

WFA's progress report on the EU Pledge responsible marketing to children initiative

The [EU Pledge](#) is a commitment by 22 leading food and beverage companies, representing an estimated 80%+ of EU food and beverage marketing spend, to change what they advertise to children across Europe.

Launched in 2007 as a commitment of the [World Federation of Advertisers \(WFA\)](#) to the EU Platform for Action on Diet, Physical Activity and Health, the EU Pledge programme has made a significant difference to the types of food and beverage advertising children see across media in the EU. Yearly reports with the detailed methodology are available [here](#).

WFA and EU Pledge member companies support the European Commission's Code of Conduct for Responsible Business and Marketing Practices and are committed to working towards the Code's objectives and targets, notably to the aspirational objective to reverse malnutrition and diet-related noncommunicable diseases (NCDs) in the EU and the aspirational target of a food environment that makes it easier to choose healthy and sustainable diets.

In line with the terms of reference of the EU's Code of Conduct for Responsible Business and Marketing Practices, EU Pledge signatories have committed to carry out independent third-party compliance monitoring of the EU Pledge commitments.

2023 monitoring

The 2023 monitoring was the second exercise measuring compliance against the [enhanced](#) commitment, which was submitted to the EU Code of Conduct for Responsible Business and Marketing Practices. The consistency in results on TV, and the improvements on digital media show members' continued commitment to abide by the rules. This also applies to advertising on TikTok, which was monitored for the first time. The compliance rates on digital media in relation to the primary appeal of ads demonstrates members' commitment to the EU Pledge and underscores the importance of the Implementation Guidance Note released in 2016 and last updated in 2020. The potential cases of non-compliance with the International Chamber of Commerce (ICC) [Code of Advertising and Marketing Communications](#) (hereafter ICC Code); and the ICC [Framework for Responsible Food and Beverage Marketing Communications](#) (hereafter ICC Framework)¹ support EU Pledge signatories in further aligning their commercial communications with the guidelines, to market food and beverages products responsibly, regardless of the age of the audience or the nutritional profile of the product.

Key results

- **TV:** The overall compliance rate is **98.63%**
- **Digital:**
 - **97.62% of company-owned websites reviewed were deemed compliant with the EU Pledge.** 1 out of 42 websites were found in breach of the commitment.
 - No websites were found to be primarily appealing to children under 13 (100% compliance).
 - 1 website was in potential breach of the ICC Code and/or ICC Framework (97.62% compliance).
 - **96.71% of social media pages reviewed were deemed compliant with the EU Pledge.** 5 out of 152 profiles were found in breach of the commitment.

¹ Any non-compliant asset flagged against the ICC Code and ICC Framework identified as part of this monitoring are only meant to be indicative potential breaches. Actual and official breaches of the ICC Code and ICC Framework can only be assessed on a case-by-case basis by an SRO's jury after following the national procedures for handling complaints. SROs do not open investigations based on this monitoring and results remain confidential.

- No profiles were found to be primarily appealing to children under 13 (100% compliance).
- 5 profiles were in potential breach of the ICC Code and/or ICC Framework (96.71% compliance).
- **92.06% of influencer posts reviewed were deemed compliant with the EU Pledge.** 10 out of 126 posts were found in breach of the commitment.
 - No posts were found to be primarily appealing to children under 13 (100% compliance).
 - 10 posts were in potential breach of the ICC Code and/or ICC Framework (92.06% compliance).

Compliance with the EU Pledge commitment was carried out by the following independent third parties:

- **Ebiquity**², to review EU Pledge member companies' compliance with the commitment relating to TV advertising;
- **EASA – The European Advertising Standards Alliance**³, to review EU Pledge companies' branded websites, social media pages and influencer profiles, for compliance with the EU Pledge commitment.

The methodology and process of the monitoring of company-owned websites and social media profiles were reviewed by Professor Liselot Hudders, assistant professor at the Department of Communication Sciences at Ghent University and a postdoctoral fellow of the FWO at the Marketing Department and Dr Dienneke Van de Sompel, visiting Professor at the Department of Communication Sciences at Ghent University.

Ebiquity was also commissioned to measure the levels of **exposure to food and beverage advertising on TV** for all audiences and child audiences. The results demonstrate relatively low levels of ad exposure to food and beverage ads on TV. These findings serve as a reminder that, though it continues to be important to ensure that child exposure to 'HFSS' advertising remains quite limited, we have already come a long way. The WFA works together with the EU Pledge member companies towards reducing children's exposure to 'HFSS' ads.

- The daily spot average exposure for **all food advertisement** is at
 - **3.51** for all individuals
 - **1.11** for all child audiences
- The daily spot average exposure for **ads of products that do not meet EU Pledge nutrition criteria**⁴ is at
 - **3.01** for all individuals
 - **0.91** for all child audiences

Methodology:

The analysis was carried out in six EU markets (France, Germany, Italy, Netherlands, Romania and Spain), between 1 January and 31 March 2023.

The data points used to measure the balance of food advertising to children were the number of times that children under 13 saw ads by EU Pledge member companies, for products that do not meet companies' nutrition criteria, and for all EU Pledge company products. This was measured in "impacts", which is the statistical number of times each

² [Ebiquity](#) is the world leader in media investment analysis harnessing the power of data to provide independent, fact-based advice, enabling brand owners to perfect media investment decisions and improve business outcomes. As a data-driven solutions company Ebiquity help brand owners drive efficiency and effectiveness from their media spend, eliminating wastage and creating value. Ebiquity is able to provide independent, unbiased advice and solutions to brands because they have no commercial interest in any part of the media supply chain which is why they are conducting the analysis for the EU Pledge.

³ The [European Advertising Standards Alliance](#) brings together national advertising self-regulatory organisations in Europe. Based in Brussels, EASA is the European voice for advertising self-regulation.

⁴ See EU Pledge [nutrition white paper](#)

spot is viewed by one person and hence the most accurate measure of “exposure”. Exposure was calculated by dividing the number of total impressions, by the number of people within the specific target group (“universe”) and the number of days analysed.

EU Pledge members:



About the EU Pledge:

The [EU Pledge](#) is a voluntary initiative by leading food and beverage companies to change food and beverage advertising to children under the age of 13 in the European Union. It consists of three main commitments:

- No advertising for food and beverage products to children under the age of 13 on TV, print and internet, except for products which fulfil common nutritional criteria.
- No marketing or advertising in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes.
- Abide by the International Chamber of Commerce (ICC) codes and frameworks in all marketing communications. These are minimum common standards that enable joint monitoring and accountability.

Individual companies can apply corporate standards that go above and beyond these common rules.

The EU Pledge was launched in December 2007 as part of signatories’ commitment to the multi-stakeholder European Union Platform for Action on Diet, Physical Activity and Health, forum. The initiative was last strengthened in July 2021, in the context of the EU Code of Conduct on responsible business and marketing practices, under the banner of the EU Farm to Fork Strategy.

About WFA: The World “Federation” of Advertisers (WFA) is the voice of marketers worldwide, representing 90% of global marketing communications spend – over €800 billion per year. **WFA helps its members set standards for responsible marketing communications worldwide, and encourages leadership initiatives, which go beyond compliance with existing industry standards.** WFA signed the EU’s Code of Conduct on 5 July 2021.

For more information, please contact Fraser Bridges (f.bridges@wfanet.org)

Transparency Register: 6440918199-49