

High Fat Sugar Salt

SRC - Google Policy Update

28 September 2020

Confidential + Proprietary

High Fat Sugar Salt Policy

In October 2020, the Google Ads Other Restricted Businesses Policy will be updated to restrict the serving of High Fat Sugar Salt (HFSS) Food and/or Non-Alcoholic Beverages (F&B) advertising for minors in the United Kingdom and European Union.

Why we are launching this update now?

- Advertisers with products High in Fat, Sugar, and Salt (HFSS) have in recent years been faced with more restrictions on their advertising on TV and digital mainly with regards to showing ads to minors. The restrictions vary widely by region, with advertisers in some regions facing severe press and regulatory body pressure.
 - For example, the UK introduced its requirements in 2017 and the implementation of the Audiovisual Media Services Directive will see similar rules introduced across the EU.
- The marketing to kids policy/regulatory landscape is rapidly evolving and many of these requirements are expanding to digital and social media. In response to these changes, Google is reevaluating its marketing to kids approach and getting in front of forthcoming regulatory action.
- As a solution, we are rolling out this new policy in which HFSS selected accounts will only expose their ads to users who declared they are 18+ years old in the EU and the UK.

Policy Details

- **Locations**: EU Member States and UK.
- **Platforms**: YouTube and Display Network
- Self-declaration process: Advertisers will be required to self-declare that they are using an account to run HFSS campaigns, and all the creatives within that account will be subject to the HFSS F&B policy restrictions.
- **Effect of the policy**: Ads within HFSS-labelled accounts will only serve to users with a declared age of 18 and above. Non-HFSS ads will continue to serve as usual.

What is a HFSS ad under our new policy?

- We consider ads to be promoting the **sale of HFSS products** when one or more HFSS foods, beverages or meals is featured in the ad (via text, imagery and/or video) **and/or** the landing page.
- Examples of ads <u>within</u> scope of this policy
 - Ads that depict only brands (e.g., logo, delivery service) in text/imagery/video but include any depiction of HFSS F&B on the landing page
 - Ads or landing pages that include text/imagery/video of multiple foods and beverages if at least one is HFSS.
- Examples of ads <u>outside</u> scope of this policy:
 - Ads or landing pages that include text/imagery/video of foods, beverages and meals that are not HFSS.
 - F&B company ads or landing pages that do not include text/imagery/video of any HFSS foods and beverages, such as:
 - Brand logo or company name depicted in a sponsorship i.e. "Sponsored by or brought to you by ..."
 - Restaurant locator websites / review websites / delivery services

Google HFSS F&B Nutritional Profile

Nutrient levels are applied on a 100-gram and per serving basis for global applicability and to reflect common labelled serving sizes and calorie levels for meal and meal components.

If our policy is more lenient than the regulations for a given product in a relevant country, advertisers should still follow the relevant country's regulations when marketing those products.

Eten en drinken PER Verzadigd Natrium Totaal Toegevoegde suiker (a) (ma) suiker vet (a) (g) Dranken Portiegrootte Alle dranken behalve 0 N.v.t. 105 ma N.v.t. op label melk (ongeveer 225 gram) 100 g N.v.t. 46 ma 0 Granen/broden Portiegrootte 2 360 10 N.v.t. Brood. broodproducten. op label noedels, riist, granen, (ongeveer pannenkoeken 100 gram) 2 100 g 360 10 Ontbijtgranen Portiegrootte 1,5 250 6,75 N.v.t. op label (ongeveer 30 gram) 22,5 100 g 5 625

*Complete NP table available at:

Google https://support.google.com/adspolicy/answer/9919030?hl=nl

What advertisers need to do?

- F&B advertisers will be required to **separate HFSS campaign** accounts from non-HFSS campaign accounts on Google Ads and DV360.
- HFSS advertisers will be required to self-declare HFSS campaigns on an account level and all the creatives within the account will be labeled for HFSS (via <u>Self-Declaration Form</u>).
- Existing ads will be labeled for HFSS after the account self-declaration process is completed.
- Self-declarations will be processed Google monthly.

High fat salt sugar food and beverage selfdeclaration

Google requires advertisers to self-declare ads containing food and/or beverage products that are high in fat, salt and/or sugar (HFSS). This self-declaration is required for all ad formats and extensions. With the information you provide, all the creatives within the account will be subject to HFSS food and beverage policy restrictions. Learn more about Google's HFSS food and beverage advertising policy.

Q Describe your issue

Important note

Advertising Policies Help

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Google will process your application and change serving restrictions of accounts in bulk once a month (the first week of every month). Google will send you an email notification about your self-declaration status once your account is changed. Until you receive this notification, the high fat salt sugar food and beverage policy restrictions will not apply to your account.

* Required field

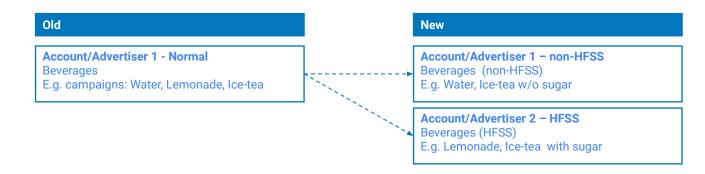
Please select your product

Google Ads

DV360

HFSS Account Structure Recommendation

Option 1 When? In accounts where HFSS and non-HFSS campaigns are running, we propose to split these and create a second Account (DV360 advertiser). In one account you can run non-HFSS campaigns with normal reach and in the second account you can run HFSS campaigns with restricted reach.



Option 2 When? When in an existing account there are exclusively HFSS campaigns running, we propose to declare the existing account as HFSS.

Old	New
Account/Advertiser 1 - Normal	Account/Advertiser 1 − HFSS
Chocolate	Chocolate (HFSS)
E.g campaigns: chocolate nut bar, Pralines	E.g campaigns: chocolate nut bar, Pralines

Google

Policy Launch

On 6 October 2020, the HFSS F&B update to Google Ads Other restricted businesses policy will start being enforced in the EU+UK markets.