Beverage Advertising Initiative (CFBAI)	Children's Advertising Review Unit (CARU)
About the Programs	The Initiative addresses what food and beverages are depicted in advertising primarily directed to children under 12 years old. The goal is to use advertising to help promote healthy dietary choices and healthy lifestyles among American children.	CARU addresses how all products—including food and beverages—are advertised to children under 12 years old. Taking into account their special vulnerabilities, CARU sets high standards to assure that advertising directed to children is truthful, not misleading, unfair, or inappropriate for its intended audience.
The Programs in Action	The Initiative is currently comprised of 17 food and beverage industry leaders. Under the Initiative, participants commit—or pledge—to devote all their advertising on TV, radio, print, Internet, and other covered advertising primarily directed to children under 12 years old to healthier or better-for-you products. Besides traditional media, their pledges apply to advertising on child-directed interactive games provided free or at nominal charge; video and computer games that are rated "Early Childhood" or that are labeled for children under 12; DVDs of G-rated movies and other non-rated DVDs that are primarily directed to children under 12; child-directed advertising in mobile media, and word-of-mouth advertising. Thirteen Participants—Burger King Corporation, Campbell Soup Company, ConAgra Foods, Inc., The Dannon Company, General Mills Inc., Kellogg Company, Kraft Foods Global, Inc., McDonald's USA, Nestlé USA, PepsiCo, Inc., Post Foods, LLC, Sara Lee Corporation, and	CARU reviews and evaluates child-directed advertising in all media. CARU scrutinizes thousands of television commercials and advertisements in print, radio and online media annually. CARU also monitors online privacy practices on children's websites. CARU's Self-Regulatory Guidelines for Children's Advertising provide detailed guidance to children's advertisers on how to deal sensitively and honestly with children. These guidelines are designed to go beyond the issues of truthfulness and accuracy to take into account the uniquely impressionable and vulnerable child audience. When CARU finds advertising to be misleading, inaccurate, or inconsistent with CARU's standards, it seeks change through the voluntary cooperation of advertisers. CARU publishes its decisions to provide guidance to all advertisers. CARU also offers an ad pre-screening service for CARU supporters to help advertisers spot and

	Children's Food and Beverage Advertising Initiative (CFBAI)	Children's Advertising Review Unit (CARU)
The Programs in Action, cont'd	Unilever—are using meaningful nutrition standards to determine what products are shown in their child-directed advertising. Four participants—Cadbury Adams USA LLC, The Coca-Cola Company, Hershey Company, and Mars, Inc.—are not engaging in advertising primarily directed to children under 12 years old. The Initiative requires its participants, as it pertains to their advertising efforts primarily directed to children under 12 years old, to: • Not pay for or actively seek placement of foods and beverages in editorial/programming content; • Stop advertising foods and beverages in elementary schools (pre-K through 6th grade) to kids; • Use only better-for-you foods in interactive games that incorporate a company's food or beverage products. The Initiative staff reviews the companies' pledges to ensure that they comply with the Initiative's requirements. The companies' nutritional standards also are subject to the approval of the Initiative's Director and must be consistent with or based on, for example, USDA/HHS Dietary Guidelines for Americans, or FDA-established definitions for "healthy." The Initiative staff monitors the participants' advertising to ensure they are meeting their commitments, and reports annually on its findings.	correct problems before the ads are disseminated. In 2006, CARU Guidelines were comprehensively revised to: • Authorize CARU to take action on "unfair advertising;" • Explicitly address "blurring" or advertising that obscures the line between editorial content and advertising messages; • Explicitly address the use of advertising messages in online interactive games; • Provide additional guidance on food and beverage marketing including: 1. Requiring that any depiction of food being consumed must be tied to the labeled serving size; 2. Prohibiting the disparagement of healthy foods or lifestyles; and 3. Requiring that mealtime depictions of foods be shown in the context of a nutritionally balanced meal.

	Children's Food and Beverage Advertising Initiative (CFBAI)	Children's Advertising Review Unit (CARU)
History	The Initiative was established in November 2006 as a voluntary self-regulation program to address concerns about advertising and childhood obesity. It is administered by the Council of Better Business Bureaus (BBB). Founded in 1912, BBB is supported by over 400,000 businesses and is dedicated to fostering fair and honest relationships between businesses and consumers, and contributing to an ethical business environment.	The National Advertising Review Council (NARC) established CARU in 1974 to promote responsible children's advertising. NARC is administered by the Council of Better Business Bureaus. NARC was formed in 1971 by the Association of National Advertisers, the American Advertising Federation, the American Association of Advertising Agencies and the Council of Better Business Bureaus. Its purpose is to foster truth and accuracy in national advertising through self-regulation.
For More Info	Visit http://www.bbb.org/us/children-food-beverage-advertising-initiative/ or contact Elaine D. Kolish at 703-247-9382 or ekolish@council.bbb.org. Comments and questions about the program or any pledges can be sent to kidsinitiative@council.bbb.org. Media Contact: Alison Southwick 703-247-9376 or asouthwick@council.bbb.org.	Visit www.caru.org or contact Wayne Keeley at 212-705-0112 or wkeeley@caru.bbb.org. To file a complaint regarding an advertisement that you feel violates CARU Guidelines, go to www.caru.org/complaint. Media Contact: Linda Bean 212-705-0129 or lbean@narc.bbb.org.

Appendix E — Summary of Participants' Changes in Their Definitions of Advertising Primarily Directed to Children under 12 and Policies on Not Advertising to Children Under Six (Highlights show participants' changes to their commitments)

Company	Children Under 6 Commitments	Children Under 12 Commitments
Burger King Corp. (Change effective Jan. 1, 2011)	≥ 30% or more of audience: No advertising[1]	≥ 30% or more of audience: Approved products only
Cadbury Adams[2]	≥ 50% of audience: No advertising	
Campbell Soup Company (Changes effective Jan. 1, 2010)	≥ 35% of audience:[3] No advertising	≥ 35% of audience:[3] Approved products only
The Coca-Cola Company (Change effective Oct. 1, 2010)	≥ 35% of audience: No advertising[4]	
ConAgra Foods, Inc. (Change effective June 1, 2010)	≥ 35% of audience: No advertising[5]	≥ 35% of audience: Approved products only
The Dannon Company (Changes effective Jan. 1, 2011)	≥ 50% of audience: No advertising[6]	≥ 35% of audience:[6] Approved products only
General Mills Inc. (Change effective July 2010)	≥ 35% of audience:[7] No advertising (television and internet)	≥ 35% of audience: Approved products only
Hershey Company	≥ 30% of audience: No advertising	
Kellogg Company (Changes effective June 2010)	≥ 35% of audience:[8] No advertising	≥ 35% of audience:[8] Approved products only
Kraft Foods Global, Inc.	≥ 35% of audience: No advertising	≥ 35% of audience: Approved products only
Mars, Inc.	≥ 25% of audience: No advertising	
McDonald's USA		≥ 30% of audience: Approved products only
Nestlé USA	≥ 35% of audience: No advertising	≥ 35% of audience: Approved products only
PepsiCo, Inc. (Change effective Aug. 2010)	Multi-factorial standard: No advertising[9]	Multi-factorial standard: Approved products only
Post Foods	≥ 35% of audience: No Advertising	≥ 35% of audience: Approved products only
Sara Lee Corp.		≥ 35% of audience: Approved products only
Unilever (Change effective May 2010)	Multi-factorial standard: No advertising	Multi-factorial standard (includes whether ≥ 35% of audience is under 12):[10] Approved products only

[1] Burger King Corporation has added a policy to not direct advertising to children under six.

[2] Cadbury Adams has been acquired by Kraft Foods. It will be covered by Kraft Foods' pledge and definition no later than 1/1/2012.

[3] Campbell's prior pledge commitment used a composition index to determine the viewing audience of children under 12 and it has adjusted its pledge to use an audience percentage instead. Campbell's also has codified in its pledge its existing corporate policy of not directing advertising to children under six and established a 35% audience definition for this group.

[4] The Coca-Cola Co. has reduced its audience definition standard to 35% from 50%.

[5] ConAgra Foods has added a policy to not direct advertising to children under six.

[6] Dannon has added a policy to not direct advertising to children under six. For advertising directed to children under 12, Dannon has reduced its audience definition standard to 35% from 50%.

[7] General Mills has reduced to 35% from 50% its standard for its no advertising directed to children under six policy.

[8] Kellogg has reduced its audience definition standard to 35% from 50% for both of its policies.

[9] PepsiCo has added a policy to not direct advertising to children under six.

[10] Unilever has added a 35% audience percentage standard to its multi-factorial standard.

Appendix F — BBB Children's Food and Beverage Advertising Initiative: Table of Child-Directed Company-Owned Websites (2009)[1]

Most, but not all, participants that advertise to children under 12 on television also maintain child-directed websites. Many sites feature interactive games and downloadable activities. Some sites feature healthy lifestyle messages, and several[2] include activity breaks that pause the online activity to encourage children to engage in active play.[3]

Although many participants maintain the same websites listed in our 2008 Report, several sites are no longer active or are no longer directed to kids under 12, including:

- McDonald's minisizefun.com site featured its Wrap sandwiches, which are no longer advertised to children under 12, and the site is no longer active;
- Kraft Foods' Kool-Aid website, which is now an adult-targeted site;
- PepsiCo's capncrunch.com, which is no longer active and was live for only a few months in 2009.

Company	Website(s)
Burger King Corp.	www.ClubBk.com
Cadbury Adams USA LLC	None
Campbell Soup Company	www.myslurp.com www.GoldfishFun.com (formerly www.pfgoldfish.com)
The Coca-Cola Company	None
ConAgra Foods, Inc.	www.chefboyardee.com www.kidcuisine.com www.peterpanpb.com
The Dannon Company	www.danimals.com www.danoninos.com
General Mills Inc.	www.sillyrabbit.millsberry.com www.trixworld.com www.gushers.com www.fruitontheloose.com www.gushersredoyourroom.com www.millsberry.com www.reesespuffs.com www.choosebreakfast.com www.halfamillionville.com (now inactive) www.winonegiveone.com (now inactive) www.cookiecrisp.com

Company	Website(s)
General Mills Inc., cont.	www.3foottheater.com www.gogurt.com www.gogurtfizzix.com www.honeydefender.millsberry.com www.luckycharms.com www.mightygiants.com www.cuckooshow.com
The Hershey Company	None
Kellogg Company	www.applejacks.com www.frootloops.com www.frostedflakes.com www.cornpops.com www.gripz.com www.poptarts.com www.kelloggsyogos.com (site now redirects to an adult-targeted page)
Kraft Foods Global, Inc.	www.lunchables.com www.thecheesiest.com www.kool-aid.com (no longer directed to children under 12.) www.respectthepouch.com
Mars, Inc.	None
McDonald's USA	www.happymeal.com www.ronald.com
Nestlé USA	www.nesquik.com/kids www.kids.icecream.com
PepsiCo, Inc.	www.capncrunch.com (no longer directed to children under 12.)
Post Foods	www.beeboy.org www.postopia.com
Unilever	www.popsicle.com www.skippypeanutbutter.com

[1] The websites included in this table are ones that the participants reported as being directed primarily to children under 12 in 2009 based on their media plans, demographic information regarding site visitors (if available) and the nature and content of the site. Some sites may no longer be active.

[2] Companies whose child-directed websites include healthy or active lifestyle messages include Campbell Soup Co., ConAgra Foods, General Mills, Kraft Foods, and Nestlé.

[3] Activity breaks are included on child-directed sites of General Mills, Kellogg, and Nestlé. PepsiCo's child-directed Cap'n Crunch website, which was operational only from April-October 2009, timed-out after a child had been on the site for 15 minutes.

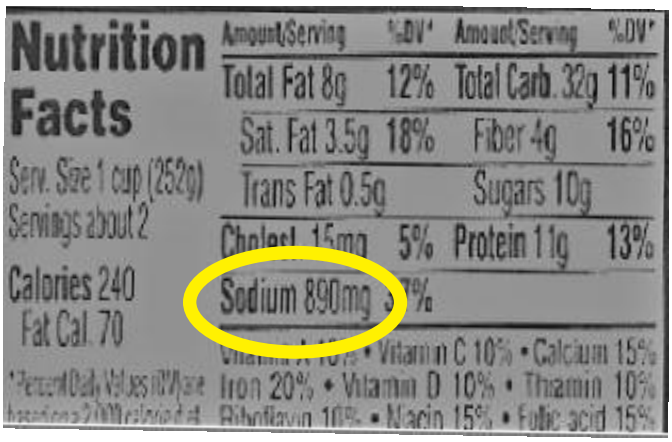
Appendix G — Examples of Change in Advertised Products and New Products

Campbell Soup Company

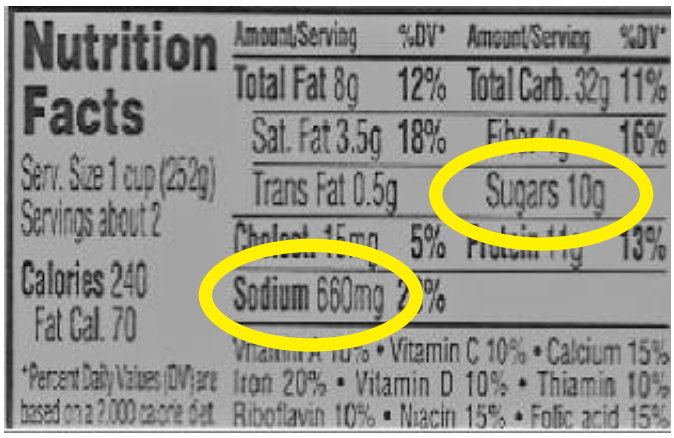
Spaghettio's with Meatballs

33% Reduction in Sodium

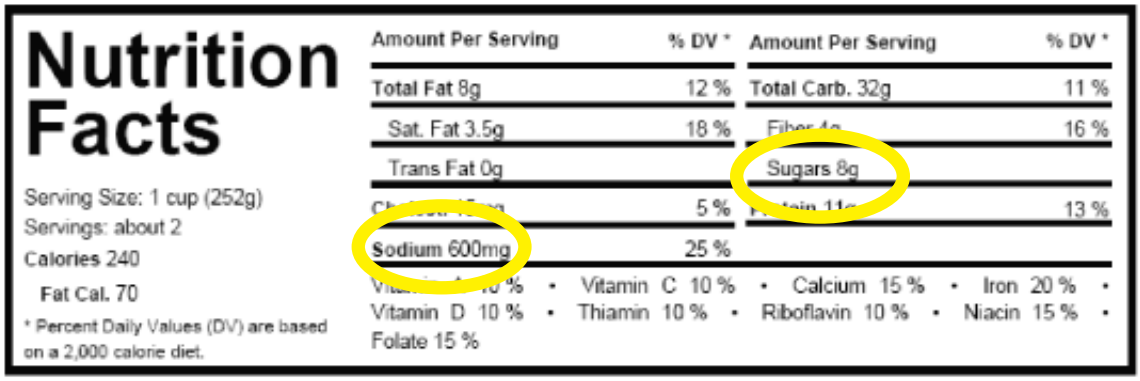
Pre-Pledge Formulation



2008 Formulation



2010 Formulation



Chef Boyardee Mini O's

34% Reduction in Sodium

2007 Formulation

Nutrition Facts

Serving Size 1 cup (252g)
Servings Per Container About 2

Amount Per Serving

Calories 180 — Calories from Fat 10

	% Daily Value*
Total Fat 1g	2%
Saturated Fat 0.5g	3%
Trans Fat 0g	
Cholesterol 0mg	0%
Sodium 990mg	41%
Potassium 300mg	9%
Total Carbohydrate 38g	13%
Dietary Fiber 2g	8%
Sugars 14g	
Protein 5g	10%

Vitamin A 40% • Vitamin C 0%
Calcium 2% • Iron 6%

* Percent Daily Values are based on a 2,000 calorie diet.

2009 Formulation

Nutrition Facts

Serving Size 1 cup (252g)
Servings About 2
Calories 170
Fat Cal. 10

*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/serving	%DV*	Amount/serving	%DV*
Total Fat 1g	2%	**Potassium** 840mg	24%
Sat. Fat 0.5g	3%	**Total Carb.** 35g	12%
Trans Fat 0g		Fiber 3g	12%
[illegible]	0%	Sugars 11g	
Sodium 700mg	29%	**Protein** 5g	10%

[illegible] • Vitamin C 0% • Calcium 10%
Iron 8% • Thiamine 10% • Riboflavin 10%
Folic Acid 10% • Phosphorus 10% • Zinc 10%
Selenium 10% • Manganese 10%

INGREDIENTS: WATER, TOMATO PUREE (WATER, TOMATO PASTE), **ENRICHED MACARONI PRODUCT** (SEMOLINA WHEAT FLOUR, EGG WHITE SOLIDS, NIACIN, IRON, THIAMINE MONONITRATE [VITAMIN B1], RIBOFLAVIN [VITAMIN B2] AND FOLIC ACID), **HIGH FRUCTOSE CORN SYRUP**, CONTAINS LESS THAN 2% OF THE FOLLOWING INGREDIENTS: **SEA SALT, CHEESES** (ENZYME MODIFIED CHEDDAR AND PASTEURIZED PROCESS CHEDDAR [PASTEURIZED MILK, CULTURES, SALT, ENZYMES], WATER, SODIUM PHOSPHATE, SALT, MILKFAT, APO-CAROTENAL AND ANNATTO [COLORS] AND VITAMIN A PALMITATE), **WHEAT FLOUR, SALT, MODIFIED CORN STARCH, TRICALCIUM PHOSPHATE, ONION POWDER, CITRIC ACID, NATURAL FLAVORINGS AND SOYBEAN OIL. CONTAINS: EGG, MILK, WHEAT.**

Nov. 2010 Formulation

Nutrition Facts

Serving Size 1 cup (252g)
Servings About 2
Calories 170
Fat Cal. 10

*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/serving	%DV*	Amount/serving	%DV*
Total Fat 1g	2%	**Potassium** 840mg	24%
Sat. Fat 0g	0%	**Total Carb.** 34g	11%
Trans Fat 0g		Fiber 3g	12%
Cholesterol less than 5mg	1%	Sugars 12g	
Sodium 650mg	27%	**Protein** 5g	5%

Vitamin A 2% • Vitamin C 0% • Calcium 10%
Iron 10% • Riboflavin 10% • Folic Acid 10%
Selenium 30% • Manganese 10%

General Mills

Sugar Reduction in Cereals*

* Data and graphics courtesy of General Mills

Kellogg

Apple Jacks*

2008

Nutrition Facts

Serving Size 1 Cup (28g/1.0 oz.)

Amount Per Serving	Cereal	Cereal with ½ Cup Vitamins A&D Fat Free Milk
Calories	110	150
Calories from Fat	5	5
	% Daily Value**	
Total Fat 0.5g*	**1%**	**1%**
Saturated Fat 0g	**0%**	**0%**
Trans Fat 0g		
Cholesterol 0mg	**0%**	**0%**
Sodium 135mg	**6%**	**9%**
Potassium 30mg	**1%**	**7%**
Total Carbohydrate 25g	**8%**	**10%**
Dietary Fiber less than 1g	0%	**3%**
Sugars 12g		
Other Carbohydrate 13g		
Protein 1g		
Vitamin A	10%	15%
Vitamin C	25%	25%
Calcium	0%	15%
Iron	25%	25%
Vitamin D	10%	25%
Thiamin	25%	30%
Riboflavin	25%	35%
Niacin	25%	25%
Vitamin B_6	25%	25%
Folic Acid	25%	25%
Vitamin B_{12}	25%	35%
Zinc	10%	15%

2009

Nutrition Facts

Serving Size 1 Cup (28g/1.0 oz.)

Amount Per Serving	Cereal	Cereal with ½ Cup Vitamins A&D Fat Free Milk
Calories	100	140
Calories from Fat	5	5
	% Daily Value**	
Total Fat 0.5g*	**1%**	**1%**
Saturated Fat 0g	**0%**	**0%**
Trans Fat 0g		
Cholesterol 0mg	**0%**	**0%**
Sodium 130mg	**5%**	**8%**
Potassium 35mg	**1%**	**7%**
Total Carbohydrate 25g	**8%**	**10%**
Dietary Fiber 3g	**10%**	**10%**
Sugars 12g		
Other Carbohydrate 10g		
Protein 1g		
Vitamin A	10%	15%
Vitamin C	25%	25%
Calcium	0%	15%
Iron	25%	25%
Vitamin D	10%	25%
Thiamin	25%	30%
Riboflavin	25%	35%
Niacin	25%	25%
Vitamin B_6	25%	25%
Folic Acid	25%	25%
Vitamin B_{12}	25%	35%
Zinc	10%	15%

*In June 2009 Apple Jacks was reformulated to contain 9 grams of whole grains.

Kraft Foods Global, Inc.

Kraft Lunchables: Turkey and Cheddar Sub with Water (Introduced 2010)

Nutrition Facts

Serving Size 1 package

Amount Per Serving	
Calories 360	Calories From Fat 70
	% Daily Value *
Total Fat 8g	**12%**
Saturated Fat 2.5g	**13%**
Trans Fat 0g	
Cholesterol 20mg	**7%**
Sodium 600mg	**25%**
Total Carbohydrate 62g	**21%**
Dietary Fiber 4g	**16%**
Sugars 32g	
Protein 11g	**10%**
Vitamin A 2% •	Vitamin C 100%
Calcium 20% •	Iron 10%

* Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g
Protein		50g	65g

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