



2

MARKETING & LABELING

STANDARD



PILLAR 1
BENEFICIAL
PRODUCTS



Commitment

Employ responsible, equitable, and honest marketing and labeling practices that allow consumers to easily make informed choices and do not exploit vulnerable populations.

Bottled milk.
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The impact of marketing and labeling of food products is an increasingly concerning public health issue. Food companies are estimated to collectively spend over \$7 billion annually¹ to market their products, many of which are not healthy² and do not align with global dietary guidelines designed to preserve the health of people and planet.³ Unhealthy diets are linked to both environmental degradation and negative public health outcomes including cardiovascular disease, cancers, diabetes, stroke, and hypertension,⁴ all of which are leading causes of mortality and responsible for an estimated 11 million annual deaths globally.⁵ While consumer preference for more nutritious foods is on the rise,⁶ marketing and labeling practices are too often being used to mislead them about the healthfulness of products.

Although many countries have national regulations and legal ramifications to protect consumers from falsehoods and deception in food marketing and labeling,⁷ they are not stringent, comprehensive, or enforced to the degree that prevents misleading claims and practices from being employed. Deceptive or misleading marketing and labeling practices impede the achievement of the SDGs and undermine consumers' intentions to take better care for their health and advocate with their purchasing power for a more sustainable, equitable world.



Marketing and labeling practices in the food sector can also perpetuate social inequities, and exacerbate risks for vulnerable and disease-burdened populations.⁸ Food companies, for example, disproportionately target marketing to demographics that already experience a greater prevalence of obesity, overweight, diet-related chronic diseases, and food insecurity, which exacerbates health disparities.⁹ Children and teens are especially vulnerable because they are easily influenced by marketing messaging. Their cognitive capacities are not yet fully developed, which limits their ability to scrutinize advertising, comprehend its intent, understand the long-term impact of unhealthy diets, and exercise willpower when making dietary choices.¹⁰ Additionally, marketing of unhealthy food products to children and teens is reinforced across multiple channels and locations (e.g., school, television, the internet, mobile phone apps, social media, and the physical community they live in),¹¹ which can sabotage parental attempts to teach healthy eating patterns.

Unhealthy foods, such as those laden with added sugar, are often relatively inexpensive to produce so utilizing misleading or questionable marketing practices to sell these foods over more healthful ones can drive down a company's bottom line and maximize profits.¹² However, improved practices in this area is necessary to achieve the SDGs, and can mitigate reputational risks and build long-term loyalty, especially among younger generations for whom corporate transparency and accountability are top purchasing factors.¹³ SDG-alignment involves utilizing marketing and labeling practices that are responsible, equitable, honest, and aid consumers in making healthy and sustainable dietary choices.

BOX 1: KEY RESOURCES FOR FOOD MARKETING & LABELING

- The FAO Codex Alimentarius.¹⁴
- The WHO International Code of Marketing of Breastmilk Substitutes.¹⁵
- The ICC Framework for Responsible Food and Beverage Marketing Communications.¹⁶



SDG 2 – Zero hunger

Target 2.1: By 2030, end hunger and ensure access by all people, in particular the poor and people in vulnerable situations, including infants, to safe, nutritious and sufficient food all year round.



SDG 10 – Reduced Inequalities

Target 10.3: Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard.



SDG 3 – Good health and well-being

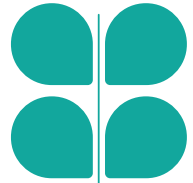
Target 3.4: By 2030, reduce by one third premature mortality from non-communicable diseases through prevention and treatment and promote mental health and well-being.



SDG 12 – Responsible consumption and production

Target 12.6: Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle.

Target 12.8: By 2030, ensure that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature.



BENEFICIAL PRODUCTS



STEPS TO MEET THE COMMITMENT

1. ADOPT A POLICY AND EMBED IT INTO GOVERNANCE AND MANAGEMENT SYSTEMS

1.1. ADOPT A POLICY

The board or the most senior level of SDG-aligned companies adopt a policy aligned with their public commitment to respect the human rights of access to information, food, and health, including a commitment to employ responsible, equitable, and honest marketing and labeling practices with the intent to aid consumers in making informed choices and remove or change practices that are misleading or exploitative, especially of vulnerable populations.⁹ The policy:

- Encompasses all forms, channels, and strategies a company utilizes including, but not limited to broadcast, print, digital, and social media; point-of-sale marketing and packaging; PR activities; sponsorship; placement; and location- or community-based marketing (e.g., door-to-door marketing, billboards).¹⁷
- States that, where the national law of the territory where the company and its business relationships operate conflicts with international law, the company defers to the higher standard.¹⁸
- Aligns with and explicitly references the standards listed in Box 4.

BOX 4: INTERNATIONAL HUMAN RIGHTS STANDARDS ON THE RIGHTS TO ACCESS TO INFORMATION, FOOD, AND HEALTH

- Universal Declaration of Human rights, Articles 19 and 25.¹⁹
- International Covenant on Economic, Social and Cultural Rights, Articles 11 and 12.²⁰
- International Covenant on Civil and Political Rights, Article 19(2).
- International Convention on the Elimination of All Forms of Racial Discrimination, Article 5 (e)(iv).²¹
- Convention on the Elimination of All Forms of Discrimination against Women, Articles 11(1)(f), 12, and 14(2)(b).²²
- Convention on the Rights of the Child, Article 24.²³
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, Articles 28, 43(e), and 45(c).²⁴
- Convention on the Rights of Persons with Disabilities, Article 25.²⁵

1.2. EMBED THE POLICY INTO GOVERNANCE & MANAGEMENT SYSTEMS

To embed the policy, SDG-aligned companies:

- Communicate expectations for implementing the policy internally and externally to their workforce (especially those in marketing, advertising, PR, and product development departments), shareholders, subsidiaries' governing bodies, and business relationships (especially suppliers, external marketing agencies, advertising partners, retail and foodservice partners, and affiliates including digital media influencers).
- Integrate the policy into contracts and other agreements relating to marketing, advertising, and labeling. In the case of pre-existing relationships, such agreements are updated with statements that require signatories to adhere to marketing and labeling practices that align with the standard.
- Use their leverage at all points along the value chain to enforce marketing and labeling practices that align with the standard.²⁶

a. Here, "vulnerable populations" refers to children and teens below the age of 18 and any demographic groups which may be both disproportionately targeted by food marketers and suffer greater burdens of obesity and diet-related chronic diseases.



- Integrate the policy into marketing, PR, advertising, and packaging policies.
- Embed the policy into the product development process to ensure products and their packaging are developed or reformulated in alignment with the standard.
- Integrate the policy into its by-laws and other governance documents (i.e., Code of Conduct, Code of Ethics), and management procedures.²⁷
- Ensure their business practices and the incentives they create do not contradict the policy in form or substance.

2. ASSESS ACTUAL & POTENTIAL IMPACTS

SDG-aligned companies identify and assess actual and potential impacts their marketing or labeling activities caused, contributed to, or are linked to, including health impacts of misleading, exploitative, or inequitable marketing or labeling. In order to systematically assess actual and potential impacts on an ongoing basis, SDG-aligned companies:

- **Evaluate how their marketing, advertising, PR, packaging, and labeling practices may mislead consumers**, distract public attention from either the true nature or origin of their products or their environmental impacts or exploit vulnerable populations. This involves engaging with potentially affected stakeholders, particularly members of target and at-risk populations. Companies assess how decisions to maximize profits or realize financial gains may be at odds with their commitment to market and label their products responsibly, equitably, and honestly and help consumers make informed choices.
- **Employ qualified and credible experts and conduct appropriate, ethically designed market research** (e.g., focus groups, consumer surveys, etc.) to aid in the determination of which practices may violate the standard.
- **Conduct initial, regular, and ongoing comprehensive assessments of marketing and labeling practices.** In particular, the companies assess whether marketing and labeling practices:
 - **Align with responsible marketing principles:**²⁸
 - **Legal:** Labeling and marketing comply with all national legislation including that regarding nutrition, health, and structure/function claims.^b
 - **Honest:** Labeling and marketing accurately portray the tangible qualities of products as well as their intangible attributes and benefits (e.g., nutrition or health benefits). They do not in any way mislead consumers or exploit their trust, ignorance, or lack of experience. When evaluating the honesty of marketing and labeling practices, differing levels of education on nutrition, environmental concerns, and social issues among different markets and audiences are considered.

- **Substantiated:** Where applicable, claims made in labeling or marketing are supportable with relevant peer-reviewed and sound scientific evidence, third-party certifications, or other respectable proof of their truthfulness. Appropriate substantiation statements and references to sources of additional information (e.g., website designed to facilitate transparent disclosure and consumer understanding) are provided and easily accessible (i.e., easily locatable and printed in reasonable font size) to consumers. Additionally, claims are reported in the context of and consistent with the entire body of scientific evidence rather than a biased selection. Lastly, claims accurately convey the meaning of scientific terminology, and convey any statistics or substantiating information in a way that does not exaggerate or misrepresent the claim.²⁹

- **Align with healthy dietary, physical activity, and lifestyle patterns** and do not promote consumption above recommended dietary guidelines, display excess portion sizes, suggest substitution for other healthy lifestyle choices (e.g., low-calorie food products in place of exercise), or otherwise subvert the importance of healthy lifestyles.³⁰
- **May mislead the average consumer^c** with regard to nutrition, health benefits, origin, processing, environmental impacts, or social impacts of their products, operations, or value chains. Specific examples can be found under Step 3 of this Standard.
- **Promote the inappropriate use of products** with particularly large health consequences, in particular:
 - **Promotion of infant formula in place of or as superior to breastfeeding** where there is no compelling medical or situational reason to do so, and/or not in compliance with the World Health Organization's *International Code of Marketing of Breast-milk Substitutes*.³¹

b. Structure/function claims are those that reference how nutrients in a product affect the structure or function of the body but do not reference disease states or their prevention. (e.g., "Calcium builds strong bones."). (Source: FDA, "A Food Labeling Guide: Guidance for Industry" (Center for Food Safety and Applied Nutrition, n.d.), <https://www.fda.gov/media/81606/download>.)

c. The average consumer in the United States is estimated to read at grade level 7, but even those with higher educational attainment and literacy struggle to understand nutrition information conveyed on food packaging. (Sources: Tiffany M. Walsh and Teresa A. Volsko, "Readability Assessment of Internet-Based Consumer Health Information," *Respiratory Care* 53, no. 10 (October 2008): 1310–15; Russell L. Rothman et al., "Patient Understanding of Food Labels: The Role of Literacy and Numeracy," *American Journal of Preventive Medicine* 31, no. 5 (November 2006): 391–98, <https://doi.org/10.1016/j.amepre.2006.07.025>.)



- **Promotion of excessive, irresponsible, at-risk, or underage consumption of alcohol** (e.g., placement of alcohol products in television programs where the target audience includes a significant underage segment); misleading consumers with respect to the physical, psychological, or social effects or the safety of alcohol; or portraying moderation or abstinence from alcohol in a negative light.³²
- **Exploit the vulnerability of children and teens** by utilizing particularly influential strategies such as fantasy, adventure, fun, social pressure, licensed characters, celebrities, or sports heroes,³³ especially through methods and channels that exclude parental mediation or exceed their cognitive capacities to make healthful decisions.³⁴
- **Exacerbate health inequities** by disproportionately targeting messages and strategies, especially those promoting unhealthy products, at demographic groups that already unduly bear the physical, social, emotional, and financial burdens of obesity and diet-related diseases,³⁵ or that disproportionately experience food insecurity, or a lack of access to healthful foods.³⁶
- **Exacerbate social inequities** by perpetuating negative stereotypes via marketing, advertising, and PR messaging that is discriminatory based on race, ethnicity, gender identity, age, family or marital status, sexual orientation, religion, or any other categorization fundamental to a group or individual's identity.
- **Conduct appropriate, ethical, and sufficient market research** anytime new products, packaging, or marketing campaigns are developed. This assessment step is in addition to regular marketing and labeling assessments and is a proactive step to ensure continued alignment with the standard. The objectives are to:
 - **Adequately test consumer perceptions of proposed wording and imagery** among a new product's target demographics to prevent the perpetuation of misleading and inequitable marketing practices.
 - **Determine whether marketing and labeling efforts will convey true, understandable, and honest representations** of the new products, their contents, their origin and processing, and their nutritional and health values and will help consumers make informed choices according to their personal values.

3. INTEGRATE BY SETTING TARGETS & TAKING ACTION

SDG-aligned companies integrate the findings of their comprehensive assessment of marketing and labeling practices outlined in **Step 2** into business decisions, processes, and functions by **setting targets** and then **taking action** to align with the standard within set target dates.

3.1. SET TARGETS

SDG-aligned companies set specific, time-bound intermediate and long-term targets to establish responsible, equitable, and honest marketing and labeling practices and to contribute significantly to the achievement of the SDGs, especially SDGs 2, 3, and 10. The intermediate targets are relevant for the companies to monitor their and their business relationships' continuous improvement towards meeting the standard. Where possible, indicators measure outcomes rather than outputs or activities. These targets are tailored to the business activities of the companies and are based on their assessments of actual and potential impacts of their marketing and labeling practices. The following are some examples of performance indicators to track progress over time:

- By 2023, 75% of marketing to vulnerable groups promotes products that meet nutritional guidelines.
- By 2023, 100% of marketing to children and teens meets the standard.
- By 2025, 100% of packages and labels are updated to meet the standard.
- By 2030, 80% of annual marketing expenditures is spent on marketing messages consistent with the standard.

3.2. TAKE ACTION

Where an SDG-aligned company identifies instances of actual or potential marketing and labeling practices that are irresponsible, misleading, or inequitable it takes appropriate and swift action to cease them to align with the standard. Depending upon assessment findings, measures to align practices with the standard could include:

- **Remove health and nutrition claims that do not meet the FAO Codex Alimentarius³⁷** or national regulations from packaging. Where national laws do not exist, are not as stringent as, or conflict with the Codex Alimentarius, the company defers to the higher standard.



- **Remove misleading wording and images from packaging, including those that:**
 - **Conceal or distract from the true content, nutritional value, or processing of the product** or deliberately exploit consumers' desires for healthy and less processed foods. Examples of such misleading^d practices include:
 - **Exaggerating the minor presence of healthful ingredients** (e.g., labeling bread containing minor amounts of whole grains, but made primarily from refined flour as "multigrain" or naming the product "Grain & Seed Bread").³⁸
 - **Distorting the importance of minor or irrelevant nutritional properties** when the product does not meet core nutritional standards for the category, or in an effort to distract consumers from less healthful aspects of the product (e.g., Front-of-Pack (FOP) labeling of cereal that does not meet sugar and fiber nutritional standards with "Good source of Vitamin D" and "12 Vitamins & Minerals").³⁹
 - **Advertising food safety or processing practices and creating the illusion of superiority** when such practices are required by law (e.g., FOP labeling of chicken products with "no added hormones" when national regulatory agencies prohibit the addition of hormones to all chicken products).
 - **Creating the illusion of exclusivity of an inherent value of a food product** (e.g., FOP labeling peanut butter with "cholesterol free" when peanuts naturally do not contain cholesterol). In particular, the company does not use any claims or terminology related to the absence of gluten when a product is not third-party verified (i.e., "Certified Gluten-free"). This is especially important given the rising demand for such products, widespread misinformation about their healthfulness,⁴⁰ and the severe complications that can affect those with Celiac's disease from the consumption of trace amounts of gluten.⁴¹
 - **Touting the absence of ingredients with similar, negative nutritional qualities as included ingredients** (e.g., labeling foods with "no high-fructose corn syrup" when the product contains substantial amounts of other added sugars).
 - **Highlighting self-evident qualities**, especially of minor ingredients, in a manner that suggests products are less processed or otherwise more healthful than in actuality (e.g., "Made with real honey," "Made with real fruit juice").
 - **Utilizing incomplete comparisons** or claims (e.g., "25% less fat" without a comparator).⁴²
- **Mislead consumers** with respect to the origin, animal welfare, environmental, or social impacts of products. Examples of these practices include:
 - **Executorial "greenwashing"**⁴³ by displaying the term "green" or images or symbols evocative of nature (e.g., trees, leaves, fields) that might create false perceptions regarding the environmental impact of a company or its products. In particular, SDG-aligned companies do not label or market products that are the most environmentally taxing according to planetary health guidelines (e.g., red meats, dairy products, almonds) as "green choices" or environmentally friendly unless they substantiate the claim with a disclosure about the specific sustainable production practices that are in place that render a product sustainable relative to the others in their category (e.g., managed grazing, integrated crop-livestock systems, advanced irrigation methods).
 - **Misrepresenting the methods used to raise animals** in animal-based agriculture through images and/or wording (e.g., labeling eggs as "naturally-raised" and/or depicting images of hens on pasture on packaging despite the eggs coming from caged hens⁴⁴).
 - **"Fairwashing"** by misrepresenting social practices and creating false perceptions regarding the treatment of workers and communities in operations and value chains (e.g., labeling a product as "fair wage" when the company does not verify that workers and producers beyond the first tier of its supply chain are compensated with fair wages).⁴⁵
 - **"Originwashing"** by falsifying a product's origin information on packaging or marketing materials.⁴⁶ SDG-aligned companies ensure that any traceability and related sourcing claims (e.g., "responsibly sourced") utilized are honest and, in the case of the latter, accompanied by understandable explanations that can be easily located.

d. Here, "misleading" is considered in the context of the average consumer and the prominence of packaging statements. Even when substantiated in minor ways (e.g., placing fine print for potentially confusing or misleading claims in a different location on the packaging), these practices may still be considered exploitative of consumers with limited ability to navigate the overwhelming environment of modern food retail stores and the myriad of products they contain within time, attention, and mental energy parameters.



- **Borrowing legitimacy from established and recognized initiatives or certifications** by utilizing misleading or suggestive wording when the product does not meet such standards (e.g., labeling eggs with “Humanely Raised” in lettering that is reminiscent of the “Certified Humane” certification or the poultry industry-created label “One Health Certified” which is not aligned or associated with the WHO “One Health” initiative⁴⁷),⁴⁸
- **Mislead consumers** by promoting or not correcting extrapolation of the environmental benefits of products to health benefits (or vice versa) by, for example, combining two or more of the aforementioned misleading practices.^e
- **Remove or substantiate unregulated or underregulated terminology that consumers may associate with health and environmental benefits of products.** If such terminology is used in labeling or in marketing, they are substantiated by easily located, accompanying statements that qualify their meaning, and provide explicit details about how the product meets or exceeds nutritional standards or the ways in which it is environmentally beneficial or protects animal welfare. Examples of such terminology include:
 - Natural” or “All Natural.”⁴⁹
 - “Healthy” or derivative words (e.g., “Healthful,” “Healthier,” “Wholesome”).⁵⁰
 - “Eco-friendly”, “Green,” and “Sustainable.”⁵¹
- **Provide honest, clear, and understandable information** to help consumers make informed choices with regard to the nutrition, social impact, and environmental sustainability of products. This can be accomplished by:
 - **Using “Better-for-you” symbols** that clearly and easily indicate to consumers that products meet specific dietary guidelines, especially with regard to limiting added sugars, saturated fat, trans fat, and sodium, and/or containing nutrient-dense foods such as whole grains, fruits, and vegetables, and/or healthy proteins (i.e., seafood, legumes, nuts, seeds). These symbols are implemented in conjunction with multi-stakeholder, established national initiatives, or developed as an internal marketing tool. In all cases, the nutrition standards the symbols signify are based on well-developed, substantiated, peer-reviewed scientific literature, and align with national dietary guidelines.
 - **“Better-for-you” symbols can be implemented for products that have been reformulated to meet nutritional guidelines but only in ethical and transparent ways.** SDG-aligned companies avoid utilizing “better-for-you” symbols on reformulations that do not improve product healthfulness (e.g., utilizing “low sugar” symbols after substituting sugar with artificial sweeteners).
- **“Better-for-you” symbols are developed or utilized when nutrient-based** (e.g., utilizing red, yellow, and green colors to indicate whether a product meets nutrient categories such as saturated fat, fiber, sugar, etc.) and not for summary indicators (i.e., a pooled index that provides one numerical or letter “grade” to the product).
- **“Better-for-you” symbols are not used to highlight specific nutrients, ingredients or products** without providing transparent and clear information regarding the negative nutritional aspects of the others.⁵² Instead, these symbols are used to convey aspects of healthfulness and unhealthfulness across all products in a company’s portfolio.
- **Implementing “better-for-the-planet/environment” symbols** for products that meet planetary health guidelines and are produced in a manner that meets all of the environmental standards included in this document with symbols that clearly and easily signify to consumers that the products meet these standards. These can be developed in conjunction with third-party experts or authoritative organizations and are substantiated with easily located, accessible information on how environmental standards are met.
- **Providing context for how food products fit into a healthy dietary pattern** by including statements on packaging or in marketing materials that distinguish “everyday” from “occasional” foods if products exceed nutritional standards (e.g., exceed added sugar or sodium contents) or provide a reference for how the food fits into dietary guidelines (e.g., category of MyPlate).
- **Providing accessible nutrition information online**⁵³ for all products to aid consumers in making informed choices prior to purchase and outside of the retail environment.

e. Research has shown, for example, that consumers conflate marketed environmental benefits with increased healthfulness and nutrition of food products. (Sources: Thomas J. L. van Rompay, Florian Deterink, and Anna Fenko, “Healthy Package, Healthy Product? Effects of Packaging Design as a Function of Purchase Setting,” *Food Quality and Preference* 53 (October 1, 2016): 84–89, <https://doi.org/10.1016/j.foodqual.2016.06.001>.)



- **Alter marketing practices to protect vulnerable populations.** This can be accomplished by:
 - **Refraining from marketing foods that do not meet strict, category-specific/food-based nutritional guidelines** for calories, saturated fat, sodium, whole grains, fruit and vegetable content, and micronutrients^f or foods that qualify as processed and ultra-processed by established international standards^g to children and teens^h through all channels^h and strategies^h including, but not limited to: television, radio, and print; company websitesⁱ and internet advertisements on third party websites; mobile phone apps or games, text messaging/SMS messaging, and push notifications, including location-based notifications; social media platforms and influencer marketing; product placement in television shows, movies, video games, or computer games; use of licensed characters (e.g., cartoon characters from animated films and television programs), fantasy, celebrities, or sports stars to promote such products; use of toys or other incentives for purchase or consumption; placements of company branding (i.e., logos, slogans) on children's merchandise including clothing, books, toys, dishware, etc.; child-care or school-based marketing including banners, branded school supplies, free samples, bus advertisements, sports team sponsorships, etc.
 - **Refraining from marketing that exploits children and teens** or parent-child relationships through suggestive tactics, such as:
 - **Portraying parents or other caregivers in a negative light** for not allowing purchase or consumption of low-nutrition foods or promoting rebellious behavior in order to secure their purchase.
 - **Suggesting that purchase or consumption of a product conveys greater social acceptance**, or physical or psychological benefits, or, conversely, that abstaining from products will diminish the same attributes.
 - **Engaging in responsible marketing of healthy products^j** in the context of healthy lifestyle choices, such as:
 - **Promoting healthy lifestyle habits and dietary patterns in marketing materials of products that meet nutritional standards** (e.g., the portrayal of characters on packaging engaging in physical activity; portrayal of professional athletes consuming water or low-sugar beverages to quench their thirst).
 - **Portrayal of parents or caregivers with children in a positive light**, and consuming products that meet nutritional guidelines together.
 - **Portrayal of foods in age-appropriate portion sizes** and in the context of balanced meals consistent with national dietary guidelines.
 - **Altering marketing practices to promote equity, diversity, and inclusion.** This can be accomplished by:
 - **Ensuring that marketing of products is equitable across demographic groups**, and does not disproportionately market products that do not meet nutritional guidelines to ethnic minorities, low-income populations, developing nations, and other demographic groups where health disparities exist with regard to obesity, overweight, diet-related chronic disease, undernutrition, and food insecurity.
 - **Acknowledging a shared responsibility for public health ramifications** of the consumption of relevant products⁵⁶ and working to correct health disparities by creating and disseminating marketing messages that promote healthful products and depict dietary choices consistent with national guidelines.
 - **Refraining from practices that exploit economic or social disadvantages** of vulnerable population groups, especially those that already suffer from a lack of access to adequate, safe, and nutritious food.⁵⁷ These practices include aggressive and/or misleading sales and marketing of unhealthy products as convenient and nutritious options in their communities.
- f. When determining if a product meets nutritional standards, SDG-aligned companies reference the two following two sets of standards and utilize the more stringent of the two for a comparable serving size: WHO, "WHO Regional Office for Europe Nutrient Profile Model," 2015, https://www.euro.who.int/__data/assets/pdf_file/0005/270716/Nutrient-children_web-new.pdf; BBB National Programs, "CFBAI Category-Specific Uniform Nutrition Criteria, 2nd Ed.," January 1, 2020, https://bbbnp-bbbp-stf-use1-01.s3.amazonaws.com/docs/default-source/cfbaifcfbai-revised_criteria_chart_1-28-2019.pdf?sfvrsn=c31ce512_2.
- g. Full details for determining foods that are processed or ultra-processed can be found in: PAHO, "Pan American Health Organization Nutrient Profile Model," 2016, https://iris.paho.org/bitstream/handle/10665.2/18621/9789275118733_eng.pdf?sequence=9&isAllowed=y.
- h. A marketing channel is encompassed here when children under the age of 18 constitute 25% or more of the audience. (Source: Access to Nutrition Initiative, "Global Access to Nutrition Index 2021 Methodology.")
- i. SDG-aligned companies embrace strategies and tools to limit children's access to marketing of unhealthful foods such as designing websites and digital media presences to be adult-oriented and not attractive to kids and teens (e.g., avoiding the use of characters or vibrant and cartoon-like animations) and pop-ups that ask for year of birth or parental consent before entrance. (Source: Access to Nutrition Initiative, "Global Access to Nutrition Index 2021 Methodology.")
- j. Products marketed in these ways must still meet nutritional standards in order for a company's marketing to meet the standard. SDG-aligned companies avoid justifying the marketing of unhealthful foods to target audiences, especially children, under the guise that unhealthful foods can be consumed as "part of a healthy lifestyle," "part of a balanced diet," or offset with physical activity. Indeed, depicting unhealthful foods as part of a healthy lifestyle or represented by physically-fit individuals (e.g., athletes drinking sugar-sweetened beverages) creates mixed messages and, among children and teens unable to cognitively evaluate these messages, may promote the idea that consumption of such foods may actually lead to greater health and social status. As previously mentioned, the companies also avoid deceitful reformulation of products (e.g., substituting artificial sweeteners for sugars) in an attempt to "meet" nutritional standards and continue marketing unhealthful foods to children.



- **Contributing to improving access to adequate nutrition** through the development and marketing of products tailored to local or regional needs, including fortified and shelf-stable foods that can mitigate micronutrient deficiencies and reduce nutrition inequities (e.g., iron-fortified, high protein porridge flakes marketed in Sub-Saharan Africa⁵⁸),⁵⁹
- **Actively challenging stereotypes and promoting inclusivity** by representing diversity of race, national origin, ethnicity, sexual orientation, marital status, gender expression, family structure, and other identities in marketing campaigns and materials.⁶⁰ In particular, SDG-aligned companies tailor imagery and messaging to portray diversity when targeting international markets rather than assuming those of its home market will suffice.
- **Altering in-store and point-of-sale marketing practices**, in conjunction with retail management and other actors, including:
 - Reserving end-cap and eye-level shelf placements for products that meet nutritional, environmental, and social standards while placing those that do not on higher shelf-space. In particular, SDG-aligned companies remove products targeted at children that do not meet nutritional standards and the responsible marketing principles in this standard from low and middle shelf placements to promote parental agency and intervention in decisions.⁶¹
 - **Dedicating store promotions, sales, and special displays to products that meet nutritional, environmental, and social standards** rather than those that do not.
- **Monitor affiliate advertising, PR messaging, and unpaid promotion**, as well as public discourse and sentiment pertaining to products and activities, especially on social media and online platforms and through functions such as tagging and hashtags.
- **Where misinformation or inaccurate representation of their products or their benefits is identified, attempts are made to correct this** through appropriate measures that avoid infringing on the rights to free speech and expression. Such measures include making substantiated rebuttals to false or misleading statements regarding its products without bribing or coercing creators to alter them against their will.⁶²
- **Where a company has maintained a business relationship that has resulted in misrepresentation or false promotion** of products and their benefits, the company engages with the relationship to correct such practices. If repeated or not corrected in an appropriate time frame, the relationship is terminated.
- **Using leverage and constructively engaging with governments, civil society, and peer companies, including through multi-stakeholder initiatives**, to help protect consumers across the food manufacturing industry and broader ecosystem. This includes:
 - **Advocacy for policy changes** that: promote responsible, equitable, and honest practices; prohibit misleading wording and images in marketing and labeling; and prohibit unethical marketing practices that exploit children, teens, and other vulnerable populations (e.g., legislation that prohibits the marketing of unhealthy products in schools).
 - **Refraining from practices** to influence policymaking (e.g., lobbying, manipulation of science, financial incentives that sway policymakers) that undermine public health measures and/or interfere with policy changes that restrict misleading or exploitative marketing and labeling practices, or prohibit corporations from attempting to shift responsibility for the health consequences of products onto consumers.⁶³
 - **Funding or promoting age-appropriate educational initiatives (i.e., media literacy programs) and social marketing campaigns** that help consumers scrutinize food marketing and make healthy food choices, or that support parents to mitigate the influence of persuasive marketing of unhealthy foods on their children and reinforce healthy eating patterns. Such programs acknowledge that public health and nutrition are a shared responsibility⁶⁴ and do not shift responsibility solely onto consumers. The programs are developed in conjunction with third-party experts and aligned with national or international dietary guidelines. Outcomes of the programs are third-party verified and evaluated, and product placement or branding are excluded from program materials and delivery.⁶⁵
 - **Participating in the development and standardization of FOP symbols** that communicate to consumers that products meet established nutrition, environmental, and social standards (e.g., UK traffic light symbol) and related efforts that encourage industry peers to innovate and create healthier products to obtain the right to use such symbols.⁶⁶



4. ESTABLISH AND PARTICIPATE IN EFFECTIVE GRIEVANCE MECHANISMS & PROVIDE OR ENABLE REMEDY

4.1. ESTABLISH GRIEVANCE MECHANISMS

SDG-aligned companies establish effective grievance mechanisms that are accessible to stakeholders to report irresponsible, misleading, or inequitable marketing and labeling practices. The grievance mechanisms evaluate violations of the standard and determine the appropriate remedy for impacts on consumers and communities.

4.2. COOPERATE IN STATE-BASED GRIEVANCE MECHANISMS

SDG-aligned companies commit to respectful, equitable, and transparent cooperation with judicial grievance and remediation processes, where relevant. The company refrains from using legal waivers that preclude access to judicial recourse for victims. Where State-based mechanisms order sanctions or remedy, the company complies and uses leverage to ensure its business relationships comply.

4.3. PROVIDE OR ENABLE REMEDY

When companies identify that they have, even inadvertently, contributed to harm by marketing and labeling products in irresponsible, misleading, or inequitable ways or have, through deliberate omission or inaction, allowed the false or misleading promotion of their products to occur (e.g., through social media trends or third parties with no company counter statements), they acknowledge their part in the harm done and provide for or cooperate in remediation through legitimate processes.

Any measures to provide, contribute to, or enable remedy are designed in partnership with those impacted and through expert consultation. Remedies for harm done may include issuing public statements to correct false claims or inaccurate portrayals; funding of health promotion, social, or environmental programs (e.g., pediatric nutritional education program, diabetes lifestyle prevention program) for communities impacted; and compensating individuals harmed by marketing or labeling practices that do not meet the standard (e.g., compensation for medical costs incurred by an individual with Celiac disease who consumed a product labeled “gluten-free” which was not gluten-free).

5. TRACK PERFORMANCE

SDG-aligned companies track the implementation of measures to meet the standard within their target dates through qualitative and/or quantitative outcome-based performance indicators on an ongoing basis and in partnership with affected stakeholders, qualified independent professionals, retailers, external marketing agencies, affiliates, and other relevant actors in their value chain. The following are some examples of performance indicators to track implementation of measures to market and label responsibly, equitably, and honestly:

- Ratio of marketing expenditures spent on marketing products that meet nutritional standards to products that do not.
- Percentage of marketing expenditures related to marketing messages consistent with the standard (e.g., consistent with healthy lifestyle choices, nutritional and planetary dietary guidelines, accurate portrayal of environmental and social impact of different food categories).
- Percentage of packages updated with labeling, including wording and images, that aligns with the standard with respect to nutrition, environmental, and social impacts.
- Percentage of surveyed consumers who accurately understand products’ nutrition, environmental, or social impacts.
- Number of changes made to the company’s marketing or labeling practices based on focus group findings and international standards on responsible Food and Beverage marketing communications.
- Percentage of total marketing to children that meets the standard.
- Percentage of marketing directed at ethnic minorities, low-income populations, and other vulnerable demographic groups.
 - Percentage of marketing aimed at these groups that promotes products that meet nutritional standards.
- Percentage of surveyed consumers who rate marketing as inclusive, diverse, or challenging of stereotypes.
- Number of reported incidents of misleading, irresponsible, or inequitable marketing or PR management.
 - Changes to marketing and PR management practices based on these reports.



6. DISCLOSE PERFORMANCE

To enable transparency and accountability, SDG-aligned companies communicate publicly on their performance against their marketing and labeling commitment and targets, particularly when concerns are raised by or on behalf of affected stakeholders. Where relevant, SDG-aligned companies also share aggregate data and high-level findings directly with affected stakeholders and organizations, including human rights organizations and researchers.

Regular public disclosure is accurate, clear, accessible, and third-party verified information about the actual and potential related to their marketing and labeling practices, their efforts to address these to implement their policy commitment, and performance against targets. Disclosure includes sufficient information to evaluate the adequacy of the company's approach and activities. Formal disclosure includes information on the following:

- **Findings of the marketing and labeling assessment**, including specific marketing and labeling messages and strategies that were found to be irresponsible, unethical, or misleading. Companies also disclose how they arrived at the results of this assessment, including any expert involvement and the results of any research conducted to understand consumer perceptions of products through marketing and labeling efforts.
- **Measures undertaken during the reporting period to transition their marketing and labeling practices.** This includes information on changes in marketing strategies, target audiences, and messaging as well as alterations to label images, wording, and design.
- **Measures undertaken during the reporting period to protect children, teens, and vulnerable populations** from exploitation in their marketing efforts. If marketing to these segments, SDG-aligned companies disclose the specific marketing activities and expenditures related to these segments during the reporting period.
- **Any measures that were undertaken in partnership with industry partners, civil society organizations, multi-stakeholder groups, governments, and other stakeholders** to address irresponsible, inequitable, and misleading marketing and labeling or to standardize labeling of nutrition, environmental, or social benefits in the food sector (e.g., policy change advocacy).
- **Progress on relevant performance indicators, even when progress is not as good as expected and the targets set are not met.** When companies fail to meet their own targets, they disclose key learnings and delineate how they are modifying their strategy and efforts to still achieve intermediate and long-term targets to align their practices with the SDGs and market and label their products responsibly and honestly with regards to nutrition, environmental, and social dimensions.
- **Any instances where irresponsible, inequitable, or misleading marketing or labeling was identified**, specifying how the instance was identified, what elements of the standards were violated, and steps that were taken to both remedy the situation and prevent further such instances from occurring, including changes to its marketing and labeling policies and practices.



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