



**Canadian Children's Food and Beverage Advertising Initiative**  
***Commitment Concerning Advertising to Children***

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Campbell Company of Canada is a charter participant in the Canadian Children's Food and Beverage Advertising Initiative created under the auspices of Advertising Standards Canada. We are committed to advertising that supports the efforts of Canadian families to encourage their children to make healthier dietary choices that will serve them well into adulthood. In the Global Guidelines for Responsible Advertising to Children adopted by Campbell worldwide in March 2006, the current copy of which is attached to this Commitment (Appendix A), we have undertaken to follow what we believe to be self-regulatory best practices in the markets in which we advertise our products. Our Global Guidelines provide, for example, that we do not address advertising communications to audiences consisting primarily of children who are younger than six years old. Consistent with this undertaking, we are making a further Commitment Concerning Advertising to Children, which applies to all advertising primarily directed to children under 12 years of age in any medium in Canada.

Our commitment to children and their families centers on the five core principles of the Initiative, which relate to (1) advertising messaging and content (2) use of products in interactive games (3) use of licensed characters, celebrities and movie tie-ins (4), product placement, and (5) advertising in schools.

The Commitment set forth below is for any child directed advertising run during the 2011 calendar year, and may be amended if our approach to responsible advertising to children changes.

### **1. Advertising Messaging and Content**

The content of our advertising should be consistent with our own beliefs about nutrition and wellness and our Canadian vision of Extraordinary Authentic Nourishment for All. Accordingly, during this calendar year, we will support families by assuring that 100 percent of the products we advertise in our advertising primarily directed to children under 12 are healthier dietary choices (as described below). Ingredient statements and nutrition facts for the products that may be advertised to children in calendar year 2011 are included in Appendix B to this Commitment.

#### ***Healthier Dietary Choices***

Many children do not know how to construct a healthy diet and are unaware of the nutrient contributions of different foods. It is therefore difficult for them to make healthier dietary choices without guidance. In advertising directed to children, it is appropriate to favour foods that contribute important nutrients that may otherwise be at insufficient levels in children's diets; moderate the consumption of saturated fat, *trans* fat, cholesterol, sugars, and sodium, which are generally over-consumed in the typical Canadian diet; or, of particular importance, moderate total calories in their diets. Because different individuals have different needs, healthier dietary choices may vary for different children at different times. Within different food categories, various characteristics of a particular food – such as its calorie content, energy density, nutrient and other

contributions, frequency of consumption, and the way the food fits into a typical diet – influence the judgment of whether it is a healthier dietary choice for a particular child.

### Soups:

Soups that provide children with positive nutrition such as a serving of vegetables, a source of a vitamin or mineral at the level of 5% of the Daily Value and have sodium levels that meet the requirements for foods participating in the Heart & Stroke Foundation's *Health Check*<sup>™</sup> program are considered a healthier dietary choice. The 2011 plan does not include any advertising of soup to children under 12.

Most soups are below 200 calories in a 250ml serving. Soups frequently contain food groups such as vegetables, lean meats and whole grains that are recommended as part of a healthy diet for children. Soups are rich in water content, and provide a tasty way to support hydration. Like many vegetables and fruits, most soups have low energy density. Energy or calorie density is a measure of the number of calories in a food divided by its weight in grams. A food with an energy density of no more than 0.6 – e.g., 150 calories in a 250ml serving – is considered to have very low energy density. Following an eating pattern that includes many low energy density foods is helpful for weight management. According to the 2010 U.S. Dietary Guidelines Committee Report, “*Strong evidence shows that eating patterns that are low in calorie density improve weight loss and weight maintenance*”. The fact that a significant proportion of children in Canada are overweight or obese is an important public health concern. Consumption of more foods with low or very low energy density should be encouraged as a means of reducing caloric intake.

### Snack Crackers:

Canada's Food Guide advises that "*young children have small appetites and need calories for growth and development*" and "*do not restrict nutritious foods because of their fat content. Offer a variety of foods from the four food groups*". Children typically do not consume sufficient calories by eating only three meals per day. Because they are actively growing and metabolize food more quickly than adults, snacking is an important behaviour for children, and healthful snacking should be encouraged. The foodguide recommendations also encourage children aged 4-8 and 9-13 consume 4 and 6 (respectively) grain products daily with an additional recommendation to "*Make at least half your grain products whole each day.*"

A snack cracker product will be considered to be a healthier dietary choice in our advertising if it provides a serving of grain and has less than 35% of calories from fat, is low in saturated fat, has zero grams of *trans* fat, has equal to or less than 195 mg sodium and 8 g sugar per 20 g serving. *Pepperidge Farm Goldfish Cheddar* snack crackers and *Pepperidge Farm Goldfish Made with Whole Grain Cheddar* snack crackers meet the above criteria.

Even though snack crackers are typically consumed as a separate snack item, they may also be depicted as an accompaniment to meal items, such as soup, as long as appropriate portions are shown.

### **Implementing and Measuring Message Delivery**

Our advertising to children may be in the following mediums covered in this commitment:

- Television
- Radio
- Print
- Internet advertising
  - Canadian children have the ability to access the Campbell USA website found on the company-owned website [www.pfgoldfish.com](http://www.pfgoldfish.com). The site complies with the Campbell Commitment to the Children's Food and

Beverage Advertising Initiative in the United States. The URL is referenced on Canadian Pepperidge Farm snack cracker packaging

- Video and computer games rated “Early Childhood” or “EC”
- DVDs of movies that are rated “G”
- Mobile media, such as cell phones, PDA’s and through word of mouth marketing techniques

100% of the advertising to children under 12 will meet the standards set forth in this Commitment.

To authenticate our Commitment we will provide on a bi-annual basis all media schedules purchased for the kid’s campaign, validated by media supplier (station) billing, that details programs and costs. This will be provided by our media agency of record.

For the 2011 commitment period, our children's advertising will appear in Kids Specialty and Digital networks. Examples include but are not limited to, YTV, Teletoon, Discovery Kids, BBC Kids. Programs targeted to children under 12 will be determined as those with a child audience composition index exceeding 300 compared to the population norm, for the period ending July 31, 2011. For the period commencing July 31, 2011 and ending December 31, 2011, those programs targeted to children under 12 will be defined as any show that has a projected audience at the time media is purchased of 35% or more children under 12 years old during any airing of that show.

## **2. The Use of Product in Interactive Games**

Interactive games are activities on a web site in which the user is challenged to attain a score, beat a competitor, or master a level. For our 2011 calendar year, any interactive game primarily for use by children which includes a depiction of one of our food or beverage product varieties, or product packaging for a product variety, will depict only healthier dietary choices. Canadian children have the ability to access the interactive games and other content found on the company-

owned website [www.pfgoldfish.com](http://www.pfgoldfish.com). This website is maintained by Pepperidge Farm in the United States. The games and other content on the site comply with the Campbell Global Guidelines for Responsible Advertising to Children and with the Commitment of Campbell Soup Company and Pepperidge Farm, Incorporated pursuant to the Children's Food and Beverage Advertising Initiative in the United States ("US Commitment Program"). The US Commitment Program is equivalent to the Canadian Children's Food and Beverage Advertising Initiative. Details of the US Commitment Program may be found at [www.bbb.org/us/children-food-beverage-advertising-initiative/](http://www.bbb.org/us/children-food-beverage-advertising-initiative/). The [www.pfgoldfish.com](http://www.pfgoldfish.com) URL will be referenced on Canadian Pepperidge Farm snack cracker packaging.

### **3. The Use of Licensed Characters, Celebrities and Movie Tie-ins**

Today, we advertise in accordance with the standards set forth in this commitment and do not use any third party licensed characters, celebrities or movie tie-ins. Any future use of licensed third party characters, celebrities or movie tie-ins in any child directed media will be in accordance with the standards set forth in the existing Children's Broadcast Code for advertising to children and meet the standards set forth in this Commitment.

If Campbell decides to use third party licensed characters in future it will immediately advise ASC and submit a revised Commitment.

### **4. The Practice of Product Placement**

We do not actively seek to place our products in the program/editorial content of any medium primarily directed to children, for the purpose of promoting the sale of those products, or pay for such a placement.

## **5. Advertising in Elementary Schools**

Schools provide a special protective learning environment for our children. Elementary school children tend to trust their teachers and what they learn in school more readily than older children, who have a greater capacity independently to evaluate what they are told. We have chosen to limit our activity in elementary schools to (a) communicating public service messages through materials provided to foodservice personnel, school administrators, or teachers and designed for use in either classrooms or the lunchroom; (b) supporting charitable fundraising activities or other programs benefiting schools, through such efforts as our Labels for Education program; and (c) providing product display materials to foodservice personnel.

*Our specific undertakings in this Commitment are effective for the time period indicated above. The Commitment applies to our businesses in Canada, and may be amended at any time. Commitments effective for future time periods and any amendments to this Commitment will be submitted for consultation and acceptance to ASC under the Canadian Children's Food and Beverage Advertising Initiative. Commitments are monitored by ASC. Notice of any approved amendment will be posted by ASC on the CCFBAI website and by Campbell on [campbellsoup.ca](http://campbellsoup.ca).*

## **Appendix A: Global Guidelines for Responsible Advertising to Children**

**For more than a century, Campbell Soup Company has been nourishing people's lives with quality products.** Millions of people around the globe trust Campbell and its brands – not only because we make and market a wide range of wholesome, nutritious and great-tasting food products, but also because our consumers know and appreciate our standards, including the standards reflected in our advertising practices.

**We believe in the value of advertising.** Advertising communications provide all of us with useful information to help make everyday decisions that enrich our lives with new ideas, products and experiences. We also believe that carefully executed advertising campaigns and communications in all media vehicles may be appropriately addressed to children, if the varying levels of knowledge, sophistication and maturity of children of different ages are recognized and respected.

**As a company, we believe that balanced nutrition, within a healthy lifestyle, is a key to overall health and well being for people of all ages.** Balanced nutrition plays a critical role in maintaining good health, reducing the likelihood of disease, and improving the quality of life. Any food can be enjoyed as part of a healthy lifestyle when consumed in moderation.

**We believe that consumers are more likely to make appropriate food choices in following a healthy lifestyle when food companies provide clear and helpful information about their products, and about the role their products can play in a balanced and healthful diet.** We are committed to offering consumers a variety of wholesome, delicious, and nourishing products, and to helping them obtain the nutrition information and education they need to help make sound food choices.

**Parents and guardians are important gatekeepers in helping children make informed food choices.** However, adults are not always with a child when he or she is exposed to advertising, and younger children are less able to identify and evaluate advertising messages on their own. We believe that companies must take account of a child's ability to understand its advertising communications. For this reason, we will not address advertising communications to audiences consisting primarily of pre-school age children, *i.e.* those who are younger than six years old. When we advertise in media directed to a mixed audience of pre-school age children and adults, our advertising messages will be directed to the adult audience, not to the child audience. Communications to children who are six years old through eleven years old will take account of the relative sophistication of the audience. The layout and word choice we use when addressing the 'tween market, for example, will reflect the greater capacity of that audience to understand the nature of advertising than younger children.

**When we create advertising content that is directed to an audience consisting primarily of children, we will take special care to safeguard their safety and well-being.**

- Depictions of children preparing food will show age-appropriate heating and food-handling methods and situations.
- Children featured in advertising will be shown in safe physical and social environments, and will not be shown engaging in dangerous behavior.

- Our campaigns will show our products in the context of nutritional best practices. We will model good eating habits by showing appropriate eating occasions, moderation, healthy attitudes towards food, and an active lifestyle. For example, products advertised to children will be shown with appropriate portion sizes, and mealtime foods will be illustrated with wholesome food accompaniments. When we advertise single-serve and snacking products to children, we will show appropriate portions for children in the target audience.
- We will also protect children from misunderstanding or misinterpreting our advertising messages by using age-appropriate language.

**We are committed to responsible advertising.** Our most senior executives, including our Chief Executive Officer, personally oversee our process by which we review and approve advertising addressed to children before it is released to media to ensure it meets our guidelines. Wherever we advertise our products, we adopt what we consider to be self-regulatory best practices. As supporters of the Children's Advertising Review Unit (CARU) of the Council of Better Business Bureaus in the United States and similar organizations in other countries (such as Advertising Standards Canada), we subscribe to high industry standards for the self-regulation of advertising to children. For more information on the CARU Self-Regulatory Guidelines for Children's Advertising and the principles that underlie them, please go to [caru.org](http://caru.org) or visit appropriate organizations by country.

## Appendix B: Nutrition Facts and Ingredient Statements

### Pepperidge Farm® Goldfish® Cheddar Snack Cracker:

<b>Nutrition Facts</b>	
Per 37 crackers (20 g)	
Amount	% Daily Value
<b>Calories 90</b>	
<b>Fat 3.5 g</b>	<b>5 %</b>
Saturated 1 g	5 %
+ Trans 0 g	
<b>Cholesterol 0 mg</b>	
<b>Sodium 170 mg</b>	<b>7 %</b>
<b>Carbohydrate 13 g</b>	<b>4 %</b>
Fibre 1 g	4 %
Sugars 0 g	
<b>Protein 2 g</b>	
Vitamin A 0 %	Vitamin C 0 %
Calcium 2 %	Iron 2 %

INGREDIENTS: ENRICHED WHEAT FLOUR, CHEDDAR CHEESE [(MILK, CHEESE CULTURE, SALT, ENZYMES), WATER, SALT], VEGETABLE OIL (CANOLA, SOYBEAN AND/OR SUNFLOWER OILS), SALT, YEAST, SUGAR, SPICES (ONION POWDER), SODIUM BICARBONATE, YEAST EXTRACT, ANNATTO, MONOCALCIUM PHOSPHATE AND AMMONIUM BICARBONATE.

**Pepperidge Farm® Goldfish® Made with Whole Grain Cheddar Crackers:**

<b>Nutrition Facts</b>			
Per 37 crackers (20 g)			
Amount	% Daily Value		
<b>Calories 100</b>			
<b>Fat 3.5 g</b>	<b>5 %</b>		
Saturated 1 g	5 %		
+ Trans 0 g			
<b>Cholesterol 5 mg</b>			
<b>Sodium 170 mg</b>	<b>7 %</b>		
<b>Carbohydrate 14 g</b>	<b>5 %</b>		
Fibre 2 g	<b>8 %</b>		
Sugars 0 g			
<b>Protein 2 g</b>			
Vitamin A	0 %	Vitamin C	0 %
Calcium	2 %	Iron	2 %

INGREDIENTS: WHOLE GRAIN WHEAT FLOUR, ENRICHED WHEAT FLOUR, CHEDDAR CHEESE [(PASTEURIZED CULTURED MILK, SALT, ENZYMES), ANNATTO], VEGETABLE OIL (CANOLA, SOYBEAN AND/OR SUNFLOWER), SALT, AUTOLYZED YEAST, YEAST, SEASONING (ONION POWDER, PAPRIKA, SPICES), SODIUM BICARBONATE AND MONOCALCIUM PHOSPHATE.