



Canadian Children's Food and Beverage Advertising Initiative General Mills Commitment

General Mills Canada Corporation is pleased to submit its Commitment under the Canadian Children's Food and Beverage Advertising Initiative (the CCFBAI). The CCFBAI is a voluntary self-regulation program currently comprised of 19 of the largest food and beverage companies in Canada. By advancing and hastening a shift in the mix of messaging to encourage healthier dietary choices and healthier lifestyles in advertising to children under 12, the CCFBAI represents a significant step forward. General Mills Canada Corporation is proud to be a charter member of the CCFBAI and is fully supportive of its goals. As an industry leader, General Mills Canada Corporation is committed to maintaining the highest standards for responsible advertising to children. We have a long history of advocating increased levels of physical activity and support of fitness programs, particularly for children, in public policy arenas and through various private sector initiatives. Company initiatives such as the General Mills Champions for Healthier Kids grant program reflects our ongoing support for youth nutrition and fitness initiatives. The scope and breadth of our Commitment under the CCFBAI demonstrates General Mills Canada Corporation's continuing commitment to high standards and to providing clear leadership on this important issue.



A. Identifying Information

1. The corporate name and address of the Participant.

Company Name & Address

General Mills Canada Corporation
5825 Explorer Drive,
Mississauga, Ontario
L4W 5P6
905-212-4000
Fax: 905-212-4122
Web site: <http://www.lifemadedelicious.ca>

2. The name and contact information of an individual(s) responsible for overall implementation of the Commitment.

Commitment Implementation

Dale Storey
Vice President, Marketing
dale.storey@genmills.com
905-212-4000

3. The name of the specific entity or entities covered by the Commitment.

General Mills Canada Corporation

4. The name of each brand and/or product line that meets the nutrition criteria.

Lucky Charms®
Cinnamon Toast Crunch®
Honey Nut Cheerios®
Apple Cinnamon Cheerios®
Golden Grahams®
French Toast Crunch®
Reese Puffs®
Nesquik®
Fruit Gushers®
Fruit by the Foot®
Fruit Flavoured Snacks
Dunkaroos® Chocolatey Chip
Dunkaroos® Cinnamon Graham Cookies
Fruit Roll-ups®

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B. Core Principles

1. An overview of the manner by which the Participant intends to comply with the Advertising Messaging principle. Core Principles – Pledge should incorporate the core principles recognized in the Core Principles document effective January 2011.

General Mills Canada Corporation will only advertise Healthier Dietary Choices to children under 12.

General Mills Canada Corporation will commit to only advertise Healthier Dietary Choices to children under 12. As discussed in detail in Sections 2(d) and 2(e), General Mills Canada Corporation has developed a Healthier Dietary Choice standard based on dietary recommendations and regulations from Canadian and international government authorities. The standard takes into account the calorie and overall nutrient or food group contribution of a food product. Because the Healthier Dietary Choice standard rests on key elements of nutrition, it will be applied consistently across all types of General Mills Canada Corporation products.

This Commitment applies to all of the following types of media: television, radio, print, internet (i.e., third-party websites and company-owned websites), video and computer games rated “Early Childhood” or “EC”, and other video/computer games that are age graded on the label or packaging as being primarily directed to children under 12, DVDs whose content is primarily child directed, cell phones and PDAs, and word-of-mouth advertising when it is primarily directed to children under 12.

General Mills Canada Corporation will apply this guideline to 100% of products advertised in all media primarily directed to children under 12.

One-hundred per cent of General Mills Canada Corporation advertising in media primarily directed to children under 12 will be for products that: **(1) represent Healthier Dietary Choices, and (2) meet the sugar guideline described below.**

General Mills Canada Corporation will not target any advertising to preschool children, defined as children under six year of age, for any product, regardless of the product’s nutritional profile.

General Mills Canada Corporation will advertise to children under 12 only those products that have 12 grams or less of sugar per serving.

In recognition of consumer interest in the amount of sugar in food and beverage products and to support industry efforts to address consumer interest in sugar, advertising to children under 12 will also be subject to a sugar guideline. In addition to meeting the Healthier Dietary Choice standard, following the lead of our US parent company, only those products that have 12 grams or less of sugar per serving, other than sugar from dairy, fruit and vegetables, will be advertised to children under 12.

General Mills Canada Corporation advertising will continue to reinforce positive, healthier lifestyle choices.



Balance, Moderation and Exercise

It is our goal to help families and children address health and wellness issues by focusing on three steps to healthier living. We call this our Balance, Moderation and Exercise strategy:

- **Balance:** encourage families/children to understand and follow nutritional guidelines for a balance diet of healthier and nutritional foods.
- **Moderation:** encourage families/children to eat sensible portions of any food at any one sitting and throughout the day – we will never depict over-consumption.
- **Exercise:** advocate higher levels of physical activity

To achieve the above, and to help further the goals of the CCFBAI, General Mills Canada Corporation have undertaken the following initiatives/partnerships:

Whole Grains: Recognizing the impressive body of research supporting consumption of whole grains, in 2005 General Mills Canada Corporation made an important shift in our product family, by reformulating as necessary to ensure that whole grains are a key ingredient in all of our cereals. Some of our favourites, including original Cheerios, had always been based on whole grain, but now consumers can be confident that whole grains are found throughout our line of cereals, including the presweetened varieties. We are even more confident that this step can improve the overall nutritional health of Canadians given the emphasis on whole grains in the newest Canada's Food Guide (2007 version recommends that at least half of a Canadians' grain products servings be whole grain every day).

Champions for Healthier Kids Grants: The program annually awards a minimum of 25 grants of \$5,000 each to registered community based organizations around the country supporting innovative youth, nutrition and fitness programs.

Concerned Children's Advertisers (CCA) Partnership: General Mills Canada Corporation has long respected Canadian children and their families. We are very proud to have played an active and contributing role in the creation and ongoing evolution of Concerned Children's Advertisers (CCA). Established in 1990, CCA works to support and contribute to the establishment of the highest standards and codes of conduct for responsible advertising to children. As well, CCA plays a leading role in providing children with media literacy education and social messaging that will help them to build healthier, active lives.

Support of Amateur Athletics in Canada: General Mills Canada Corporation has been, and will continue to be, a committed supporter of amateur athletics in Canada. General Mills believes that sports promote many important skills (both social and physical) in our youth and to that end we are proud supporters of many of the key amateur athletics organizations in Canada. We have been longtime sponsors of Canada's Olympic Team, Hockey Canada, Speed Skating Canada and the Special Olympics, and we have recently signed on to become partners with these organizations through the next 4-6 years.

2. *A description of how the Participant intends to comply with the Advertising Message principle, including the following information:*

- a. *state separately for each covered medium (television, radio, print and internet) the percentage of advertising (measured in media impressions) that the Participant intends to devote to advertising products representing Healthier Dietary Choices;*

This Commitment is for the period of January 01, 2011 onward and reflects the most current changes to the commitment and updated principles. During this period, 100% of all advertising in all media primarily directed to children under 12 will be for products that (1) represent Healthier Dietary Choices as described in Section 2 (d) of this Commitment and, (2) meet the sugar guideline described above in Section B (1).

- b. *the proposed method by which the Participant intends to calculate media impressions for television, radio, print and internet (excluding company owned websites) necessary to satisfy the percentage requirement;*

Measurement and Calculations

For all media: Any program where 35% or more of the total audience is under 12 years of age will be considered “children’s advertising.”

Audience demographic calculations will be measured in media impressions primarily directed to specific demographic groups at the time the advertising is purchased, as determined by Bureau of Broadcast Measurement – Nielsen Media Research (BBM-NMR) ratings for TV, comScore Media Metrix for internet, and Print Measurement Bureau (PMB) data for magazine.

Our Commitment will be calculated separately for each advertising medium. We monitor ratings and audience demographics on a regular basis as available to ensure that we are aware of any changes in programming and/or audience composition.

Our media buying agencies are aware of our CCFBAI Commitment and will adjust media buys on an on-going basis to ensure compliance with the Commitment.

SUMMARY TABLE: EXTERNAL ADVERTISING

MEDIUM	AUDIENCE COMPOSITION	MEASUREMENT OF AUDIENCE COMPOSITION	CRITERIA FOR BRANDS PERMITTED TO ADVERTISE
Television	35% or greater is under 12	BBM-NMR – Meter data issued weekly; Diary data issued 3x per year	Meet Healthier Dietary Choice standard and sugar guideline
Television	35% or greater is under 6	BBM-NMR – Meter data issued weekly; Diary data issued 3x per year	Not Allowed
Print	Currently not planned		Meet Healthier Dietary Choice standard and sugar guideline
Radio	Currently not planned		Meet Healthier Dietary Choice standard and sugar guideline
Internet – included within TV promotions	35% or greater is under 12	comScore Media Metrix – released weekly	Meet Healthier Dietary Choice standard and sugar guideline
Internet – 50%	35% or greater is under 6	comScore Media Metrix – released weekly	Not Allowed

- c. *the proposed method by which the Participant intends to measure advertising on Participant owned websites;*

Measurement and Calculations

It is difficult to measure audience composition on the Internet without implementing complex tracking mechanisms. For this reason, if the content of one of our own sites is targeted to children under 12, we will assume that 100% of the traffic is coming from children under 12. Only products that represent Healthier Dietary Choices and meet the sugar guideline will be allowed to appear on an internet site with content primarily directed to children under 12. Content primarily directed to children under 12 will be determined based on a number of factors, including the content's subject matter, format, projected audience demographics and the composition of audience to which the site is advertised.

Additionally, General Mills Canada Corporation operates in full compliance with the Personal Information Protection and Electronic Documents Act requirements for collecting, using and disclosing any personally identifiable information from individuals, including children.

SUMMARY TABLE: INTERNAL WEBSITES

PRODUCT MEETS HEALTHIER DIETARY CHOICE STANDARD AND SUGAR GUIDELINE	CONTENT AUDIENCE	PERMITTED ON AN INTERNAL SITE WITH CONTENT PRIMARILY DIRECTED TO CHILDREN UNDER 12
Yes	Under 6	Not Allowed
Yes	Under 12	Allowed
No	Under 6	Not Allowed
No	Under 12	Not Allowed

- d. *for products representing Healthier Dietary Choices, state the scientific and/or governmental standard(s), or the company developed standard(s) on which the Participant is relying to designate the product as a Healthier Dietary Choice; and*

To be advertised to children under 12, a product must:

(A) Contain 175 calories or less per labeled serving **AND** it must **ALSO**

Either

(B) Meet all of the following nutrition criteria per labeled serving:

(Adapted from criteria developed by General Mills Inc.).

- 3 grams or less of fat
- 2 grams or less of saturated and trans fats, together
- Maximum of 60 milligrams of cholesterol
- Maximum of 230 milligrams of sodium for cereal and snacks / maximum of 480 milligrams for side dishes and main dishes
- Minimum of 2 grams of fibre or minimum of 5% of at least one of the following vitamins and minerals: vitamin A, vitamin C, calcium or iron.

OR

(C) Supply, per labeled serving, at least 1/2 serving of a food group targeted by Health Canada¹ for increased consumption (i.e., whole grain, vegetables and fruit, lower fat dairy, meat alternatives including beans, lentils or tofu), AND have per labeled serving:

- Maximum of 230 milligrams of sodium for cereal and snacks / maximum of 480 milligrams for side dishes and main dishes
- 2 grams or less of saturated and trans fats, together

- e. *to the extent the Participant is relying on a company developed standard, state the scientific and/or governmental standard(s) on which it is based.*

The standards outlined in Section 2(d) were developed by nutrition experts from the General Mills Bell Institute of Health and Nutrition, adapted for Canada from criteria developed for our US parent company, General Mills Inc. They are based upon the dietary recommendations and regulations from

Health Canada and international health authorities², including the US Food and Drug Administration, US Department of Agriculture – Department of Health & Human Services, and National Institutes of Health – Institute of Medicine. The guidelines and regulations of these organizations use a similar standard to that used by Health Canada for setting the Daily Values on our Nutrition Facts table. Our nutrition standards consider calorie AND overall nutrient or food group contribution of a food product. They address calorie requirements of children, incorporate standards associated with good nutrition and target key food groups recommended for increased consumption. Our criteria differ slightly from our US parent where we have made adaptations to conform to Health Canada’s definitions for nutrient content claims.

Specifically, the basis for each part of the requirement is as follows:

A: 175 Calories or less per labeled serving

A criterion for calorie content is included in recognition of the increasing prevalence of and concern about obesity, particularly childhood obesity. Balancing energy intake and energy output is essential for managing weight. To ensure internal consistency in our guidelines for marketing to children, this calorie limitation was adopted by General Mills Canada Corporation from the scientifically derived criteria developed by our US parent. According to the DHHS/USDA 2005 Dietary Guidelines for Americans and recommendations from the Institute of Medicine, most children ages 6-12 require approximately 1800 calories daily to maintain energy balance³. This same level of calories is used as the basis for the USDA MyPyramid recommendations for children⁴. FDA regulations identify 10% of a recommended intake as a “good source” or significant amount⁵. This approach characterizes 180 calories a significant source for children (1800 calories x 10% = 180 calories). In establishing the US calorie criterion, the calorie level used in US school wellness standards was also taken into account. For example, California’s SB12 includes a calorie content criterion of 175 calories for individual foods served a la carte to elementary school children⁶. Based on these considerations, our US parent selected the more conservative, lower value of 175 calories as our criterion.

B: “Healthier” nutrition criteria

In the US, the FDA has established a regulatory definition of “healthier”⁷ addressing the total fat, saturated fat, sodium, and cholesterol content of a food, with attention also focused on nutrients that make a positive contribution to the diet, namely vitamin A, vitamin C, calcium, iron, protein and fibre. These nutrients are also of great interest in Canada, and where possible General Mills Canada Corporation adopted the scientifically valid criteria that had been established by our US parent company, however, in some cases, as noted, we have adapted those criteria to conform to Health Canada’s definitions for nutrient content claims⁸.

- 3 grams or less of fat
- 2 grams or less of saturated and trans fats, together (consistent with Canadian criteria for “low in saturated fat” and “free of trans”)
- Maximum of 60 milligrams of cholesterol
- Maximum of 230 milligrams of sodium for cereal and snacks / maximum of 480 milligrams for side dishes and main dishes
- Minimum of 2 grams of fibre (consistent with Canadian criteria for “source of fibre”) or minimum of 5% (consistent with Canadian criteria for “source of” the nutrients in question) of at least one of the following vitamins and minerals: vitamin A, vitamin C, calcium or iron.



C: Supply, per labeled serving, at least 1/2 serving of a food group targeted by Health Canada¹ for increased consumption (i.e., whole grain, vegetables and fruit, lower fat dairy, meat alternatives including beans, lentils or tofu), **AND** have per labeled serving;

- Maximum of 230 milligrams of sodium for cereal and snacks / maximum of 480 milligrams for side dishes and main dishes
- 2 grams or less of saturated and trans fats, together

Canada's Food Guide 2007 directs Canadians to make each Food Guide Serving count, with a focus on choosing whole vegetables and fruit, making at least half of the recommended number of grain products servings whole grains, selecting lower fat milk products, and having meat alternatives (beans, lentils, tofu) often¹ our nutrition standards reinforce these recommendations by including a criterion for at least 1/2 serving contribution of one of these food groups. A half-serving of a food group can make a significant contribution toward reaching the total daily amount required within the four food groups.

Based on Canada's Food Guide, examples of 1/2 serving include¹:

- 1/2 slice of bread, 1/4 of a bagel/pita/tortilla, 1/4 cup of cooked rice/pasta/couscous, 15 grams of ready to eat cereal from the Grain Products group
- 1/4 cup of frozen or canned fruit, or 1/2 of a whole fruit from the Vegetables & Fruit group
- 1/4 cup of frozen or canned vegetables or 1/2 cup of green salad from the Vegetables & Fruit group
- 1/2 cup of 2% (or lower) milk, 1/2 of a 175 gram cup of 2% M.F.(or lower fat) yogurt from the Milk & Alternatives group
- 1/4 cup of tofu or 1/4 cup cooked beans from the Meat & Alternatives group

Although Canada's Food Guide encourages the increased consumption of the above foods, the Guide also recommends limiting intakes of fat, sugar and salt. For this reason, products that provide a half-serving of a food recommended for increased consumption must also not exceed certain sodium, saturated fat and trans fat limits.

For sodium, General Mills Canada Corporation adopted the scientifically valid criteria that had been established by our US parent company. For sodium, the US limitation was established using the Dietary Guidelines and the FDA's requirement for "healthier" as benchmarks. For cereal and snacks, the starting point was the Dietary Guidelines recommendation of consuming no more than 2,300mg of sodium per day⁹ to which the FDA measurement of 10% of the recommended intake as a "good source" or significant amount (2,300mg x 10% = 230mg)⁵ was applied. The limitation of ≤480mg of sodium for side and main dishes is consistent with the FDA's sodium level requirements to meet the definition of healthier for a single food, and is more restrictive than the FDA's sodium limit for main dishes¹⁰.

Limitations of 2 grams or less of saturated and trans fats, together, were established based upon the Canadian criteria for the "low in saturated fat" and "free of trans fats" claims, which recognize the similarity of health risk from over consumption of saturated and trans fats^{1,8}.

3. *The manner by which the Participant intends to implement the Licensed Character principle.*

As part of the CCFBAI Commitment, companies commit to reduce their use of third-party licensed characters in advertising primarily directed to children under 12, unless the advertising includes a product meeting Healthier Dietary Choices to appeal to the intended audience.

General Mills will allow only Healthier Dietary Choice products that meet the Sugar Guidelines to use third-party licensed characters, celebrities and movie tie-ins in advertising primarily directed to children under 12.

Consequently, no licensed characters, celebrities or movie tie-ins will be used in advertising primarily directed to children under 12 for products not meeting these standards.

4. *A description of the manner by which the Participant intends to implement the Product Placement principle.*

General Mills Canada Corporation will not pay for or actively seeks to place any of our products, regardless of nutrition profile, into program/editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products.

5. *A description of the manner by which the Participant intends to implement the Interactive Games principle.*

General Mills Canada Corporation will allow only products that (1) represent Healthier Dietary Choices as described in Section 2(d) of this Commitment and (2) meet the sugar guideline described above in Section B(1) will be incorporated into interactive games primarily directed to children under 12.

In addition, General Mills Canada Corporation websites and interactive games primarily directed to children under 12 will include a 30-minute “activity break,” pausing the activity to encourage children to engage in another “more active” activity. Links to external health-oriented sites that meet the Interpretation Guidelines to the Canadian Code of Advertising Standards will be provided where feasible. Games will reinforce the Balance, Moderation and Exercise strategy outlined in Section B (1), and will never advocate, encourage or depict excessive consumption of food products.

6. *A description of the manner by which the Participant intends to implement the Advertising in Schools principle.*

General Mills Canada Corporation does not advertise in elementary schools. General Mills Canada Corporation will continue our policy to not advertise food or beverage products of any kind, regardless of nutrition profile, in elementary schools. Similarly, we will not conduct giveaways, product promotions, contests or any other advertising activity primarily directed to students in elementary schools.

7. *An implementation schedule for each commitment set forth in the Participant’s Commitment.*



We will only advertise products that (1) represent Healthier Dietary Choices as described in Section 2(d) of this Commitment and (2) meet the sugar guideline described above in Section B(1).

We will NOT advertise any product to children under 6.

Our CCFBAI Commitment is reflected in the Company's Marketing Guidelines, and is enforced across the company through a strict internal review and approval process. All advertising to children, whether it is TV, radio, print or Internet goes through a rigorous review process, including prescreening by ASC and final approvals by General Mills Canada Corporation Marketing and Advertising senior management. Every marketer at General Mills Canada Corporation is required to review and acknowledge their understanding of General Mills' Marketing Guidelines annually. Each of our design, advertising and social media agencies is required to do the same.

- ¹ Canada's Food Guide – Canada's Food Guide has been available to guide Canadians towards healthier eating since 1942, and has been revised 7 times since that first publication. The most recent version of the Food Guide (Eating Well with Canada's Food Guide) was released in February 2007, based on the most up to date science about diet and health, and the most careful modeling of the ideal diet to date. Please visit http://www.hcsc.gc.ca/fn-an/food-guide-aliment/index_eng.php for more information about this Guide.
- ² Canada's Food Guide (see above) and US Department of Health and Human Services and U.S. Department of Agriculture. Dietary Guidelines for Americans, 2005. 6th Edition, Washington DC: U.S. Government Printing Office, January 2005 (<http://www.health.gov/dietaryguidelines/dga2005/document/default.htm>); Otten, J., Pitzel Hellwig J. & Meyers, L. (Eds.), (2006). The Dietary Reference Intakes: The Essential Guide to Nutrient Requirements. Washington DC: The National Academies Press; 21 CFR Parts 100-169, 2006.
- ³ Estimated daily calorie requirements for children 6-12 years range from 1200-2600 calories. A value of 1800 calories is a "mid-point." Referenced by DHHS/USDA 2005 Dietary Guidelines, page 12.
- ⁴ www.mypyramid.gov
- ⁵ US "good source" nutrient content claim 21 CFR 101.54(c). 2006 ed., 93-94.
- ⁶ An act to amend Sections 49430, 49431, 49433.9, and 49434 of, and to add Section 49431.2 to, the Education Code, relating to pupils. SB.12 (2005).
- ⁷ FDA "Healthier" is defined per reference amount, per labeled serving and per 50g for products with a reference amount $\leq 30g$. Our nutrition standards apply these criteria on a labeled serving basis to reflect the serving size actually shown on the product package. "Healthier nutrient content claim" 21 CFR 101.65(d) (2). 2006 ed., 113-114.
- ⁸ Canadian Food Inspection Agency, Guide to Food Labelling and Advertising (2003), available online at <http://www.inspection.gc.ca/english/fssa/labeli/guide/toce.shtml>.
- ⁹ The DHHS/USDA Dietary Guidelines for Americans state, "Consume less than 2,300mg (approximately 1 tsp of salt) of sodium per day." DHHS/USDA 2005 Dietary Guidelines, pages 39-42.
- ¹⁰ US FDA's definition of "healthier" includes 480mg or less of sodium per labeled serving for a single food. 21 CFR 101.65(d)(2)(ii). FDA's definition of healthier for main dishes includes 600mg or less of sodium per labeled serving. 21 CFR 101.65(d)(2)(ii).