

# FOOD AND RESPONSIBLE MARKETING

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## MEP: Marketing techniques need to respect privacy

Intrusive marketing practices brought on by the Internet have attracted the attention of the European Parliament, with lawmakers concerned about guaranteeing citizens' privacy, said Philippe Juvin MEP in an interview with EurActiv.



*French MEP Philippe Juvin (European People's Party, France) is a member of the European Parliament's internal market and consumer protection committee and the draftsman of an own-initiative report on 'The impact of advertising on consumer behaviour'.*

*He was speaking to EurActiv's Outi Alapekkala.*

**Referring to your report, how big a role do you think advertising actually plays in consumer choice?**

Advertising is a good thing for the internal market – it's very

useful and we need modern and efficient advertising to improve the efficiency of the internal market. Nevertheless, it needs to be controlled to be sure that individual rights are respected. That is the aim of this report – to find a good balance between these two aims.

**How would you define responsible marketing?**

What is modern and good for consumers? Probably marketing that is fair and respects individual rights, including consumers' confidential information. For instance, I think it's absolutely impossible to accept that advertisers could read the content of your personal emails to make advertising. It's absolutely impossible to think that such a thing could be acceptable.

**But isn't this the case already? I have witnessed targeted advertising in Google Mail, based on the subject of correspondence.**

It is something that is discussed, at least. Personally, I think it's possible that it does exist now.

**You are particularly worried about digital media in your report – what about children being targeted through the Internet or**

**other digital tools?**

One new way to develop advertising is behavioural advertising – very useful, very efficient advertising. It is so efficient that we need consumers to understand what behavioural advertising is.

Of course, children and other vulnerable people have to be protected against this kind of advertising because they cannot understand this type of advertising. And when they receive very targeted advertising, it is necessary that they understand what it is.

**Could you give me an example of targeted advertising for children?**

If children receive adverts on their PCs at home about toys or foods because they have been on websites concerning those toys or foods before – they have to be informed that it's not by chance that they receive these advertising emails.

Children cannot understand that – especially for foods and toys. We propose in this report that behavioural advertising towards children [should be] strictly forbidden.

**In your report you also mention consumer educa-**

**tion – and the European Commission is planning a communication on 'consumer empowerment' in 2012. What can the EU do? Is there a role for industry in consumer education?**

Some things have been done in the member states, for example in the UK there is 'Media Smart', which seems a very interesting initiative. In this report, I propose developing such procedures in all other EU member states.

**I understand that industry is financing this initiative. Do you feel comfortable with that and do you think it is OK if industry then brands the educational material?**

Yes – but it depends on the level of power the industry has in the definition of the message that is delivered through the programme.

**For 'Media Smart', I understand that industry gives the money and governments implement the project. Some countries opt to have company logos in the material, some not.**

We probably need to work with industry – it's impossible to imagine

procedures and tools without the industry, but we have to be aware of dangers of such an association. Industry has a role to play, states too, but the roles are not the same. We have to have a good definition of the level of responsibility of the two actors. But of course, we need the help of the industry.

**Is there anything else that can be done at European or national level to improve people's media literacy?**

It's a first step to include new media in the question of fair or unfair advertising. This was the main aim of my report. Now I'm waiting for the response of the Commission, which has to propose new measures for unfair advertising on the Internet. Probably, if our proposals are acceptable and useful, we can expect that other countries – including the United States – could join us in having common rules on digital advertising.

**There are no such rules at EU level yet, so are you proposing new legislation or to revise existing legislation?**

Both – to rework current EU legislation and probably envisage a new one.

## EU agreement on food labelling taking shape

Member states are nearing a deal on new food labelling rules that would leave wiggle room for industry to use their own labelling schemes and choose whether to show nutritional information on the front or back of a product's packaging.

The 27 EU ministers in charge of consumer affairs are set to reach a political agreement on the proposal at a meeting next Monday (6 December).

The expected deal comes after

a first reading in the European Parliament last summer saw lawmakers reject calls by health and consumer groups for a traffic light system giving a visual warning for high fat, sugar or salt content in a product.

The Parliament vote was largely seen as a victory for the food industry, which had lobbied fiercely against the traffic light system, currently in force in the UK.

A final agreement on the

proposal will nevertheless still be far from certain after Monday's meeting, as there are still major differences between the ministers' and the Parliament's positions.

**No mandatory front-of-pack labelling**

The European Commission had initially proposed a strict mandatory scheme with information provided front-of-pack for five nutrients: energy,

salt, sugar, fat and saturated fats. These would have to be shown in amounts of 100g, 100 ml or per portion.

The original text also proposed approving additional national schemes – voluntary or mandatory – that would coexist with EU-level rules.

In its first reading, the European Parliament backed mandatory front-of-pack nutrient labelling but voted in June to delete the entire chapter

mentioning national schemes. The House's rapporteur on the dossier, Renate Sommer MEP (European People's Party; Germany), argued that "all should be done by a pan-European regulation".

"We do not want to have additional national labelling schemes," she said.

The Council, which represents the EU's 27 member states, is likely to reject the idea that

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additional national labelling schemes would need pre-approval at EU level, a diplomatic source explained to EurActiv. Instead, it suggests giving food operators the freedom to use their own schemes in addition to the EU-level requirements.

These industry schemes would need to comply with criteria set out in the regulation, such as avoiding labelling that misleads consumers. But they would not need to be pre-approved at EU level.

If endorsed, this system would likely be welcomed as good news by the food industry, which has been rolling out its own voluntary scheme across Europe, based on Guideline Daily Amounts (GDAs).

In addition, the Council wants to leave operators free to choose whether they want to put the nutritional information on the front or back of packaging.

The Council's stance is likely to infuriate consumer groups, which have been calling for mandatory front-of-pack labelling of key nutrients for years. Health and consumer organisations are calling for a traffic light system giving consumers "at-a-glance information" and a visual warning for high fat, sugar or salt content of a product.

## Marketing 'nanofoods'

The Commission's initial proposal did not refer to nanomaterials, but the Parliament voted for mandatory labelling of foods that contain nanoparticles.

EU ministers are set to endorse the House's position at their Monday meeting.

In a recent interview with EurActiv, European consumers' organisation BEUC called on the food industry to be more transparent regarding the use of nanotechnology in food.

Ruth Veale from BEUC regretted that while the industry made big headlines a few years ago regarding the use of nanomolecules in improving the quality of food, it has completely shut down communications on the matter since consumers started to ask questions about nanomolecules' impact on health.

Veale also noted that while the food industry across the board categorically denies using, researching or investing in nanotechnologies, a Dutch consumer group only recently found an item containing silica on a nanoscale. The group claims this powder is being used in food products to prevent it from sticking.

The Parliament is also asking for mandatory labelling of appetite-enhancing substances in products like sweeteners, and would require manufacturers to indicate that on the front of packaging.



## Country of origin

Indication-of-origin labelling is currently voluntary, except where failure to provide the indication might mislead the consumer as to the true origin of a product. Regarding meat, only beef must carry an origin label. The Commission did not propose any changes to these rules.

But the Parliament asked for mandatory origin labelling to be extended to fish, poultry and dairy products, even when used as an ingredient in processed food, as well as other single-ingredient products.

The Council, in turn, is ready to support an extension of current rules to pork, lamb and poultry, but suggests that the Commission should study, within three years of the entry into force of the legislation, whether country-of-origin labelling should be extended to other products. These would include milk products, single-ingredient products, processed foods and other ingredients when they represent more than 50% of a food product.

## Second reading

Described as "a hard bit of work" by officials due to its technicality and complexity, the dossier will be forwarded to the Parliament for a second reading.

But Parliament officials noted that reaching a second reading deal with Council would "need a lot of compromise," in particular within the House itself, because the positions are very different between rapporteur Sommer (EPP) and the Parliament's other political groups.

"In the first reading there was a difference on pretty much all of the issues – so we will have to try to solve these," noted an official.

The Parliament will also need an absolute majority to amend the Council's common position.

# EU hopes media literacy will 'empower consumers'

Policymakers believe consumers need to be more critical about the messages they receive in the media, as people have little chance of escaping from advertising in today's commercially-filled world.

The European Commission is pushing member states to include media courses in their education programmes in order to help EU citizens to become active users of the media.

A Commission recommendation on media literacy, published in 2009, encourages governments to boost citizens' awareness of emerging risks in new media, such as privacy breaches or hidden advertisements.

The EU executive also asked the media industry to provide citizens with a means to "better identify the boundaries between marketing and content".

For example, it suggested holding "awareness-raising campaigns about techniques used for commercial communication purposes, notably about product placement and online advertising".

EU member states also recognise the importance of media literacy and the European Parliament has suggested developing media literacy programmes "to promote active and aware citizenship in Europe".

## Media literacy for commercial communication

With the Internet taking up a growing share of the media market, especially among the younger generation, the European Commission has developed an EU approach to media literacy in the digital environment. The communication, adopted in 2007, encouraged initiatives in several areas:

- Giving young audiences tools to develop a critical approach to commercial communication, enabling them to make informed choices;
- Raising awareness about industry codes of conduct, and;
- Encouraging public/private financing in this area with adequate transparency.

One example of a privately-funded programme is Media Smart, which provides educational materials to primary schools free of charge with the aim of teaching children to think critically about advertising in the context of their daily lives.

The initiative is funded by the advertising business in the UK and supported by Britain and other EU governments.

It was launched in the UK in November 2002 and has since been rolled out in several EU countries, including Belgium, the Netherlands, Germany, Finland, Sweden, Portugal, Hungary and France.



Will Gilroy from the World Federation of Advertisers noted that "as far as we were aware, back in 2002 there was nothing in schools which taught children to be media-literate or at least media-educated".

But since it is virtually impossible to hide all advertising from children, Gilroy said the industry can "help give children the skills to be critical and discerning in a commercially-filled world".

## Consumer groups suspicious about industry funding

However, the merits of such private initiatives are questioned by European consumer organisation BEUC, which argues that industry-funded programmes like Media Smart let the wolf into the sheepfold.

"Giving industry the opportunity to teach children about advertising [...] it is not very clear how it works. So we would prefer if it was done by an independent body," commented BEUC's Ruth Veale, suggesting that people would have more trust in such initiatives if they were done "away from industry".

Meanwhile, Will Gilroy stressed that "industry does not claim to have a role in educating children, but in enabling it". It is not true to say that "industry is going into schools, teaching," he said, adding that while industry pays for the Media Smart programme, the money is given directly to the academics and experts who develop the materials.

Last month, the European Parliament's committee on the internal market and consumer

protection suggested developing programmes like 'Media Smart' in all EU countries.

The draftsman of the report, MEP Philippe Juvin (European People's Party; France) said he had no problem with industry financing such initiatives, but cautioned: "It depends on the level of power the industry has in the definition of the message

that is delivered through the programme."

"We probably need to work with industry – it's impossible to imagine procedures and tools without the industry, but we have to be aware of the dangers of such an association," Juvin said.

## Consumer empowerment

Aside from the need to educate children to make them media-savvy, the European Commission notes that marketing, products and services are becoming increasingly complex, making it more difficult for consumers as a whole to make informed choices.

In order to tackle the issue, the Commission is planning to table a non-legislative communication on consumer empowerment in 2012.

The idea is "to put together best practices on consumer empowerment with regard to information, education, media, representation and redress". It will also involve identifying best practices in areas such as information on rights, consumer education and capacity-building.

But for BEUC, consumer education is mainly an excuse to avoid legislating and more about "putting the onus back on the consumer so that it is up to them to make the right decision".

Veale said that while education is important, "you will also need tools and the instruments in place to use what you have learned".

"You can educate until the cows come home," she said of food advertising. But if the products don't have a clear labelling scheme or are somehow misleading, she says education becomes meaningless.

# Consumer group: Food ads still targeted at kids

Despite industry pledges, children are still being targeted in food adverts and such ads are moving from television to other media such as the Internet, says Ruth Veale of European consumers' organisation BEUC in an interview with EurActiv.

*Ruth Veale is head of the food, health, environment and safety department at BEUC, the European consumers' organisation.*

*She was speaking to EurActiv's Outi Alapekkala.*

## What are your current priorities on food and responsible marketing?

Health claims and food information and marketing to children are our top things in marketing of foods.

We really appreciate that the European Food Safety Authority (EFSA) is applying 'gold standards' when reviewing the claims dossiers and, so far, over 80% of all claims have received a negative opinion.

## Against a background of a massive rejection of claims by EFSA, can we even talk about responsible advertising today?

Well, exactly. The work that EFSA has done has been fantastic and it is great that they have put out the opinions as soon as they could so that we are at least aware of those products that have received a negative opinion. We can, by looking at the opinion, identify what types of product have received a negative opinion - like Yakult recently.

But the issue now is to set up the positive list of claims by the Commission, which will not now be put in place until after June next year - some say not before December next year.

## Does this mean that Yakult can still be advertised as usual until then?

Yes. And this is the issue for us - the fact that these products can still remain on the market with their claims until six months after the positive list has been set up, which means that consumers can potentially be misled into buying these products for another 18 months.

The positive list was supposed to be set up by this year but then it was postponed so that all claims

would go on a positive or negative list together. And this will be done by the end of next year.

The other issue is the nutrient profiles, which are the cornerstone of the health claims regulation.

While [German European People's Party MEP] Renate Sommer (the European Parliament's rapporteur on the dossier) has tried to get these deleted from the health claims regulation, for us they are of vital importance and are also related to responsible marketing.

Because for health claims it ensures that only products that meet a specific nutrition criteria can bear a claim. So obviously we do not want products high in fat, sugar or salt to bear a claim.

But also, you need to know that industry has come out very strongly against these profiles - and some companies have said that profiles could lead to warnings on products or the product couldn't be sold any more. This is complete misinformation and not acting responsibly. And Renate Sommer has really been trying to get nutrient profiles deleted from health claims regulation through the food information regulation.

But this is weird for us, because companies often use their own profiles to determine what foods they market to children. So if you look at the EU pledge - each company has its own nutritional criteria to determine what they do and what they don't advertise to kids.

## What is your assessment of the EU pledge?

For us there are various areas where it needs to go further. It is a step into the right direction, for sure. But there are lot of 'buts'.

Among their specific commitments, companies have varying criteria regarding the age of children concerned and use different nutritional criteria to determine what they advertise. The development of nutritional criteria (as to what foods can/cannot be advertised to children) is not transparent - we don't know how they came up with them. We would like to have scientific criteria be developed to determine what foods should and should not be advertised to children.

The second issue is that the pledge does not cover all forms of media. So, where you say that there is 99% compliance with advertising to children on TV, we have seen over a number of years anyway that companies are moving away from television advertising and they are going

towards the Internet, games and video games. They really have great imaginations.

## Are you saying that foods are being advertised in video games?

There are company-specific websites which are not covered under the pledge, as far as I'm aware. And they have games specifically targeting children and these are naturally branded. You can send these games and links to your friends.

So you need to go to a company website, but you also with some food products you more and more have on the pack a code saying 'visit our website for free games', for example. So this is advertised on the product - 'go to our website to get games'. And this is not really covered by the companies' EU pledge.

Also, the fact that cartoon figures on boxes of cereals, for example, and companies' own cartoon characters - [some of which are] as well-known as Disney characters - are not covered by the pledge. So you could say that there are a number of loopholes in the pledge. While certain media are covered, industry is also getting more inventive in its way of marketing to children.

## Is responsible marketing only about children?

For us the main issue is children, but when it comes to health and nutrition claims, for example, the issue touches upon adults as well. This is why scientific evaluation of claims by the EFSA is necessary and nutrient profiles are necessary, because we don't want a product high in salt, sugar or fat to bear a claim.

Our studies back in 2005 show that consumers look at the claim and base their purchase on a claim rather than the nutritional criteria, because these claims are often on branded products and people trust brands. So, when consumers could choose between a product with a claim and a product without one, they opted for the product with a claim. So this is why health claims regulation is so important for us. We have studied consumers' confidence in claims and they read and trust them.

## Is the trust brand-related?

The majority of consumers look at the claims and are more likely to buy a branded product with a claim than a branded

product without a claim.

If people are confronted with a product on a shelf - most say they will go for the brand because they know about it and trust in it. And if the brand has a claim, it is easier for a consumer to trust a claim made by a multinational brand. So brands play an important role in the selection.

## Isn't it in the interest of a big brand to be a trusted brand? How valuable is trust in a brand or trust in a product?

I think they go hand in hand. While there was a lot of criticism from industry about EFSA's workings and the claims, it is important to say that there are some companies who have invested a lot of money in making sure that their claims are scientifically substantiated which are supporting EFSA and are supporting the development of profiles - but how strict they want those profiles to be is another matter. So there are companies that are working with same mindset as us.

## Is it possible to shelter children from advertising in today's commercial world?

I think we need to stress that it is not only about advertising to children, as we have seen a shift by companies away from advertising to children to advertising to parents. 'If you are a good parent you should be giving your child this,' etc.

There is one ad about a perfect mother having little chocolates for her children every day after school - and these are naturally 'the perfect portion size for children'. In another, a happy family is having breakfast together - and they are clearly happy because they are all having chocolate cereals, high in sugar.

So, it is about shifting away from directly targeting children and putting pressure on parents - and this is another issue for us.

But we also need to be looking at TV programmes that children actually watch (they may not be qualified strictly as children's programmes but are hugely popular among children).

And when we asked about this around companies, they said 'well, parents are there to police their children'. But we think that parents already have enough to deal with.

**So should we take all**

## food advertising off TV?

The television is not as much of a problem as it was before, but this is where profiles come in. And I believe it is important to have strict profiles when it comes to marketing to children.

As I said, within the different pledges every company has their own criteria - whereas we'd need something strict: 'this you can do, and this you cannot'.

But there is also the fact that we have given self-regulation a go. We are on this platform, trying to be constructive.

A lot more needs to be done - addressing the nutrition criteria, the age of children.

I need to be clear that what we are speaking of is the advertising of foods high in fat, salt and sugar to children.

## But how can you protect children in a commercial world, where adults can be targeted with advertising and children will always be confronted with those ads as well?

This is of course an issue. But the other one is the specific targeting of children - and that has not stopped yet.

So before talking about children seeing ads targeted at adults, we need to go back and make sure that programmes or sites that are specifically intended for children don't have these adverts: that would already reduce a lot what children are confronted with. And then the next step would be to look at this other issue.

## What does responsible marketing mean to you?

It is something that is not hidden or misleading, and does not put undue pressure on people to buy a product.

## Industry finances programmes like Media Smart. What do you think about this?

It is a huge issue. Companies going to school and sponsoring books or playgrounds is very common in the UK, at least. Last year we had an example here in Belgium whereby you had McDonalds in schools sponsoring all sport equipment, and it was a huge deal at that time. But you have in the UK cases in which companies then require that their logo is on the balls or T-shirts, etc.

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as well.

I think that for us, we would prefer for any sort of campaign to be funded either by governments or the European Commission, for example.

Sometimes when it is funded by industry it is not very transparent and people will have a lot more trust if it is away from industry. Giving industry the opportunity to teach children about advertising is not very clear how it works. So we would prefer if it was done by an independent body.

The same standards should be applied across Europe on this and the Commission or governments could take the money from the industry and then allocate it, so that there would be a sort of in-between step.

### What about greening consumer behaviour? Is there any role there for industry in education on this?

Our UK member did a study on green labels just a while ago and the major finding was that they would like the label to be endorsed by an independent body, so that there is clear scientific criteria behind these labels and that these are transparent, because here again you have so many green claims made by companies.

### Current green claims are based on companies' own assessment of a product compared to another company's product in the same category. Do you think that there should be EU regulation on green claims?

It is a bit early to talk about an EU-wide scheme, but we do believe that there should be some sort of standardisation with these labels. There is currently a proliferation of labels, which merely confuses consumers. Perhaps more criteria should be put in the development of a single label, for example.

We have to make sure that the green labels mean something. Consumers will trust them more if they come from government or an independent body than from industry.

We are asking for more transparency from the industry when it comes to health claims, their own nutrient profiles or the use of nanotechnology in food, for example.

We have asked for this transparency regarding nanotech – are companies using it or not? – because with all the secrecy and a kind of a grey area on this, we don't know what we should

believe. How are we supposed to trust in the food industry when they are not being upfront?

### Industry loves to talk about consumer education and empowerment. Why do think this is the case – is it just to avoid regulation?

Yes. It is about putting the onus back on the consumer so that it is up to the consumer to make the right decision.

Education is important. We would be the first ones to say that education is important, but you will also need your tools and the instruments in place to use your education. So if you don't have a proper labelling scheme or if you are then going to be misled on what's in the product: you can educate until the cows come home, but you need tools to be able to use what you have learned.

### Could you elaborate on nanotech in foods?

One of our members in the Netherlands sent us an article where silica was found on a nano scale in food products – a powder which prevents things from sticking together – and the Dutch authorities have confirmed that this nano-ingredient is being used in food products. But then again, when you ask the food industry, they say that no nano additions are being used in food.

It is extremely expensive for our members to test food products to see whether there are ingredients at nano scale.

And industry has said that the only area where nano is being used currently in food is in food packaging, and that there is no problem with them migrating into food – that's another issue – but they are not willing to be transparent as to where they are looking to use nano.

A few years ago we could read in the newspapers that there will be nano-fat molecules, which means that there will be no fat in your ice cream or your mayonnaise. Then when people started questioning nano and saying well 'would it be good for your health' – it just all closed up and there is no more information.

Industry will say 'consumers are sceptical now about using nano' – well, one of the reasons is that industry is not listening to consumers.

### Do you feel that the food industry is not being transparent about where they are using nanomaterials? Doesn't it have any obligation

### to reveal products' nano ingredients?

When EFSA put out a call for information on nano – the answer across the industry board was 'we are not using nano, we are not looking at nano, we are not investing in nano'. So, who knows what's out there and what we are consuming? And this is why we want legislation as soon as possible – be it through novel foods regulation or through food information - we want systematic labelling of nano-ingredients.

But then again, it comes to the food industry saying 'our ingredients are supplied by someone else and they may not inform us that there is nano'. But the responsibility lies with companies to find out this information.

### Do you have any special message on responsible marketing?

On the companies' EU pledge and codes of conduct, we believe that they are a step in the right direction but there are a number of gaps and loopholes that need to be addressed: the nutrient criteria, the forms of media, the coverage of the media, the age of children.

Also there is a review of the EU platform on nutrition and PA, and we are going to look at the mandates of the platform and the commitments made to the platform, and I guess that the issue of advertising to children will be one of the issues that will pop up again – reformulation of products, etc.

### Is food marketing always about obesity?

For us it is about allowing consumers to make healthy and informed food choices in general. Obesity is a huge issue and is probably spurring people to act more quickly. But at the end of the day, food information is there to allow consumers to make an informed and, ultimately, healthier choice.

### Healthy eating and lifestyles seems to be a rather complex issue. How big a role do you think advertising and marketing play in making food choices?

Difficult to say, but if you come back to the claim issue, we have research showing that almost 70% of people choose a product because of a claim, so you could say that they play a major role. But we don't have any specific figures on this.

# Europe to assess advertisers' pledges on child obesity

The European Union is due to assess the advertising industry's commitment to self-regulation when it comes to marketing unhealthy foods to children, as concerns mount over child obesity.

"In recent years Britain has become a nation where overweight is the norm," points a study by the UK government's Office for Science.

The study says some 60% of adult men and about 25% of all children under 16 could be obese by 2050, increasing the risk of chronic diseases such as diabetes. In turn, it predicts that annual healthcare costs to treat all the new cases will reach £50 billion.

The European Childhood

inappropriate audiovisual commercial communication" of foods and drink high in fats, sugar and salt in and around children's programmes.

## Health claims

Meanwhile, a regulation was recently adopted to eliminate misleading health claims from the EU market.

Examples of such claims include 'good for your heart', 'low fat' or 'source of calcium'.

In order to bear such claims, food packaging will have to carry appropriate nutrient profiles. This means that a product with a high sugar or salt content, for example, cannot bear the claim 'zero fat'



Obesity Group (ECOG), a research organisation, argues that there is "a direct relationship between advertising and higher rates of obesity in children".

But the advertising industry disputes those claims. The UK study, they claim, gives a far more complex picture of the factors influencing obesity, with only around 2% of food choices attributable to marketing and advertising.

## Advertising self-regulation

Marketing of food and drink in the EU is currently based on a self-regulatory approach, whereby companies voluntarily agree to follow certain codes of conduct and restrain themselves from promoting unhealthy foods, in particular to children.

The approach was first endorsed in 2005-2006, when the European Commission convened an ad hoc round table on advertising to define a 'best practice model' for self-regulation.

The EU's Audiovisual Media Services Directive (AMSD) asks member states and the Commission to "encourage media service providers to develop codes of conduct regarding

or 'high in fibre' – even if that is the case – because the other ingredients do not correspond to a scientific description of a balanced diet.

After years of scientific assessment, the European Commission is expected to table a list of permitted health claims by the end of 2011. Once the list is out, food manufacturers will have six months to take false claims off the market.

Some 80% of the claims submitted to the European Food Safety Authority (EFSA) for approval so far have received a negative opinion.

Consumer advocacy groups say this clearly demonstrates the industry's failure to self-regulate nonsense claims such as 'good for beauty and your inner harmony'. Consequently, they are calling for advertising of food using health arguments to be more strictly regulated.

Earlier this year, French food group Danone withdrew health claim applications regarding two of its best-selling dairy products, citing confusion about what scientific evidence was required from the company under the process to validate the claims.

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Activia is a yoghurt which Danone claims "aids digestion", while its dairy drink Actimel allegedly helps "strengthen the body's defences".

Observers say the withdrawal was tactical, amid fears that the well-known claims would be officially unsubstantiated and their removal ordered by EFSA.

## Industry initiatives on obesity

As the UK example shows, sedentary lifestyles and over-eating have made obesity the number one public health challenge of the 21st century. The European Commission has also decided to tackle the issue.

In its 2007 EU strategy to tackle being overweight and obesity, the EU executive confirmed the existing voluntary approach to regulating food marketing and advertising, arguing it can be more efficient at tackling the issue.

In an effort to ward off regulation, industry groups have launched a series of initiatives. Examples include the World Federation of Advertisers, which pledged in 2007 to limit food and drink advertising to children under the age of 12 on TV, in print and on the Internet.

Another more recent commitment comes from the European soft drinks industry (UNESDA), which recently extended to the digital sphere its earlier commitment to refrain from directly targeting children under 12 through e-mail, mobile phones, outdoor video and other digital means.

## Review due in coming weeks

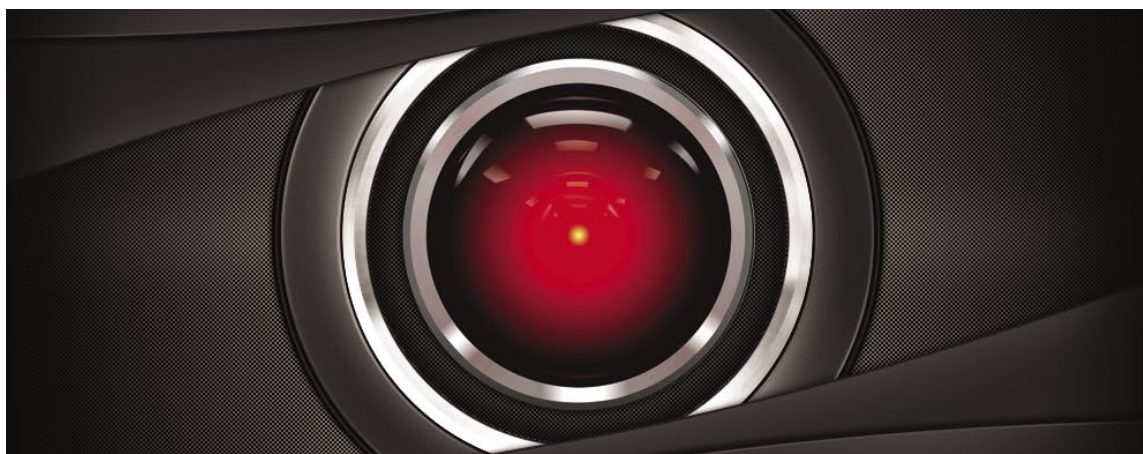
The European Commission has warned that the voluntary measures will be assessed this year to determine whether other ways are also required.

The EU executive is currently finalising a mid-term progress report on its obesity and nutrition strategy, in which it will outline how it has delivered on its objectives so far, including on those regarding marketing and advertising self-regulation.

The report will be presented on 8-9 December during a conference on nutrition organised jointly with the Belgian EU Presidency.

In the meantime, Commission spokespeople said Brussels was continuing to work with stakeholders via the EU platform on diet, physical activity and health. Dialogue with EU member states is taking place through the High Level Group on nutrition and physical activity.

# Parliament seeks to rein in 'unfair' online advertising



Intrusive marketing practices brought on by the Internet have attracted the attention of the European Parliament, with lawmakers concerned about guaranteeing citizens' privacy, said Philippe Juvin MEP in an interview with EurActiv.

Advertising "needs to be controlled to ensure that individual rights are respected," stressed Juvin, a French lawmaker from the centre-right European People's Party (EPP).

Juvin has been entrusted by the Parliament to draft a report on the impact of advertising on consumer behaviour.

In his report, the French lawmaker tries to avoid the pitfalls of an 'all-or-nothing' stance. While advertising certainly helps improve the circulation of goods in the EU internal market, he says "a good balance" needs to be found with respect to citizens' privacy.

The report, adopted by the Parliament's internal market and consumer protection committee in Intrusive marketing practices brought on by the Internet have attracted the attention of the European Parliament, with lawmakers concerned about guaranteeing citizens' privacy, said Philippe Juvin MEP in an interview with EurActiv.

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says "a good balance" needs to be found with respect to citizens' privacy.

The report, adopted by the Parliament's internal market and consumer protection committee in early November, will be voted on by MEPs in their December plenary.

The European Commission will then "propose new measures for unfair advertising on the Internet," Juvin said.

Dominic Lyle, director-general of the European Association of Communications Agencies (EACA), stressed that the Juvin report had "created a very interesting discussion" at a time when advertising was "going through a transition period with new techniques and new media involvement".

## Responsible marketing

Juvin defines responsible marketing as that which is "fair and respects individual rights, including consumers' confidential information".

He said the Parliament wants to prohibit certain practices, including "robots" on Google's Gmail service that are able to scan personal emails for keywords to automatically generate targeted advertisements.

"It is absolutely impossible to accept that advertisers could read the content of your personal emails to make advertising," he said, without citing Google.

While personalised advertising is not in itself a problem, Juvin stresses that it must not lead to the development of intrusive advertising based on consumer tracking, "which breaches the principles of data protection and privacy".

The French lawmaker underlined that consumers should

receive "clear information on how their personal data are being collected and used". He called on the European Commission to develop an EU website labelling system, modelled on the European Privacy Seal, to certify a site's standard of data protection.

## Industry self-regulation

MEPs are particularly concerned about the development of "hidden" Internet advertising in the form of comments posted on social networks, forums and blogs. Such practices are currently not covered by EU rules, he said, calling for the existing Unfair Commercial Practices Directive (UCPD) to be "reworked" to address the issue. Alternatively, "a new directive" could also be envisaged, he suggested.

But Dominic Lyle of EACA believes there is no need to legislate as current laws already cover all kinds of commercial communications. "If you start to change directives every time new advertising techniques are introduced you will never stop," he said, arguing that the main problem is that the current UCPD is not yet being properly implemented in member states.

Lyle also argued that social media communities are actually very good at spotting brands that are trying to control their conversations and "are quick to get rid of or be negative about them".

Self-regulation practice codes are more flexible and can be updated more quickly than hard legislation, Lyle added, referring to the International Chamber of Commerce and the European Advertising Standards Alliance, which recently updated their codes to include digital marketing.

## Behavioural ads

Other new forms of Internet advertising include so-called "behavioural" ads, which assess users' web-browsing behaviour, such as the pages they have visited or the searches they have made, to select which advertisements to display.

Consumers must be informed when they are subject to this kind of practice, Juvin said.

Behavioural advertising is so efficient, according to Juvin, that his report calls for clearly-worded warnings marked "behavioural advertisement" when such ads are displayed.

He said children are particularly vulnerable to this kind of advertising, in particular when they relate to toys or food. This is why the report proposes to strictly forbid behavioural advertising towards children altogether, Juvin added.

But Lyle argued that new advertising techniques are not hugely different – except perhaps technically or technologically – in what they bring to consumers. "The idea that you can take old-fashioned advertising techniques that are about controlling your message and implant those into a much more fluid social media environment doesn't work," he said.

"Until people learn how to manage social media correctly – and very few advertisers are currently doing that – its impact on consumers will be minimal," Lyle argued.

"Either you use the social media well, through engaging with consumers to know what people expect and want from the brand – while it is of course up to consumers whether they want to engage with the brand – or you use it bad and fail," Lyle concluded.

# Advertisers: Marketing given disproportionate focus in obesity debate

Marketing and advertising have been unfairly portrayed as the "bad guys" in the obesity debate, argues Will Gilroy from the World Federation of Advertisers (WFA) in an interview with EurActiv.



*Will Gilroy is director of communications at the World Federation of Advertisers (WFA) – which represents 58 national advertising associations on five continents and over 60 of the world's biggest marketers, including several food and drinks companies. He was speaking to EurActiv's Outi Alapekkala.*

## What is responsible marketing?

When I started working on this long time ago, we used to go to talk to the WHO [World Health Organisation] about food advertising in the framework of the debate on diet, physical activity and health. We talked about 'responsible food marketing', but at that time we had not articulated in a clear, coherent and understandable manner what we meant by that. The WHO told us that they didn't exactly understand what we meant by 'responsibility' in practical terms

So we took a blank sheet of paper, sat down and asked ourselves what we meant by responsibility in terms of food marketing. We listened to other stakeholders – NGOs, regulators, parents, teachers, consumer groups – and they told us that it is not only about how you advertise – the marketing techniques used – but it is also about what you advertise, so quantitative and qualitative restrictions. So we needed to come up with a vision of responsibility in terms of responding to those two dimensions.

This means that we needed to put in place codes of conduct globally to ensure that marketers are advertising responsibly in terms of the marketing techniques that they are using. In practical terms this means that they are not appealing directly to children and trying to undermine parental

authority; that they are not promoting unhealthy lifestyles; that they don't insinuate that crisps or chocolate could replace meals; and so on.

Furthermore, stakeholders told us that another problem was perceived to be that children were watching an advert for chocolate, followed by an advert for a burger, followed by an advert for a sugary soft drink, etc. And it was the 'cumulative effect' that is supposedly impacting children's food choices and food preferences. This meant that we needed to adopt a self-regulatory scheme to change the types of products that were being promoted to children. So, it is not only about how you advertise but also about what you advertise.

In 2007 we got an agreement between 11 companies not to advertise to children under 12 years old – except 'better for you' products. For example, Kraft Foods, Nestlé, Unilever, Kellogg's and others only advertise some of their products to children, which fulfil strict nutritional criteria.

Others, such as Coca-Cola, Ferrero and Mars, have stopped all advertising to under 12s. These companies, accounting for about 66% of all food advertising business in the EU, made this big commitment – which de facto changed the types of products advertised to children.

So when you ask what is 'responsible' – it is putting together, across the whole of industry, standards on what you can, and more importantly, cannot do in your advertisements and then companies themselves are committing to advertising only 'better for you' products to children.

## Is it responsible to advertise to children at all?

Let me turn the question around. Today in the environment we live in, how do you try and pretend not to advertise to children, or how do you try to shelter children from advertising?

Sweden has tried to ban advertising on TV for under 12s – but what does it mean, not to advertise to children? Children watch TV at any time of the day and are always on the Internet. They walk on the street and see outdoor advertising like everybody else.

I believe that you can't shelter children from a commercial world – we have chosen a commercial world and to live in capitalist

society, so that's where we stand. But what you can do is to try to make sure that in those areas which are specifically targeting children, you are only presenting 'healthier for you' products and helping parents to support their efforts to ensure healthy lifestyles.

Secondly, you need to be educating children to be critical in a world which is commercially filled.

## Is the current EU legal framework responsible?

First of all, we all need rules to set an even playing field. Because the companies we are talking about are big companies that have been on the market for long time and have a very strong sense of CSR and they don't want to be undermined by rogue traders – small companies that come to market, do things illegally, and try to mislead people to make fast money and then disappear from the market. This happens every day across all sectors.

It is in our interest to have a strong legal framework which European citizens trust.

The important thing with the current legal framework is that it understands and recognises the role that advertising self-regulation plays. And when we talk about self-regulation it is not about the industry regulating itself, but advertising standards authorities. It gives a place for the industry to go above and beyond the law.

The advertising industry has long understood that in today's environment it is better to be policing yourself – to have a body called the Advertising Standards Authority to which consumers or competing companies can make a complaint, which is very quickly resolved within the industry.

And the current EU legal framework understands and recognises this principle – that industry self-regulation is fundamental. Even EU consumer organisations all realise that there is a need for a self-regulatory body.

In 2006 we had these discussions with EU regulators, consumer and public health groups who said that ideologically, self-regulation does not work. And we said, OK – imagine a world without self-regulation. A consumer would not be able to make a complaint about an ad, but would have to start legal proceedings against the company, which would be costly and time-consuming. By the time the issue were resolved, the

perceived damage would be done. The only people who would profit would be lawyers.

Advertising self-regulation provides effective, quick and free consumer redress. It also proactively polices all forms of marketing communications to make sure that they are legal, decent, honest and truthful.

**How about at scientific level – regarding health and nutrition claims, for example? Some 80% of the claims filed for approval within the European Food Safety Authority (EFSA) have already been rejected – this does not sound very responsible to me. Can we say the claims case is an industry failure regarding responsible marketing?**

I'm not an expert here. But I'm aware that this is a major issue and you need to ask the food industry about it, because I can only talk about when that claim is advertised, so as such it is not an advertising industry issue.

But I'm aware that it has created a lot of discussion and this is clearly an area where regulation is required – because as you said, a lot of claims that were made previously cannot be made now on the base of EFSA rulings. And that is good for consumers, there is no doubt about that – health and nutrition claims need to be scientifically substantiated.

But I would not so much say that it is a failure on the part of industry as it is a success in terms of the regulator – for being able to sit through those claims and make scientific substantiation relevant to EU citizens.

**One industry representative recently told me that the interests of big multinationals are no longer only in the economy, and they wish to do more societal engagement, whether regarding education, nutrition, health, etc. Is this something that is discussed more generally in the advertising industry?**

Companies like Coca-Cola understand that they have two things of value: they have their tangible assets – the bottles that have not yet been sold, their supply chain, offices, etc., and if these were sold tomorrow they would get a price for them.

The second thing is probably

more important, and that is the intangible value of Coca-Cola – the brand.

Estimates show that – depending on the company and the sector – anything between 30% and 75% of the value of a brand is intangible – in how many millions of minds does the brand resonate, and that is key in a globalised market. And leading companies understand the importance of building that intangible brand value.

If we compare a company to a person, it is not so much the skills of that person, but how much you like that person or how much does that person make you feel good and how nice that person is. And if companies see their brands as 'corporate people', they understand that they are much more valuable being friendly and doing the right thing.

In a society where consumers ask for more and are empowered to ask for more through social media and new technologies, the requirement for social responsibility is greater than ever. And in this new world paradigm, it is important to do and be seen to do the right thing. And for big brands like Coca-Cola it is extremely important, because they understand the importance to their brand value of all these intangible components.

So, yes, being the right brand, a nice guy and doing the right thing is important for today's leading brands.

**Could brand value be used to do something more than just selling a product, such as associating a brand to a healthy lifestyle, for example?**

Many of the big leading brands are enlightened companies who understand that they need to give consumers more than just a good product experience. As a parent you don't want to feel that your purchase decisions are being undermined by companies appealing directly to their child behind your back. So the fact that several major companies have pledged not to advertise directly to children can help parents feel empowered to make the final choice and perhaps also helps parents make healthier decisions.

I believe that many companies are trying to align themselves with the societal push for a healthier society.

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# The big debate: Are food ads to blame for child obesity?

While the food industry has taken a series of initiatives to restrict advertising of unhealthy products to children, consumer groups are not convinced and call for the development of stricter criteria. EurActiv hears arguments from both sides of the debate in parallel interviews.

Regulation of marketing to children varies considerably across Europe and few countries have specific rules on food marketing.

The food industry claims to have "dramatically shifted" the balance of products advertised to children under the age of 12 since major brands signed an EU pledge in 2005.

Food manufacturers claim they are now increasingly directing their advertising spending towards "better for you" options.

Children's exposure to products that do not qualify as "better for you" has been reduced by 60%, says Will Gilroy, director of communications at the World Federation of Advertisers (WFA), which represents national advertising associations and the world's biggest marketers, including several food and drink companies.

In some cases, they have taken even bolder steps by pulling out of children's airtime altogether, he adds.

However, consumer groups are not convinced. Specific targeting of children "has not stopped yet," said Ruth Veale of the health and safety department at European consumers' organisation BEUC.

And while the industry's EU pledge is certainly "a step into the

right direction," there are a lot of 'buts' and loopholes, Veale said.

## Shift from TV to other media

For example, BEUC complains that "the pledge does not cover all forms of media". While there may be a 99% compliance rate on advertising to children in television, Veale believes "industry is getting more inventive in their way of marketing to children".

Over the years, food firms have shifted their advertising from TV to the Internet and video games, she notes. Indeed, the emergence of digital marketing has created a huge opportunity for advertisers, with online ad spending growing by 40% in 2008.

The European soft drinks

industry (UNESDA) admits that the Internet plays an "increasingly important role in the marketing mix," but stresses that online advertising is only targeted at adults and teenagers.

However, Veale argues that this is not enough, because children watch a lot of television or visit Internet sites that are not specifically aimed at them. In that sense, though, it seems almost impossible to stop all food advertising, as companies have a legitimate right to market their products.

"I believe that you can't shelter children from a commercial world," said Will Gilroy, noting that children watch TV at any time of day, are always on the Internet and see outdoor advertising on the street like anybody else.

However, this does not mean that industry should do nothing, Gilroy added, suggesting that advertising aimed at children should concentrate on "healthier for you" products. Moreover, he says more effort should be made to educate children to take a critical view of today's commercial environment.

## Putting pressure on parents

According to BEUC, other loopholes in the industry's pledges include adjusting nutritional values to determine whether or not advertising can be authorised, as well as varying age criteria.

"The development of nutritional

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You can see the same with the energy sector, for example – they are trying to align with society's push for a more environmentally-conscious and sustainable society. In the automotive sector, companies are trying to make their cars more efficient, and so on.

## Industry loves to talk about consumer education and consumer empowerment. What role do you see for industry in consumer education?

If we come back to your question on whether it is ethical to be advertising to children at all...I asked whether it is possible to hide advertising from children.

While I think it is impossible to hide all advertising from children, it does not stop you from thinking about it and trying to do what you can to help give children the skills to be critical and discerning in a commercially-filled world.

According to academic and scientific research, children under six years old can't understand the difference between advertising and editorial. But we are not going to hide advertising from them.

The research also indicates that six to eleven is the formative period during which children start to develop the skills necessary to be critical when faced with commercial communications. But as far as we were aware, back in 2002 there was nothing in schools which taught children to be media-literate or at least media-educated.

So we launched Media Smart (www.mediasmart.org.uk). The advertising industry paid for it and gave the money directly to

academics and experts in the field who developed the materials free of charge. These materials were offered to teachers in order to teach children how to be critical in a media-filled world.

Since 2002, the materials have been used to teach three million children across the EU how to be critical when faced with commercial communications. It was started in the UK and has since been rolled out in several EU countries – Belgium, the Netherlands, Germany, Finland, Sweden, Portugal, Hungary and now in France.

While NGOs are often upset saying 'industry is going into schools, teaching' – it is simply not true. Industry pays for it and independent academics – such as Professor David Buckingham in the UK – develop the materials.

Now the pack has become 'Digital Advise' – teaching children things to bear in mind, when they go online, how to be critical.

So, industry does not claim to have a role in educating children, absolutely not, but in enabling it.

98% of the teachers who used the materials said they were good or excellent and that they would use them the next year as well. So the material provided helps teachers hugely, because they're given materials to teach something that is extremely relevant and where there is a clear consumer need.

Materials were originally non-branded, but the first thing the teachers said was 'please give us the materials next year branded because otherwise it does not reflect real life'. So some markets actually want the materials branded. Some don't.

Now there is some interest from Australia and the US to try to roll out the same programme. The programme is continuously being cited everywhere – even in the Juvin report - as a best practice example. It is enlightened self-interest by the industry.

Whether you think it is legitimate to advertise to children or not, children are going to see advertising. So I think it is enlightened from the companies to be funding this kind of programme – bearing in mind that in the real world you are not going to be able to stop any form of marketing communications when children are concerned. It is unfeasible.

So any company who has products that may be attractive to children should be looking at this kind of programme, because they have a vested interest in making sure that children are smart when seeing commercial communications.

## Responsible marketing always seems to only be about children. What about adults?

We don't want to live in a nanny state – companies have a legitimate right to be operating and part of their operations is to innovate and bring new products to the market. And how do they bring them to the market? They market them: that's how capitalism works.

Grown-ups are grown-ups and they should not be wrapped up in cotton wool. They should have the faculties to fend for themselves. But when it comes to children, that's a more sensitive issue.

## Do you have any special message on food and responsible marketing?

Yes, about the role of advertising and marketing promotions in relation to the broader debate on obesity.

Obesity and being overweight is pretty complex. There are a lot of things that lead to them. Of course advertising has an impact on food choices and preferences, otherwise companies would not do it. But as one part of the totality of different factors, all research shows that it is a very small part. One study estimates the impact of food advertising on food choice at just 2%. But there has been a disproportionate focus on marketing and advertising because it is an 'easy fix'.

Changing the whole world, which in many countries has moved from manufacturing to a service-based economy, where we all sit in front of computers and kids don't go out and play sports as they used to – these are hard things to solve, while marketing is an easy thing.

Having said that, it is not for the marketing industry to say 'we don't do anything'.

This is why companies realise they need to be advertising responsibly – to change what you advertise and how you advertise it. The now 16 companies representing 75% of food marketing in the EU have reduced all their TV advertising, of all products, by over 30% since 2005. In addition, children's exposure to products that do not qualify as 'better for you' has been reduced by 60%.

All this has been done through self-regulation, as companies have

understood that there is political and public concern around food marketing.

But to fix obesity and being overweight will take a bird's eye view of all the contributing factors. And it will not just be a disproportionate focus on marketing and advertising, which is probably being unfairly portrayed as the 'bad guy' in all of this debate.

The problem is that it remains an easy fix for politicians operating in a limited time frame. Perceptions are everything in politics and politicians are under pressure to seek to do things that are quick fixes. But as any health expert will tell you: nobody can fix obesity and overweight in a four-year term. It needs joined-up, cross-sectoral policymaking over a sustained period of time where things like education, smart urban planning, investments in health care and in promoting physical activity in schools and so on are fundamentals of any government policy.

People need to see the bigger picture. But sometimes regulators, activists and the media are quick to find a scapegoat. There is nothing more tragic than childhood obesity and that creates hysteria in the press, and it is very difficult as an industry to find a middle ground and be reasonable in an emotive debate. It is easy to be emotional about this, it is difficult to be pragmatic and see the big picture and how all different issues interplay and then make a sensible and proportionate policy based on everything.

But as I said there will always be an inclination to restrict marketing, because it is the most visible of any company's activities.

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criteria is not transparent – we don't know how they came up with them. We would like to have scientific criteria [...] developed to determine what foods should and should not be advertised to children," said Veale.

Meanwhile, the WFA's Will Gilroy spoke of the "cumulative effect" of advertising, whereby children are exposed to successive adverts for chocolate, burgers and sugary soft drinks, for example. This, he said, has an impact on children's food choices and preferences, which in turn has an impact on their health.

Gilroy stressed that the industry's commitments mean that brands refrain from appealing directly to children, undermining parental authority or promoting unhealthy lifestyles. In fact,

"healthier for you" advertising targeted at children can actually "help parents to support their efforts to ensure healthy lifestyles," he said.

But Ruth Veale points to some perverse effects of this trend, saying "we have seen a shift by companies away from advertising to children to advertising to parents". Such targeting includes ads suggesting that "if you are a good parent you should be giving your child this," she says. Similarly, manufacturers have started promoting chocolates branded as a "perfect portion size for children".

**Food ads and obesity**

There is no definitive statistic on the role played by advertising and marketing in people's food choices.

But Ruth Veale claims BEUC

research has shown that almost 70% of people chose a product thanks to a health or nutrition claim, which suggests that advertising plays a major role. As for making claims, responsible marketing touches upon adults as well, she said.

"This is why scientific evaluation of claims by the European Food Safety Authority is necessary and nutrient profiles are necessary, because we don't want a product high in salt, sugar or fat to bear a claim," she stressed.

But Will Gilroy underlined that fixing obesity "will take a bird's eye view of all the contributing factors". He cited a study estimating the impact of food advertising on food choices at just 2% and regretted that there is "a disproportionate focus on marketing and advertising"

in the obesity debate. In fact, he sees the whole debate as an "easy fix" for politicians eager to make a difference in a four-year term.

On the other hand, Gilroy does recognise that politicians have difficult choices to make. "It is difficult to be pragmatic and see the big picture" about how different issues interplay, he said. As a consequence, policymakers face difficult decisions on cross-sectoral topics such as education, urban planning, healthcare investment and promoting physical activity over a sustained period of time, he explained.

However, Gilroy seems to be well aware of a trend towards stricter advertising regulation. "There will always be an inclination to restrict marketing, because it is the most visible of any company's activities," he said.

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# Learn how Coca-Cola markets responsibly

