



THE RESPONSIBLE CHILDREN'S MARKETING INITIATIVE COMPANY ACTION PLAN

COMPANY NAME: Campbell Arnott's Australia/New Zealand

DESCRIPTION OF CORE BUSINESS: Campbell Arnott's is one of the largest food manufacturers in the region, employing more than 3,000 staff across Australia and New Zealand. The Company manufactures a range of baked snacks, simple meals and healthy beverages. Icon brands within its portfolio include Country Ladle, Chunky, V8, Tim Tam, Tiny Teddy and Shapes.

STATEMENT OF COMPANY COMMITMENT: Campbell Arnott's has always been committed to the health and wellbeing of its consumers. This commitment extends to responsibly marketing its products to children under 12 years of age, who may find the concept of a 'balanced diet' more difficult to understand than adults. Campbell Arnott's welcomed the development of the Australian Food and Grocery Council's (AFGC) *Responsible Children's Marketing Initiative* and has pledged its commitment to marketing communications to children under 12 years of age only when it will further the goal of promoting healthy dietary choices and healthy lifestyles in accordance with the core principles set out below.

CORE PRINCIPLES:

We will meet each of the core principles outlined in the Responsible Children's Marketing Initiative by:

Advertising Messaging

Campbell Arnott's will not advertise food and beverage products to children under 12 years in media unless:

1. Those products represent healthy dietary choices, consistent with established scientific or Australian government standards; and
2. The advertising and/or marketing communication activities reference, or are in the context of, a healthy lifestyle, designed to appeal to the intended audience through messaging that encourages:
 - Good dietary habits, consistent with established scientific or government criteria
 - Physical activity.

Use of popular personalities and licensed characters

Campbell Arnott's will not use popular personalities or licensed characters in advertising primarily directed to children under 12 years unless such advertising complies with the messaging options set out above and the specific requirements of the Children's Television Standards in relation to promotions and endorsement by program characters (CTS section 22).

Product placement

Campbell Arnott's will commit to not paying for or actively seeking to place their food or beverage products in the program/editorial content of any medium primarily directed to children under 12 years for the purpose of promoting the sale of those products unless those products are consistent with healthy dietary choices as set out above.

Use of products in interactive games

Campbell Arnott's will commit that in any interactive game primarily directed to children under 12 years where its food or beverage products are incorporated, the interactive game must incorporate or be consistent with healthy dietary choices and healthy lifestyle messaging as set out above.

Advertising in schools

Campbell Arnott's will refrain from product-related communications in primary schools except where specifically requested by, or agreed with, the school administration for educational or informational purposes, or where the communication is related to healthy lifestyle activities under the supervision of the school administration or appropriate adults.

Use of premium offers

Campbell Arnott's will commit to not advertising premium offers on products directed primarily to children under 12 years unless those products are consistent with the healthy dietary choices as set out above. In addition the reference to the premium must be merely incidental to the product being advertised in accordance with the AANA codes and in the Children's Television Standards (CTS Section 20).

SCIENTIFIC OR GOVERNMENT STANDARDS

Campbell Arnott's produces a large range of sweet biscuits and savoury crackers, soups and juices which have varying nutrition profiles based on formulation, format and size. In determining which of our products may be considered acceptable for advertising to children under 12 years, we have used the *New South Wales Healthy School Canteen Strategy Fresh Tastes @ School Program* nutrient criteria for green and amber foods. Further information on this standard can be found at;
https://www.det.nsw.edu.au/policies/student_serv/student_health/canteen_gu/CMPlanner.pdf

MEDIA

Campbell Arnott's support of this initiative applies to television, radio, print, cinema and third-party internet sites where the audience is predominantly children and/or having regard to the theme, visuals, and language used are directed primarily to children.

COMPLIANCE AND COMPLAINTS

Campbell Arnott's agrees to abide by any decision or ruling made by the appointed arbiter in relation to the execution of this plan.

REPORTING

Campbell Arnott's will provide a report of our marketing activity against this plan on an annual basis, with the first plan due by 31 January 2010.

Submitted by:

Name: Mark Alexander

Position: President Asia Pacific

A handwritten signature in black ink, appearing to read 'MRA' followed by a long, horizontal flourish.

On behalf of:

Company Name Campbell Arnott's

Date: 3 February 2009

Appendix

Campbell Arnott's has a broad range of nutrition profiles across its portfolio and has based its nutrition criteria for the Responsible Children's Marketing Initiative (see Table 1) on the nutrition criteria stipulated in the *NSW Healthy School Canteen Strategy Fresh Tastes @ School Program* for green and amber foods.

The *NSW School Canteen Strategy Fresh Tastes @ School Program* was developed by the NSW Department of Health and the NSW Department of Education and Training in consultation with independent nutritionists. It categorises foods by their nutrition value into green or "fill the menu foods", amber or "select carefully foods", and red or "occasional foods". A similar program has also been adopted in Queensland, Victoria and South Australia. The program incorporates recommendations from the *NH&MRC Australian Guide to Healthy Eating* and the *Australian Dietary Guidelines for Children and Adolescents*.

Table 1: Criteria for Campbell Arnott's Products by Category		
Product Category	Nutrition Criteria Green Foods	Nutrition Criteria Amber Foods
Savoury crackers	N/A	Total energy ≤ 600 kJ/serving Saturated fatty acids ≤ 3g/serving Sodium ≤ 200 mg/serving
Sweet Biscuits	N/A	Total energy ≤ 600 kJ/serving Saturated fatty acids ≤ 3 g/serving Dietary fibre ≥ 1 g/serving
Soups	Canned, commercially prepared or canteen made soups all fall within the amber and green categories	
Fruit and Vegetable Juices	≥ 99% juice Serve size < 200 mL Serve size < 250 mL if high fibre	≥ 99% juice Serve size < 300 mL
Based on <i>NSW Healthy School Canteen Strategy Fresh Tastes @ School Program</i> , 2006		