



I. INTRODUCTION

Companies engaged in advertising and marketing foods and beverages have developed this self-regulatory initiative for advertising such products to children under age 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 Statement was first issued in November 2006 when the Council of Better Business Bureaus (BBB) and 10 companies launched the Children's Food and Beverage Advertising Initiative (CFBAI) to shift the mix of foods in advertising primarily directed to children under age 12 ("child-directed" advertising) to include healthy dietary choices or better-for-you foods. In 2009, the CFBAI and its participants expanded the scope of the original advertising commitments to include, for example, new and emerging social and digital media. The expanded commitments went into effect on January 1, 2010.¹ In 2010, a number of participants strengthened their definitions of child-directed advertising.² In July 2011, the participants agreed that new [CFBAI category-specific uniform nutrition criteria](#) would be the foundation for participants' pledge commitments as of December 31, 2013. This, the Fourth Edition of the CFBAI Program and Core Principles Statement, incorporates use of the CFBAI's uniform criteria as a program requirement.

Below, 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 engaging in advertising primarily directed to children under age 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 age 12.³ 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:

¹ These changes were memorialized in the Second Edition of the CFBAI Program and Core Principles Statement.

² Participants defining child-directed advertising as advertising on media where the audience was composed of at least 50% children ages 2-11 changed to a definition of at least 35% children ages 2-11, harmonizing with other participants already using a 35% or lower threshold. These changes were memorialized in the Third Edition of the CFBAI Program and Core Principles Statement.

³ Participation in the CFBAI is entirely voluntary and there are no sanctions for companies that choose not to participate.

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

1. Advertising Primarily Directed to Children Under Age 12

Participants will commit that all “advertising primarily directed to children under age 12” will be for healthy dietary choices or better-for-you foods.⁴ As of December 31, 2013, these foods must meet the [CFBAI’s category-specific uniform nutrition criteria](#) (attached as Appendix A), which have replaced company-specific criteria as the basis for identifying healthier dietary choices or better-for-you foods for child-directed advertising. The CFBAI’s bases for these criteria are explained in the “[White Paper on CFBAI’s Uniform Nutrition Criteria](#).” With the CFBAI’s consent, the participants may continue to use company-specific criteria if such criteria are at least as strong as the CFBAI’s criteria.⁵ Alternatively, participants may commit to not engage in child-directed advertising as defined in this Statement.

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

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

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

- Company-owned websites that are primarily directed to children under age 12 (traffic to such websites may or may not be measured)
- Video and computer games that are rated “Early Childhood” or “EC,” which are inherently primarily directed to children under age 12, and other games that are age-graded on the label or packaging as being primarily directed to children under age 12
- DVDs of movies that are rated “G” whose content is primarily directed to children under age 12, and other DVDs whose content is primarily directed to children under age 12.

Mobile Media and Word of Mouth. This principle also applies to advertising that is primarily directed to children under age 12 on cell phones, smart phones, tablets, other personal digital devices, and through word of mouth.⁶

⁴ Participants also are encouraged to disseminate healthy lifestyle messaging, such as messaging encouraging:

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

⁵ If a participant has made additional commitments restricting child-directed advertising based on nutrition criteria that are more restrictive than the CFBAI’s criteria, the participant may follow the more restrictive criteria to meet its obligations. A participant also may use a bifurcated approach of using its own criteria, or portions thereof, when these are stronger or the CFBAI’s criteria, when they are stronger. In no event will a participant be able to qualify a product for child-directed advertising that does not meet and/or exceed the CFBAI’s criteria.

⁶ The commitment regarding word of mouth advertising refers to advertising primarily directed to children under age 12 where a participant provides incentives (financial or otherwise), product samples or other support to

2. Use of Foods in Interactive Games

Participants will commit that in any interactive game that is primarily directed to children under age 12, which is provided free or at nominal charge (in any format), where the company's foods or beverages are incorporated into the game, the interactive game will incorporate or be accompanied only by healthy dietary choices or better-for-you foods.

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 age 12 will be consistent with their advertising commitments.⁷

4. Product Placement

Participants will commit to not paying for or actively seeking to place their foods or beverages in the program/editorial content of any medium primarily directed to children under age 12 for the purpose of promoting the sale of those products.

5. Advertising in Elementary Schools

Participants will commit to not advertising branded foods or beverages to children in elementary schools, pre-K through 6th grade.⁸

B. DEFINITIONS OF CHILD-DIRECTED ADVERTISING

Participants are permitted, within reasonable limits and subject to the CFBAI's review and approval, to define "advertising primarily directed to children under age 12." Below we summarize the approaches that participants use to define such advertising.

For certain media, such as TV, radio, print, and third-party websites, "advertising primarily directed to children under age 12" generally means advertising for which children ages 2-11 constitute at least 35% of the expected audience (viewers, listeners, readers or visitors) at the time of the media buy, depending upon the participant.⁹ The CFBAI and participants also

individuals or groups who are not employees to encourage such individuals or groups to influence others to discuss or consume the company's branded foods or beverages.

⁷ 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 age 12). This commitment also does not apply to the use of company-owned characters.

⁸ This commitment does not apply to displays of foods and beverages, 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.

⁹ Some participants choose to use a lower percentage and some also include supplemental measures to identify "advertising primarily directed to children under age 12." 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 age 12." Visit the CFBAI's website at www.bbb.org/kids_food to view company pledges or 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.

may consider a company-owned or third-party website child-directed even if less than a specific percentage or an unknown percentage of visitors are children based on a multi-faceted analysis, including factors such as an assessment of the target audience according to the media plan, actions taken to restrict child access, such as age-screening, and the overall impression of the site's content.

For advertising in other covered media, determinations will be made in accordance with standards established by the company and 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, 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.

C. IMPLEMENTATION

Each pledge will include an implementation schedule for each commitment made by the participant, unless an implementation date is specified by this Statement.

III. ADMINISTRATION AND OVERSIGHT

1. Pledge Development

Company pledges 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.¹⁰

¹⁰ 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.

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 Statement were the result of an extensive review that occurred ahead of the planned 2010 review. The Third Edition reflected changes that individual participants made during 2010. This, the Fourth Edition, reflects the adoption of category-specific uniform nutrition criteria based on a more than year-long nutrition science review conducted by the CFBAI and its participants.

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 five 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 individually and voluntarily adopted such policies. Now the majority of participants have policies on not engaging in advertising primarily directed to children under six that are reflected in their CFBAI pledges. Although such policies are not required, the CFBAI has agreed to monitor and report on compliance with these policies when they are incorporated into a participant's Pledge.

1st Edition, November 2006; 2nd Edition, November 2009; 3rd Edition, September 2010; 4th Edition, January 2014.
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Children's Food and Beverage Advertising Initiative
Council of Better Business Bureaus, Inc.
Category-Specific Uniform Nutrition Criteria

Product Category	Unit	Nutrients to Limit (NTL)			Nutrition Components to Encourage (NCTE)	Notes
		Calories	Sat Fat	Sodium		
1. Juices	LSS	≤ 160	0 g	≤ 140 mg	No added sugars	<ul style="list-style-type: none"> - A serving must contain ≥ 4 fl oz of 100% F/V juice - Sugars limited to those naturally occurring in F/V
2. Dairy products						
- Milks and milk substitutes	8 fl oz	≤ 150	≤ 2 g	≤ 200 mg	≤ 24 g	<ul style="list-style-type: none"> - For LSS < 8 fl oz, NTL & NCTE to be scaled proportionately - Powder/syrup flavorings mixed with 8 fl oz non-fat milk are allowed ≤ 25 g total sugars as prepared
- Yogurts and yogurt-type products	6 oz	≤ 170	≤ 2 g	≤ 140 mg	≤ 23 g	<ul style="list-style-type: none"> - 6 oz (170 g) is most common single serving size - For LSS < 6 oz, NTL & NCTE to be proportionately lower
- Dairy-based desserts	½ c	≤ 120	≤ 2 g	≤ 110 mg	≤ 20 g	<ul style="list-style-type: none"> - Serving sizes limited to ½ c - For LSS < ½ c, NTL & NCTE to be scaled proportionately
- Cheese and cheese products	LSS	≤ 80	≤ 3 g	≤ 290 mg	≤ 2 g	<ul style="list-style-type: none"> - For LSS < 1 oz, NCTE to be scaled to ≥ ⅓ c dairy equivalent and ≥ 10% DV calcium
3. Grain, fruit and vegetable products, and items not in other categories	LSS	≤ 150	≤ 1.5 g	≤ 290 mg	≤ 10 g	<ul style="list-style-type: none"> - Subcategories differentiate, on a calorie basis, among products that have a small RACC (i.e., ≤ 30 g or ≤ 2 tbsp) and/or are lighter in density (e.g., g/cup) from those with a larger RACC and/or higher density - Examples of ≤ 150 calorie products: most children's breakfast cereals, crackers, & pretzels - The 290 mg sodium limit was set for all grain products but the administrator's expectation is that only leavened crackers need that limit and other products are expected to not exceed 200 mg - Examples of > 150-200 calorie products: denser breakfast cereals (e.g., shredded wheat), waffles, & vegetable products with sauces
4. Soups and meal sauces	LSS	≤ 200	≤ 2 g	≤ 480 mg	≤ 6 g	<ul style="list-style-type: none"> - Tomato-based products allowed ≤ 12 g of total sugars/LSS to include sugars naturally occurring in tomatoes & those added to balance product pH
5. Seeds, nuts, and nut butters and spreads	1 oz or 2 tbsp	≤ 220	≤ 3.5 g	≤ 240 mg	≤ 4 g	<ul style="list-style-type: none"> - For LSS < 1 oz or 2 tbsp, NTL & NCTE to be scaled proportionately
6. Meat, fish, and poultry products	LSS	≤ 120	≤ 2 g	≤ 480 mg	≤ 2 g	<ul style="list-style-type: none"> - For LSS ≤ 1 oz, NTL reduced to ≤ 60 kcal, ≤ 1 g sat fat, ≤ 240 mg sodium and ≤ 1 g total sugars
7. Mixed dishes	LSS	≤ 280	≤ 2.5 g	≤ 540 mg	≤ 10 g	<ul style="list-style-type: none"> - Products include casseroles, burritos, pizzas, & sandwiches that do not meet FDA/USDA definition

Appendix A.

Product Category	Unit	Nutrients to Limit (NTL)			Nutrition Components to Encourage (NCTE)	Notes
		Calories	Sat Fat	Sodium		
8. Main dishes and entrées	LSS	≤ 350	≤ 10% kcal	≤ 600 mg	<ul style="list-style-type: none"> ≥ 10% DV of two essential nutrients ≥ 1 serving of F/V/D/WG or ≥ ½ serving of F/V/D/WG and ≥ 10% DV of two essential nutrients 	<ul style="list-style-type: none"> for <i>main dishes</i> Items that contain ≤ 200 kcal and meet NTL criteria may qualify if they contain ≥ ½ serving of F/V/D/WG or ≥ 10% DV of any essential nutrient Items must meet FDA/USDA definition for <i>main dishes</i>
9. Small meals	LSS	≤ 450	≤ 10% kcal	≤ 600 mg	<ul style="list-style-type: none"> ≤ 17/12 g (See notes) ≥ 1½ servings of F/V/D/WG or ≥ 1 serving of F/V/D/WG and ≥ 10% DV of three essential nutrients 	<ul style="list-style-type: none"> Small meals contain multiple items but do not meet FDA/USDA definition for <i>meals</i> Meals must meet FDA/USDA definition for <i>meals</i> Sugars from <u>one</u> qualifying milk/milk substitute, or qualifying yogurt/yogurt-type product, or qualifying fruit (i.e., without added sugars) <u>or</u> qualifying F/V juice are not counted in the 17 g or 20 g total sugars limits When <u>two</u> qualifying items are present, the sugars from both items are not counted in the total sugars limit, but the limits (to account for all other items) are reduced to 12 g (small meals) and 15 g (meals) All other NTL criteria for small meals and meals (calorie, sat fat, and sodium limits) must be met
10. Meals (entrée and other items including a beverage)	Meal	≤ 600	≤ 10% kcal	≤ 740 mg	<ul style="list-style-type: none"> ≤ 20/15 g (See notes) ≥ 2 servings of F/V/D/WG or ≥ 1½ servings of F/V/D/WG and ≥ 10% DV of three essential nutrients 	

Trans fat. The criteria for *trans fat* is 0 g labeled for all categories. For foods in the meat and dairy categories served as individual foods or as part of composite dishes or meals (e.g., soups, mixed dishes, entrées, meal-type products), naturally occurring *trans* fats are excluded.

Exemptions

- Sugar-free mints and gum.
- The following products also are exempt from the nutrient criteria specified above, except as indicated in notes to Categories 9 & 10:
 - Fruit products without added sugars;
 - Vegetable products without added fats and which meet FDA regulations for "very low sodium;"
 - Beverages, including bottled waters, that meet FDA regulations for "low calorie" and "very low sodium" (diet sodas and beverages with added caffeine are excluded from this exemption).

Abbreviations and Glossary

DV: Daily Value.
Essential Nutrients: Those occurring naturally in foods (or that are added to foods to meet standards of identity or to restore nutrients lost in processing), and for which a DV has been established. If fortification is used to meet the criteria, the nutrient must be a DGA 2010 nutrient of concern (calcium, fiber, potassium, vitamin D) or a nutrient that is required to be listed on the Nutrition Facts Panel (iron, vitamins A & C).
F/V/D/WG: Any combination of fruits, vegetables, non/low-fat dairy, and/or whole grains.
LSS: Labeled serving size.
NA: Not applicable.
NCTE: Nutrient components to encourage are F/V/D/WG or Essential Nutrients.
NTL: Nutrients to limit are calories, saturated (sat) fat, *trans* fat, sodium and total sugars.
Qualifying F/V Juice: Any fruit or vegetable juice or blend that contains no added sugars and meets the requirements of Category 1.
Qualifying Flavored Milk/Milk Substitute/Yogurt/Yogurt-type Product: These are products that meet the Category 2 criteria for milk/milk substitutes, or yogurt/yogurt-type products.
RACC: Reference amount customarily consumed.
Serving(s): See USDA Food Group Serving Equivalents.
Total Sugars: Include naturally occurring and added sugars.