



Code of self-regulation of the advertising of food products
directed at minors, prevention of obesity and health

CÓDIGO (PAOS)

29 March 2005





CODE OF SELF-REGULATION OF THE ADVERTISING OF FOOD PRODUCTS DIRECTED AT MINORS, PREVENTION OF OBESITY AND HEALTH (PAOS CODE)

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INTRODUCTION

The present code is included within the framework of the NAOS Strategy, recently launched by the Spanish Ministry of Health and Consumer Affairs, with the aim of “reducing the prevalence of obesity and overweight and their consequences, as much in the area of public health as in their social repercussions”. This goal is shared with the World Health Organisation and community institutions.

Childhood obesity is a multifactorial problem requiring a co-ordinated response from all the agents involved, including not only the food and drink industry and advertising sector, but also health authorities, parents and educators, retailers, in addition to many others. Measures must go beyond the mere control of the promotion of foodstuffs, a necessary measure, but not sufficient when taken in isolation.

In this context, it is important to underline that a sedentary lifestyle and insufficient burning of energy, caused by the new models and habits of behaviour in our modern society, play a major role in increasing obesity and overweight, and it serves no purpose to place the burden of responsibility for the problem on the Spanish food and drink industry – nor on specific foodstuffs or their advertising. However, the Federation of Food and Drink Industries (FIAB), aware of the problem, has agreed to take a constructive and proactive role in the complex and collective battle against obesity, setting high levels of social responsibility in their advertising activities, in particular those directed at children, in order that they contribute to promoting the adoption of healthy diets and physical activity with a positive effect on health and well-being.

To this end, The FIAB has instigated the drafting of the present sector Code (PAOS Code) with the aim of establishing a set of guidelines to help companies participating in the development, implementation and dissemination of their advertising messages directed at minors. The present Code is in line with the Principles of Food and Beverage Product Advertising of the Confederation of the Food and Drink Industries of the EU (CIAA), approved in February 2004.



Firstly, the companies adhering to the Code reiterate –as must be the case- their commitment with respect to the general advertising legislation, as well as to current legislation concerning the advertising of foodstuffs, and the legal provisions referring to the protection of minors, independent of the medium or means used in the diffusion of the advertising.

Furthermore, the participating companies, in their advertising directed at minors, agree to respect the standards contained in the Code, which specify and expand upon the scope of the legal requirements the advertising and promotion of food and beverage products directed at minors, to the benefit of the general interest of consumers and of the market.

SCOPE

The application of the standards in the Code will take into consideration the age of the audience of the specific advertisement. This is not groundless, given that the younger the audience to whom the advertisement is addressed, the greater is their credulity and vulnerability, and therefore, the greater the need to offer them special protection¹. For this purpose, extra caution is required in advertisements directed at children under 12 years of age.

An advertisement will be considered to be directed at children under 12 years of age according to the following criteria:

- (i) The type of food product being promoted: any publicity shall be deemed to be directed at children under 12 years of age which objectively promotes a food product (*) primarily addressed to the audience of said age;
(*) Measured by Dym Panel or Homescan
- (ii) The design of the advertisement: any publicity shall be deemed to be directed at children under 12 years of age designed in such a way that the content, language and/or images are aimed at and principally suited to the audience of said age, particularly attracting their attention or interest.
- (iii) The circumstances in which the diffusion of the advertisement is carried out: any publicity shall be deemed to be directed at children under 12 years of age which is transmitted in either a medium or with a method objectively addressed (**) principally at the audience of said age, or by means of general communication media when inserted in timetables, programming blocks, sessions or spaces directed at children under 12 years of age or with an audience principally under 12 years of age.
(**) Measured by Sofres



The standards of the present Code of the FIAB are applicable to the advertising and promotion of food and beverage products made by companies adhering to the Code and transmitted using any medium or support, except for the labelling and packaging of these products, which is governed by the applicable legislation.

ETHICAL STANDARDS

I.- Principle of legality

1.- The advertising of food and drink products directed at minors will be in accordance with current legislation, whatever the content, the means of diffusion or the form adopted.

II.- Principle of loyalty

2.-The advertising of food and drink products directed at minors will be in accordance with the requirements of good faith and commercial good practice, whatever the content, means of diffusion or the form adopted.

III. Presentation of the products

When making advertisements directed at minors it must be remembered that these are characterised by a lower degree of experience and greater credulity and ingenuity, and that, consequently, advertisements which in normal conditions might appear clear and true to an adult audience, may be considered to be misleading if the receiving audience is underage.

3- Special caution is required in the making and diffusion of advertising of food and drink products directed at minors in order to guarantee that the written, sound and visual features do not mislead as to the characteristics of the product being promoted.

4- The presented advertisement of the food or drink product should not mislead minors as to the benefits derived from the use of the product. This includes, although the list is by no means exhaustive: the acquisition of strength, status, popularity, growth, ability and intelligence.

5- Advertising of food or drink must not mislead minors by suggesting that the food product being promoted has special characteristics, when all similar products also have these characteristics.



6.-In food and drink advertisements directed at an underage audience, precautions must be taken to avoid exploiting the imagination of the minor. Fantasy, including animations and cartoons, is ideal as much for smaller children as for older children. However, it is necessary to prevent the use in advertising of such elements from creating unobtainable expectations or from exploiting the ingenuity of smaller children when distinguishing between fantasy and reality⁷.

7.- In food and drink advertisements directed at minors the use of frightening presentations must be avoided. Gratuitous descriptions of violence or excessively aggressive presentations must not be used ⁸.

IV. Information about the products

Minors, especially those under 12 years of age, have a more limited vocabulary and less-developed linguistic skills than adults. Their level of reading is poor, when they read, and they trust more in the information offered through images than that offered in words. The use of simple language significantly increases comprehension.

8. In the event that in a food or drink advertisement directed at minors it is necessary to offer any additional information, this must be expressed in a language which is comprehensible to the underage audience, in a clear, legible and outstanding way. With this in mind, if the additional information is offered by means of overprinting, the size of the instructions, the contrast with the background, and the time they are displayed on the screen must all be considered⁹.

V-. Sales pressure

Minors, especially those under 12 years of age, are not prepared in the same way as adults to make wise and independent purchasing decisions. Therefore, food or drink advertisements directed at underage audiences must avoid the use of excessive commercial pressure.

9-. The advertising of food or drink products must not make a direct appeal to minors to purchase the advertised product, thus exploiting their inexperience or credulity¹⁰, nor should it encourage them to ask or persuade their parents or other individuals to purchase the advertised product¹¹. Neither should these advertisements suggest that a parent or adult who purchases the food or drink product for a child is a better, more intelligent or more generous parent or adult than one who does not do so.



10-. **The advertising of food or drink products directed at minors must not reward them for acquiring the advertised product nor should it create a feeling of urgency or exclusivity nor resort to using terms susceptible to generating such a feeling of urgency or exclusivity.**

11-. **In food and drink advertisements directed at child audiences the benefits attributed to the food or drink must be inherent to their use.** Advertising must not give the impression that the acquisition or consumption of a food or drink product will make the child more acceptable among his/her friends. Neither must it imply that the non-acquisition or non-consumption of a product will cause the rejection of the child among his/her companions. The advertisements must not suggest that the purchase and use of the product will give the user prestige, abilities and other special qualities as have the characters appearing in the advertisement.

12-. **Prices should be clearly specified.** Reductionisms such as “only” or “no more than” must not be used. Nonetheless, advertisements in which the price is featured must comply with all the basic requirements of national legislation, in particular those rules relevant to consumer protection.

VI. Support and promotion through characters and programmes

13-. **In no event should the advertising of food and drink products exploit the special trust which minors have in their parents, teachers, or other persons, including professionals from children’s programmes, or characters (real or fictitious) from films or fictional series¹².** This is to prevent the presence or testimony of certain individuals or characters who are known to and admired by the minors in advertisements directed to minors, from exercising undue influence over them, with the result that they feel encouraged to request the purchase of the advertised food product, not so much for the actual characteristics of the product, but rather, simply due to the testimony or support (where applicable) of the character which appears in the advertisement

The age of the minors to whom the advertisement is directed is a variable to be considered when checking compliance with this rule. For this purpose, special caution is required in advertisements directed at minors under 12 years of age.

The advertising of licensed food products is subject to the same regulations. For this purpose, licensed food products is understood to mean those products which include in their commercial name, the name of real or fictitious characters from films, series or children’s programmes, or the name of famous individuals who enjoy a high degree of popularity or standing among minors¹³.



To the effect of the above:

13.1. Characters particularly close to underage audiences shall not take part or appear in the advertising of food or drink products directed at minors, such as for example, presenters of children's programmes, characters –real or fictitious– from films or series, or others¹⁴.

Nevertheless, in food and drink advertisements directed at minors, images may be shown which reproduce scenes from a certain children's programme, film or series while this bears a direct relation to the promotion being carried out (for example, gift of a DVD from a children's programme for the purchase of a particular food or drink product). However, when reproducing such scenes, no reference can be made, whether directly or indirectly, to the product being promoted, nor can it appear on the screen. When these scenes are finished, and with a clearly-defined separation, the advertised product can be shown and information given concerning its characteristics, but never using the image or the voice of characters from said programmes, spots or films.

Nonetheless, fictional characters may be shown which have been created specially for advertising purposes related to the product being promoted and which, consequently, are known to child audiences exclusively as a result of the character's participation in the advertising of the product.

13.2. The advertising of food or drink directed at minors may not feature characters who are familiar or famous among the general public and who enjoy a high degree of popularity among child audiences¹⁵.

13.3. Without prejudice to the above, in any case, real or fictitious persons or characters who enjoy a high degree of popularity among child audiences may take part in public health and educational campaigns sponsored or promoted by food product companies with the specific aim of promoting healthy eating habits and physical exercise among children. These public health or educational campaigns may make particular reference to the name or logo of the company sponsoring or promoting said campaign¹⁶.

14-. Telepromotions¹⁷ of food or drink products shall not be made during programmes directed at minors under 12 years of age. This is in order to prevent the exploitation of the special trust which children have in the presenters or fictional characters taking part in said programmes through this type of advertising, and to prevent children from confusing or not clearly distinguishing advertising content from editorials and programmes¹⁸.



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In spite of the above, presenters or fictional characters who take part in children's programmes may appear on the children's programmes, in clearly defined public health or educational spots or "moments", with the specific aim of promoting healthy eating habits and physical education among children. In the educational or public health spots special reference may be made to the name or logo of the company promoting and paying for the campaign¹⁹.

VII. Identification of the Advertising²⁰

15. Food and drink advertisements directed at minors must be clearly defined from the programmes. Situations, scenes and styles evoking the programme must not be used in such a way that minors may confuse or be unable to clearly distinguish the publicity content of the programming.

Advertisements should not be referred to as "programmes".

Expressions including "news flash" and the use of individuals who normally present informative programmes or other programmes must not be used in advertising to avoid confusing the child as to the commercial nature of the advertising.

Food and drink advertisements which parody programmes are only acceptable where it is obvious that the advertisement is merely a parody and it uses individuals who do not appear in the programme in question.

VIII. Comparative presentations

Sometimes advertising which compares the advertised product with another product may be difficult for minors to understand and assess. Comparative presentations must be based on the real advantages of the food or drink, and be easily understood by these audiences.

16. Comparative presentations must be presented in such a way that minors are able to clearly understand them²¹.

IX- Special offers, draws, competitions and children's clubs

The use of special offers including among others, prizes, draws, competitions, discounts, free gifts, etc in advertising, is a marketing tool which undoubtedly has the capacity to increase the attractiveness of a product for a minor. Therefore, special attention must be paid to the advertising of these techniques, in order to protect minors from being exploited due to immaturity.



17. The advertisement which includes a special offer must be designed in such a way that, in addition to transmitting the message relative to the promotional incentive, it clearly shows the product advertised.

18. The essential conditions of the special offers must be clearly and simply expressed in the advertisement, so that they are easily legible and understandable to minors²².

19. Advertising draws included in advertisements for food or drink directed at minors should not generate unreal expectations as to the possibilities of winning or as to the prize which may be obtained²³. Therefore: (1) Prizes must be clearly indicated; (2) It is necessary to avoid being misleading as to the "possibilities" of winning; (3) The prizes awarded must be appropriate to the underage audience.

20. In order to avoid misleading minors, reference may only be made to children's clubs during the advertising of food or drink if the following requirements are met: (1) Interactivity: The minor must carry out some act implying intentional incorporation to the club and must receive something in exchange; (2) Continuity: A continuous relationship must exist between the club and the child member, for example through informative leaflets or regular activities; (3) Exclusivity: The activities or advantages derived from belonging to a club must be exclusive to members and not merely available as a result of purchasing a specific product.

X-. Security

Advertisements should not show adults or children in dangerous situations or acts which are harmful to themselves or others²⁴. Consequently, for example, when scenes depicting sports (such as cycling or skateboarding) are shown in food and drink advertisements, the individuals carrying out these activities should be equipped with the relevant safety gear²⁵.

21. Advertisements must avoid using scenes, images or messages which encourage the dangerous or inappropriate use of the product advertised, especially in those cases where such behaviour can be easily copied by children²⁶.

22. Food and drink advertisements must not encourage children to enter strange places or talk to strangers²⁷.



XI. Education and nutritional information

23. **As a general rule, food and drink advertisements should not promote or present unhealthy eating habits or lifestyles such as eating or drinking without moderation, in excess or compulsively, nor should they encourage, approve or present sedentary life styles as acceptable.** To this end, the advertising of those products directed at children should not show the food or drink being promoted in large or disproportionate quantities. Likewise, when the advertisement depicts the food or drink being promoted in the context of a meal, it should be accompanied by a reasonable variety of foods in order for the advertisement to encourage consumption of the product as part of a varied and balanced diet.

24. **In advertising directed at minors, no product may be shown as a substitute for any of the three main meals (breakfast, lunch and dinner).**

25. **Food and drink publicity should not demean the importance of healthy eating habits, including a varied and balanced diet or the practice of physical activity.**



[STANDARDS OF APPLICATION OF THE CODE]

I.- Binding to the Code

1. Member companies of the associations belonging to the FIAB who have expressly stated their adhesion to the FIAB “Code of Self-Regulation of the Advertising of Food Products Directed at Minors” agree to respect the standards recognised in the code in their advertising of food or drink products.
2. The participating companies shall sign a document of adhesion to the present Code which reflects the commitment, as a result of the adhesion, to reflecting the standards of the Code when carrying out advertising activities, and to observing and immediately complying with the content of rulings that may be issued by the Advertising SELF REGULATION Jury when resolving claims which have been made with respect to the Code.
3. The list of companies adhering to the Code will be made public.

II.- Control of Compliance to the Code

1.- Control a posteriori of compliance to the Code

1 The control of compliance to the standards of the FIAB “Code of Self-Regulation of the Advertising of Food Products Directed at Minors” is initially the duty of the Advertising Self Regulation Jury, who is responsible for resolving the possible claims concerning the advertising of the participating companies received for infringements of the standards of said Code.

2 In this respect, the companies adhering to the FIAB Code of Self-Regulation agree to put up the possible claims against the advertising of other participating companies initially, and prior to appealing to the Courts of Justice, before the Advertising Jury, and to observe and scrupulously and immediately comply with the content of rulings that may be issued by the Advertising Jury when resolving claims which have been made with respect to the Code, either by suspending the advertising or by making the necessary modifications.

2.- Extrajudicial ruling of controversies and claims

1. In addition to the companies adhering to the FIAB Code of Advertising Self-Regulation, claims concerning infringements of the standards of the Code may be put before the Advertising Jury by: the FIAB itself, consumer associations, Self-Regulation, the





Public Administrations, or any company or business or professional association, in addition to the Monitoring Commission, assigned or at the request of individual consumers, or other individuals, bodies or collectives not included in this list.

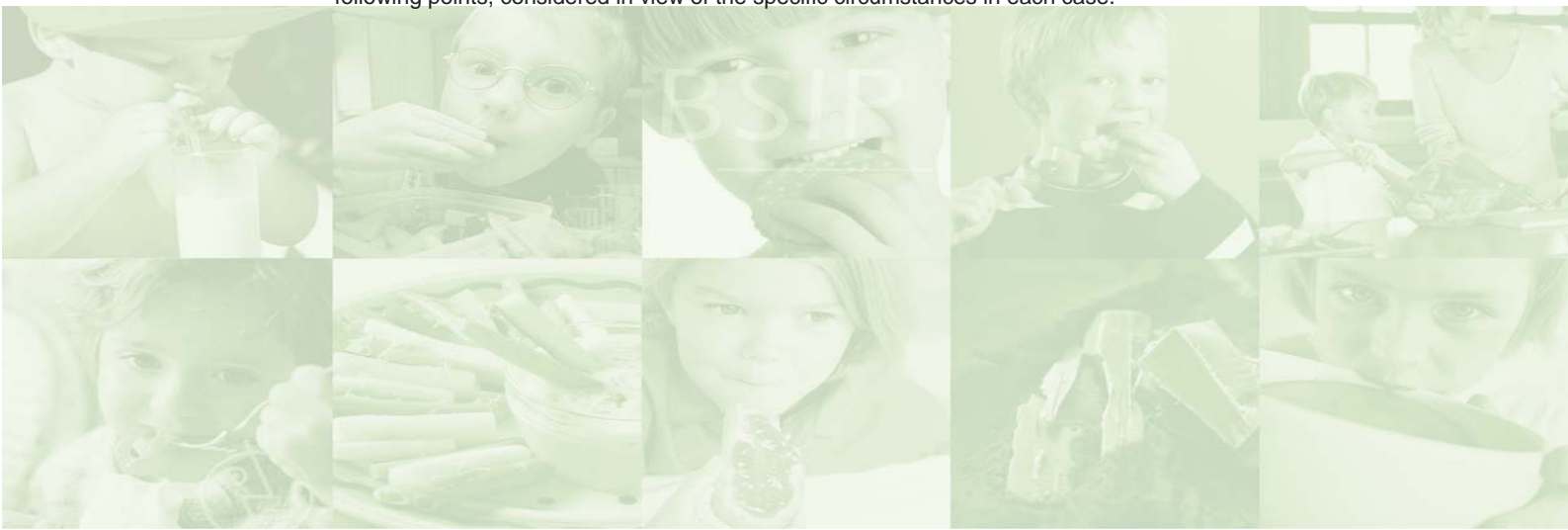
2. For the effective application of the Code and the processing and ruling of possible claims received for infringements of the Code in the advertising of companies adhering to the Code, the actions of the Advertising Self-Regulation Jury will be governed by the principle of independence, transparency, the adversarial principle, and the principles of effectiveness, legality, liberty and representation by the consumer established in the European Commission Recommendation 98/257/EC, and will proceed in accordance with that laid down in their code of conduct. The jury will resolve the claims received, in the light of the ethical standards contained in the FIAB Code of Self-Regulation, establishing, in each case, whether or not a violation of the standards has occurred and the degree of severity.

3. In the rulings, the Jury will determine which party or parties will bear the administrative costs arising from the processing of the claim before Self-Regulation. The totality of the fees arising before Self-Regulation for the handling of the procedure will be borne by the party whose claims have been rejected. In the event that the acceptance or rejection is partial each party will bear their own costs, and the above-mentioned fees or administrative costs will be equally divided. The Administration, consumer associations and the Monitoring Commission of the Code shall be exempted from the payment of said fees or administrative costs before Self-Regulation and the handling and ruling of the proposed complaints shall be free. The rates applicable to companies adhering to the Code and who are also members of Self-Regulation shall be those established by the association for its members.

4. The rulings dictated by the Advertising Jury in application of the present Code will be immediately communicated to the parties concerned for compliance, as well as to the FIAB for due action and, where appropriate, so that procedures may be initiated for the collection of the fines imposed by the Jury. Subsequently, rulings will be made public either on the web page or other media belonging to the FIAB and Self-Regulation.

3.- Infringements and fines

1. In the ruling of the complaints received for infringements of the present Code of the FIAB, the Jury will decide on the correctness or incorrectness of the promotional or advertising activities in each of the cases in the light of the Code. In addition to declaring the incorrectness or illegality of the advertising object of the controversy and to seek the definitive suspension of the same or its modification or rectification, the ruling of the Jury which determines the infringement of the claimed advertising activity will impose, where applicable, a fine on the company claimed against in respect of the list of infringements and fines laid out in the following points, considered in view of the specific circumstances in each case.



2. Infringements will be classified as minor, serious or very serious according to the following criteria:

- a) Importance or repercussion of the infringement as regards consumers.
- b) Impact of the advertising: duration of the advertising activity claimed against, scope of the means of diffusion employed and number of consumers reached.
- c) Unfair competition.
- d) Damage to the image of the food industry.

Having classified the infringement as minor, serious or very serious in accordance with the above criteria, there may be aggravating factors which will be taken into consideration by the Jury when imposing the relevant fines within the scale of point 3 below. The accumulation of aggravating factors may also cause an infringement to pass from an initial classification of "minor" to "serious" or "very serious". The aggravating factors are as follows:

- e) Degree of intentionality.
- f) Non-compliance with prior warnings.
- g) Generalization of the infringement. h) Repetition.
- i) Concurrence of various infringements in the same event or promotional or advertising activity.
- j) Financial profit for the advertiser derived from the infringement.
- k) Broadcasting during children's protected viewing times, or using mediums or methods specifically directed at children's audiences.
- l) Lack of collaboration with the control organs of the Code.

3. In accordance with the above-mentioned criteria, the Jury will accord the imposition of the following fines: a) Minor infringements: From 6,000 to 30,000 euros. b) Serious infringements: From 30,001 to 90,000 euros. c) Very serious infringements: From 90,001 to 180,000 euros.

4. The FIAB will carry out the fines imposed by the Jury, taking responsibility for the collection of the imposed fines. A special fund will be established in the FIAB with the monies from said fines which will be used to finance the cost of the programme for the control and application of the Code, and to carry out educational and public health campaigns promoting healthy eating habits and physical activity in collaboration with the competent authorities.



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5. In the event of repeated infringements considered serious or very serious, or the non-compliance of a ruling issued by the Jury, the FIAB reserves the right to decide to withdraw the company from the companies adhering to the present Code. The FIAB will make public said expulsion and the reasons for the same. Where withdrawal is for this reason, the company can not be reconsidered for readmission as a company adhering to the Code in the space of at least one year. The readmission of the company as a company adhering to the present Code will only occur, following this period, where the company expressly agrees not to carry out practices forbidden by the Code, and satisfies the payment of the fines or of any other outstanding financial obligations.

6. Likewise, The FIAB reserves the right to report the offending company to the competent authorities and/or to appeal to the Courts of Justice in the event that any of the companies adhering to the present Code does not comply with the contents of a ruling issued by the Advertising Jury referring to the infringement of the current legislation with respect to food product advertising, or in the event of non-payment of the fines agreed in a Jury ruling.

4.- Copy advice procedure

1. In order to ensure that advertising is appropriate to the present FIAB Code of Self-Regulation, the companies adhering to the same agree to send the Technical Office of Self-Regulation, for prior examination through the confidential and binding copy advice procedure, all the advertisements directed at minors under 12 years of age, and food and drink television advertisements, which are to be broadcast in children's protected viewing times, as established by the Code of Self-regulation for Television Content and Children and the Agreement for the Promotion of Self-Regulation of Television Content and Children signed by television operators and the Government in December 2004. The Technical Office will respond to these consultations within three working days of the request.

2. Likewise, companies adhering to the Code may send the Technical Office of Self-Regulation, for prior examination through the voluntary, confidential and binding copy advice procedure any other advertising components directed at minors, in those cases where doubts exist with respect to the suitability of the same for the present Code. The Technical Office will respond to these consultations within three working days of the request.

3. The companies seeking advice will supply the Technical Office of Self-Regulation any information relative to the advertising in question as required in order to carry out the copy advice.



4. In the event of disagreement with the content of the copy advice issued by the Technical Office of Self-Regulation, the advertiser may voluntarily request revision by the Jury, who, in accordance with the Regulation and in view of the copy advice issued by the Technical Office and the allegations and documents provided by the advertiser, will decide to confirm or reject the content. The Jury's decision will always be binding. The section of the Jury who take part in this review will refrain from participating in the procedure that would pass before the Jury in the event a complaint is presented against the advertiser in question.

5. The companies adhering to the FIAB Code of Self-Regulation will not use in advertising either the content of the copy advice or the fact that it was requested. However, they may present said consultations before the Courts of Justice, administrative authorities and the Jury of Self-Regulation in the event of disagreement.

III.- Monitoring Commission

1.- In addition, a Monitoring Commission of the Code will be created, of mixed composition, made up of a representative from the Spanish Agency of Food Safety (AESAs) –who will chair the Commission–, three representatives from the Consumers' and Users' Council, three representatives from the FIAB, one representative from the AEA (the Spanish Advertisers' Association), and one representative from Self-Regulation with voice but without vote, who will act as Secretary to the Commission.

2.-The functions of the Monitoring Commission will be as follows:

- a) The Commission will regularly evaluate the application of the Code with respect to the goals established by the NAOS Strategy.
- b) The Commission will propose improvements and reviews of the Code to the FIAB as it deems necessary, and will be aware of projects to modify the content of the Code when FIAB carries out reviews.
- c) The Commission will regularly review the reports presented by Self-Regulation with respect to compliance with the Code.
- d) The Commission, in all cases where it is estimated that there has been an infringement of the standards contained in the Code, may decide to present the claims before the Advertising Self-Regulation Jury.
- e) The Commission will also examine the claims or complaints presented by individual consumers or any other individuals, bodies or collectives not included in the above list in section II.2.1, in order to clarify whether there are indications of infringement of the standards contained in the Code of Self-Regulation, and to decide, in each case, whether or not to send them to the Advertising Jury.

In those cases where the Commission considers that there is no indication of infringement of the standards of the Code, a reply will be sent to the claimant explaining the reasons behind the rejection of the claim.



In those cases where, to the contrary, the Commission believes that there is an indication of an infringement of the present Code, the claim will be submitted to the Advertising Jury for its processing as a claim.

f) The Commission may apply to SELF REGULATION for information whether certain advertisements, publicly available as broadcasting has commenced, were the object of copy advice of the Technical Office of Self-regulation and the result of the same.

3.-The Monitoring Commission will meet regularly as required in order to satisfactorily fulfil its functions, in a summons from the Chairman or at the request of three or more members.

IV.- Date of effect

The present Code comes into effect on 15 September 2005, and will be regularly reviewed, in order to adapt it and keep it up-to-date with respect to changes in society and the status of legislation. When as result of the review the necessary modifications are made to the Code, this shall be made with the necessary audience and publicity.



ANNEX

LIST OF STANDARDS ON WHICH PRESENT CODE IS BASED

Law 34/1988, of 11 November, General law on Advertising.

Law 3/1991, of 10 January, of Unfair Competition.

Law 26/1984, of 19 July, General Law for the Defence of Consumers and Users.

Royal Decree 1334/1999, of 31 July, approving the General standards of Labelling, Presentation and Advertising of Food Products.

Law 25/1994, of 12 July, incorporating Directive 89/552/EEC concerning television across borders, into the Spanish Legal System.

Royal Decree 1907/1996, of 2 August, concerning the advertising and commercial promotion of products, activities or services intended for health purposes.

The Code has also taken into account the ethical standards recently promoted at European and International level concerning the advertising of food products: the “Principles of Food and Beverage Product Advertising” approved in February 2004 by the Confederation of the Food and Drink Industries in the EU (CIAA), and the “ICC Framework for Responsible Food and Beverage Communications” from the International Chamber of Commerce, approved in July 2004.

