

Commitment Concerning Advertising to Children

**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. We are committed to advertising that supports the efforts of American families to encourage their children to make healthy lifestyle and dietary choices that will serve them well into adulthood. In the Global Guidelines for Responsible Advertising to Children adopted by the Company in March 2006, a copy of which is attached to this Commitment, we have undertaken to follow what we believe to be self-regulatory best practices in the markets in which we advertise our products. Our Global Guidelines provide, for example, that we do not address advertising communications to audiences consisting primarily of children who are younger than six years old. Consistent with this undertaking, we are making a further Commitment Concerning Advertising to Children, which applies to all advertising primarily directed to children under 12 years of age in any medium in the United States. We have made a separate Commitment concerning our business in Canada.

Our commitment to children and their families centers on the five core principles of the Initiative, which relate to (a) the nature of advertising messages, (b) the use of licensed characters, (c) product placement, (d) the use of products in interactive games, and (e) advertising in schools.

The Commitment set forth below is for advertising run during our 2007-2008 business year, beginning August 2007, and may be amended if our approach to responsible advertising to children changes in future years. If there is a change in the relevant 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 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 nutritionists. Information about our staff of nutritionists can be found at campbellwellness.com. Accordingly, during the next year, we will support families by assuring that the products we advertise in our advertising primarily directed to children under 12 are sound food choices. The manner in which we will implement this is explained in the discussion below on “Implementing and Measuring Message Delivery.” Ingredient statements and nutrition facts for the products that will be in the marketplace when we advertise them to children in the coming year are included in Schedule A to this Commitment.

Sound Food Choices

Many children do not know how to construct a healthy diet and are unaware of the nutrient contributions of different foods. It is therefore difficult for them to make sound food choices without guidance. In advertising directed to children, it is appropriate to favor foods that contribute important nutrients that may otherwise be at insufficient levels in children’s diets; moderate the consumption of fat, saturated fat, *trans* fat, cholesterol, sugars, and sodium, which are generally over-consumed in the typical American diet; or, of particular importance, moderate total calories in their diets. Because different individuals have different needs, sound food choices may vary for different children at different times. Within different food categories, various characteristics of a particular food – such as its calorie content, energy density, nutrient and other contributions,

frequency of consumption, and the way the food fits into a typical diet – influence the judgment whether it is a sound food choice for a particular child.

Soups. Almost all soups have fewer than 200 calories in an eight ounce serving. Soups frequently contain ingredients whose consumption by children should be encouraged, such as vegetables and lean meats. Soups also support good hydration. In addition, because many soups have low energy density, soups are useful in maintaining a healthy weight. 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. 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 very low energy density. 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. The fact that an increasing proportion of children in the United States are overweight or obese is an important public health concern, and consumption of foods with low or very low energy density should be encouraged as a means of reducing caloric intake.

Any soup with a very low energy density is a sound food choice for children, if it also provides children with positive nutrition such as a serving of vegetables, or a vitamin or mineral at the level of 10% of the Daily Value. Soups in which sodium levels have been reduced are also a sound food choice.

In the coming year, we will advertise our *Campbell's 25% Less Sodium Chicken Noodle* soup, *Campbell's Tomato* soup, and *Campbell's Chicken & Stars* soup, as well as our *Campbell's 25% Less Sodium Tomato* soup to children because these products have a very low energy density and are sound food choices for them. The tomato soups provide children with a serving of vegetables and 10% of the Daily Value of vitamin C. Chicken & Stars soup and the 25% Less Sodium Chicken Noodle soup are reduced in sodium. We will include depictions or references to our 25% Less Sodium Tomato soup in at least half of our tomato soup advertising to children.

Snack Crackers. Children typically do not consume sufficient calories by eating only three meals per day. Because they are actively growing and metabolize food more quickly than adults, snacking is an important behavior for children, 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, which are a weakness of many snacking choices for children, such as sugar-based candy.

A snack cracker product will be considered to be a sound food choice in our advertising if the product depicted is packaged in a portion control pack of 100 calories or less, or is a variety that has less than 35% of calories from fat, 10% of calories from saturated fat, zero grams of *trans* fat, and a modest amount of added sugars. 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.

In the coming year, we will advertise our *Pepperidge Farm Goldfish Cheddar* snack crackers to children because they have less than 35% of calories from fat, 10% of calories from saturated fat, zero grams of *trans* fat, less than one gram of sugars and are a sound food choice.

Canned Pasta. Canned pasta is a convenient meal-time option for 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. The Dietary Guidelines recommend that children and adolescents consume whole-grain products often because they are an important source of fiber and other nutrients. 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 in our advertising, canned pasta products will have a composition such that they derive fewer than 35% of their calories from fat, have 25% less sodium than the largest-selling canned pasta item or SKU in the canned pasta product category, and contribute, in an eight ounce serving, 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).

In the coming year, we will advertise our plain and meatball varieties of *Campbell's SpaghettiOs* canned pasta to children because they provide less than 35% of calories from fat, are reduced in sodium compared to the largest selling item in the canned pasta category, have a serving of vegetables in each product serving, and will be a sound food choice. In fact, our plain variety provides a good source of fiber, vitamin A, iron, and four essential B vitamins, while the meatball variety provides a good source of fiber, calcium, protein, and eight other vitamins and minerals.

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 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.

Our advertising to children for our 2007 – 2008 business 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 the only product varieties verbally identified in the advertising or whose packaging is shown.

The Use of Licensed Characters

We have committed for the 2007-2008 business year to advertise sound food choices to children. 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.

The Use of Product in Interactive Games

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. For our 2007-2008 business year, any interactive game primarily for use by children 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 campbellsoup.com and bbb.org/initiative/.