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Commitment Concerning Advertising to Children
Fiscal Year 2009

**Campbell Soup Company, together with its subsidiary,
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Campbell Soup Company is a charter participant in the Children’s Food and Beverage Advertising Initiative created under the auspices of the Council of Better Business Bureaus (“Initiative”). Consistent with our corporate Global Guidelines for Responsible Advertising to Children and our existing Commitment Concerning Advertising to Children under the Initiative that was applicable to our Fiscal Year 2008, we make this further Commitment Concerning Advertising to Children for our Fiscal Year 2009 (“this year”). It applies to all of our advertising primarily directed to children under 12 years of age in the United States (“advertising to children”) and may be amended if our approach to responsible advertising to children changes. If there is a change in the nutritional value of a product to which we refer in measuring compliance with our Commitment, we will undertake to have a reformulated product that meets the current Commitment available in the marketplace within a reasonable period of time.

The Nature of the Advertising Message

The content of our advertising – what we advertise to children - should be consistent with our own beliefs about nutrition and wellness, as reflected in the Campbell Soup Company Nutrition Guide, and this Commitment reflects the advice of our staff of resident

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nutritionists. Accordingly, we will support families by assuring that all the products we advertise to children are sound food choices. How we implement this is explained in the discussion below on “Implementing and Measuring Message Delivery.” Schedule A describes the products we will advertise to children this year. They are sound food choices and meet the criteria set forth below. The Schedule includes ingredient statements and nutrition facts for those products. Schedule B is an illustrative list of media outlets we assume to be primarily directed to children. Schedule C is a chart summarizing the sound food choice criteria.

Sound Food Choices

Soups. Overweight and obesity among children is an important public health concern. Soups are useful in maintaining a healthy weight because practically all soups have low energy density¹. According to the 2005 Dietary Guidelines Committee Report, eating foods with low energy density may be a helpful strategy to reduce energy intake when trying to maintain or lose weight. Consumption of foods with a low or very low energy density by children should be encouraged as a means of reducing caloric intake. Therefore, we will only advertise soups having 150 or fewer calories² to children so as to encourage the consumption of foods with a *very* low energy density.³

Soups frequently contain ingredients whose consumption by children should be encouraged, such as vegetables and lean meats. Soups also support good hydration. Many soups provide a meaningful amount of positive nutrition such as a serving of vegetables, or a vitamin or mineral at the level of 10% of the Daily Value and those soups we currently intend to advertise to children this year provide at least one of those benefits.

¹ Energy density is a measure of the number of calories a food contains in relation to its weight in grams; it is calculated by dividing the number of calories in a serving by the weight of that serving in grams.

² All nutritional values for soups are per eight ounce serving.

³ A food with an energy density of no more than 0.6 – e.g., 150 calories in an eight ounce serving – is considered to have a very low energy density according to Dr. Barbara Rolls, the leading authority on energy density, and her *Volumetrics*TM weight control plan. Almost all soups have fewer than 200 calories.

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With all the nutritional benefits they offer for children, soups should nonetheless be controlled for nutrients that are recognized by the Dietary Guidelines for Americans as nutrients that should be controlled in the diet. We will only advertise soups to children that are low in fat and low in saturated fat, i.e. have no more than 3 grams of total fat and no more than 1 gram of saturated fat (and, no more than 15% of calories from saturated fat)⁴. Furthermore, those soups must have zero grams of *trans* fat as labeled and contain no more than 12 grams of sugar from sources other than vegetables, fruit, and dairy.⁵ With respect to sodium content, it is our current intention, commencing in January 2009, to only advertise soups to children that have a sodium level of 480 mg or less.⁶ We do, however, also recognize that soups with a sodium level that is 25% less than that of the largest selling canned soup are also a sound food choice due to such reduction in sodium and reserve the right to advertise such products to children this year. Moreover, our Campbell's condensed tomato soup is also a sound food choice and we reserve the right to advertise it to children this year. It provides a significant nutritional benefit in having both a serving of vegetables and 10% of the Daily Value of vitamin C and meets the other sound food choice criteria, while having a responsible sodium level of less than 750 mg.⁷

Snack Crackers. Children need snacks. They typically do not consume sufficient calories by eating only three meals per day. Because children are actively growing and metabolize food more quickly than adults, snacking is an important behavior, and healthful snacking should be encouraged. The Dietary Guidelines recommend limiting fat intake to 25-35% of calories for children ages 4 through 18, limiting saturated fat to less than 10% of calories and keeping *trans* fat as low as possible. They also recommend limiting intake of added sugars.

⁴ Consistent with FDA criteria for "low in fat" and "low in saturated fat."

⁵ IOM suggests that added sugar intake be no more than 25% of calories. In a 2000 calorie diet, this means that added sugar would be limited to 125 grams. If an individual food represents 10% of caloric intake, then sugar should be limited to 12.5 grams per serving. We have reduced this amount to 12 grams.

⁶ Consistent with FDA criterion for acceptable sodium levels for a claim of "healthy."

⁷ 750 mg of sodium is 25% less than historical levels of sodium in canned soups. If we choose to advertise regular Campbell's condensed tomato soup to children, we will include depictions or references to our 25% Less Sodium tomato soup in at least half of such tomato soup advertising.

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Due to concerns about obesity and overweight, cited above, a snack cracker product will be considered to be a sound food choice and may be advertised to children if the product depicted is packaged in a portion control pack of 100 calories or less. A snack cracker will also be a sound food choice that may be advertised to children if it has 170 calories or less⁸ and no more than 35% of calories from fat, no more than 10% of calories from saturated fat, zero grams of *trans* fat as labeled, and no more than 12 grams of sugar (other than from fruit, vegetables, or dairy).⁹ Even though snack crackers are typically consumed as a separate snack item, they may also be depicted as an accompaniment to meal items, such as soup, as long as appropriate portions are shown.

Canned Pasta. Canned pasta is a convenient and nutritious meal-time main dish option for parents to serve to their children. Such products typically provide a serving of vegetables, and often provide a serving of grains or a source of protein. Vegetables are a key component of a healthy diet, according to the Dietary Guidelines, and it is important for Americans to eat more of them. Except for starchy vegetables like potatoes, children consume less than half of the recommended amount of vegetables and mixed dishes are a child-friendly way to consume them. Mixed dishes, such as canned pasta, are also a good food in which to incorporate the nutrients in short supply in children's diets, i.e. calcium, potassium, fiber, magnesium, and vitamin E. To be considered a sound food choice and to be advertised, canned pasta products, as a main dish, must make a significant contribution to a nutritious diet. They must contribute a serving of vegetables or a one-ounce equivalent of whole grains, plus a good source of two or more nutrients, at least one of which is among those nutrients in short supply in children's diets (fiber, calcium, magnesium, potassium, or vitamin E), but they also must have no more than 300

⁸ Per 30 gram serving. A desirable benchmark for the contribution of calories by snacks to the diet is that they should represent about 10% of calories. Recent research suggests that snacks actually contribute about 20% or 25% of calories in the diets of American children. Applying a 10% benchmark to a 2,000 calorie diet would suggest that a snack should be limited to 200 calories. We have reduced this to 170 calories which we believe to be a desirable and responsible limit for the calories contributed by a baked snack cracker.

⁹ Fat, saturated fat, and *trans* fat values are per guidance in the Dietary Guidelines. With respect to sugar, IOM suggests that added sugar intake be no more than 25% of calories. Accordingly, in a 2000 calorie diet, added sugar would be limited to 125 grams. If a snack represents 10% of caloric intake, then sugar should be limited to 12.5 grams per serving. We have reduced this amount to 12 grams.

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calories¹⁰ and contain no more than 12 grams of sugar from sources other than vegetables, fruit, and dairy.¹¹ The levels of fat, saturated fat, and *trans* fat in canned pasta should depend on whether the food contains meat or does not contain meat. Canned pasta without meat will only be advertised if it has no more than 35% of calories from total fat, no more than 10% of calories from saturated fat, and zero grams of *trans* fat, as labeled. Canned pasta with meat will contribute more of these fats to the diet due to its meat content. Consequently, we evaluate such products by the USDA standard for “lean” meat.¹² As such, canned pasta with meat will only be advertised to children if it has no more than 10 grams of fat and 4.5 grams of saturated fat. Furthermore, it must have no more than 0.5 grams of *trans* fat, as labeled, and the *trans* fat may only come from meat and dairy. Finally, to be advertised to children, a canned pasta must have 25% less sodium than the largest-selling canned pasta item or SKU in the canned pasta product category.

Healthy Lifestyle Messages

We believe that healthy lifestyle messages can also form the basis of responsible advertising to children. Advertising supports a healthy lifestyle message when it addresses a recognized need of children with respect to positive emotional, social, or physical development. Children's attitudes towards themselves, their diets, and their pursuit of physical activity affect their development during childhood, and also form the basis of their attitudes as they mature into adulthood. Children with positive attitudes and positive thinking skills are better able to resist depression and anxiety and perform better, both in and out of school. In addition, many children do not know how to construct a healthy diet or avoid over-indulging in calorie-dense but nutrient-poor foods and

¹⁰ All nutritional values for canned pasta are per eight ounce serving. Canned pasta is a meal-time main dish. As such, 300 calories in a serving allows sufficient additional calories to complete the meal in the context of overall calorie guidelines for children of 1200 to 2200 calories per day.

¹¹ IOM suggests that added sugar intake be no more than 25% of calories. In a 2000 calorie diet, this means that added sugar would be limited to 125 grams. If an individual food represents 10% of caloric intake, then sugar should be limited to 12.5 grams per serving. We have reduced this amount to 12 grams.

¹² Fat content is typically higher in meat-containing products than in products not containing meat. Meat is, in fact, an important component of the diet of many Americans. In amending its labeling regulations to allow for the nutrient content claim “lean” on FDA products, the FDA explained that the action was taken, among other reasons, to provide reliable information that would assist consumers in maintaining healthy dietary practices.

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beverages. Finally, with a reduced commitment to physical education and activity in the nation's schools, many children are not developing the enthusiasm for regular physical activity that is an essential lifelong habit to support good health.

American children can be helped to develop healthy attitudes towards themselves, their diets, and the pursuit of physical activity with messages and information in advertising that promote the development of positive thinking or coping skills; better understanding of how to construct a healthy diet and/or avoid overindulgence; and/or positive attitudes about regular physical activity.

Implementing and Measuring Message Delivery

When we intend to communicate in our advertising to any particular group of people, such as women between the ages of 25 and 49 or children from ages 6 through 11, our agencies identify specific media outlets, such as television programming and websites, where we will be able to reach that group of people. We advertise the products discussed in this Commitment to both children and adults. The advertising itself, the tonality of the advertising, and the messages in the advertising differ based on the intended audience. Advertising is also placed in different media to reach different audiences.

Attached as Schedule B is an illustrative list of media outlets in which we will assume, for the purposes of this Commitment, advertisers place advertising to direct messages primarily to children from ages 6 through 11. There may be exceptions when advertising is clearly and objectively directed to adults and the media properties in which the advertising is placed are chosen to reach an adult audience. However, we have chosen these and similar outlets as a means to identify advertising directed to children because a disproportionate number of their readers, viewers, or visitors are children from age of 6 through 11 (in numbers roughly 2 times their proportion in the American population, i.e. with a Composition Index of 200 or more). It would be inefficient and uneconomic to seek to speak to that child audience by purchasing time or space in media delivering primarily an adult audience and, consequently, it is not our practice to do so.

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Our advertising to children this year will be on television, in print publications, on the internet, and on our own websites designed for use by children. We will measure our compliance with the standards set forth in this Commitment by considering planned media impressions as reported by A.C. Nielsen, for television, print (based on total circulation), and the internet; and actual page views for our own websites.

We will consider advertising as supporting a sound food choice if qualifying product varieties or SKUs are identified and are, in fact, the only product varieties identified in the advertising or whose packaging is shown.

The Use of Licensed Characters

We have committed to only advertise sound food choices to children this year. When we use licensed third party characters in advertising to children, they will support sound food choices.

The Practice of Product Placement

We do not actively seek to place our products in the program/editorial content of any medium primarily directed to children, for the purpose of promoting the sale of those products, or pay for such a placement. We will continue this practice. In considering placement in movies in first release from January 1, 2009, we will not rely upon Motion Picture Association of America ratings to evaluate whether content is primarily directed to children, but will evaluate PG and PG-13 movies based upon our best judgment of the likely audience, taking into account both in theater viewing and anticipated home viewing in such evaluations. Moreover, we will not actively seek to place our *Goldfish* crackers products in the program/editorial content of any medium whether or not it is primarily directed to children.

The Use of Product in Interactive Games

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Interactive games are activities on a web site in which the user is challenged to attain a score, beat a competitor, or master a level. Any interactive game primarily for use by children this year which includes a depiction of one of our food or beverage product varieties, or product packaging for a product variety, will depict only sound food choices.

Advertising in Elementary Schools

As a formal supporter of the Guidelines for Competitive Foods under the Schools Program of the Alliance for a Healthier Generation, we have recognized that schools provide a special environment. Elementary school children tend to trust their teachers and what they learn in school more readily than older children, who have a greater capacity independently to evaluate what they are told. We have chosen to limit our activity in elementary schools to (a) communicating public service messages through materials provided to foodservice personnel, school administrators, or teachers and designed for use in either classrooms or the lunchroom; (b) supporting charitable fundraising activities or other programs benefiting schools, through such efforts as our Labels for Education program; and (c) providing product display materials to foodservice personnel.

Our specific undertakings in this Commitment are effective for the time period indicated above. The Commitment applies to our businesses in the United States, and may be amended at any time. Commitments effective for future time periods and any amendments to this Commitment will be submitted for consultation and acceptance to the Children's Advertising Initiative of the Council of Better Business Bureaus, Inc. Commitments are monitored by the Initiative. Notice of any amendment will be posted on cambellsoup.com and cbbb.org/initiative/.