EU Pledge 2009 Monitoring report

September 09



















Supported by



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About the EU Pledge

The EU Pledge is a voluntary initiative taken by leading food and beverage companies in Europe to change food and beverage advertising on TV, print and internet to children under the age of twelve in the European Union.

Launched in December 2007, the EU Pledge initiative is a commitment to the European Union Platform for Action on Diet, Physical Activity and Health, the multi-stakeholder forum set up by EU Health and Consumer Affairs Commissioner Markos Kyprianou in 2005 to encourage stakeholders to take initiatives aimed at promoting healthy lifestyles in Europe.

EU Pledge member companies represent approximately two thirds of the food and beverage advertising spend in the EU. The initiative is open to any food and beverage company active in Europe and willing to subscribe to the EU Pledge commitments.

The current participating companies are:

Burger King

Coca-Cola

Danone

Ferrero

General Mills

Kellogg

Kraft Foods

Mars

Nestlé

PepsiCo

Unilever

The EU Pledge programme is supported by the World Federation of Advertisers (WFA), which is also the owner of the commitment in respect of the EU Platform for Action on Diet, Physical

Activity and Health. The EU Pledge is a framework initiative, under which participating companies committed to comply with the minimum criteria set out below ('About the commitment'), by 1 January 2009 throughout the EU.

Participating companies must all meet these criteria, but can go further. The framework EU Pledge commitments provide a common benchmark against which companies can jointly monitor and verify implementation.

Since the initiative was launched, all participating companies have made their individual corporate commitments within the framework of the EU Pledge programme. All company commitments, published on the EU Pledge website (www.eu-pledge.eu), were implemented across the EU by 31 December 20081.

To facilitate compliance with the EU Pledge commitments, detailed implementation guidance was sent to the member companies in October 2008, for circulation to all relevant staff in marketing, media planning and corporate affairs departments in all EU markets.

¹ In case of mergers or acquisitions, an agreed transition period is allowed for the implementation of measures taken under the EU Pledge.

About the commitment

No advertising of products to children under 12 years, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines². For the purpose of this initiative, "advertising to children under 12 years" means advertising to media audiences with a minimum of 50%³ of children under 12 years⁴.

No communication related to products in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes.

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² To date there is no one single global or European set of nutritional guidelines, because of the substantial differences across food cultures. There are nonetheless national and some elements of international guidance (e.g. World Health Organisation). Such guidelines usually include recommendations on daily caloric/nutritional intake and dietary habits/regimens and are dietary guidelines, not specific to individual foods. EU Pledge companies have developed their own nutritional guidelines on the basis of the most widely accepted national and international guidelines that exist (e.g. WHO, FAO, USDA, IOM, EURODIET). They have done so individually to reflect the diversity of members' product portfolios. Some include products from a number of categories; others include only one category (e.g. confectionery, soft drinks). Other EU Pledge member companies still have taken the decision not to advertise any of their products to children under 12. All applicable nutritional guidelines are published as part of the individual company commitments under the EU Pledge on www.eu-pledge.eu

³ This is a commonly agreed benchmark to identify media with an audience composed of a majority of children under 12 years old. This method of audience indexing has been agreed as a pragmatic system to determine the applicability of advertising rules. Nevertheless, this is a minimum common benchmark for all EU Pledge member companies. For further detail see: www.eu-pledge.eu

⁴ The rationale for this threshold is the strong degree of academic consensus that by the age of 12 children develop their behaviour as consumers, effectively recognise advertising and are able to adopt critical attitudes towards it. Although children between the ages of 6 and 12 are believed to generally understand the persuasive intent of advertising, care should be taken because they may not have a fully developed critical understanding. For further information see: http://www.wfanet.org/pdf/adv_papers/when_is_a_child_pdf

Executive summary

In line with the Terms of Reference of the EU Platform for Action on Diet, Physical Activity and Health, EU Pledge signatories are required to monitor and report on the implementation of their commitments. EU Pledge member companies have committed to carry out independent, third-party compliance monitoring of the two central EU Pledge commitments. Following this commitment, the EU Pledge commissioned:

- Accenture Marketing Sciences⁵ to review independently EU Pledge member companies' compliance with the abovementioned commitment on food and beverage advertising on TV, print and internet; and
- PricewaterhouseCoopers⁶ to monitor compliance with the commitment on product-related communications in primary schools.

Both monitoring programmes were carried out and completed in the first half of 2009.

This report follows the commitment made by EU Pledge member companies at the end of 2007 to publish the results of these monitoring programmes and to share them with the EU Platform for Action on Diet, Physical Activity and Health and other interested stakeholders.

Both compliance monitoring exercises have been independently reviewed by Mr. Lucien Bouis, member of the European Economic and Social Committee and a former director of the Bureau de Verification de la Publicité (BVP, French advertising Self-Regulatory Organisation), whose appraisal of the fairness and accuracy of the monitoring methodologies and processes is given in the foreword to this report.

In addition to monitoring the implementation of commitments, EU Pledge member companies have sought to go beyond compliance and measure the change in the balance⁷ of their food and beverage advertising to children as a result of the EU Pledge and individual company commitments made within the framework and in the spirit of the EU Pledge.

Accenture Marketing Sciences was therefore commissioned to measure to what extent

⁵ Accenture is a global management consulting, technology services and outsourcing company. Accenture Marketing Sciences helps companies measure and optimise investments in marketing, media, retail and digital.

⁶ PWC is a leading global auditing and professional services firm.

⁷ I.e. a change in exposure of children under 12 to advertising for foods that meet/do not meet companies' nutritional criteria.

children's viewing of TV adverts for products marketed by EU Pledge member companies has changed since 2005 to the best of our knowledge, i.e.: How many adverts by EU Pledge member companies did children under twelve see in 2005? How many in 2009? What proportion of these ads was for products not deemed compliant with the EU Pledge criteria for advertising to children?

This change monitoring exercise has delivered a measure of the concrete impact that the EU Pledge initiative and related company policies have had on the balance of food advertising to children. The analysis is limited to TV advertising because of the lack of comparable historic data for other media.

Key results

On the basis of independent compliance monitoring in six EU markets, EU Pledge member companies achieved the following compliance rates on their advertising commitment:

- TV: 99.8%
- Print: virtually 100% (2 non-compliant ads found in 6 markets)
- Online: virtually 100% (1 non-compliant ad found)

Children's exposure to EU Pledge member companies' TV advertising for products that do not meet companies' nutritional criteria has declined since 2005 by:

- 93% in programmes with a majority of children under 12 in the audience.
- 56% overall, i.e. in all programmes in all channels in the six markets monitored.

For all EU Pledge member companies' advertising across all products, this represents, in the six markets monitored since 2005:

- A 61% drop in programmes with a majority of children under 12 in the audience.
- A 30% drop overall, i.e. in all programmes on all channels in the six markets monitored.

EU Pledge member companies achieved an overall compliance rate of 93% with regard to their commitment relating to communications in primary schools.

Report by the independent reviewer

At the request of EU Pledge members, Lucien Bouis accepted to be appointed as the independent reviewer for the EU Pledge monitoring report. He is a member of the European Economic and Social Committee and a former director of the Bureau de Vérification

de la Publicité (BVP, French advertising Self-Regulatory Organisation). This is his independent account of the compliance monitoring report performed by Accenture and PricewaterhouseCoopers.

Independent review of the compliance monitoring exercise

Objective

In the context of the European Union Platform for Action on Diet, Physical Activity and Health launched by the EU's Directorate General for Health and Consumers and with the support of the World Federation of Advertisers, eleven food and beverage companies made a series of commitments affecting the way they communicate with children under the age of twelve.

At the request of Landmark Europe, which provides the secretariat for the EU Pledge initiative, I have agreed to undertake the independent review of the compliance monitoring exercise which EU Pledge member companies had committed to perform. The purpose of my independent review was to assess whether the compliance monitoring, performed by the two agencies Accenture Marketing Sciences and

PricewaterhouseCoopers, was performed with an adequate methodology, diligence and resources.

EU Pledge members committed to the following:

- No product-related communications for food and drinks in primary schools, unless requested by or agreed with the school administration for educational purposes
- No advertising for food and beverage products to children under the age of twelve on TV, print and internet, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines.

Communication in primary schools

With respect to the first part of the EU Pledge commitment concerning communications in schools, the appropriate means have been put in place by the agency PricewaterhouseCoopers (PWC) to ensure that the compliance monitoring was reliable and realistic. The monitoring exercise was carried out in 4 EU countries: Finland, Hungary, the Netherlands and Portugal.

The monitoring was performed between 1 January and 31 March 2009, during which period primary schools were given information about the EU Pledge and responded to a survey.

By sending surveys to over 1000 primary schools in each country (with different geographic and socio-economic characteristics) per country, and by ensuring that around 100 of these responded in each country, PWC ensured that they had enough respondents to guarantee a reliable and representative response rate.

PWC performed their survey by asking a series of questions concerning:

- Advertising on school infrastructure
- Advertising on vending machines
- Advertising on school furniture and equipment

- Advertising in school publications
- Advertising during events organized at/by the school
- Sponsorship of educational material

Considering a number of difficulties which arose with respect to the questionnaire, and the risk of certain questions overlapping with one another, all efforts were made to explain and refine certain questions. In some cases, follow-up phone calls were made.

After analysis of the responses of primary school directors, it is noteworthy that the non-compliance rate for primary schools is 7%. A critical analysis of the compliance monitoring report completed by PWC may allow EU Pledge members to take actions following this report.

Advertising in TV, print and internet

Six countries were chosen as a sample for the compliance monitoring of the second commitment of the EU Pledge concerning advertising for children under 12 years old. Accenture Marketing Sciences carried out the monitoring in France, Italy, Germany, Ireland, Spain and Poland.

The compliance monitoring exercise was carried out through January to May 2009. The adequate means were put in place to guarantee that the exercise (and its result) was reliable (identification of channels and websites, TV audience analysis, database, filtering systems...).

TV

Concerning the compliance monitoring on television, all advertisements broadcast on all channels (for which data was available) were filtered and analysed to assess whether these commercials had been aired when more than 50% of the audience were under 12 years old. In France and Italy, data for cable and satellite television were not available.

During the observation period, the 11 EU Pledge member companies broadcast 414,553 advertising spots for their products. Only 480 of these spots were found to be non-compliant by the agency in charge of the compliance monitoring.

Print

Concerning the compliance monitoring in press and magazines, Accenture drew up a list of publications which are reasonably expected to be designed for children under 12 years old (more than 50% of the readership).

All advertisements published during the first three months of 2009 were analysed in order to assess whether they breached the EU Pledge commitment. In all magazines and publications analysed in the 6 countries, there were only two cases of non-compliance.

Internet

Concerning the compliance monitoring on the internet, a method similar to the monitoring for press was applied. Accenture drew up a list of websites reasonably expected to be designed for an audience of at least 50% of children under 12 years old and all commercials (banners, pop-ups...) on these websites were analysed and filtered to assess whether they complied with the EU Pledge commitment.

The result of this rigorous verification shows that contrary to a common belief on new media advertising, there are few cases of non-compliance with the EU Pledge commitment, similar to other 'traditional' media.

Conclusions

Taking into account the number of countries in the sample, the populations covered, the significant number of companies that are part of the EU Pledge, the diversity of their product portfolios, the number of advertisements analysed and the range of media assessed, the compliance monitoring performed for the EU Pledge has been carried out faithfully, realistically, and with diligence.

I have been kept informed of the progress made by the monitoring agencies and I am therefore in a position to vouch for the seriousness of the research undertaken and the reliability of the results. They correspond to the terms of reference agreed to by all the operators involved.

During the course of my mission I have had full access to all the information I considered necessary, and have received answers to all

my questions. I have been in regular contact with Landmark Europe as well as with PWC and Accenture. I also interviewed the representatives of these agencies to assess the quality of their reports.

In view of the significant number of food and drink companies involved and their willingness to submit their commitments to independent verification, the results of this EU-wide self-regulatory initiative should be of great interest to all stakeholders involved in health and consumer protection.

Lucien Bouis

Brussels, 15 July 2009



Compliance monitoring - Advertising

Objective and scope

Accenture Marketing Sciences was commissioned to carry out independent monitoring of member companies' compliance with the following EU Pledge commitment:

"No advertising of products to children under 12 years, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines. For the purpose of this initiative, "advertising to children under

12 years" means advertising to media audiences with a minimum of 50% of children under 12 years."

For the purposes of this verification, six sample EU markets were chosen: France, Germany, Ireland, Italy, Poland and Spain. As well as reflecting geographical balance, these Member States represent approx. 60% of the EU population.

Methodology

The following methodology was applied by Accenture:

TV

All advertising spots for products marketed by EU Pledge member companies, aired in the six markets⁸ during the period 1 January-31 March 2009 (Q1 09) were collected (TNSofres data in Spain; Nielsen data in all other markets). With this methodology, the totality of advertising spots (**414,553 spots**) aired over a three-month period in the six markets were reviewed for compliance with the EU Pledge commitment.

Spots for products that do not meet EU Pledge companies' nutritional criteria, where applicable, were identified. For those member companies that do not apply nutritional criteria and do not advertise any products to children under twelve, all spots were included.

⁸ Satellite ratings not monitored by AGB in Italy. French satellite ratings not available to Accenture within the framework of the monitoring exercise.

For all these spots, the audience composition at the time each spot was aired was analysed, on the basis of national ratings data. This allowed identification of ads aired in and between programmes with an audience in which the majority were children under twelve.

All spots for products that EU Pledge member companies have committed not to advertise to children under twelve, aired at times when the audience was composed of a majority of children under twelve, were deemed noncompliant with the EU Pledge. In a few instances (298 spots out of 441,553), spots aired during adult programming at nighttime showed a child audience >50%. These are probably statistical anomalies due to small ratings at nighttime. In fact all these spots showed a child audience rating below 1 Gross Rating Point (GRP)⁹. These spots were nonetheless considered as non-compliant spots.

Print

Because age-specific readership data for children's press is not available, Accenture drew up a list of children's titles in each of the six markets, on the basis of national genre classifications used in the industry.

Using advertising data from national monitoring agencies (databases of all ads placed in print titles), Accenture verified the presence in any of these children's print titles of advertising for

products that EU Pledge member companies have committed not to advertise to children under twelve (non-compliant ads).

Internet

Online advertising monitoring is achieved in a similar way to print through the creation of a list of children's sites and then monitoring those sites to verify the presence of any ads for products that EU Pledge member companies committed not to advertise to children under the age of twelve.

The list of websites for the monitoring exercise (See Annex I) was developed autonomously by Accenture using Nielsen Net Ratings to identify a sample of sites of particular appeal to children under twelve.

These websites were subsequently monitored live during a period of ten weeks (1 April – 15 June 2009), using Accenture's proprietary Advertising Banner Buyer Audit automatic monitoring technology. This enables the identification of any online ad on the chosen sites by product and time of appearance.

⁹ See glossary in Annex I.

Outcome

The detailed compliance rates reported by Accenture per market and per medium can be found in the Accenture presentation included in this report.

The overall weighted compliance rate per medium was as follows:

TV advertising: 99.8%

- Print advertising: Only two instances of advertising in children's titles were observed.
- Online: On the websites monitored,
 Accenture reported only one instance of non-compliance, i.e. two adverts for products not meeting companies' nutritional criteria on two websites targeted at children under 12.

Follow-up

Each EU Pledge member company was informed of each reported instance of non-compliance. Companies were therefore able to identify each spot in question, by product, channel/title/website and time. This enabled

companies to take corrective action where necessary, to adapt media planning where appropriate, and to update guidance to marketing departments where needed.

Measuring change in the balance of advertising

Objective and scope

Although this was not part of the EU Pledge commitment to the EU Platform for Action on Diet, Physical Activity and Health, member companies felt it necessary to measure the change in the balance of food and beverage products advertised to children under twelve, i.e. the shift in children's exposure to advertising to products that meet companies' nutritional criteria vs. those that do not, so as to assess the effect and significance of the initiative.

Due to the lack of historic data for print and Internet advertising, this exercise was limited to TV advertising – still by far the dominant medium in terms of food and beverage marketing spend.

The year 2005 was chosen as a benchmark, coinciding with the launch of the EU Platform for Action on Diet, Physical Activity and Health.

The purpose of this exercise was to examine how advertising by EU Pledge member companies has changed in practice in respect of its reach among children under twelve.

Methodology

The outcome indicators used to measure this change were the following:

• The number of times that children under twelve saw ads by EU Pledge member companies (measured in "impacts", l.e. the number of times each ad is viewed by one person) in the period 1 January – 31 March 2005 vs. the same period in 2009.

 The share of these ads that was for products which EU Pledge member companies have committed not to advertise to children, in 2005 vs. 2009.

Accenture analysed the change in advertising practice on the basis of these indicators and was asked to report the findings in terms of:

 Change in programmes with an audience composed of a majority of

- children, the minimum common benchmark applied under the EU Pledge initiative.
- Change in general programming, i.e. all programmes aired during the monitoring periods in the six markets during Q1 2005 and Q2 2009.

This analysis was carried out by contrasting two comparable sets of data:

- The advertising and ratings data already analysed to measure compliance in Q1 2009.
- The equivalent data for Q1 2005, i.e. all advertising spots for products marketed by EU Pledge member companies in that period on the same channels.

For the purposes of this analysis, all advertising spots were included, regardless of the time of broadcast or the size of the audience.

Outcome

The results reported by Accenture show a marked decline in children's exposure to ads for products that do not meet companies' nutritional criteria. This trend is visible on the basis of both change measurement parameters chosen, namely:

- A 93% decline in programmes with an audience composed of a majority of children.
- A 56% decline overall, i.e. in all programmes on all channels at all times.

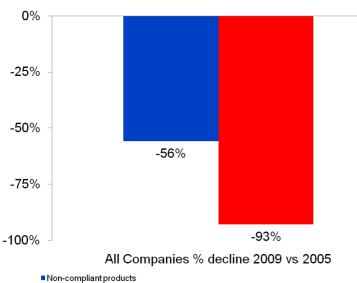


Fig 1: EU Pledge member companies

- Child <12 impacts 2005 vs. 2009:

products that do not meet companies'

nutritional criteria.

■Non-compliant products in spots with a reported profile >50%

For all EU Pledge member companies' advertising across all products, this represents, in the six markets monitored since 2005:

- A 61% decline in programmes with an audience composed of a majority of children.
- A 30% decline overall, i.e. in all programmes on all channels at all times.

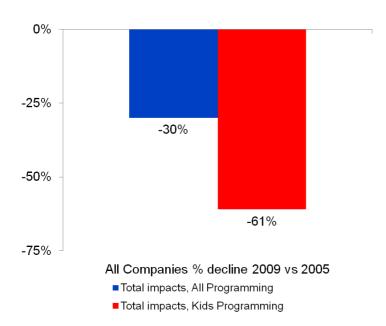


Fig 2: EU Pledge member companies

- Child <12 impacts 2005 vs. 2009: <u>all</u>
products

The only precedent for measuring change in the balance of food advertising to children in a similar way in Europe was set by UK communications regulator Ofcom in its 2008 Review of the effects of HFSS restrictions on advertising and media¹⁰. In its report, Ofcom measured the change in the number of impacts for high fat/sugar/salt food¹¹ advertising on

Given that the present analysis covers six markets representing 60% of the EU population and that the EU Pledge member companies also represent around 60% of food and beverage marketing spend in the EU, these results are of significance for assessing the change in the balance of TV food advertising to children practices in Europe.

children and adolescents under the age of 16 between 2005 and 2008. Ofcom reported a 34% drop overall (63% in children's airtime and 20% in adult programmes).

Ofcom 2008: Changes in the nature and balance of television food advertising to children – A review of HFSS advertising restrictions (http://www.ofcom.org.uk/research/tv/reports/hfssdec (08/)

¹¹ HFSS" foods, as defined on the basis of the UK Food Standards Agency nutrient profiling system.

Compliance monitoring – Primary schools

Objective and scope

PricewaterhouseCoopers (PWC) was commissioned to carry out independent monitoring of member companies' compliance with the following EU Pledge commitment:

"No communication related to products in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes."

For the purposes of this verification, four ΕU markets sample were chosen, complement the geographical sample chosen advertising monitoring for the component: Finland, Hungary, Portugal and The Netherlands.

Methodology

PWC developed six key performance indicators for monitoring compliance:

KPI 1: Is any food or beverage product advertising found on school grounds?

KPI 2: Is any food or beverage product advertising found on vending machines in the school?

KPI 3: Is any food or beverage product advertising found on school infrastructure?

KPI 4: Is any food or beverage product advertising found in publications and products produced for or distributed by the school?

KPI **5**: Is any food or beverage product advertising found during events which are organised by the school?

KPI 6: Do schools get sponsoring of material from food and beverage companies and if "yes", was the provision of branded material done with the school director's agreement?

A questionnaire was devised to survey schools in the four chosen countries and assess compliance with the above KPIs.

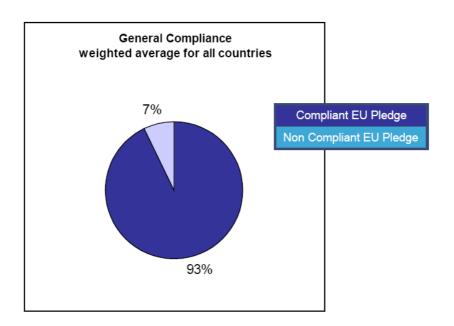
The translated questionnaire was sent to a randomly selected, representative sample of primary schools in the four countries, designed to meet standard statistical accuracy benchmarks for this type of research (a margin of error no greater than 10% and a 95% confidence level).

The responses were collected and analysed by PWC.

Outcome

The compliance rates identified by PWC are reported in more detail – per country and KPI – in the PWC report in Annex II.

The overall weighted compliance rate was as follows:



Follow-up

Each EU Pledge member company was informed of the number of reported instances of non-compliance relating to their brands, per KPI and per market. While companies could not rectify individual cases of reported breaches, due to the confidentiality of survey responses,

they gained a perspective on which type of communication in which market was potentially problematic for them, enabling adaptation of marketing guidelines and/or practice where appropriate.

Obstacles and learnings

The monitoring programme implemented for the EU Pledge programme posed a number of difficulties which had to be addressed and resolved. The main obstacles included:

Diverse advertising and media markets:

The EU is a highly diverse landscape of advertising and media markets: the number of channels and print titles varies greatly from one country to another; rating agencies differ; audience measurement systems vary and children's programmes/media channels are often categorised on the basis of different age segments. As a result, the availability of consistent, comparable data in all markets poses significant challenges.

Large scale data processing:

The chosen methodology, particularly for TV advertising, required the collection and analysis of a very large body of data (all ads aired by the eleven member companies in six major EU markets). While this methodology allowed for a robust assessment of compliance and change, it was a time-consuming and resource-intensive process.

Online advertising:

The type of compliance monitoring carried out for online advertising under this programme is still novel and therefore methodologically challenging. In particular, the fluid nature of the online environment means that live monitoring needs to be performed. With limited resources, this can only be done by selecting a non-exhaustive sample of websites. The result is a less comprehensive snapshot than that which can be obtained for TV advertising.

Tracing product formulation data:

The policy adopted by most EU Pledge member companies is to restrict advertising to children under twelve to those products that meet specific nutritional criteria, developed on the basis of accepted scientific evidence and/or applicable national and international dietary guidelines. This commitment runs in parallel to a significant innovation, and where appropriate reformulation, effort. For some companies, the nutritional characteristics of a number of products have therefore changed substantially since 2005. Retrieving accurate product formulation data for 2005 was a significant challenge, especially for those companies with a very large product portfolio and those that have undergone substantial transformation through mergers and acquisitions.

Monitoring compliance in schools:

The schools monitoring programme posed specific challenges. The first relates to the translation of the EU Pledge commitment into a

questionnaire that is understandable and userfriendly for schools, without sacrificing detail necessary to verify compliance accurately. Secondly, it was challenging to obtain responses from the target number of schools: low response rates in some countries meant that it was necessary to survey a much larger number of schools than anticipated in order to reach a statistically representative sample meeting the requirements of a 95% confidence rate and no more than a 10% margin of error.

A key learning for the schools monitoring programme was also to make the questions

regarding individual instances of non-compliance more specific with regard to the brands concerned, not only the company involved, so as to better enable corrective action by companies.

Communicating complex monitoring frameworks:

The complexity of the monitoring methodologies used and the ensuing complexity of the data collection efforts needed made for challenging communication, both internally to companies and externally.

Next steps

EU Pledge member companies are committed to independent, transparent and participative monitoring, as set out in the terms of reference of the EU Platform for Action on Diet, Physical Activity and Health. EU Pledge member companies will share and present the results of

the 2009 monitoring programme with the members of the EU Platform and other interested stakeholders, so as to consider suggestions for further improvements, with a view to the 2010 monitoring programme.

ANNEX I – Accenture Marketing Sciences Monitoring Report



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TV compliance monitoring 2009 - Objective

- Assess EU Pledge member companies' compliance with the following commitment:
 - "No advertising of products to children under 12 years, except for products which fulfill specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines. For the purpose of this initiative, "advertising to children under 12 years" means advertising to media audiences with a minimum of 50% of children under 12 years."
- For the purposes of this verification, 6 sample EU markets were chosen: France, Germany, Ireland, Italy, Poland and Spain. As well as geographical balance, these Member States represent approx. 60% of the EU population.



















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TV compliance monitoring 2009 - Methodology



- All spots by all EU Pledge member companies, aired in the 6 markets* from 1 January to 31 March were collected (TNSofres data in Spain; Nielsen data in all other markets). Total sample size: 414,553 spots.
- Spots for products that do not meet EU Pledge companies' nutritional criteria, where applicable (some member companies do not advertise any products to children <12), were identified on the basis of product lists supplied by companies.

^{*} Stations monitored include all available to Accenture at the time of monitoring. This precludes satellite and cable channels in France and Italy.



















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- Audience composition at the time each spot was aired was analysed, based on national ratings data, to identify those aired in and between programmes with an audience in which the majority were children <12.
- All spots for products that EU Pledge member companies have committed not to advertise to children <12 (i.e. products not meeting companies' nutritional criteria), aired at times when the audience was composed of a majority of children <12, were deemed non-compliant with the EU Pledge.

















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TV compliance monitoring 2009 - Results



- In Q1 2009 out of 414,553 spots monitored, 480 spots for products that do not meet companies' nutritional criteria were found in programmes that we would consider to be targeted at children < 12, with a profile of 50% or more children <12 and in child-orientated programmes:
 - In France, Italy, Ireland and Spain this was restricted to no more than 20 spots which
 we would consider to be reasonable given the package based buying processes of T V
 airtime trading practices.
 - In Germany and Poland there was some advertising that was more persistently appearing in or around children's programming with a 50% or greater profile, which has been reported back to the advertisers in question. These spots represent less than 0.2% of spots monitored in these two markets.

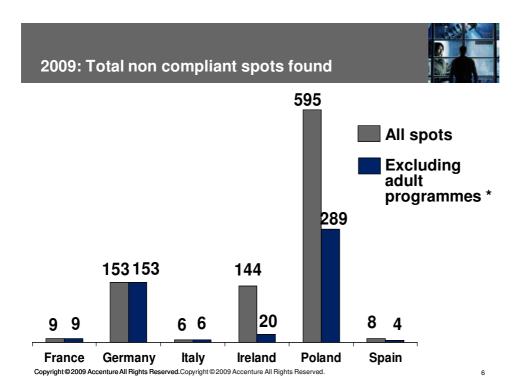
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TV compliance monitoring 2009 - Results

- In addition, we found:
 - 136 spots for products not meeting companies' nutritional criteria in daytime adult programmes that nonetheless recorded an audience share of 50% children <12.
 - 298 spots for products not meeting companies' nutritional criteria in night time programmes (21h00 -5h59) that nonetheless recorded an audience share of 50% children <12. These are most likely statistical anomalies due to small ratings (all these spots achieved an <12 rating below 1 GRP).</p>
- Although not in breach of the spirit of the EU Pledge, these spots were deemed non-compliant with the letter of the commitment and included in the overall compliance figure.
 - > The overall compliance rate for the 6 markets monitored was 99.8% (914 non-compliant spots out of 414,553)

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TV advertising- measuring change



- · Objective:
 - Measure how the balance of advertising by EU Pledge member companies has changed since 2005 in respect of its reach among children <12.
- Methodology Change measurement:
 - The number of times that children <12 saw ads by EU Pledge member companies (measured in "impacts", i.e. the number of times each ad is viewed by one person) in the period 1 January - 31 March 2005 vs. the same period in 2009.
 - The share of these ads that was for products which EU Pledge member companies have committed not to advertise to children in 2005 vs. 2009.
- Methodology Indicators of change:
 - Change in programmes with an audience composed of a majority of children, the minimum common benchmark applied under the EU Pledge initiative.
 - Change in general programming, i.e. all programmes broadcast during the monitoring periods in the six markets during Q1 2005 and Q1 2009.
- Sample: All spots by EU Pledge companies aired in Q1, '05 and Q1, '09, regardless of time of broadcast or size of audience.

















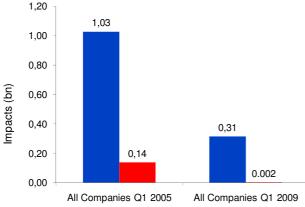


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France: Trends 2005 vs. 2009



All impacts for products not meeting companies' nutritional criteria: Children under 12 (Nielsen)



Advertising for products that do not meet companies' nutritional criteria fell by:

- -99% in programmes with a reported profile of 50% or more of children under 12
- -70% across all programming
- Total Impacts for non-compliant products products (bn)
- Total Impacts for non-compliant products in spots with a reported profile



















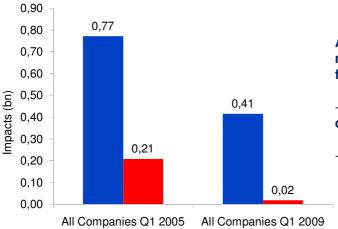
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Germany: Trends 2005 vs. 2009



All impacts for products not meeting companies' nutritional criteria: Children under 12 (Nielsen)



Advertising for products that do not meet companies' nutritional criteria fell by:

- -91% in spots with a reported profile of 50% or more of children under 12
- -46% across all programming

- Total Impacts for non-compliant products (bn)
- ■Total Impacts for non-compliant products in spots with a reported profile >50%













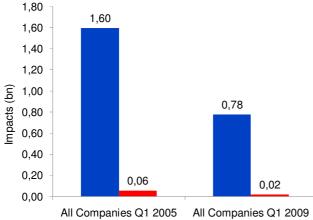




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Poland: Trends 2005 vs. 2009

All impacts for products not meeting companies' nutritional criteria: Children under 12 (Nielsen)



Advertising for products that do not meet companies' nutritional criteria fell by:

- 62% in spots with a reported profile of 50% or more of children under 12
- -51% across all programming

- ■Total Impacts for non-compliant products (bn)
- ■Total Impacts for non-compliant products in spots with a reported profile >50% (bn)



















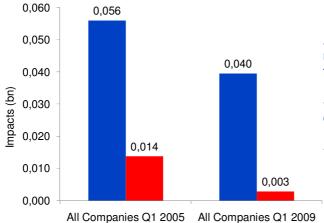
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Ireland: Trends 2005 vs. 2009



All impacts for products not meeting companies' nutritional criteria: Children under 12 (Nielsen)



Advertising for products that do not meet companies' nutritional criteria fell by:

- -79% in spots with a reported profile of 50% or more of children under 12
- -29% across all programming

- Total Impacts for non-compliant products (bn)
- Total Impacts for non-compliant products in spots with a reported profile >50% (bn)















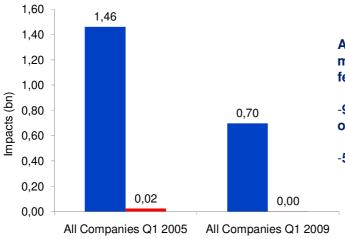
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Italy: Trends 2005 vs. 2009



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All impacts for products not meeting companies' nutritional criteria: Children under 12 (Nielsen)



Advertising for products that do not meet companies' nutritional criteria fell by:

- -99% in spots with a reported profile of 50% or more of children under 12
- -52% across all programming

- ■Total Impacts for non-compliant products (bn)
- ■Total Impacts for non-compliant products in spots with a reported profile >50% (bn)



















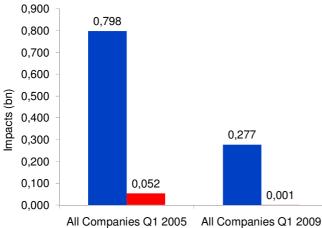
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Spain: Trends 2005 vs. 2009



All impacts for products not meeting companies' nutritional criteria: Children under 12 (TNSofres)



Advertising for products that do not meet companies' nutritional criteria fell by:

- -99% in spots with a reported profile of 50% or more of children under 12
- -65% across all programming
- Total Impacts for non-compliant products (bn)
- Total Impacts for non-compliant products in spots with a reported profile >50%













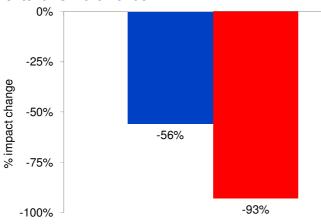
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All markets & All Companies % Trends in non-compliant products 2005 vs. 2009



All impacts for products not meeting companies' nutritional criteria: Children under 12



Advertising for products that do not meet companies' nutritional criteria in all markets fell by:

- -56% in <12yr impacts across all programming
- -93% in <12yr impacts in spots with a profile of >50%

All Companies % decline 2009 vs 2005

- Non-compliant products
- Non-compliant products in spots with a reported profile >50%

















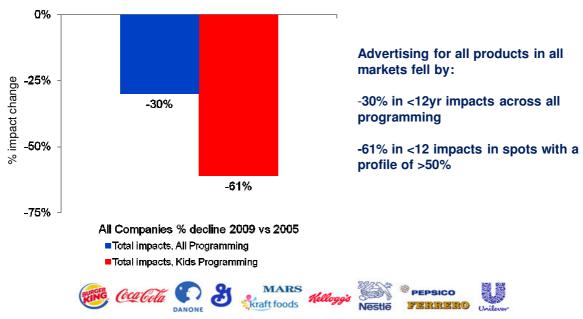
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All markets & All Companies % Trends in all products 2005 vs. 2009



Total impacts, all products: Children under 12



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Print compliance monitoring - Methodology



- Because age-specific readership data for children's press is not available, we drew up a list of children's titles in each of the six markets, on the basis of national genre classifications used in the industry.
- Using advertising data from national monitoring agencies (databases of all ads placed in print titles), we verified the presence in any of these children's print titles of advertising for products that EU Pledge member companies have committed not to advertise to children under twelve ("non-compliant" products).
- Any ads for such products in any of these titles were deemed instances of non-compliance.









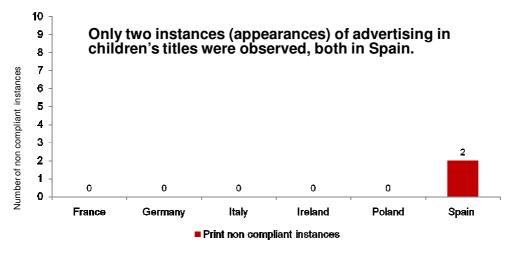














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Internet monitoring methodology



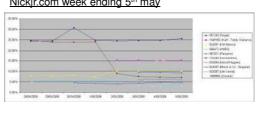
Digital monitoring was carried out by scanning a sample of websites popular among children under 12 in the six markets monitored to ascertain the presence of any ads for products that EU Pledge member companies have committed not to advertise to children under 12.

Sites

Selected a sample of websites with a direct affinity to younger children, including some high traffic network sites, e.g. msn, with filters able to determine sections of the sites with a majority share of <12s in the audience



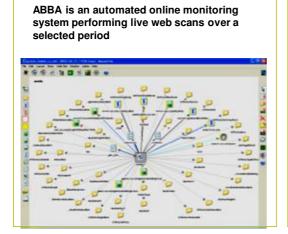
Compliance Accenture's Advertising Buyer Banner Audit (ABBA) product automatically monitors sites and produces reports of advertiser activity. Nickjr.com week ending 5th may



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Accenture's Advertising Buyer Banner Audit (ABBA)





Identifying non-compliant ads on a live basis



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Websites scanned during 01/04/2009 – 15/06/2009



http://www.orange.fr/ www.yahoo.co.uk http://www.miniclip.com/games/fr/ cda.pl http://www.stardoll.com/en/ http://www.jeux-gratuits.com/ http://www.aol.de/ http://www.girlsgogames.co.uk/ http://www.ieux.fr http://de.msn.com/ http://www.nick.co.uk/ http://www.tfou.fr/ http://it.msn.com/ http://www.nickjr.co.uk/ http://www.girlsgogames.fr/ http://es.msn.com/ http://www.cartoonnetwork.co.uk/home/index.jsp http://www.jeu.fr Gioco.it http://home.disney.co.uk/ www.gry.pl Agame.com http://www.runescape.com/ poszkole.pl Flashgames.it http://www.miniclip.com/games/en/ wyspagier.pl http://www.iuegos.com/ http://www.uk.realarcade.eu/ zylom.com http://www.disney.es/ http://www.agame.com gry-online.pl http://www.minijuegos.com/

http://www.habbo.co.uk/ instalki.pl http://fr.msn.com/ teksty.org

This is a non-exhaustive selection of websites popular among children under twelve in the sample markets (.co.uk sites chosen to cover Ireland)

















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Internet Scanning Results



- · We found evidence of only one non-compliant ad by EU-pledge member companies on the sites scanned.
- · It should be noted though that the ad originated from the USA. We have therefore found no evidence that any of the EU Pledge companies have used any of the selected children's sites in Europe.
- · However, given that a number of .com sites are popular among children under 12 in the EU, it is clearly difficult for global advertisers to control advertising of this nature on the internet. This is exacerbated by the 'catch-all' nature of selling space on the internet by the ad-networks - for example we also found evidence of financial services and automobile advertising on some of these children's sites.
- · We would therefore recommend that EU Pledge member companies:
 - Avoid using ad-networks to buy advertising space for products that they have committed not to advertise to children under 12.
 - Buy directly from appropriate websites instead.
 - Ensure that an appropriate age filter is applied when buying advertising space on social networking sites

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Appendices

- Glossary
- Print Titles
- TV Stations

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Glossary



- Impacts (Impressions) number of times a message is seen by the audience.
 - In this report, when represented as a percentage, this is the proportion of the total children's impacts across the period that were within spots with a profile share of 50% or more.
- GRPs -(Gross Rating Point) Percentage of the target audience viewing at the given time
- **Profile** the audience make-up- who was watching at that time? (the demographic breakdown)
- Spot each individual advertising activity the airtime used by the advertiser



Poland: Children's print titles

Title	Periodicity	Circulation
Angielski jest super!	bi-monthly	40 000 copies*
Cartoon Network	monthly	59 938 copies*
CyberMycha	monthly	44 500 copies*
Czarodziejki Witch	bi-weekly	120 000 copies*
Disney i Ja	monthly	45 000 copies*
FIFI	monthly	49 949 copies*
High School Musical	bi-monthly	50 150 copies*
Hot Wheels	monthly	55 000 copies*
Jetix Magazyn	monthly	39 939 copies*
Kaczor Donald	weekly	88 750 copies*
Klm Kolwiek	monthly	50 000 copies*
Komputerowa Gratka	monthly	50 000 copies*
Kraina Zwierząt	monthly	45 000 copies*
Księżniczka	monthly	58 000 copies*
Kubuś Puchatek	monthly	135 000 copies*
Miki Max	quaterly	40 000 copies*
Mój Kucyk Pony	monthly	49 840 copies*
Noddy	monthly	50 000 copies*
Odlotowe Agentki	monthly	64 886 copies*
Power Rangers	monthly	70 000 copies*
Puchatkowe Zabawy	quaterly	55 000 copies*
Scooby-Doo!	monthly	119 683 copies*
Spider-Man	monthly	50 000 copies*
Styl Witch	monthly	70 000 copies*
Świat Przygód z Hugo	monthly	59 937copies*
Teletubbies	monthly	50 000 copies*
Tom&Jerry	monthly	30 000 copies*
Winx Club	monthly	64 907 copies*
Wojownicze Żółwie Ninja	monthly	40 000 copies*
Wróżki	monthly	55 010 copies*
Zabawy i Marzenia z Barbie	monthly	100 000 copies*
Zabawy z Tygryskiem	quaterly	45 000 copies*

* Source: ZKDP, average single circulation, April 2008

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Spain: Children's print titles



Children's Titles	
SAPOS Y PRINCESAS	
CARTOON NETWORK	
DIBUS!	
PELO PICO PATA	
REVISTA DELS SUPERS	
WITCH	
BARBIE	
JETIX	
PRINCESAS	
LOS LUNNIS	
REPORTERO DOC	
JUGON!	
ART ATTACK	
POKEMON	
BRATZ	
WITCH ESPECIALES	
HIGH SCHOOL MUSICAL	
WINX CLUB	
LEO LEO	
MEGA HIRO	
PRINCESAS ESPECIAL	
CARACOLA	
EL INCREIBLE SPIDERMAN	
HADAS	
POPI	
LOS LUNNIS (ESPECIAL)	
APRENDE Y JUEGA CON POKEMON	
CARS	
PLAYHOUSE DISNEY	

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Print Titles: Italy



Print	Circulation (*)	Readership (***)
Weekly		
IL GIORNALINO	52,930	146,000
TOPOLINO	232,513	1,240,000
Montly		
BAMBI	14,219	n.a.
BARBIE	48,881	n.a.
CIP & CIOP	31,372	n.a.
CLASSICI WALT DISNEY (I)	26,112	n.a.
FOCUS JUNIOR	188,198	n.a.
GRANDI CLASSICI DISNEY (I)	29,330	n.a.
PAPERINO	50,244	n.a.
POWER RANGERS MAGAZINE	32,262	n.a.
VMNNIE THE POOH	40,305	n.a.
WITCH	73,161	n.a.

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Print Titles: Ireland



The only listed children's title in Ireland is the Funday Times, being a supplement of the Sunday Times. Other titles, e.g. comics imported from abroad (e.g. the U.K.)

^(*) source ADS May 07-April 08 (**) source Audipress 2007 Total readership





ABRICOT
ADVENTURE BOX
ARKEO JUNIOr
ASTRAPI
BABAR
BAMBI
COSINUS
D LIRE
DISNEY PRINCESS
DISCOVERY BOX
FILOTEO
HISTOIRES POUR LES PETITS
I LOVE ENGLISH JUNIOR
IMAGES DOC
J AIME LIRE
J APPRENDS A LIRE
JE BOUQUINE
JE LIS DEJA
JE LIS DES HISTOIRES VRAIES
KID PADDLE

CHILDREN'S TITLES
JULIE
LE JOURNAL DE MICKEY
LE JOURNAL DES ENFANTS
LE PETIT LEONARD
LE PETIT QUOTIDIEN
LES BELLES HISTOIRES
LES CLES DE L ACTUALITE JUNIOR
MANON
MES PREMIERS J AIME LIRE
MICKEY PARADE GEANT
MILLE ET UNE HISTOIRE
MOBICLIC
MOI JE LIS
PETITES HISTOIRES POUR LES TOUT
PETITES MAINS
PICOTI
PICSOU MAGAZINE
PIF GADGET
PIROUETTE
POMME D API

CHILDREN'S TITLES
POMME D API SOLEIL
POPI
POPI DOUDOU
SCIENCE ET VIE DECOUVERTES
SEPT AUTOUR DU MONDE
SPIROU
STORY BOX
SUPER PICSOU GEANT
TOBOCLIC
TOBOGGAN
TOUPIE
TRALALIRE
WITCHMAG
WAKOU
WAPITI
WINNIE
YOUPI
ZAZA MIMOZA

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Germany: Children's Print Titles



	Magazine	Coverage in target group (<12) in %	Coverage in target group (<12) in mio.
1	Micky Maus	11,3%	0,56
2	Lustiges Taschenbuch	6,4%	0,32
3	Barbie	6,1%	0,30
4	SpongeBob Schwammkopf	5,8%	0,29
5	GEOlino	5,7%	0,28
6	Wendy	5,1%	0,25
7	Benjamin Blümchen	4,6%	0,23
8	Löwenzahn	4,4%	0,22
9	Donald Duck Sonderheft	4,4%	0,22
10	Fix & Foxi	4,3%	0,22
11	Bibi Blocksberg	4,2%	0,21
12	Tiere - Freunde fürs Leben	4,1%	0,21
13	Pferde - Freunde fürs Leben	4,0%	0,20
14	Prinzessin Lillifee	3,9%	0,19
15	Disneys Prinzessin	3,7%	0,19
16	Simpsons Comics	3,7%	0,19
17	Girlfriends	3,6%	0,18
18	Lissy	3,4%	0,17
19	Bob der Baumeister	3,2%	0,16

Source: KidsVerbraucherAnalyse 2008, Targetgroup: Children 6-12, Potenzial: 4.99 Mio. Copyright © 2009 Accenture All Rights Reserved. Copyright © 2009 Accenture All Rights Reserved.





Spain	Poland	Italy	Ireland	Germany	France
A3	Ale Kino	Canale 5	3e	ARD	C+
AXN	Animal_Planet	Italia 1	C4	COMEDY	Fr2
Boomerany	AXN/ AXN Crime	La7	E4	DSF	Fr3
C. Historia	AXN Sci-Fi	Rai Due	LVTV	K1	Fr5
C.SUR	BBC Entertainment	Rai Tre	MTV	MTV	M6;
C+	BBC Knowledge	Rai Uno	NICK	N_TV	TF1
C+ 30	BBC Lifestyle	Rete 4	NKJR	N24	
C9	Canal+ Sport		PAR	NICK	
CALLE 13	Comedy Central		RTE1	PRO7	
	Discovery/ Discovery Science/ Discovery				
Canal Cocina	World		RTE2	RTL	
Canal Hollywood	Domo		SETA	RTL2	
Cartoon Network	E!Entertainment		SKY1	SAT.1	
CMT	Extreme Sports		SNWS	SUPRTL	
Cosmapoliton	FilmBox		SPT2	TELE_5	
CS2	Foxlife		SSPT	VIERTE	
Cuatro	Hallmark		TG4	VIVA	
Disovery	ITV		TV3	VOX	
Disney Channel/ Disney CH +1	Jetix/FoxKids		UTV	ZDF	
ETB1	Kino Polska				
ETB2	kuchnia.tv	Note: Sa	tellite ratino	as not monito	red by
Extreme Teuve	Movies 24	AGB in It	taly in Q1 2	009. France s	atellité _
FOX	MTV Classic/VH1 Polska	Note: Satellite ratings not mo AGB in Italy in Q1 2009. Fran ratings not available to Accel		e to Accentur	e
JETIX	National Geographic				
K3-33	Planete				
LA OTRA	Polonia1				

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Channels by Market (Contd)



Channel List by Market (contd)			
Spain	Poland		
LA SEXTA	Polsat/Polsat2/Polsat Sport/Polsat Sport Extra		
La2	PULS		
National Geographic	Superstacja		
Natura	Tele5		
NICK	Travel Channel		
ODISEA	TV4		
Paramount Comedy	TVN/ TVN Style/TVN Turbo/TVN24/TVN7		
PUNT2	TVP INFO/TVP3/TVP1/TVP2		
T5	TVS		
Teledeporte	Wedding TV		
TV3	ZigZap/Hyper/MiniMax		
TVE1	Zone Club		
TVG	Zone Europa		
TVM	Zone Reality		
	Zone Romantica		

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ANNEX II – PWC Monitoring report



Contents

Section I

Introduction

Section II

- Compliance analysis
 - Hungary
 - Finland
 - Portugal
 - The Netherlands

Section III

- Conclusions

Appendices

Section I Introduction

- 1. The commitments
- 2. The indicators monitored
- 3. Monitoring approach
- 4. The sample
- 5. The response rates and margins of error
- 6. Project time line
- 7. The compliance ratio calculation



1. The commitments

The commitment has been specified in the following way:

 Communications that are prohibited in primary schools under the EU Pledge commitment

All forms of promotional messages, i.e.: advertising and other commercial communications intended to promote products produced by the companies involved.

For example:

- Promotional text, sound or images of products, e.g. on/at:
 - Posters, banners (in corridors, in classrooms, in the playground, at the school entrance gate, in open spaces, in the sports room...)
 - School infrastructure (on windows, doors, tables, chairs, ...)
 - Folders (in refectory, playground, secretariat, ...)
 - School events, parties, fancy fairs, (e.g. posters, banners, parasols, tables, chairs, ...)
- Sales promotions: e.g. distribution of free products and/or product merchandise in schools.

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June 2009 Slide 5

1. The commitments

- 1. No advertising of products to children under 12 years, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines. For the purpose of this initiative, "advertising to children under 12 years" means advertising to media audiences with a minimum of 50% of children under 12 years.
- 2. No communication related to products in primary schools, except where specifically requested by, or agreed with the school administration for educational purposes.

The second commitment was the subject of this study.

PricewaterhouseCoopers
DRAFT REPORT v1.7. - Landmark Europe – EU Pledge

1. The commitments

- 2. Communications that are not prohibited in primary schools, i.e. that continue to be allowed by the EU Pledge:
 - On-pack communication: promotional messages found on food and beverage product packaging sold in school canteens/shops/vending machines.
 - In-pack communication: food or beverage product advertising found in the packaging of a product sold in school canteens/shops/vending machines.
 - Communication on brands or products in independent media that pupils may have access to in schools such as internet, newspapers, magazines, television, software packages, videogames, ...
 - Branded school materials or sport materials that have been acquired through sponsorship for educational purpose and agreed with the school.

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June 2009 Slide 6

2. The indicators monitored



Six indicators (Key Performance Indicator) have been identified to monitor the compliance to the commitment:

- **KPI 1:** Is food or beverage product advertising found on school grounds?
- KPI 2: Is food or beverage product advertising found on vending machines in the school?
- **KPI 3:** Is food or beverage product advertising found on school infrastructure?
- **KPI 4**: Is food or beverage product advertising found in publications and products produced for or distributed by the school?
- KPI 5: Is food or beverage product advertising found during events which are organised by the school?
- **KPI 6:** Do schools get sponsoring of material from food and beverage companies and if "yes", was the provision of branded material done with the school director's agreement?

General KPI: Compliance EU pledge

There is no prohibited communication in schools related to beverages or food distributed by companies that are members of the EU-Pledge initiative

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3. The monitoring approach

- Multiple choice questionnaires with closed questions sent out to school head teachers in a selection of schools in four different types of European countries.
 - · Hungary: an east-central European country
 - Finland: a north European country
 - · Portugal, a south European country
 - The Netherlands: a west European country
- Same questionnaires translated into the different national languages.
- A English version of the questionnaire was prepared for the benefit of this report and is attached in annex.



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4. The Sample

Country	Nbr of schools	Nbr of questionnaires send out	Sc sele ord
Hungary	2.401	930	ha
Finland	2.988	1.064	g geog
Portugal	8.853	2.219	sp
The Netherlands	6.891	1.876	

ols ed in to a d aphic ad

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5. The response rates and margins of error

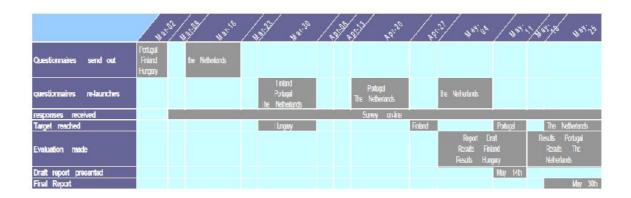
Country	Nbr of responses received	Respons rate	Confidence level*	Margin of error*
Hungary	100	10,8%	95%	9,60%
Finland	93	8,7%	95%	10,00%
Portugal	95	4,3%	95%	10,00%
The Netherlands	95	5,1%	95%	10,00%

Target Margin of error = 10 %

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June 2009 Slide 10

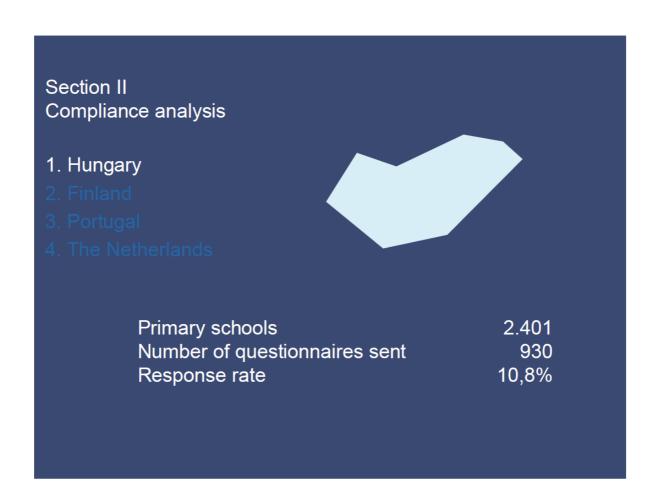
6. The project time line: Monitoring 2009



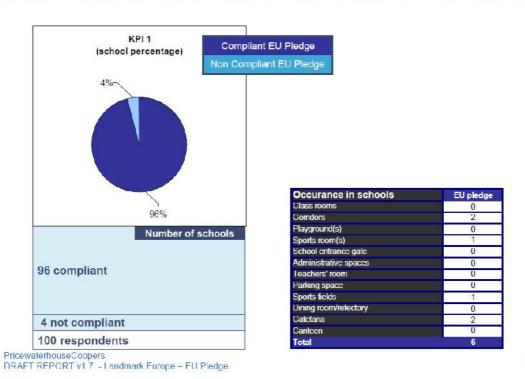
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^{*} The number of responses received (in relation to the actual number of schools) qualifies the representativeness and accuracy of the survey results. We express this with <u>confidence level</u> and <u>marqin of error.</u>

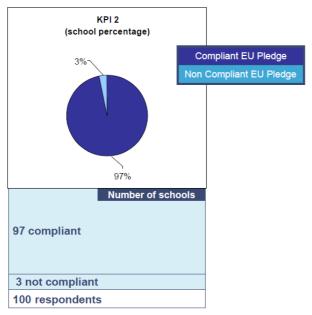
e.g. for Hungary, there is a 95% chance (certainty) that results for the whole population of Hungarian schools are between [9,6% higher] and [9,6% lower] than the results of Hungarian schools that filled in the survey.



Hungary KPI 1: Is food or beverage product advertising found on school grounds?



KPI 2: Is food or beverage product advertising found on vending machines in the school?

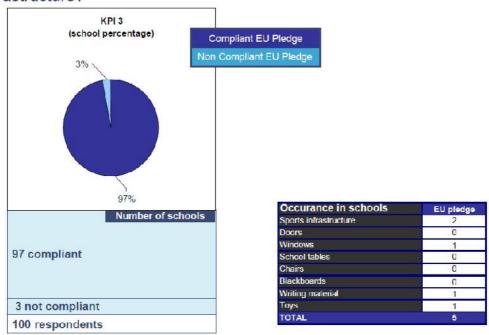


PricewaterhouseCoopers
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June 2009 Slide 14

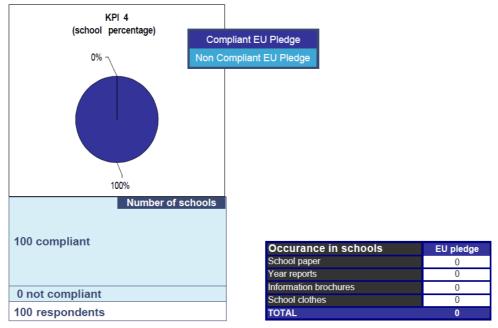
Hungary

KPI 3: Is food or beverage product advertising found on school infrastructure?



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KPI 4: Is food or beverage product advertising found in publications and products produced for or distributed by the school?

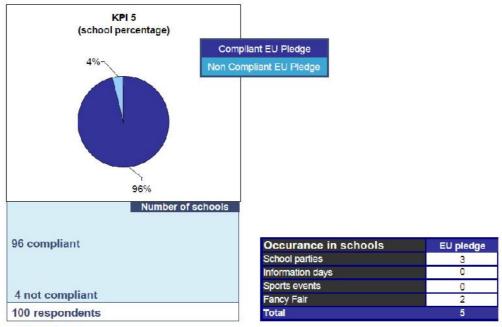


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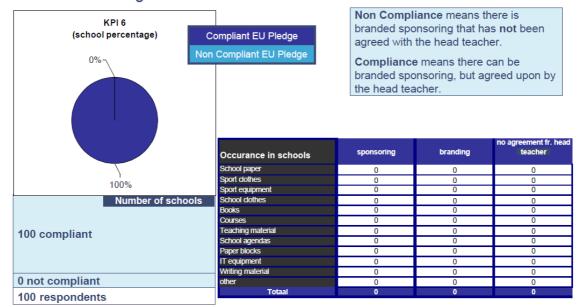
Hungary

KPI 5: Is food or beverage product advertising found during events which are organised by the school?



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KPI 6: Do schools get sponsoring of material from food and beverage companies and if "yes", was the provision of branded material done with the school director's agreement?



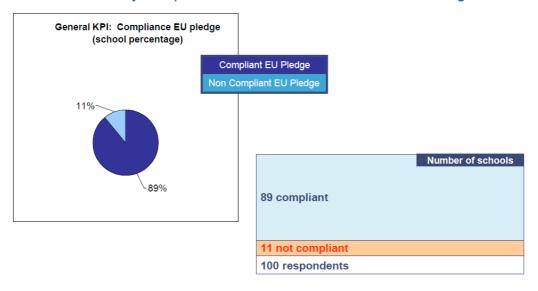
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Hungary

General KPI: Compliance EU pledge

There is no prohibited communication in schools related to beverages or food distributed by companies that are members of the EU-Pledge initiative

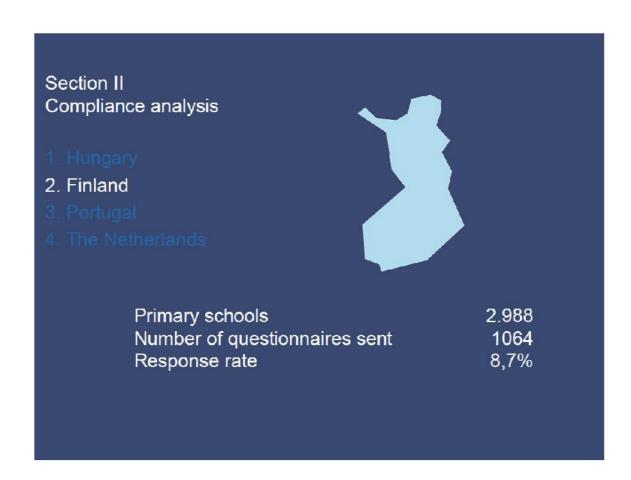


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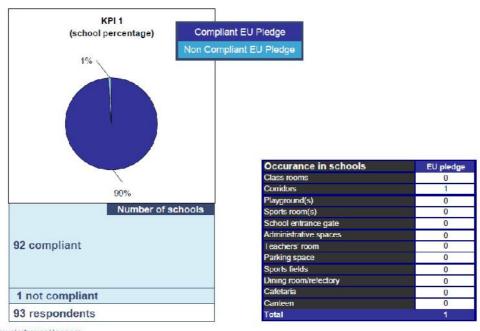
3.Comments

- Average response rate
- 11% of Hungarian schools report one or more breaches of the EU Pledge.
- Hungary has lowest compliance rate of the 4 countries investigated.
- · Breaches are evenly spread over 4 of 6 KPI.
- The highest number of breaches is related to events which are organised by Hungarian schools (school parties & fancy fairs).

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KPI 1: Is food or beverage product advertising found on school grounds?

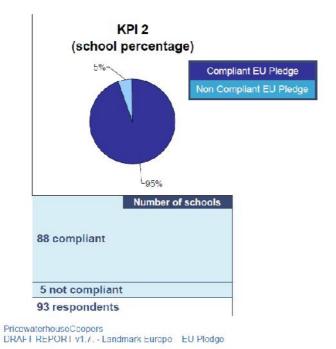


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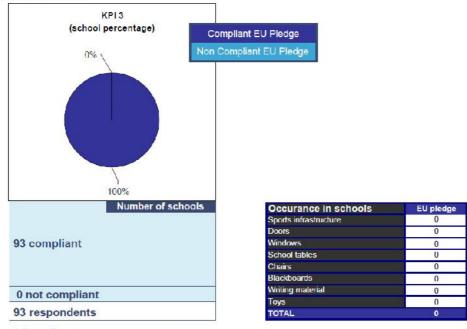
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Finland

KPI 2: Is food or beverage product advertising found on vending machines in the school?



KPI 3: Is food or beverage product advertising found on school infrastructure?

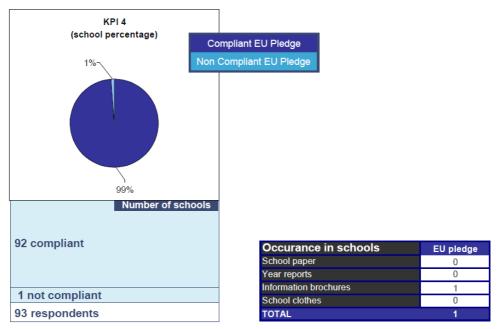


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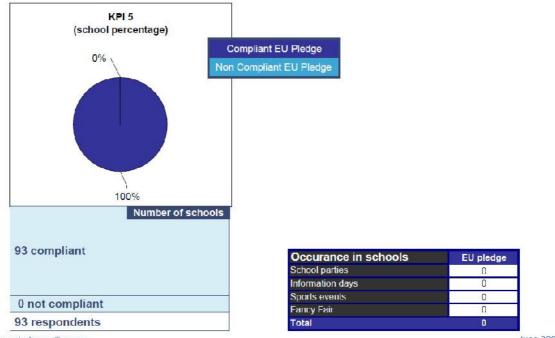
Finland

KPI 4: Is food or beverage product advertising found in publications and products produced for or distributed by the school?



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KPI 5: Is food or beverage product advertising found during events which are organised by the school?



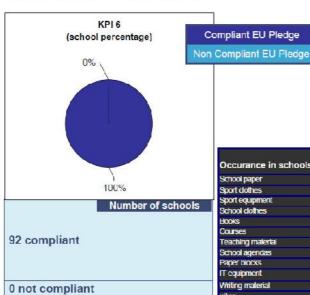
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Finland

KPI 6: Do schools get sponsoring of material from food and beverage companies and if "yes", was the provision of branded material done with the school director's agreement?

Non Compliance means there is



Non Compliance means there is branded sponsoring that has not been agreed with the head teacher.

Compliance means there can be branded sponsoring, but agreed upon by the head teacher.

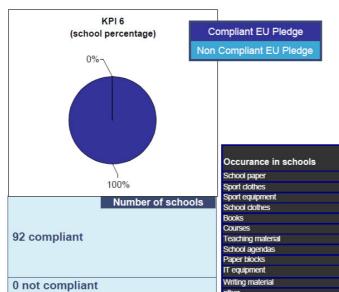
Occurance in schools	sponsoring	branding	no agreement fr. head teacher
School paper	0	0	0
Sport dothes	Ω	Ω	0
Sport equipment	U	U	0
School dothes	0	0	0
Hooks	U	U	0
Courses	0	0	0
Teaching malerial	U	0	0
School agendas	0	0	0
Paper blocks	0	0	0
IT equipment	U	U	0
Writing material	0	0	0
other	O	0	1
Totaal	0	0	1

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92 respondents

KPI 6: Do schools get sponsoring of material from food and beverage companies and if "yes", was the provision of branded material done with the

school director's agreement?



Non Compliance means there is branded sponsoring that has not been agreed with the head teacher.

Compliance means there can be branded sponsoring, but agreed upon by the head teacher.

Occurance in schools	sponsoring	branding	teacher
School paper	0	0	0
Sport clothes	0	0	0
Sport equipment	0	0	0
School dothes	0	0	0
Books	0	0	0
Courses	0	0	0
Teaching material	0	0	0
School agendas	0	0	0
Paper blocks	0	0	0
IT equipment	0	0	0
Writing material	0	0	0
other	0	0	1
Totaal	0	0	1

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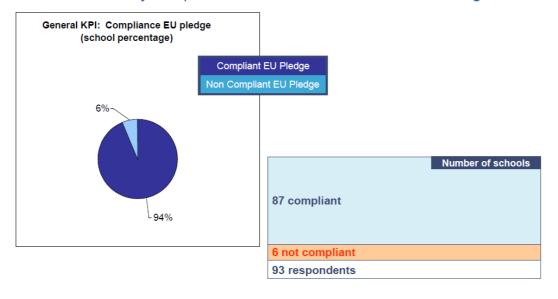
92 respondents

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Finland

General KPI: Compliance EU pledge

There is no prohibited communication in schools related to beverages or food distributed by companies that are members of the EU-Pledge initiative

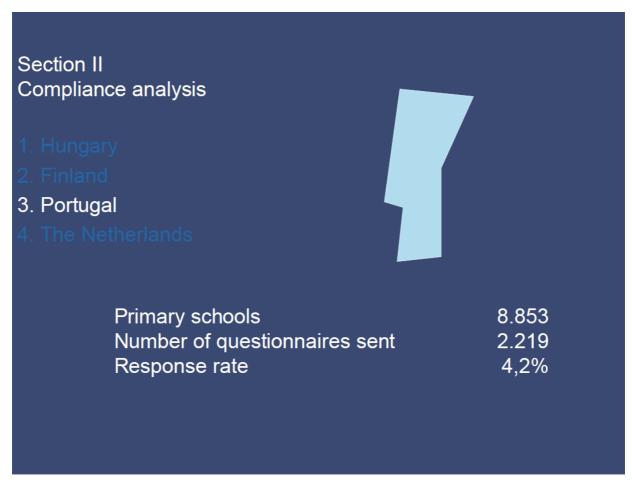


PricewaterhouseCoopers DRAFT REPORT v1.7. - Landmark Europe - EU Pledge

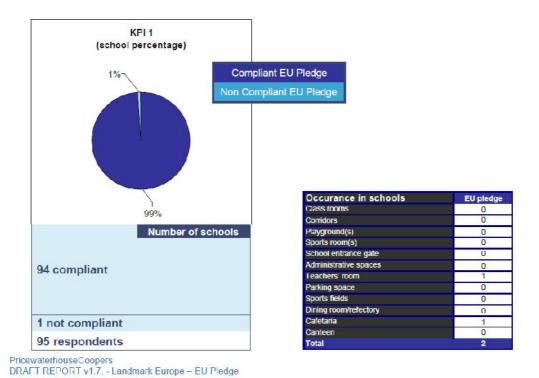
3.Comments

- Average response rate;
- 6% of Finnish schools report one or more breaches on the EU Pledge;
- breaches are very much concentrated in 1 of 6 KPI;
- The highest number of breaches is related to food or beverage product advertising found on vending machines in Finnish schools.

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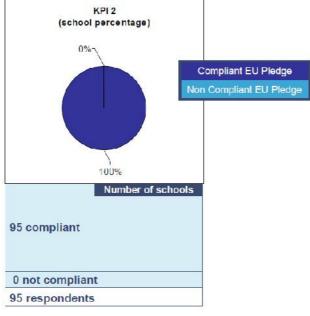
KPI 1: Is food or beverage product advertising found on school grounds?



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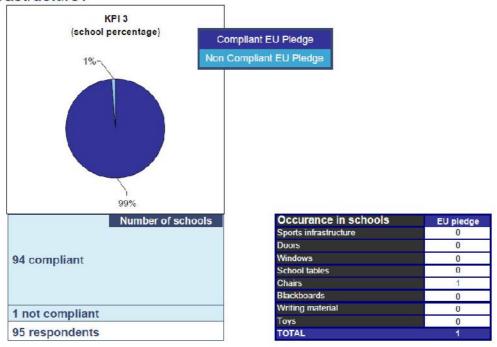
Portugal

KPI 2: Is food or beverage product advertising found on vending machines in the school?



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KPI 3: Is food or beverage product advertising found on school infrastructure?

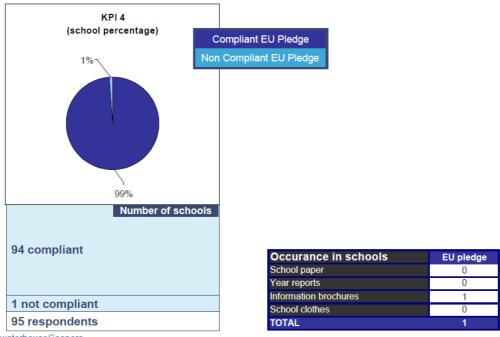


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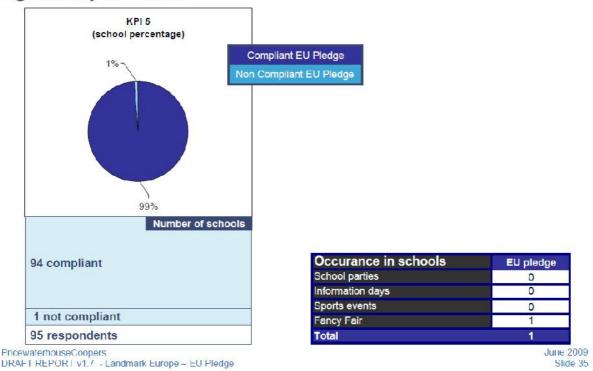
Portugal

KPI 4: Is food or beverage product advertising found in publications and products produced for or distributed by the school?



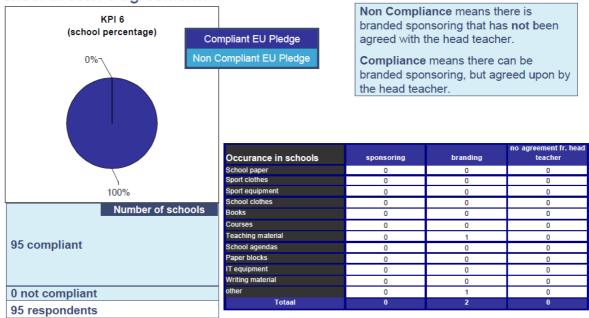
PricewaterhouseCoopers
DRAFT REPORT v1.7. - Landmark Europe – EU Pledge

KPI 5: Is food or beverage product advertising found during events which are organised by the school?



Portugal

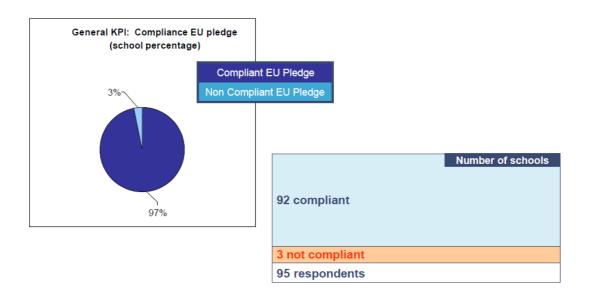
KPI 6: Do schools get sponsoring of material from food and beverage companies and if "yes", was the provision of branded material done with the school director's agreement?



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General KPI: Compliance EU pledge

There is no prohibited communication in schools related to beverages or food distributed by companies that are members of the EU-Pledge initiative



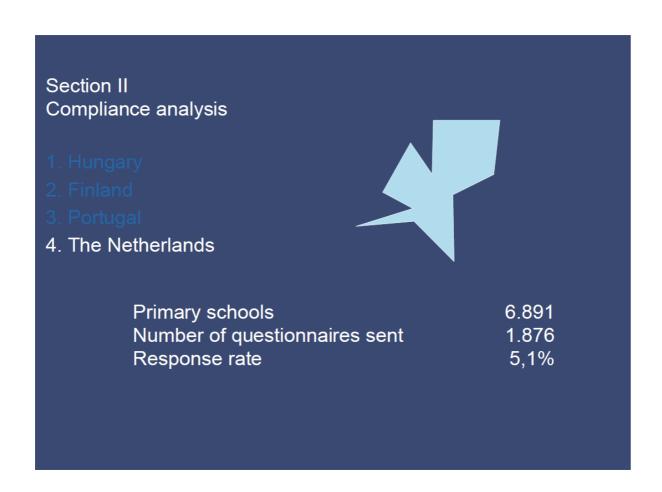
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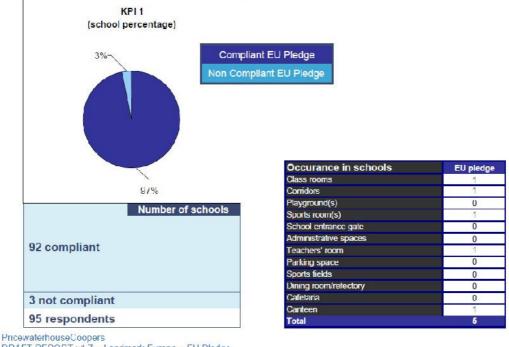
Portugal

3.Comments

- Low response rate.
- 3% of Portuguese schools report one or more breaches on the EU Pledge.
- Portugal has the highest compliance rate of 4 investigated countries.
- Breaches are equally spread over 4 of 6 KPIs.

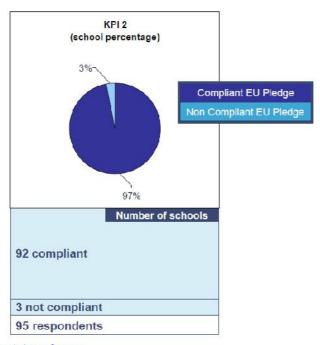


KPI 1: Is food or beverage product advertising found on school grounds?



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KPI 2: Is food or beverage product advertising found on vending machines in the school?

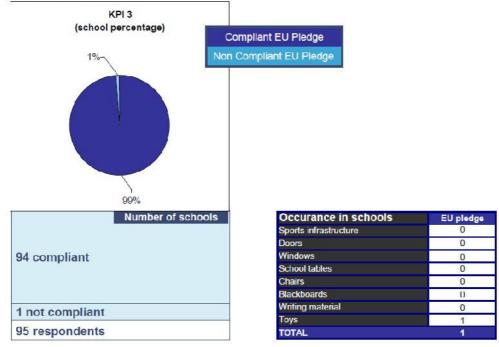


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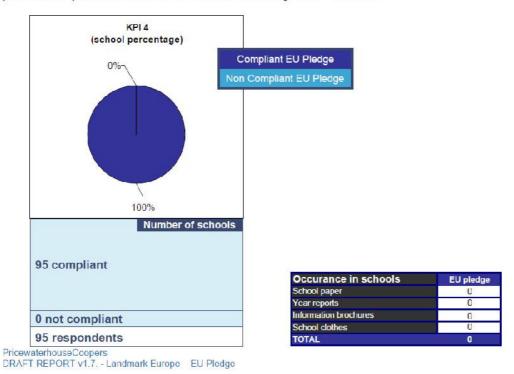
The Netherlands

KPI 3: Is food or beverage product advertising found on school infrastructure?



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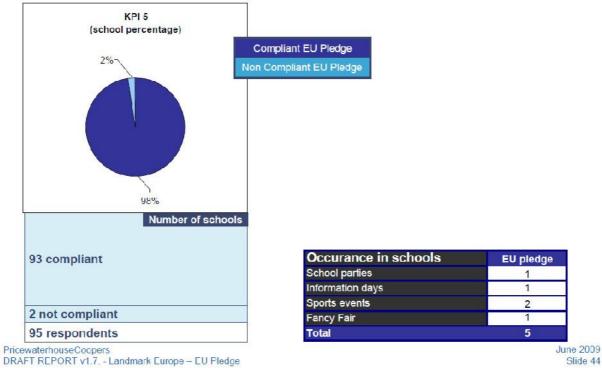
KPI 4: Is food or beverage product advertising found in publications and products produced for or distributed by the school?



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The Netherlands

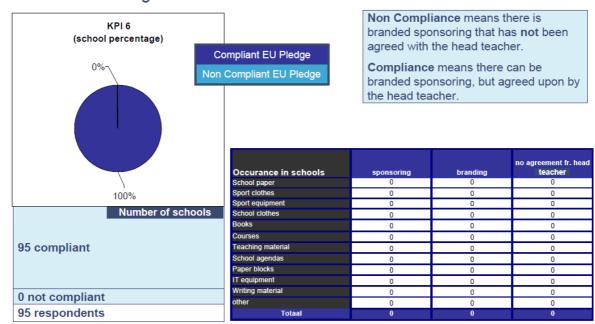
KPI 5: Is food or beverage product advertising found during events which are organised by the school?



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61

KPI 6: Do schools get sponsoring of material from food and beverage companies and if "yes", was the provision of branded material done with the school director's agreement?



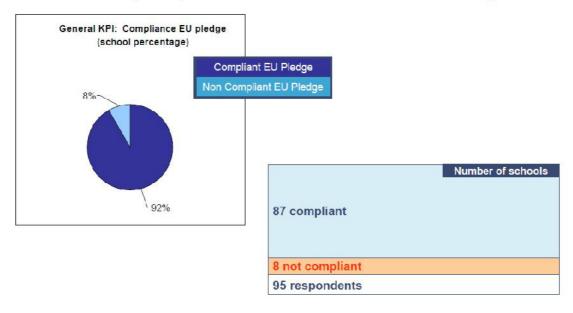
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The Netherlands

General KPI: Compliance EU pledge

There is no prohibited communication in schools related to beverages or food distributed by companies that are members of the EU-Pledge initiative



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3.Comments

- · Low response rate;
- 8% of Dutch schools report one or more breaches on the EU Pledge;
- breaches are mainly concentrated in 2 of 6 KPIs;
- The highest number of breaches is related to :
 - food or beverage product advertising found on vending machines in Dutch schools, and
 - food or beverage product advertising found on school grounds (class rooms, corridors and teacher rooms).

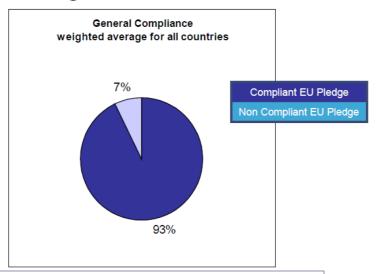
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Section III Conclusions

- 1. The weighted average for all countries
- 2. Summary Schools and KPIs
- 3. General appraisal
- 4. Action plan
- 5. The monitoring cycle

1. The weighted average for all countries



The general compliance rate with the Pledge of all investigated schools is 93%. This figure does not represent all EU countries, but only the 4 countries analysed.

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2. Summary Schools and KPIs

		General KPI	KPI1	KPI2	KPI3	KPI4	KPI5	KPI6
Hungary	compliant EU pledge	89	96	97	97	100	96	100
	non-compliant EU pledge	11	4	3	3	0	4	0
	Total	100	100	100	100	100	100	100
Finland	compliant EU pledge	87	92	88	93	92	93	93
	non-compliant EU pledge	6	1	5	0	1	0	0
	Total	93	93	93	93	93	93	93
Portugal	compliant EU pledge	92	94	95	94	94	94	95
	non-compliant EU pledge	3	1	0	1	1	1	0
	Total	95	95	95	95	95	95	95
the Netherlands	compliant EU pledge	87	92	92	94	95	93	95
	non-compliant EU pledge	8	3	3	1	0	2	0
	Total	95	95	95	95	95	95	95
General	compliant	355	374	372	378	381	376	383
	non-compliant EU pledge	28	9	11	5	2	7	0
	Total	383	383	383	383	383	383	383
	general compliance rate	93%	98%	97%	99%	99%	98%	100%
	general non-compliance rate	7%	2%	3%	1%	1%	2%	0%

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3. General appraisal

- Average to low response rates
- 7% of schools report one or more breaches on the Pledge
- breaches are spread over 5 of 6 KPI
- The highest number of breaches is related to food or beverage product advertising found on vending machines in schools
- This is followed by
 - food or beverage product advertising found on school grounds
 - food or beverage product advertising found during events which are organised by the school

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4. Action plan

- The EU Pledge members should take actions to improve KPI 1, KPI 2, KPI 4 & KPI 5 compliance rates, i.e. food or beverage product advertising found:
 - · on school grounds;
 - · on vending machines in schools;
 - on publications and products produced for or distributed by schools;
 - during events which are organised by schools;
- Priority should be given to tackle food or beverage product advertising on vending machines since this item presents the lowest compliance rate.

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5. The monitoring cycle will help to identify improvements in the compliance rates year after year





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Appendices

English translation of the questionnaire

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Questionnaire to be completed by the school

Plea	se complete the following in CAPITALS:
Nam	e of the school:
Addı	ress:
Pho	ne number:
E-ma	ail address:
Cont	tact person:
Fund	ction of the contact person:
Date	of completion of questionnaire:

I. Aim of the survey

This survey will be used to investigate whether the food and beverage companies that are members of the EU-Pledge initiative have fulfilled their commitments (see www.eu-pledge.eu). To do this, the EU-Pledge member companies (Burger King, Coca-Cola, Danone, Ferrero, General Mills, Kellogg's, Kraft, Mars, Nestlé, PepsiCo and Unilever) have asked PricewaterhouseCoopers to carry out an independent audit of their compliance with the commitment. The EU Pledge commitment is effective from 1 January 2009. When answering the questions below, please report your present observations

II. Information on the communication prohibition in primary schools

Communications that are prohibited in primary schools under the EU Pledge commitment: All forms of <u>promotional messages</u>, i.e.: advertising and other commercial communications intended to promote products produced by the companies involved.

For example:

- Promotional text, sound or images of products, e.g. on/at:
 - Posters, banners (in corridors, in classrooms, in the playground, at the school entrance gate, in open spaces, in the sports room...)
 - School infrastructure (on windows, doors, tables, chairs, ...)

...

- Folders (in refectory, playground, secretariat, ...)
- School events, parties, fancy fairs, (e.g. posters, banners, parasols, tables, chairs, ...)
- Sales promotions: e.g. distribution of free products and/or product merchandise in schools.

Communications that are <u>not prohibited</u> in primary schools, i.e. that continue to be allowed by the EU Pledge:

- On-pack communication: messages which are on the packing of a product sold in school canteens/shops/vending machines.
- In-pack communication: messages which are <u>in</u> the packing of a product sold in school canteens/shops/vending machines..
- Communication on brands or products in independent media that pupils may have access to in schools such as internet, newspapers, magazines, television, software packages, videogames, ...
- Branded school materials or sport materials that have been acquired through sponsorship for educational purpose and agreed with the school.

III. School characteristics

1. Plea	Please mark your province:					
(eg The Netherlands)						
1.1		Friesland				
1.2		Drenthe				
1.3		Overijssel				
1.4		Flevoland				
1.5		Gelderland				
1.6		Utrecht				
1.7		Noord-Holland				
1.8		Zuid-Holland				
1.9		Zeeland				
1.10		Noord-Brabant				
1.11		Limburg				
1.12		Groningen				
2. Plea	se m	ark the location which applies to your school:				
2.1		City (> 20.000 inhabitants)				
2.2		Town or village (< 20.000 inhabitants)				
3. Plea	se m	ark the kind of subsidy system that applies to your school:				

(aan te passen per land)

3.1		Public school (funded by public authority: national, city, village, province)
3.2		Private school (funded by public authority: national, city,
		village, province)
3.3		Private school (privately funded)
		pupils in your primary school share infrastructure (classrooms,
	en spa :hool?	aces, sports rooms, play grounds) with students of a secondary
4.1		Yes
4.2		No
I	IV.	Questionnaire
E la	نمناطييم	ty for housespee or food found on cohool grounds?
5. IS	publici	ty for beverages or food found on school grounds?
	Yes	No
5.1		□ Class rooms
5.2		□ Class rooms □ Corridors
5.2 5.3		☐ Class rooms ☐ Corridors ☐ Playground(s)
5.2		☐ Class rooms ☐ Corridors ☐ Playground(s) ☐ Sports room(s)
5.2 5.3 5.4		☐ Class rooms ☐ Corridors ☐ Playground(s) ☐ Sports room(s) ☐ School entrance gate
5.2 5.3 5.4 5.5		☐ Class rooms ☐ Corridors ☐ Playground(s) ☐ Sports room(s) ☐ School entrance gate ☐ Administrative spaces
5.2 5.3 5.4 5.5 5.6		☐ Class rooms ☐ Corridors ☐ Playground(s) ☐ Sports room(s) ☐ School entrance gate ☐ Administrative spaces ☐ Teachers' room
5.2 5.3 5.4 5.5 5.6 5.7		□ Class rooms □ Corridors □ Playground(s) □ Sports room(s) □ School entrance gate □ Administrative spaces □ Teachers' room □ Parking space
5.2 5.3 5.4 5.5 5.6 5.7 5.8		□ Class rooms □ Corridors □ Playground(s) □ Sports room(s) □ School entrance gate □ Administrative spaces □ Teachers' room □ Parking space
5.2 5.3 5.4 5.5 5.6 5.7 5.8 5.9		□ Class rooms □ Corridors □ Playground(s) □ Sports room(s) □ School entrance gate □ Administrative spaces □ Teachers' room □ Parking space □ Sports fields
5.2 5.3 5.4 5.5 5.6 5.7 5.8 5.9 5.10		☐ Class rooms ☐ Corridors ☐ Playground(s) ☐ Sports room(s) ☐ School entrance gate ☐ Administrative spaces ☐ Teachers' room ☐ Parking space ☐ Sports fields ☐ Dining room/refectory
5.2 5.3 5.4 5.5 5.6 5.7 5.8 5.9 5.10 5.11 5.12		□ Class rooms □ Corridors □ Playground(s) □ Sports room(s) □ School entrance gate □ Administrative spaces □ Teachers' room □ Parking space □ Sports fields □ Dining room/refectory □ Cafetaria □ Canteen
5.2 5.3 5.4 5.5 5.6 5.7 5.8 5.9 5.10 5.11 5.12		☐ Class rooms ☐ Corridors ☐ Playground(s) ☐ Sports room(s) ☐ School entrance gate ☐ Administrative spaces ☐ Teachers' room ☐ Parking space ☐ Sports fields ☐ Dining room/refectory ☐ Cafetaria
5.2 5.3 5.4 5.5 5.6 5.7 5.8 5.9 5.10 5.11 5.12	public	□ Class rooms □ Corridors □ Playground(s) □ School entrance gate □ Administrative spaces □ Teachers' room □ Parking space □ Sports fields □ Dining room/refectory □ Cafetaria □ Canteen ity for beverages or food found on vending machines in the
5.2 5.3 5.4 5.5 5.6 5.7 5.8 5.9 5.10 5.11 5.12 6. Is	public	□ Class rooms □ Corridors □ Playground(s) □ Sports room(s) □ School entrance gate □ Administrative spaces □ Teachers' room □ Parking space □ Sports fields □ Dining room/refectory □ Cafetaria □ Canteen ity for beverages or food found on vending machines in the
5.2 5.3 5.4 5.5 5.6 5.7 5.8 5.9 5.10 5.11 5.12	public	□ Class rooms □ Corridors □ Playground(s) □ School entrance gate □ Administrative spaces □ Teachers' room □ Parking space □ Sports fields □ Dining room/refectory □ Cafetaria □ Canteen ity for beverages or food found on vending machines in the

7.1 7.2 7.3 7.4 7.5 7.6	Yes	No □ Sports infrastructure □ Doors □ Windows □ School tables □ Chairs □ Blackboards			
7.7 7.8	publi	 □ Writing material □ Toys city for beverages or food found in publications and products 			
		No School paper Information brochures School clothes			
		city for beverages or food found during events which are ed by the school?			
9.1 9.2 9.3 9.4 9.5 9.6	Yes	No □ School parties □ Information days □ Sports events □ School journeys □ Day trips □ Fancy Fair			
10. Is publicity for beverages or food found during events, organised by third parties, in which the school participates or in which students participate in relation with the school?					
10.1 10.2 10.3	Yes	No □ Sports events □ Socio-cultural activities □ Fancy fair			
		city for beverages or food found in books, courses, school s,?			
11.1 11.2 11.3 11.4 11.5 11.6	Yes	No □ Books □ Courses □ Teaching material □ School agendas □ Paper blocks □ Paper support to awareness sessions on diet, physical activities en health			

	ou get some sponsoring of material from food and be anies?	everage						
12.1 12.2	□ Yes □ No							
If yes, to what kind of material it is related?								
12.3 12.4 12.5 12.6 12.7 12.8 12.9 12.10 12.11 12.12	Yes No School paper Sport clothes Sport equipment School clothes Sooks Courses Teaching material School agendas Paper blocks Paper support to awareness sessions on diet, activities en health	physical						
12.14	□ □ Writing material							
If ye	, is it branded by the sponsor ?							
12.15 12.16	□ Yes □ No							
If yes, was the provision of branded material done with the shool director's agreement?								
12.17 12.18	□ Yes □ No							
whi (mo	replied YES to any of the questions 5 to 12 above, please h food and beverage brands, if any, are advertised in you than one answer is possible) in the column with the sponding to the question where you replied YES	r school						

	QU 5	QUX	QU12	Brand
12.1				
12.2				
12.3				
12.x				

Please complete this form and return it by fax (02/710.72.24) or mail to: PricewaterhouseCoopers

(Insert Local Addresses)

For all enquiries, please contact the EU Pledge secretariat:

Rocco Renaldi at rrenaldi@landmarkeurope.eu