

## ANNEX 3



### **Online promotion of food to children**

Best practice principles for communications on advertiser-owned websites

#### **1. Application of these principles**

1.1 In the UK commercial communications are regulated through the BCAP and CAP codes and any complaints about those communications are adjudicated on by the independent Advertising Standards Authority. The non-broadcast CAP code covers all paid for marketing communications in the online environment, including banners, pop-ups and sponsored links on third party websites.

1.2 Promotional offers on websites are covered by the CAP Code.

1.3 Websites are excluded from the CAP/ASA system (other than for promotional offers). In effect they are seen to be the same as shops.

1.4 These Best Practice Principles are designed for advertisers to adopt on a self-regulatory basis to cover those parts of the online environment not subject to the ASA/CAP system.

#### **2. Approach to best practice principles**

2.1 We believe that voluntary guidance is an effective means of establishing responsible and effective marketing practices.

2.2 These principles stem from a commitment to be responsible marketers and reflect a belief that brands and products can play a positive role in encouraging people to adopt a healthy lifestyle.

2.3 These principles are designed to guide the use of marketing communications of food and drink products and are fundamental to the relationship with consumers.

#### **3. Definitions**

3.1 For the purpose of these principles, a *child* is anyone under 16, unless otherwise stated.

3.2 References to 'food' throughout the document should be taken to include both food and drink.

#### **4. General principles**

4.1 The online promotion of food products should not condone or encourage poor nutritional habits or an unhealthy lifestyle in children.

4.2 Although children may be expected to exercise some preference over the food they eat or drink, online communications should be prepared with a due sense of responsibility and should not directly advise or ask children to buy or to ask their parents or other adults to make enquiries or purchases.

4.3 Online communications of food products should not encourage children to pester or make a nuisance of themselves.

4.4 Online communications should neither try to sell to children by directly appealing to emotions such as pity, fear or self-confidence nor suggest that having the product somehow confers superiority, for example making a child more confident, clever, popular or successful.

4.5 Online communications addressed to children should avoid 'high pressure' and 'hard sell' techniques; they should neither directly urge children to buy or persuade others to buy nor suggest that children could be bullied, cajoled or otherwise put under pressure to acquire the product.

4.6 Products and prices should not be presented in online communications in a way that suggests children or their families can easily afford them.

4.7 Online communications addressed to or targeted directly at children should not actively encourage them to eat or drink at or near bedtime, to eat frequently throughout the day or to replace main meals with confectionary or snack foods.

## **5. Use of licensed characters and celebrities**

5.1 In line with the non-broadcast CAP Code these principles on the use of licensed characters and celebrities apply to commercial communications targeted at pre-school and primary school children.

5.2 Licensed characters and celebrities popular with children should be used online with a due sense of responsibility in accordance with this guidance and should not encourage over consumption by children.

## **6. Nutrition and health claims**

6.1 These principles on the use of Nutritional and Health Claims apply to commercial communications targeted at pre-school and primary school children.

6.2 Nutrition and Health claims should be supported by sound scientific evidence and comply with EU Regulation (EC) No 1924/2006 on nutrition and health claims made on foods.

6.3 Marketing communications should not disparage good dietary practice or the selection of options, such as fresh fruit and vegetables that accepted dietary opinion recommends should form part of the average diet.

For further information about these best practice principles please contact Director of Public Affairs Ian Twinn at [iant@isba.org.uk](mailto:iant@isba.org.uk).

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