

ASAS Advisory on Children's Code for Advertising Food and Beverage Products Interpretative Guidelines

Background

These guidelines are intended to help the Advertising Standards Authority of Singapore (ASAS), as well as marketers and their agencies, to interpret the rules in the Code. They neither constitute new rules nor bind ASAS in the event of a complaint about a marketing communication in relation to the Code. Final decisions on any complaint that require interpretation of the Code rest with the ASAS Council.

In addition to the specific guidance provided in this document, marketing communications should at all times reflect not just the letter of the Code but also its spirit.

Definitions

Paragraph 2.1(d) (ii): *Marketing communications that constitute ordinary display in store/ at point of sale are excluded from the scope of the Code*

“Ordinary display in store/ at point of sale” should be understood to mean:

- Marketing communications that are located within the actual premises of the store/ restaurant or along its frontage, including but not limited to, pallets and point of sale materials, the display of products on shelves, at checkouts or in the aisles of the store; menu boards, tray mats, posters, flyers, table stickers, hanging mobiles, standees, tent cards and TV screens. Where the store/ restaurant consists of outdoor areas or drive-throughs, “ordinary display in store/ at point of sale” shall include display of products within such outdoor area or along its frontage and along the drive-through route. With regard to cinemas, “ordinary display in store/ at point of sale” shall mean the entire premises of the establishment.

The following should not be considered part of “ordinary display”:

- Any retail points that are located outside of the store or restaurant premises (e.g. pop-up stores, exhibition booths, mobile brand experience platforms); flyers or pamphlets distributed outside the store or restaurant premises (e.g. by staff or paid promoters, or at third-party venues).

Paragraph 2.1(d) (iii): *Sponsorship, where this only entails the use of the sponsor's name and or trademark, is excluded from the scope of the Code*

- This means that marketing communications related to a sponsorship agreement are only covered by the Code if such communications feature product names/ images, as opposed to corporate or brand names or logos.

Guidelines

Paragraph 3.1: *All food and beverage products promoted in marketing communications that are targeted primarily at children in any media must meet the Common Nutrition Criteria endorsed by the HPB*

- “Targeted primarily at children” should be interpreted as set out in Paragraph 2.1(e), i.e.: *“marketing communications which [...] having regard to their placement, as well as to the theme, visuals and language used, are targeted primarily at children”*. In practice this shall mean compliance with the guidelines for placement and content set out under points 1 and 2 below.
- Any advertiser wishing to place marketing communications in children’s schedules (see Appendix A) on television, print media, radio, cinema, third party internet websites with a .sg domain and outdoor supports (billboards) will need to complete the Nutrition Criteria Compliance Certificate provided in Appendix B to these Interpretative Guidelines and supply the media owner with the completed certificate. For any food or beverage marketing communication that is not accompanied by a duly completed Nutrition Criteria Compliance Certificate, the media owner should assume that the product does not meet the Common Nutrition Criteria and ensure that the marketing communication is not placed in media primarily targeted at children, as set out below. The completion of the Certificate shall not be required for brand advertising, i.e. marketing communications for a brand only that does not feature specific products.

1. Advertising placement guidelines:

- **Free-to-air TV:** Please see Schedule A for the current list of child-dedicated children’s programming hours applicable for the purposes of the Code.

The list will be updated by the ASAS, in consultation with the Media Development Authority and the media owners, as and when TV channels and/ or their children’s programming schedules change significantly.

- **Print media:** Please see Schedule B for the current list of print media that specifically target children.

The list will be updated by the ASAS, in consultation with the Media Development Authority of Singapore and publishers. In cases where a publication does not feature on the list but the marketer/ ASAS believes that it may be specifically targeted primarily at children, the marketer/ ASAS should come to a determination based on available evidence about the target audience of the publication, which should be provided by the publisher.

- **Subscription TV:** Please see Schedule C for the current list of children’s subscription channels. Media owners are required to communicate to their content providers the food and beverage marketing restrictions applicable to these channels in Singapore.

- **Radio:** Please see Schedule D for the current list of child-dedicated children’s radio programming hours applicable for the purposes of the Code.

The list will be updated by the ASAS, in consultation with the Media Development Authority and the media owners, as and when radio channels and/ or their children’s programming schedules change significantly.

- **Cinema:** Marketing communications for products that do not meet the common nutrition criteria shall not be placed in or around films that are both rated “G” shown in Singapore cinemas and are targeted primarily at children to be established by criteria under point 2 below.

Should a cinema owner accept an advertisement booking in relation to a specific movie before the Media Development Authority of Singapore has given the film a local rating, the cinema owner shall not be held responsible for non-compliance with the Code.

- **Internet – third-party websites:** Only .sg websites that are targeted primarily at children are covered by the Code. Please see Schedule E for examples of .sg websites targeted primarily at children.

In cases where a marketer/ the ASAS believes that a website may be targeted primarily at children, the marketer/ ASAS should come to a determination based on available evidence about the target audience of the website, which should be provided by the publisher.

- **Outdoor advertising (billboards):** There should not be any fixed outdoor advertising within 50 metres of a primary school. Fixed outdoor advertising shall be marketing communications displayed on fixed outdoor billboards and bus shelters. This does not apply to fixed outdoor billboards and bus shelters within the vicinity of a shopping complex, supermarket, bus interchange or MRT station provided that the fixed outdoor advertising is not targeted primarily at children. A “Primary School” shall be defined as any primary school that is organised and conducted directly by the Singapore Government, or any primary school in receipt of grant-in-aid under the Education Act. Please see Schedule F for the current list of primary schools.
- **Any other media, including company-owned websites and interactive mobile applications:** See content criteria below.

2. **Advertising Content (theme, language and visuals used) guidelines:** In combination with the placement criteria set out above, marketing communications within the scope of the Code should be deemed to be targeted primarily at children if they:

- **Use licensed characters (i.e. characters acquired externally, linked to movies/ entertainment) or movie tie-ins that are targeted primarily at an audience up to the age of 12 to endorse food or beverage products:** Criteria to define whether a licensed character or movie tie-in are targeted primarily at children will include consideration of the primary target audience as indicated by the licence owner and whether the character appears in a TV show, film or game that independent data show to be primarily appealing to children up to the age of 12. Independent film ratings and primary target audience for the sake of licensing should be considered in determining whether a movie is targeted primarily at children up to the age of 12. However, the use of animation in and by itself should not be seen as a sufficient criterion to determine that a marketing communication is targeted primarily at children, since animation can also be designed to appeal to adults and/ or teenagers. Merely featuring the licensed characters alongside food or

beverage products does not constitute endorsement by such licensed characters.

- **Use games (including interactive games) or contests that are targeted primarily at an audience up to the age of 12 to promote food or beverage products:** To determine if a game or contest is targeted primarily at children, a variety of criteria should be assessed, including the content, language, level of difficulty, characters, references and any age restrictions.
 - **Use toys in marketing communications to promote food or beverage products:** This does not apply to toys that are an inherent part of the product. Equally, the definition of toys should not extend to inserts or premiums that are designed for the purpose of promoting education or physical exercise, nor to toys intended as collectibles for an older audience.
 - **Overall creative execution - use of language/ text/ visuals that are clearly intended to make the marketing communication targeted primarily at children:** To establish if the overall creative execution is designed to be targeted primarily at children up to the age of 12, a variety of criteria must be taken into account including content, language, use of child-targeted animation and music, characters, references and any age restrictions.
- The above criteria should be used in conjunction with each other in order to come to an overall determination of whether the marketing communication in question is targeted primarily at children.
 - **N.B.** The use of brand equity characters is out of scope of the Code. The mere portrayal of children in a marketing communication does not imply that the communication is targeted primarily at children. It should be emphasised that a product with a special appeal for children can never in itself be regarded as marketing.

Appendix A - Interpretative Guideline Schedules

Schedule A (Free-to-Air Television)

Updated 1 May 2019

Channel	Programming hours	Children's programming hours
Channel 5	24 hours	Mon – Sun: 6.00am – 12.00pm 3.00pm – 6.00pm
Channel 8	24 hours	Mon – Fri: 2.00pm – 2.30pm Sat & Sun: 9.00am – 11.00am
Suria	Mon – Fri: 4.00pm – 12.00am Sat: 3.00pm – 12.00am Sun: 10.00am – 12.00am	Mon – Sun: 6.00pm – 6.30pm Fri: 8.30pm – 9.00pm
Vasantham	Mon – Thurs: 3.00pm – 12.00am Fri: 3.00pm – 12.30am Sat: 1.00pm – 12.30am Sun: 1.00pm – 12.00am	Fri: 7.00pm – 8.00pm
Channel U	Mon – Fri: 3.00pm – 2.30am Sat & Sun: 10.00am - 2.30am	Nil

Schedule B (Print)

Updated 1 May 2019

	Publication title	Publisher name
1.	Hao Peng You	Chee Sze Poh Press Pte Ltd
2.	Zhi Shi Bao	Chee Sze Poh Press Pte Ltd
3.	Zhi Shi Hua Bao	Chee Sze Poh Press Pte Ltd
4.	Science Adventures	English Corner Publishing Pte Ltd
5.	Bug News	Ikano Pte Ltd
6.	Bug News Lite	Ikano Pte Ltd
7.	Singapore's Child	Key Editions Pte Ltd
8.	What's Up – News for Kids	News for Kids
9.	Xobon	Nimbus Design Consultants
10.	Wild Animal Baby	Nurture Craft Pte Ltd
11.	Buzz Tinkle Friend	Singapore Children's Society
12.	Thumbs Up Junior	Singapore Press Holdings Limited
13.	Thumbs Up Little Junior	Singapore Press Holdings Limited
14.	YP Preschool Guide	SPH Magazines Pte Ltd
15.	The Kidz Parade	Zettabyte Minds Pte Ltd
16.	Majalah Riang Ria	EDN Media Pte Ltd
17.	Panda Junior	WWF Singapore
18.	E Booster	Young Scientists Pte Ltd
19.	Junior Young Scientists	Young Scientists Pte Ltd
20.	The Young Scientists Level 1	Young Scientists Pte Ltd
21.	The Young Scientists Level 2	Young Scientists Pte Ltd
22.	The Young Scientists Level 3	Young Scientists Pte Ltd
23.	The Young Scientists Level 4	Young Scientists Pte Ltd
24.	Xiao Xiao Ke Xue Jia (Di Yi Ji)	Young Scientists Pte Ltd
25.	Xiao Xiao Ke Xue Jia (Di Er Ji)	Young Scientists Pte Ltd
26.	Xiao Xiao Ke Xue Jia (Di San Ji)	Young Scientists Pte Ltd

Schedule C (Subscription Television)

Updated September 26, 2014

List of children's channels for subscription television:

www.singtel.com

www.starhub.com

Schedule D (Radio)

Updated September 26, 2014

Station	Broadcasting hours	Children's broadcasting hours	
Capital 95.8FM	24 hours	Mon-Fri:	8.30pm – 9pm

Schedule E (Internet)

Updated September 26, 2014

www.home.disney.com.sg

www.toysrus.com.sg

www.toyshunt.com.sg

www.zoo.com.sg/kidzworld

Schedule F (Outdoor Advertising)

Updated September 26, 2014

List of primary schools in Singapore:

www.moe.gov.sg

Appendix B1 – Nutrition Criteria Compliance Certificate

Singapore Code of Advertising Practice Children's Code for Advertising Food and Beverage Products Nutrition Criteria Compliance Certificate

This Certificate is to be completed and signed by an authorised person on behalf of a brand owner wishing to place, as of 1 January 2015, food or non-alcoholic beverage product marketing communications in the Singapore media, as defined by the Singapore Code of Advertising Practice on Children's Code for Advertising Food and Beverage Products [http://asas.org.sg/Portals/0/Images/ASAS/news/Children_Code/Children-_Code_for_Advertising_Food_and_Beverage_Products.pdf].

***Note: Please complete Appendix B2 if your product falls under Category 8 (Meals).**

By signing this Certificate, the advertiser certifies that the food or beverage product to be advertised meets the Common Nutrition Criteria (CNC) underpinning the Code [http://asas.org.sg/Portals/0/Images/ASAS/news/Children_Code/Common_Nutrition_Criteria_White_Paper.pdf] and can be advertised to children, as defined in the Code and accompanying Interpretative Guidelines.

COMPANY	
FOOD OR NON-ALCOHOLIC BEVERAGE PRODUCT	
CAMPAIGN (*not mandatory)	

PRODUCT CATEGORY (Indicate Category as defined in Common Nutrition Criteria)					
	Energy (kcal/portion]	Sodium (mg/100g or ml)	Saturated fat (g/100g or ml)	Total sugars (g/100g or ml)	Components to encourage (g/100g or ml)
Nutrient values					

NAME:	DATE:
TITLE:	SIGNATURE:

Appendix B2 – Nutrition Criteria Compliance Certificate

Singapore Code of Advertising Practice Children's Code for Advertising Food and Beverage Products Nutrition Criteria Compliance Certificate

This Certificate is to be completed and signed by an authorised person on behalf of a brand owner wishing to place, as of 1 January 2015, food or non-alcoholic beverage product marketing communications in the Singapore media, as defined by the Singapore Code of Advertising Practice on Children's Code for Advertising Food and Beverage Products [http://asas.org.sg/Portals/0/Images/ASAS/news/Children_Code/Children-_Code_for_Advertising_Food_and_Beverage_Products.pdf].

***Note: Please complete this form ONLY if your product falls under Category 8 (Meals).**

By signing this Certificate, the advertiser certifies that the food or beverage product to be advertised meets the Common Nutrition Criteria (CNC) underpinning the Code [http://asas.org.sg/Portals/0/Images/ASAS/news/Children_Code/Common_Nutrition_Criteria_White_Paper.pdf] and can be advertised to children, as defined in the Code and accompanying Interpretative Guidelines.

COMPANY	
FOOD OR NON-ALCOHOLIC BEVERAGE PRODUCT	
CAMPAIGN (*not mandatory)	

PRODUCT CATEGORY (Indicate Category as defined in Common Nutrition Criteria)					
	Energy (kcal/meal]	Sodium (mg/meal)	Saturated fat (% kcal)	Total sugars (g/meal)	Components to encourage (serving*/meal)
Nutrient values					

***Please refer to Common Nutrition White Paper for details**

NAME:	DATE:
TITLE:	SIGNATURE: