Marketing to Children Compliance Assessment (India)

Nestlé

7 May 2019
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   ▶ Policy deviations
   ▶ Opportunities for improvement
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1. Executive summary
## Executive summary: observation overview

### Products in scope

<table>
<thead>
<tr>
<th>Channel</th>
<th>Milo</th>
<th>Milkybar</th>
<th>Maggi Baked Sweetcorn Noodles</th>
<th>Ceregrow</th>
<th>Nangrow</th>
<th>Rich Tomato Ketchup</th>
<th>A+ Nourish Milk</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Television(^1)</td>
<td>No observations</td>
<td>No observations</td>
<td>No observations</td>
<td>No observations</td>
<td>No observations</td>
<td>No activity</td>
<td>No activity</td>
<td>Out of scope</td>
</tr>
<tr>
<td>Print media</td>
<td>No activity</td>
<td>No activity</td>
<td>Proactive improvement opportunity</td>
<td>No observations</td>
<td>No observations</td>
<td>No activity</td>
<td>No activity</td>
<td>Out of scope</td>
</tr>
<tr>
<td>Radio</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>Out of scope</td>
</tr>
<tr>
<td>Cinema</td>
<td>No activity</td>
<td>No activity</td>
<td>No observations</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>Out of scope</td>
</tr>
<tr>
<td>Outdoor</td>
<td>No observations</td>
<td>No observations</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>Out of scope</td>
</tr>
<tr>
<td>Event Sponsorship</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>No observations</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>Out of scope</td>
</tr>
<tr>
<td>Primary Schools</td>
<td>Policy deviation</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>No observations</td>
<td>No activity</td>
<td>No activity</td>
<td>Out of scope</td>
</tr>
<tr>
<td>Premiums</td>
<td>No activity</td>
<td>Policy deviation</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>Out of scope</td>
</tr>
<tr>
<td>Packaging</td>
<td>No observations</td>
<td>No observations</td>
<td>No activity</td>
<td>No observations</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>Out of scope</td>
</tr>
<tr>
<td>Point of Sale</td>
<td>No activity</td>
<td>No observations</td>
<td>No observations</td>
<td>No observations</td>
<td>No activity</td>
<td>No activity</td>
<td>No activity</td>
<td>Out of scope</td>
</tr>
<tr>
<td>Additional site visits</td>
<td>No observations</td>
<td>No observations</td>
<td>No observations</td>
<td>No observations</td>
<td>No observations</td>
<td>No observations</td>
<td>No observations</td>
<td>Out of scope</td>
</tr>
<tr>
<td>Digital media(^2)</td>
<td>No observations</td>
<td>No observations</td>
<td>No observations</td>
<td>Proactive improvement opportunity</td>
<td>No observations</td>
<td>No observations</td>
<td>Proactive improvement opportunity(^3)</td>
<td></td>
</tr>
</tbody>
</table>

### Key

<table>
<thead>
<tr>
<th>Classification</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy deviation</td>
<td>Agreed non-compliance with Nestlé Policy or Guidelines</td>
</tr>
<tr>
<td>Proactive improvement opportunity</td>
<td>No Policy deviation, however opportunity for improvement identified</td>
</tr>
<tr>
<td>No observations</td>
<td>Marketing communication activity existed for product in scope, however no issues were identified</td>
</tr>
<tr>
<td>No activity</td>
<td>There was no marketing communication activity for the product during the assessment period</td>
</tr>
</tbody>
</table>

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1. Please refer to the Appendix for an overview of the television viewership analysis, including percentage of viewers between 2 and 12 years of age.

2. In April 2018, the Food Safety and Standards Authority of India released draft regulation calling for the restriction of High Fat, Salt and Sugar (HFSS) food advertisements directed at children. Nestlé is voluntarily reducing or removing advertising from channels aimed at children. Further, our analysis did not identify any policy deviations published by Nestlé on digital platforms.

3. We have included two examples for products outside the scope of our assessment (i.e. Milkmaid and Maggi 2 minute noodles), which were identified inadvertently during our digital media monitoring.
2. Background
As the world’s largest food and beverage, nutrition, health and wellness company, Nestlé is working together with stakeholders, customers and retailers to create a healthier environment for individuals and families. Over recent years concerns about child obesity have been rising continuously.

As an industry leader, Nestlé has proactively taken a number of steps in response to these concerns. Nestlé participates in industry activities aimed at furthering responsible advertising to consumers such as those carried out by International Chamber of Commerce and the International Food and Beverage Alliance. Nestlé is a signatory of Industry Pledges covering over 50 countries, including the voluntary advertising to children initiatives in the United States (CFBAI) and in the European Union (EU Pledge). These industry Pledges are subject to third party compliance monitoring.

In order to fulfil its global commitment to inspire people to live healthier lives, Nestlé engaged EY to perform its third party compliance monitoring of marketing communication to children in India.

**Procedures performed**

### On-site compliance assessment

We performed the following:

- Defined the products and channels to be analyzed and the period of the assessment
- Interviewed certain key stakeholders and process owners at Nestlé India (e.g. corporate affairs and communications representatives)
- Analyzed the local campaign and activity calendar to identify marketing communication to children for all channels
- Performed physical site-visits for current activity to assess Point of Sale activity, packaging, premiums, event sponsorship and outdoor communications
- Performed desktop review of content and placement for channels including television, print media, radio and cinema

### Digital media monitoring

We performed the following:

- Defined a search query with the following filters:
  - Nestlé products in scope (including official social media handles, hashtags etc.)
  - 356 specific media channels targeted at children including social media (Facebook, Twitter, YouTube, Instagram etc.), tv network channels (Nickelodeon etc.)
  - 131 food and parenting forums in India, including Top 10 Kid-Friendly Food Blogs - India 2018, Top 100 Indian Food Blogs & Websites With Best Indian Recipes in 2019 and Top 21 mommy bloggers of 2016 in India
- Analyzed over 203,540 clean posts across India from February 2018 to February 2019
3. Coverage
Coverage: onsite compliance assessment

Sample size

We provide an overview of the sample size analysed during the onsite assessment per channel in the table below:

<table>
<thead>
<tr>
<th>Channel</th>
<th>Applicable products</th>
<th>Sample size</th>
</tr>
</thead>
<tbody>
<tr>
<td>Television (national language channels)</td>
<td>Milo, Ceregrow, Nangrow</td>
<td>51*</td>
</tr>
<tr>
<td>Print media</td>
<td>Baked sweetcorn noodles, Ceregrow, Nangrow</td>
<td>16</td>
</tr>
<tr>
<td>Radio</td>
<td>No activity</td>
<td>-</td>
</tr>
<tr>
<td>Cinema</td>
<td>Baked sweetcorn noodles</td>
<td>1</td>
</tr>
<tr>
<td>Outdoor (e.g. billboards)</td>
<td>Milo, Milkybar</td>
<td>233</td>
</tr>
<tr>
<td>Event sponsorship</td>
<td>Ceregrow</td>
<td>1</td>
</tr>
<tr>
<td>Schools</td>
<td>Milo</td>
<td>1</td>
</tr>
<tr>
<td>Use of toys or premiums</td>
<td>Milkybar</td>
<td>1</td>
</tr>
<tr>
<td>Packaging</td>
<td>Milo, Ceregrow</td>
<td>2</td>
</tr>
<tr>
<td>Point of Sale</td>
<td>Milkybar, Baked sweetcorn noodles, Nangrow</td>
<td>13</td>
</tr>
<tr>
<td>Additional stores selected for site visits</td>
<td>All products</td>
<td>25</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td><strong>344</strong></td>
</tr>
</tbody>
</table>

*Channels may be counted multiple times as part of sample size where marketing communications for multiple products were deployed on the same channel.

Methodology

We selected our sample based on the following:

- For the following channels, we selected a sample size of 100% for current activity relating to products in scope during the period under review, as identified in the local campaign and activity calendar:
  - Television
  - Print media
  - Radio
  - Cinema
  - Outdoor
  - Event sponsorship
  - Schools
  - Use of toys or premiums
  - Point of Sale

- For Print media, cinema and outdoor channels, 100% of unique content was analysed (however we did not visit all physical locations)

- In addition to the above current activity, we selected 25 additional stores in order to assess unauthorized promotional activity and/or packaging for all products in scope

- The 25 additional stores selected for site visits were based on surrounding proximity to five selected primary schools
Coverage: digital media monitoring

Total posts analyzed: 203,540
Zero policy deviations identified

Location of post generation (where identifiable)

Age and gender analysis:

- 43,543 posts (23%) have identifiable gender
- 9,947 posts (4%) have identifiable age

Sentiment analysis:
- Positive sentiment: 33%
- Neutral sentiment: 59%
- Negative sentiment: 8%
4. Detailed observations
### Detailed observations

<table>
<thead>
<tr>
<th>Product</th>
<th>Channel</th>
<th>Observation / comments</th>
<th>Nestlé Policy</th>
</tr>
</thead>
</table>
| Milkybar  | Use of toys or premiums       | **Placement:** School campaign deploying premiums primarily appealing to children below 12 years of age  
**Content:** The give-away premium is a school ‘pencil case’ including the Milkybar logo and a cartoon school bus, which may be considered as appealing to children 6 to below 12 years of age | “We do not direct any marketing communication for chocolate confectionary to children below 12 years of age, irrespective of the Nestlé Policy Nutrition Criteria being met.”  
“...premiums primarily appealing to children 6 to below 12 years of age [...] cannot be used for chocolate confectionary” |
### Detailed observations

<table>
<thead>
<tr>
<th>Product</th>
<th>Channel</th>
<th>Observation / comments</th>
<th>Nestlé Policy</th>
<th>Outcome</th>
</tr>
</thead>
</table>
| Milo    | Primary Schools | • Placement: Nestlé facilitated an event in 400 schools across 11 cities in India targeting children 7 to 12 years of age. Nestlé India confirmed that the campaign was not endorsed by a national authority  
• Content: No observations | Marketing Communication and Sales in Primary Schools  
“We do not direct marketing communications to children in primary schools (i.e. with children below 12 years of age).  
We can participate in health and wellness educational programmes provided that they are specifically requested by, or agreed with, the school administration and endorsed by relevant national authorities.” | Policy deviation     |

**Supporting information:**

- Poster for schools
- Milo Caps for Volunteers
- Marketing collateral at schools
<table>
<thead>
<tr>
<th>Product</th>
<th>Channel</th>
<th>Observation / comments</th>
<th>Nestlé Policy</th>
<th>Outcome</th>
</tr>
</thead>
</table>
| Nangrow; and Maggi 2 minute noodles (out of scope) | Digital media | • Placement: No observations  
• Contents: Nestlé should consider including a gatekeeper in the advertisements. The examples identified both appear to include a child acting as the spokesperson for the product | Implementation Guidelines  
"Children below 12 shown on packs, in POS material, etc., should not appear to be acting as a spokesperson for the product." | Proactive improvement opportunity |

**Supporting information:**

![Image of Nangrow and Maggi products]

Source: [https://www.nestle.in/#next](https://www.nestle.in/#next)
## Detailed observations

<table>
<thead>
<tr>
<th>Product</th>
<th>Channel</th>
<th>Observation / comments</th>
<th>Nestlé Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baked sweetcorn noodles</td>
<td>Print media</td>
<td>• <strong>Placement:</strong> No observations</td>
<td>Implementation Guidelines</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• <strong>Content:</strong> Nestlé should consider including a gatekeeper in the advertisement. The example identified appears to include a child acting as the spokesperson for the product</td>
<td>“Children below 12 shown on packs, in POS material, etc., should not appear to be acting as a spokesperson for the product.”</td>
</tr>
</tbody>
</table>

**Supporting information:**

![Image 1](image1.png)

![Image 2](image2.png)

![Image 3](image3.png)
### Detailed observations

<table>
<thead>
<tr>
<th>Product</th>
<th>Channel</th>
<th>Observation / comments</th>
<th>Nestlé Policy</th>
<th>Outcome</th>
</tr>
</thead>
</table>
| Milkmaid (out of scope)  | Digital media | • **Placement**: No observations  
• **Content**: Whilst the product is not within the scope of this assessment, we identified an instance via digital media monitoring of what appears to be a Nestlé Milkmaid sponsored cooking class targeting children. The cooking class was focused on desserts. Nestlé confirmed that the event was conducted independently by a third party and was not sponsored or endorsed by Nestlé. | Not applicable           | Proactive improvement opportunity                                     |

**Supporting information:**

- [Image of tweet illustrating a Nestlé Milkmaid cooking class](image_url)
5. Limitations
Limitations

General limitations

- We draw your attention to the limitations inherent in this report
- We were not required to and did not undertake an audit in accordance with Swiss Auditing Standards. Consequently, no assurance will be expressed.
- The scope of our work was limited to analysis of documentation and information made available to us and specific enquiries undertaken to pursue our mandate. We have not verified the authenticity or validity of the documentation made available to us.
- We have included information that we obtained verbally, in this report. Unless expressly indicated otherwise, we cannot verify that such information obtained is credible or truthful.
- For the digital media monitoring component, our analysis was limited to publically available information accessible on the open web.
- If additional or new information is brought to our attention subsequent to the date of this report which would affect the findings detailed below, we reserve the right to amend and qualify our findings accordingly.
6. Appendix
### Appendix - television viewership analysis

<table>
<thead>
<tr>
<th>National language channel</th>
<th>Genre</th>
<th>Product</th>
<th>% of audience between 2-12</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>2018 Q1</td>
</tr>
<tr>
<td>&amp;TV</td>
<td>Hin GEC 2</td>
<td>Milo, Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>9XM</td>
<td>Mus/Youth/Bol</td>
<td>Ceregrow</td>
<td>-</td>
</tr>
<tr>
<td>B4U Music</td>
<td>Mus/Youth/Bol</td>
<td>Ceregrow</td>
<td>-</td>
</tr>
<tr>
<td>Bindass</td>
<td>Mus/Youth/Bol</td>
<td>Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>Cartoon Network(v)</td>
<td>Kids</td>
<td>Milo</td>
<td>-</td>
</tr>
<tr>
<td>Colors</td>
<td>Hin GEC 1</td>
<td>Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>Colors HD</td>
<td>HD</td>
<td>Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>Disney Channel(v)</td>
<td>Kids</td>
<td>Milo</td>
<td>-</td>
</tr>
<tr>
<td>Movies OK</td>
<td>Hin. Movies</td>
<td>Milo, Ceregrow, Nangrow</td>
<td>-</td>
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<tr>
<td>Pogo TV(v)</td>
<td>Kids</td>
<td>Milo</td>
<td>-</td>
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<tr>
<td>Sony MAX 2</td>
<td>Hin. Movies</td>
<td>Ceregrow</td>
<td>-</td>
</tr>
<tr>
<td>Sony Mix</td>
<td>Mus/Youth/Bol</td>
<td>Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>Sony SAB</td>
<td>Hin GEC 2</td>
<td>Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>Sony Entertainment Television</td>
<td>Hin GEC 1</td>
<td>Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>Sony Entertainment Television HD</td>
<td>HD</td>
<td>Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>Sony YAY(v)</td>
<td>Kids</td>
<td>Milo</td>
<td>-</td>
</tr>
<tr>
<td>Star bharat HD</td>
<td>Hin GEC 2</td>
<td>Milo</td>
<td>-</td>
</tr>
<tr>
<td>Star Gold</td>
<td>Hin. Movies</td>
<td>Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>Star Plus HD</td>
<td>Hin GEC 1</td>
<td>Milo, Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>STAR Utv</td>
<td>Hin GEC 1</td>
<td>Ceregrow</td>
<td>-</td>
</tr>
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<td>STAR Utv FTA</td>
<td>Hin GEC 1</td>
<td>Ceregrow</td>
<td>-</td>
</tr>
<tr>
<td>UTV Action</td>
<td>Hin. Movies</td>
<td>Milo, Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>UTV Movies</td>
<td>Hin. Movies</td>
<td>Milo, Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>Zee TV</td>
<td>Hin GEC 1</td>
<td>Milo, Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>Zee TV HD</td>
<td>HD</td>
<td>Milo, Ceregrow, Nangrow</td>
<td>-</td>
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<tr>
<td>Zing</td>
<td>Mus/Youth/Bol</td>
<td>Ceregrow, Nangrow</td>
<td>-</td>
</tr>
<tr>
<td>Zoom</td>
<td>Mus/Youth/Bol</td>
<td>Ceregrow, Nangrow</td>
<td>-</td>
</tr>
</tbody>
</table>
As the world’s largest food and beverage, nutrition, health and wellness company, Nestlé is working together with stakeholders, customers and retailers to create a healthier environment for individuals and families.

Nestlé Marketing Communication to Children Policy
January 2018
EY | Assurance | Tax | Transactions | Advisory

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Nestlé India Advertising Compliance in schools Report

10th May 2019
## Executive Summary

### PROFILE

**Results are based on an achieved sample of 50 interviews**

The profile of schools is mixed, geographically covering 12 states. Majority were private schools. All covered nursery and/or secondary levels (in addition to primary).

### COMMERCIAL COMMUNICATION

**Zero incidence of non-compliance re displayed communications**

No prohibited commercial communication (for any food or beverage company) was reported as being displayed around the school, on school property/equipment, on publications, at events or from sponsorship. Nestlé appears to be successfully restricting marketing communication to primary schools.

### PRODUCTS ON SALE

**8 out of 50 schools sold prohibited products such as chocolate, sweets, biscuits and crisps**

Presence of Nestlé products falling outside the Nutrition Criteria is low with just 2 schools selling such products. Products from competitor brands were also reported, indicating that Nestlé is on par with other food and beverage companies in meeting its commitment to market responsibly to primary school children. It is also important to note that many schools (or school catering contractors) are responsible for buying products - the food and beverage companies themselves may not control over such sales and nor do they promote the sale of such items in schools.
Background, objectives & methodology
Background and objectives

Background

- Nestlé are keen to demonstrate their global commitment to responsible marketing by ensuring that advertising of their food and beverage products is restricted to children under the age of 12 years, particularly within primary schools.
- Their Marketing Communication to Children Policy states that:
  
  “We do not market foods or beverages to children under the age of six. For children under 12 years of age, the Policy restricts marketing to products meeting the Nestlé Policy Nutrition Criteria.” This bans marketing of products such as biscuits, sugar and chocolate confectionary and water-based beverages with added sugar to children.
- To evidence this, Nestlé commissioned BVA BDRC to undertake an independent audit of brand presence in primary schools in India, using an approach that has previously been used by us to assess compliance to the EU Pledge.

Objectives

- Assess whether there is any evidence of branded material within Indian primary schools
- Identify the nature / content of any branded material found during the audit
- Identify which brands, if any, are most commonly displaying/provided branded material within primary schools
Methodology (1)
Sampling and data collection

**WHO?**

Primary schools across India
- Which educate children between the ages of 6 and 13 (approximately)
- May cover lower (1st - 5th standard) and/or upper primary levels (6th – 8th standard)
- Plus may also cover kindergarten/nursery and/or secondary

Sample sourced by BVA BDRC from public domain (internet) and included over 10,300 primary schools spread across India (covering all states/territories, types of primary schools – public/private, affiliations with different exam boards etc.)

**WHEN?**

Fieldwork was conducted:
- March – April 2019
- by our operations teams in PRS and Alligator (both part of the BVA BDRC Group)
Methodology (2)
Sampling and data collection

HOW & HOW MANY?
Mixed approach: telephone and online
The initial approach was to repeat the methodology used in the previous EU Pledge research:

- A two-stage approach commencing with an initial recruitment stage undertaken by telephone
- For willing participants, this was followed by email containing a link to an online questionnaire which they could complete when convenient to them
- Willing participants were encouraged to check around the school for the presence of any branded material prior to completing the online survey
- A ‘paper copy’ of the online questionnaire was also sent with the email to enable participants to print it to assist with completion around the school
- Target of 75 online completes covering a representative spread of schools across India

However, despite a large number of participants being recruited, most did not complete the online questionnaire

- Re-contact was attempted with all recruits to check reason for no-completion and to encourage participation
- Being too busy and the exam period were cited as reasons, so fieldwork was extended to allow more time
- Some also needed to check with the Head before completion
- Only a few refused to participate having seen the survey (for various reasons)
- All attempts were made to encourage completion of the online survey (including giving the motion to send the completed paper copies back or to answer over the telephone, as appropriate).

To avoid over-contacting recruits and risk upsetting them, we then attempted to recruit new schools by telephone, asking them to check round the school straight away and offering to call back to collect the results (with the telephone interviewers going through the online survey verbally)

- All but one said they didn’t need to check around the school, but were willing to do the survey over the telephone
- As a result, the majority of interviews were conducted by telephone, with the telephone interviewer reading out the questions and completing the online survey on behalf of the respondent
- Due to the start of school summer holidays in some regions, interviewing was concentrated to those not yet on holiday

Fieldwork was stopped at 50 completed interviews due to the need to report (8 online self-completion + 42 telephone completion)
As a result of the problems encountered, the achieved spread of schools is not as representative as we would have liked, but does cover a reasonable spread
Profile of achieved sample
Geographical profile of achieved sample

Participating schools were located in 12 of the 36 states/territories, with the majority located within a city.
Majority of schools surveyed were privately run and funded

Q3. Please mark the kind of funding system that applies to your school
Base: All respondents (n=50)

- 72% (n=38) Private school (privately funded)
- 12% (n=6) Government aided private school (e.g. run by a charitable trust that receives partial funding from central, state or local government)
- 12% (n=6) Public or state school (controlled and funded by central, state or local government)
### Age profile of children at schools participating

As well as primary level(s) all participating schools also covered nursery, secondary or both

<table>
<thead>
<tr>
<th>School level: Standard/Grade: Approximate age:</th>
<th>Kindergarten /nursery 3-5 years</th>
<th>Lower Primary 1st – 5th 6 – 10 years</th>
<th>Upper Primary 6th – 8th 11 – 13 years</th>
<th>Lower Secondary 9th – 10th 14 – 15 years</th>
<th>Upper Secondary 11th – 12th 16 – 17 years</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td>46% (n=23)</td>
</tr>
<tr>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td>32% (n=16)</td>
</tr>
<tr>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>X</td>
<td></td>
<td>10% (n=5)</td>
</tr>
<tr>
<td></td>
<td>✓</td>
<td>✓</td>
<td>X</td>
<td>X</td>
<td></td>
<td>4% (n=2)</td>
</tr>
<tr>
<td></td>
<td>✓</td>
<td>✓</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>4% (n=2)</td>
</tr>
<tr>
<td></td>
<td>X</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>4% (n=2)</td>
</tr>
<tr>
<td></td>
<td>X</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>4% (n=2)</td>
</tr>
<tr>
<td></td>
<td>X</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>X</td>
<td>100% (n=50)</td>
</tr>
</tbody>
</table>

**TOTAL**

- 92% (n=46) in Kindergarten /nursery
- 100% (n=50) in Lower Primary
- 96% (n=48) in Upper Primary
- 86% (n=43) in Lower Secondary
- 50% (n=25) in Upper Secondary

60% (n=30) of pupils in primary school share buildings/areas (e.g. classrooms, open spaces, sports rooms, playgrounds) with secondary school students.
Instructions given to recruits
Prior to completing the online survey, respondents were asked to carefully read/listen to the following description of what advertising/communication is and is not allowed

**FOOD AND BEVERAGE RELATED COMMUNICATIONS (E.G. PRODUCT ADVERTISING OR OTHER COMMERCIAL COMMUNICATIONS) THAT ARE PROHIBITED (NOT ALLOWED) IN PRIMARY SCHOOLS INCLUDE:**

- all forms of branded communication (i.e. has the food/beverage company name/logo on it) found on school premises inside or outside the school, such as:
  - In school corridors, classrooms, in the playground, at the entrance gate, in open spaces, in the sports room etc.
  - On school property/equipment (e.g. tables, chairs, blackboards, sports equipment...)
  - On school materials (e.g. books, newsletters, sports clothes)
  - At school events (e.g. sports events, fêtes, etc) held on school premises
  - At events organised by the school but held off-site
- Promotional material e.g. Sales promotions: distribution of samples, free products or product merchandise by sales representatives in schools
- Donation of products (or donation of funds for products) such as sweets/confectionary, chocolate, crisps, biscuits, cakes, fizzy drinks, sweetened drinks
- Products such as sweets/confectionary, chocolate, crisps, biscuits, cakes, fizzy drinks, sweetened drinks on sale in vending machines, canteens, shop etc. within the school

**FOOD AND BEVERAGE RELATED COMMUNICATIONS THAT ARE ALLOWED IN PRIMARY SCHOOLS:**

- Corporately branded communications/material which support education and public service messaging programs to promote healthy lifestyles, environmental awareness and healthy cooking to children/teens.
- On-pack communication: brand name or related messages which are on the packaging of a product sold in school canteens/shops/vending machines.
- In-pack communication: brand name or related messages which are in the packaging of a product sold in school canteens/shops/vending machines.
- Corporate branding on vending machines providing the name/logo is not displayed more prominently than necessary to enable product selection.
- 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.
- Donation of healthy products or funds for healthy products (e.g. cereal bars, unsweetened water, fruit, dairy products) for events organised by the school providing the school authorities requested the donation
In all 50 schools, no prohibited commercial communication for any food or drink products was reported to be found:

In any of the following locations around the school
- Classrooms
- Corridors
- Playground(s)
- Sports room(s)
- Sports field
- School entrance gate
- Administrative spaces
- Staff room
- Dining room / refectory / cafeteria / canteen
- Doors
- Windows
- Parking spaces
- Other locations (specify)

On vending machines / equipment
i.e. on the vending machine itself (including branded vending machines providing the brand name/logo is not displayed more prominently than necessary to enable product selection)
But excluding the selection buttons or packaging of products being sold

On any of the following school property / equipment
- Sports equipment
- Tables
- Chairs
- Blackboards / Whiteboards
- Stationery (e.g. paper, pens, notebooks)
- Toys
- Other (specify)

“We do not allow any kind of display in the school”

“We commercial communication is prohibited in schools in India, we don’t allow anything like that in our school.”

“We don’t do any advertising, we don’t have a canteen in our school.”

Q5. Is any prohibited commercial communication for food or drink products found in any of the following locations around the school? / Q6. Is any prohibited commercial communication for food or drink products found on any vending machines/equipment in school? / Q8. Is any prohibited commercial communication for food or drink products found on any of the following school property / equipment
Base: All respondents (n=50)
No prohibited commercial communication was reported to have been displayed at any school events held in the last 12 months

<table>
<thead>
<tr>
<th>Event Type</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sports events</td>
<td>56% (n=28)</td>
<td>44% (n=22)</td>
</tr>
<tr>
<td>School parties</td>
<td>34% (n=17)</td>
<td>66% (n=33)</td>
</tr>
<tr>
<td>Fetes / fairs</td>
<td>34% (n=17)</td>
<td>66% (n=33)</td>
</tr>
<tr>
<td>School performances (e.g. school play)</td>
<td>30% (n=15)</td>
<td>70% (n=35)</td>
</tr>
<tr>
<td>Information days</td>
<td>28% (n=14)</td>
<td>72% (n=36)</td>
</tr>
<tr>
<td>Summer camps / Holiday clubs</td>
<td>26% (n=13)</td>
<td>74% (n=37)</td>
</tr>
<tr>
<td>Other event</td>
<td>24% (n=12)</td>
<td>76% (n=38)</td>
</tr>
</tbody>
</table>

Q9. As far as you are aware, is/has there been any prohibited commercial communication for food or drink products displayed during any events held on school premises, or organised by the school but held off-site? Please answer on the basis of the last of each type of event that has taken place in the last 12 months.

Base: All respondents (n=50)
No prohibited communication was reported to be present in any publications/products produced for or distributed by any schools

Q10. Is there any prohibited commercial communication for food or drink found in publications and products produced for or distributed by the school such as those below? Please answer on the basis of the last of each kind of publication/product, provided this was within the last 12 months.

Base: All respondents (n=50)
In all 50 schools surveyed, no school material was sponsored by food or drink companies

This includes the following material:

- School newspaper
- Sports clothes
- Sports equipment
- Books
- Courses
- Teaching material
- School agendas
- Stationery (e.g. paper, pens)
- Documents to support awareness sessions (e.g. on diet, physical activity and health)
- IT equipment
- Other materials

“The school does not allow advertisement nor vending machines/shops within nor outside the school vicinity. Everything is cooked fresh on site. We have been offered advertisement/sponsorship from food/beverage companies but declined”
However, 8 of the 50 schools cited that prohibited products were on sale within the premises

These schools reported between 1-4 different types of products on sale. Some quoted multiple products within each category. The profile of these schools varies by region, type of school/funding system and whether primary school pupils share space with secondary school students. However all covered Kindergarten/nursery to secondary grades (either lower or higher secondary)

Yes, one or more of these types of products are on sale:
- Chocolate bars
- Other sweets / confectionary
- Biscuits
- Cakes
- Crisps
- Fizzy drinks
- Sweetened water / juice
- Other product(s) containing lots of sugar or salt

84% (n=42)
16% (n=8)

None of those types of products are on sale within the school (including in vending machines, canteen, shop)

"We only allow packed lunches in school, we don’t sell any food or drinks in school."

"We don’t have a canteen or any vending machines in school, children bring their own food in."

"We have no advertising of food or drinks at all around the school. We used to have a vending machine in the past but we have removed it. The children bring packed lunches in, we don’t sell any food in the school."

Q7. Are any of the following types of products on sale within the school (e.g. in vending machines, canteen, shop)?
Base: All respondents (n=50)
Only 2 of the 8 reported selling Nestlé products (chocolate bars)

However Nestle commented that *“We do not sell/place any products in school premises or school canteens. Most school canteens are run by third party contractors who may buy the products and sell them in the school canteens. We have no control over such sale nor are we promoting or encouraging sale of our products through these channels”*

<table>
<thead>
<tr>
<th>SCHOOL</th>
<th>Chocolate Bars</th>
<th>Other sweets / confectionary</th>
<th>Biscuits</th>
<th>Cakes</th>
<th>Crisps</th>
<th>Fizzy drinks</th>
<th>Sweetened water / juice</th>
<th>Other product(s) containing lots of sugar or salt</th>
<th>TOTAL NUMBER OF PRODUCT TYPES ON SALE WITHIN SCHOOL</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Nestlé KitKat</td>
<td>• Nestlé KitKat</td>
<td>X</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td>• Madza</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>• Cadbury’s Dairy Milk</td>
<td>• Toffees (brand unspecified)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Chocolates (unspecified)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A</td>
<td>Nestlé KitKat</td>
<td>X</td>
<td>• Lays</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Nestlé Munch</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B</td>
<td>Nestlé KitKat</td>
<td>• Nestlé KitKat</td>
<td>X</td>
<td></td>
<td>• Lays</td>
<td></td>
<td>X</td>
<td>• Parle Agro Frooti</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>• Nestlé Munch</td>
<td>• Nestlé Munch</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Brittania Good Day</td>
<td>• Brittania 50:50</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>• Lassi and sweetened milk e.g. strawberry flavour</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Fresh lemonade</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Also sell cheese sandwiches, sprouts &amp; samosas</td>
<td></td>
</tr>
</tbody>
</table>

Continued on the next page

Q7. Are any of the following types of products on sale within the school (e.g. in vending machines, canteen, shop)?
Base: All respondents (n=50)
A number of ‘unhealthy’ products from other brands were also on sale

Namely Cadbury’s, Mars, Britannia, Parle G and Lays. Four schools also cited ‘unhealthy’ homemade products.

<table>
<thead>
<tr>
<th>SCHOOL</th>
<th>Chocolate Bars</th>
<th>Other sweets / confectionary</th>
<th>Biscuits</th>
<th>Cakes</th>
<th>Crisps</th>
<th>Fizzy drinks</th>
<th>Sweetened water / juice</th>
<th>Other product(s) containing lots of sugar or salt</th>
<th>TOTAL NUMBER OF PRODUCT TYPES ON SALE WITHIN SCHOOL</th>
</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td></td>
<td>X</td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>* Homemade snacks</td>
<td>3</td>
</tr>
<tr>
<td>E</td>
<td></td>
<td>X</td>
<td>* Parle G (products unspecified)</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>2</td>
</tr>
<tr>
<td>F</td>
<td>* Cadbury’s (products unspecified)</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>* Make own smoothies, juices &amp; iced teas</td>
<td>X</td>
<td>2</td>
</tr>
<tr>
<td>G</td>
<td></td>
<td>X</td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>* Idli</td>
<td>* Samosas</td>
</tr>
<tr>
<td>H</td>
<td></td>
<td>X</td>
<td>* Britannia (products unspecified)</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>1</td>
</tr>
</tbody>
</table>

Q7. Are any of the following types of products on sale within the school (e.g. in vending machines, canteen, shop)?

Base: All respondents (n=50)
Other verbatim comments (given at the end of the survey) centered around avoiding junk food as part of school policy

“We don’t allow junk food in the school, during break and lunchtimes we check the students if they are carrying any sweets or junk food. We only allow healthy and nutritious foods in our school.”

“I think schools should stop promoting junk food, unhealthy food and drinks. If every school followed this then children will be much healthier.”

“We avoid junk food in our school due to health reasons. We believe junk food never motivates children. I think traditional food is better, steamed food in particular is good. We give out cooked chana (chickpeas) and also grounded nuts or coconuts with jaggery. We give this out every Friday during Bhajans. It’s good for the children.”

“We have our own kitchen for school Nasta. We have menu for the whole month. We strictly don’t allow junk food, fried food, packaged food in school during recess. We don’t encourage students to have chocolates and cakes too. We prepare our Gujarati traditional breakfast during recess, like Dholkla Khaman, Khichu, Batata pauha, fada Khichdi, Idli sambar. All things are prepared in our school kitchen and provide by token. Students need not to bring Nasta from home. They enjoy it nicely.

“I have been always consciously trying to keep our children healthy and therefore we ask the parents to send home cooked food and avoid sending any junk food. We also often encourage parents to send fruits and include vegetables in their diet. Teachers are also asked to check the food they carry and make sure the children eat well and drink a lot of water and avoid any kind of aerated juices and other drinks.”

“We don’t have any commercials for food or drink around the school but we do write articles about the impact of having junk food.”

“Our school already has internal audits.

“Only during festivals we give out chocolates, sweets and cakes, for example during Diwali or Janmashtami.”

Q12. If you would like to make any comments or observations, please write them here.
Base: All respondents (n=50)
For further information
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Quality standards

BVA BDRC is certified to ISO 20252 and 27001, the recognised international quality standards for market research and information security, thus this project has been carried out in accordance with these standards:

- Adherence to the standard is independently audited once per year.
- Where subcontractors are used by BVA BDRC, they are assessed to ensure any outsourced parts of the research are conducted in adherence to ISO 20252 and 27001.
- All work on this project has been carried out in conformity to these standards, GDPR and the MRS Code of Conduct.

Full methodological details relevant to the project are available upon request.
**Statistical Difference**

As this survey was conducted with a sample of the target audience, we cannot be 100% certain that a census of the whole population would yield the same results.

However, we can be 95% certain that the actual figure (in the population as a whole) falls within a certain range of the survey figure.

The percentages within the table represent the error variance for the achieved sample of 50 interviews. The equivalent figures have also been given for the intended target sample of 75 interviews to show that the difference in the margin of error between the two sample sizes is small.

<table>
<thead>
<tr>
<th></th>
<th>Survey finding of...</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>5 / 95%</td>
</tr>
<tr>
<td></td>
<td>20 / 80%</td>
</tr>
<tr>
<td></td>
<td>50 / 50%</td>
</tr>
<tr>
<td>Base</td>
<td></td>
</tr>
<tr>
<td>Total Achieved Sample (50)</td>
<td>+/- 6.0%</td>
</tr>
<tr>
<td><em>Intended target sample (75)</em></td>
<td>+/- 4.9%</td>
</tr>
</tbody>
</table>