Advertisement and Children: Global Comparative of the Legislation and Self-Regulation
CONAR - National Council of Advertisement Self-Regulation

Founding Body
ABA – Brazilian Association of Announcers
ABAP – Brazilian Association of Advertising Agencies
ABERT – Brazilian Association of Radio and Television
ANER – National Association of Magazine Editors
ANJ – National Association of Newspapers
Central de Outdoor

Body Acceding
ABTA – Brazilian Association of Paid Television
FENEEC – National Federation of Cinematographic Companies
IAB – Interactive Advertising Bureau Brazil
Advertisement and Children: Global Comparative of the Legislation and Self-Regulation

Comparative study of Legal Rules, of Self-Regulation and Codes of Conduct by sectors ("pledges") applicable to the advertising of products and service targeted to children in 18 markets around the world.

Coordinated by ABA – Brazilian Association of Announcers, and the collaboration of WFA – World Federation of Advertisers and EASA – European Advertising Standards Alliance

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Preamble

This study will use the expression "children's publicity" to talk about its object. However, the indiscriminate use of this expression is not technically correct. It was chosen to make the reading easier, avoiding the terminology "children's advertising", "advertisement targeted to children" or, as CONAR Brazil prefers, "advertisement of products and service targeted to children".

18 relevant markets have been researched: United States, United Kingdom, France, Germany, Italy, Spain, Portugal, Sweden, Norway, Greece, Russia, Canada, Chile, Peru, Mexico, India, China and Australia. Besides the national rules, the study comprehended European Union directives applicable to all the 27 member states.

The coordinator, Rafael Sampaio, with vast experience in the areas of advertising, marketing and consumption, is Vice President of ABA – Brazilian Association of Announcers and represents it in the WFA Executive Committee – International Federation of Announcers, based in Brussels (Belgium).
Brazil has a harmonious mixed system of advertisement control that blends legislation, self-regulation and codes of conduct by sectors.

As for the children’s audience, this system imposes limitations and control that are even stricter than the other countries researched in this study.

The Brazilian system is supported by the general determinations of CDC – Consumer’s Code of Defense that represses abuse in commercials against children, understood as people until 12 years of age, according to the definition of ECA- Statute of the Child and the Adolescent.

Brazil is also supported by the Brazilian Code of Advertisement Self-Regulation, administered by CONAR – National Council of Advertisement self-Regulation, with specific rules (Articles 33 and 37) and others directed to specific categories of products (for example: Attachments “H” and “P”) applicable both for children and adolescents.

CONAR’s provisions, updated in 2013, included, disapprove merchandising in any means of communication of product/service targeted to children.

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1. According to the ranking of Advertising Expenditure of Zenith Forecast in 2012, Brazil is in the 6th place in volume of investments in advertising in the world.
2. Law n° 8075/90, art. 37 § 2nd
3. Law n° 8.069/90
5. Revision of provision in section 11 – Children and Youngsters of the Brazilian Code of Advertisement Self-regulation. This code condemns the action of merchandising or indirect publicity that hires children, elements of the children’s universe or other artifices with the objective to grab the attention of this specific audience, no matter which vehicle used. In the segmented contents, created, produced or programmed specifically for the children’s audience, whatever the vehicle used, the advertising of
This restriction is only paralleled in the United Kingdom, with a legal norm, and in Australia, by self-regulation, but only in relation to the means of TV and about the airing of certain products.

Recently incorporated in the Brazilian self-regulation, the ethics norm about merchandising, submitted the activity to a rigor that didn’t reach the three countries that stood out in the present study, as those with more rigorous control: United Kingdom, Spain and Sweden, in their general aspects.

There is, in Brazil, one more element in the control system chain, at the initiative of the food and non alcoholic drinks industry, through a public commitment signed in the Brazilian Association of Announcers (ABA) and the Brazilian Association of Food Industry (ABIA) by 23 big companies of these sectors, about advertisement and children. The document is similar to other “pledges” already practiced in the European Union, the United States and some other countries.

products and services targeted exclusively to this audience, will be restricted to breaks and commercial spaces. 5- For the evaluation of the compliance of the merchandising actions or indirect publicity hired in the provisions of this Section, it will be taken into consideration that: a. the target audience is adults; b. the product or service is not announced with the intention to be consumed by children; c. languages, images, sounds and other artifacts don’t have the goal to raise children’s curiosity or attention. 6. Ranking mentioned: 5th place 7. Ranking mentioned: 8th 8. Ranking mentioned: 13th 9. Ranking mentioned: 1st
Under this perspective, for the protection of children against abusive advertisement, it can be said that, in Brazil, the set of current legal norms and volunteer puts the country on the same level of United Kingdom and above the United States and European Union.

The study shows that the prohibition (ban) is not the rule and happens only in one of the ten provinces of Canada\textsuperscript{10}, in Quebec, that adopted the banning three decades ago for the airings originated there. In Sweden the commercials are forbidden on the open TV. In Chile and Peru, some advertisements of some food and drinks are forbidden. In Greece, the advertisements of toys can only be announced on the open TV in adult time.

Countries with high population, like China\textsuperscript{11} and India\textsuperscript{12}, don’t have a specific legislation about children’s publicity and their markets are disciplined by generic self-regulating codes (AR), that don’t have chapters destined to the issue covered in this analysis.

There isn’t legislation in the United States either. There, the self-regulation mechanisms are practiced, like the famous Children’s Advertising Review Unit (CARU), and more recently, the mentioned pledge, whose utilization is being discussed by a work group in the White House, leaded by the first lady Michelle Obama.

\textsuperscript{10} Ranking mentioned: 9th
\textsuperscript{11} Ranking mentioned: 3rd
\textsuperscript{12} Ranking mentioned: 14th
In 2010, another work group, by request of the American Congress by four regulating agencies – the Center for Disease Control and Prevention (CDC), a Federal Trade Commission (FTC), a Food and Drug Administration (FDA) and the U.S Department of Agriculture (USDA) – concluded that there was need to have a law over the advertisement of food in general and that the self-regulation\(^{13}\) should be stimulated.

Brazil has a harmonious limitation system and advertisement targeted to children’s control that is among the most restricted in the world.

In the case of the European Union, there are no specific transactional norms about the subject, but only a directive of audio visual services for television (Audiovisual Media Services Directive, from 10/3/2010), that stimulates the existence of national laws, self-regulation codes and conduct\(^{14}\).

In the United Kingdom, the system of advertising self-regulation, carried out by ASA, coexists with an official regulation run by Ofcom – Office of Communication, independent regulating body for electronic communication. There are some restrictive predictions adopted by Ofcom, whose determinations are mandatory for what is regulated. As for the theme of the study, the British advertising is guided primarily by the self-regulating rules.

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13. Jon Leibowitz’ letter, chairman of FTC – Federal Trade Commission, published on the online edition of Wall Street Journal on 30.4.12: “The FTC has ‘never called for – or even hinted’ support for – congressional action on food advertising to children.” He goes on saying “the argument that the industry is under threat of mandatory regulations has been run into the sand (…). The commission does not support legislation restricting food advertising for children.”

14. The legal process in the European Union, however, holds a prerogative from the member state to adopt or not a directive.
The action of Ofcom and OFT – Office of Fair Trading (agency that has the jurisdiction over other media) only happens with the reluctance of the announcer facing the recommendations issued by ASA based on the self-regulation.

In France there is no official regulation for children’s publicity. The system applied is self-regulation by the Autorité de Régulation Professionelle de la Publicité (ARPP), based on the ICC norms – International Chamber of Commerce, that has a chapter for children’s advertisement. In the case of food advertisement, whatever it is – of any product, for any audience – it is compulsory the inclusion of a positive phrase from the official program for healthy eating.

The legal situation in Germany is not different from France, because the self-regulating system, the Deutscher Werberat, imposes norms in synch with ICC, including regarding to children’s advertisement. Outside the scope of this study, it’s worth mentioning that the German Unfair Competition Law is considered an infringement to explore the credibility and inexperience of children.

15. Ranking mentioned: 7th
18. Ranking mentioned: 4th
In Italy\textsuperscript{19}, there is also an alignment with the ICC norms through the Instituto dell’Autodisciplina Pubblicitaria and they don’t have legislation about the subject.

In Spain there is a specific code for children’s advertisement for food, based on ICC, but goes further in relation to products with a high level of fat, sugar and salt, also known as HFSS\textsuperscript{20}. It is the Cómodo de Corregulacion de la Publicidad de Alimentos Y Bebidas Dirigidas a Menores, Prevención de la Obesidad Y Salud (PAOS), established together with the Health Ministry, the food industry and the advertising self-regulation body, whose code, created by the Asociación para la Autorregulación de la ComunicaciónComercial(Autocontrol), has additional restrictions for the toys advertisements.

\begin{footnotesize}
\begin{enumerate}
\item Ranking mentioned: 10th
\item Products that have a high levels of fat, salt or sugar (High in Fat, Salt or Sugar – HFSS)
\end{enumerate}
\end{footnotesize}

\textbf{RULES FOR CHILDREN ADVERTISEMENT IN THE MAIN MARKETS IN THE WORLD}
In Portugal there is a self-regulation system administered by the Instituto Civil de Autodisciplina da Comunicação Comercial (ICAP) and a legal diploma, the Código de Publicidade, that prevents the use of children as protagonists of commercials of products that have no direct relation with them.

Sweden practices self-regulation like the other European countries mentioned, but it is the only country that, by law, banned children’s advertisement in the two open TVs established in their territory. Advertising, therefore, is free in the other media and even in the case of paid TV from other nations.

Norway historically adopted a standard which is very similar to Sweden, as guidance to the announcers and their own Government and Judicial Organ, but didn’t count on self-regulation or formal legislation. Recently (May 2013), the public authorities, after two years of study on the subject, decided that the best way is to stimulate the market to structure the self-regulation system in the country.

In Canada there are two codes of self-regulation and the pledge of big food companies, but there is no national public regulation. As already mentioned, the province of Quebec forbids any kind of advertisement targeted to children until 13 years of age. However, the population of this region consumes media generated in other provinces and abroad.
In Chile, besides the self-regulation managed by CONAR local, there is a law since 2012 about the nutritional composition of food and its publicity, determining that it has a message reminding the habits of a healthy living. It also forbids the food advertising HFSS directed to an audience below 14 years of age.

In Peru, besides the self-regulation, the government has recently enacted a law that forbids the advertisement and distribution of gifts encouraging the consumption of HFSS food, besides limiting the use of testimonials and characters that appeal to the children in this respect.

In Mexico, the food and non alcoholic drinks advertisement targeted to the children’s audience has, since 2009, a specific self-regulation, applicable both to the advertisements and the judgment of ethical infringements consolidated in only one document, the Code PABI. There isn’t, in this document, any restrictions to airing.

In Australia there is a regulation combination by The Australian Communications and Media Authority (ACMA), similar to Ofcom in the United Kingdom, through the Children’s Television Standards (CTS) with the self-regulating norms from the Australian Association of National Advertisers (AANA) and the voluntary pledge of the companies.
IN BRAZIL, ALL ASPECTS ARE CONSIDERED

In the comparative table available in digital version (www.aba.com.br) all the current norms, restrictions and recommendations to the Brazilian advertisement are listed and compared with the existing in important markets of the world.

The study reveals that Brazil stands out in range and specificity of their advertisement self-regulating norms for products and service targeted to children, applying the most complete and restrictive mixed system of control in the world.

The pledge (Brazilian letter-commitment\(^{21}\)), in turn, is the only one that explicitly recommends that the advertisement eventually made, as long as the products have an adequate nutritional profile, also promote healthy habits, balanced diet and constant physical activity.

Besides the regulatory situation described in this study, it is worth highlighting the contribution to the topic advertising and children, offered by ABA – Brazilian Association of Announcers.

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\(^{21}\) The pledge was originally signed by twenty three traditional announcers of food and non alcoholic drinks and can be found on www.aba.com.br
Performed by IBOPE Media, the study\textsuperscript{22} established the volume of advertising messages aired in commercial breaks on television (open and paid) during the period from 11/12/12 to 10/01/13, comprehending: (a) commercials of children’s products with message directed to children; (b) commercials of children’s products with message directed to adults and (c) commercials of adult products featured by children.

The IBOPE census concluded that the sum of these three categories of commercials is small on paid TV and almost insignificant on the open TV.

In Brazil, the monitoring made by CONAR and the accession of advertisement operators, allowed the current rules to be effectively followed, resulting in low presence of advertisement of products and service targeted to children in media in general, including on open TV.

\textsuperscript{22} Available on www.aba.com.br
Supplement

Norms of the Brazilian Code of Advertisement Self-regulation applicable to the advertisement of products and service targeted to children.

Article 33 – This Code condemns advertisements that:

a. show neglect for safety, specially when there are young people and children and the message is directed to them;

b. stimulate a dangerous use of the product offered;

c. do not mention special care for the prevention of accidents, when such care is essential for the use of the product;

d. do not mention the responsibility of a third party, when such mention is essential;

e. do not specify special care for the use of the product by children, elderly and sick people, in case such care is essential.

Article 37 – The efforts of parents, educators, authorities and the community should find in the advertisement an ally for bringing up responsible citizens and conscious consumers. With this perspective, no advertisement will target a consumption appeal directly to the child. And more:

1 – The advertisements should reflect special care in relation to the safety and good manners, and abstain from:

a. disregarding positive social values, such as, among others, friendship, civility, honesty, justice, generosity and respect to people, animals and the environment;

b. deliberately causing any kind of discrimination, specially those that, for any reason, are not consumers of the product;

c. associating children and adolescents to situations that are incompatible to their condition, whether they are illegal, dangerous or socially condemned;

d. imposing the notion that the consumption of the product brings superiority, or, its lack, inferiority;

e. provoking embarrassing situations to parents or responsible adult, or annoy third parties with the intention of forcing the consumption;
f. employing children and teenagers as models to voice direct appeal, recommendation or suggestion of use or consumption, though admitting their participation in the demonstrations related to the service or product;

g. using journalistic format in order to avoid that the advertisement is mistaken by news;

h. emphasizing that the product which is made to be consumed by children and teenagers have unique characteristics that, in fact, are found in all the similar products;

i. using situations of psychological pressure or violence that can spread fear.

II – When the products are made to be consumed by children and teenagers, their advertisements should:

a. try to contribute to the positive development of parents and children's, students and teachers' relationships, and other relationships that involve the target audience;

b. respect the dignity, naivety, gullibility, inexperience and the feeling of loyalty of the target audience;

c. give special attention to the psychological characteristics of the target audience, assuming their reduced discerning abilities;

d. follow some special care to avoid eventual psychological distortions in the advertising models and the target audience;

e. abstain from stimulating socially reproachable behaviors.

III – This Code condemns merchandising or indirect advertising action hired that uses children, elements of the children's universe or other artifice with the deliberate intention to capture this specific target audience's attention, whatever the vehicle utilized.

IV – On the segmented contents, created, produced or programmed specifically for the children's audience, whatever the vehicle utilized, the advertisement of products and services directed exclusively to this audience will be restricted to the commercial break spaces.
V – For the compliance of merchandising actions’ evaluation and the indirect advertisement with the provisions in this Section, it will be taken into consideration that:

a. the target audience which they are directed are adults;

b. the product or service is not advertised aiming their consumption by children;

c. language, images, sounds and other artifices don’t have the objective of sparking the curiosity or the attention of children.

1st Paragraph
Children and adolescents shall not be advertising models in advertisements that promote the consumption of any good or service incompatible with their condition, such as weapons, alcoholic drinks, cigarettes, fireworks and lottery, and all the others equally affected by legal restriction.

2nd Paragraph
The media planning of products advertisement in the subparagraph II will take into consideration that the children and the teenagers have their attention specially caught for them. Therefore, such advertisements should reflect the technical and ethically recommended restrictions, and the most restrictive interpretation shall be adopted for all the norms disposed herein.

Note: In this Section, the parameters defined in article 2nd of the Statute of the Child and the Adolescent (Law n° 8.069/90) were used: It is considered a child, for the purpose of this law, a person up to twelve years of age, and adolescents a person between twelve and eighteen years of age.

ANNEX H - Food, Soda, Juices and Similar Beverages
This Annex disciplines the commercial advertisement of food, soda, juices, chocolate drinks, non-carbonate drinks and the similar alcohol free drinks, which were classified by the public administration body, and obviously, does not exclude meeting the demands of specific legislations.

1. General Provisions – Besides meeting the general precepts of this Code, the advertisements of products submitted to this Annex shall:

a. be compatible to the terms of its official licensing. They shall adopt terminology harmonized with it to give qualities such as “diet”, “light”, “sugar free”, “gluten free”, to describe any other distinctive characteristics that guide the consumers’ choices.
b. avoid any association with pharmacological or medicine products

c. value and encourage, as often as possible, the practice of physical activities;

d. abstain from encouraging or addressing excessive consumption, nor show situations that encourage excessive consumption or conflict with this recommendation;

e. abstain from reducing the importance of a healthy, varied and balance diet;

f. abstain from introducing products that substitute the basic meals (breakfast, lunch and dinner), unless such indication is based on a medical or nutritional responsible opinion, recognized by health authorities;

g. limit technical affirmations related to the health and nutrition benefits, the ones that are compatible to the official licensing based on medical or nutritional responsible opinion. In this case, such affirmations shall be presented in accessible language for the average consumer;

h. correctly feature characteristics of flavor, size, content/weight, nutritional and health benefits;

i. avoid exploring potential benefits derived from the product consumption, such as increased popularity, status, sexual encounters, school and sports performance, among others;

j. abstain from disregarding the parents’ educators’ and health professionals’ role related to the correct guidance of healthy eating habits and other health care;

k. when using characters of the children’s universe or presenters of programs that target this audience, only do so during the commercial breaks, making a clear distinction between the advertising message and the editorial content or program;

l. abstain from using children who are above or below the average weight, according to biometric standards commonly accepted, avoiding that they and the ones like them may have their dignity hurt.
2. When the product is drawn up to children, its advertising should abstain from any encouragement for shopping or consumption, specially if it is introduced by an authority from the family, school, medical, sportive, cultural or public, as well as characters that interpret them, except in educational campaigns, institutional, that promote healthy eating habits.

3. The advertisement that mentions the functional properties of the product submitted to this Annex, should be based on technical or scientific facts, and should conform to the respective official licensing.

4. The non-alcoholic beverages advertisement should abstain from creating any confusion regarding:
   a. the quality, nature and kind of product;
   b. the caloric value of the product;
   c. its nature (natural or artificial), as well as the presence of additives, if it is the case;

5. In the advertisement of products submitted to this Annex, a more restrictive interpretation should be adopted when:
   a. it is publicized that it is a “natural product”;
   b. the product is drawn up for the consumption of children

ANNEX P - Beers and Wines

It is considered an alcoholic beverage, for the effect of advertising ethics, the one that was classified by the official rules and regulations that its licensing is subordinated. This Code, however, establishes a distinction among the three categories of alcoholic beverages: the ones that are normally consumed during the meals, hence the name table beverages (the Beers and Wines, objects of Annex P); other alcoholic beverages, whether they are fermented, distilled, rectified or obtained by mixture (normally served in shots, whose advertisement is disciplined by Annex “A”); and the ices category, like coolers, alcohol pop, ready to drink, malternatives, and similar products, where the alcoholic drink is mixed with water, juice or soda, included in its own Annex (Annex T) and Annex A, when appropriate.

The ethical following norms complement the general recommendations of this Code and, obviously, don’t exclude meeting the requirements contained in the specific legislation.
The advertisement submitted to this Annex:

1. General Rule: since it is alcoholic beverage – a restrict consumption product and improper for certain audiences and situations – it shall be structured in a socially responsible way, not stepping away from the purpose of spreading the brand and characteristics, not permitted, by text or image, direct or indirectly, including the slogan, the appeal for consumption and the exaggerated offer of product units in any means of communication.

2. Principle of children and adolescents' protection: there will not be children and adolescents as target audience. Due to this principle, the Announcers and their Agencies shall adopt special care in designing their market strategy and the structure of their advertising messages. Therefore:
   
   a. children and adolescents shall not participate, whatsoever, in advertisements; any person that appears in them will have to be and look more than 25 years of age;

   b. messages shall be destined exclusively to the adult audience, not being justifiable any compromise in relation to this principle. Therefore, the advertisements' content will make it clear that the product is inappropriate to be consumed by children; it shall not use language, expressions, graphics and audio visuals that clearly belong to the children/adolescents' universe, such as “humanized” animals, puppets or animation that may spark the curiosity or attention from young children, or contribute to their adoption of moral values or habits that are incompatible with young age;

   c. media planning shall take this principle into consideration, and shall, therefore, reflect the restrictions and the care which are technically and ethically appropriate. So the advertisement shall only be inserted in the programming, publication or website targeted predominantly to adults. Due to the difficulty in assessing the predominant audience, it will be adopted the programming that best meets the purpose of protecting children and adolescents;

   d. websites belonging to product brands that fit the category dealt with here shall contain a selective assess device to prevent minors from surfing it.

3. Principle of social responsibility consumption: the advertisement shall not induce in any form, the excessive or irresponsible consumption. Therefore, with this principle, in the alcoholic beverages advertisement:
a. appeal to sensuality shall not be the main content of the message; models shall never be treated as sex objects;

b. shall not have a scene, illustration, audio or video that show or suggest the ingestion of the product;

c. shall not use images, language or arguments that suggest that the ingestion of the product a sign of maturity, or that it enhances personal courage, professional or personal success or that give more power of seduction for the consumer;

d. supported on a famous person’s image, it shall be adopted the same conditions disposed on item 2, letters “a”, “b”, “c” and “d” from Annex “Q” – Testimonials, Attests and Endorsements;

e. It shall not be used arguments or situations that make the product consumption a challenge, nor demoralize those who don’t drink; it shall never be used image or text that belittle consumption moderation;

f. It shall not be admitted that they are recommended due to the alcoholic level or its effects over the senses;

g. Specific references about the alcoholic level of a product are acceptable, as long as there are no implications or conclusions about the safety or quantity that can be consumed due to such reduction;

h. It shall not positively associate the consumption to driving;

i. The consumption shall not be encouraged in improper, illegal, dangerous, or socially condemned situations;

j. The consumption of the product shall not be associated to the performance of any professional activity

k. The product shall not be associated to a situation that suggests aggressiveness, the use of weapons and alterations of emotional balance; and

l. Olympic sports uniforms shall not be used to support the marketing of the brand.

4. Warning clause: Every advertisement, whatever the means employed for its broadcasting, shall have the “warning clause” to be adopted in specific resolution of the Superior Council of CONAR, which will reflect the advertisement social responsibility and the Announcers’, Advertising Agencies’ and Communication Vehicles’
consideration with the audience in general. In the face of such commitments and the need to give them total efficacy, the resolution will take into consideration the peculiarities of each means of communication and will indicate, to each one of them, sayings, format, time and space of the clause broadcasting. Integrated to the advertisement, the “warning clause” will not invade the editorial content of the vehicle; it will be reported with correction, ostensibly and written in a legible and highlighted way. And more:

a. on the Radio, it shall be inserted in the end of the advertising message;

b. on TV, including the paid and on the Cinema, it shall be inserted in audio and video in the end of the advertising message. The same rule applies to advertising messages aired in theaters, show houses and the like;

c. in Newspapers, Magazines and any other printed means; on panels and posters and advertising pieces on Internet, it shall be written as was adopted in resolution;

d. on videos aired on Internet and on telephones, they shall observe the same prescriptions adopted for the TV;

e. on packages and labels, it shall reinforce that the sale and consumption of the product is recommended only for people over 18.

5. External media and alike: for reaching all the age range, without technical possibility of segmentation, the messages aired in External Media and alike, whether they are “outdoors” or “indoors” with mass circulation venues, screen and electronic panels, “back and front lights”, building walls, “busdoors”, public transport, advertising pieces of any nature inside the transportation vehicle, vehicles used for the distribution of the product: street furniture and alike, etc., whatever means of communication and its support, they will be limited to exhibiting the product, its brand and/or slogan, not appealing for the consumption, keeping the need to include the “warning clause”.

6. Exceptions: it is released from the insertion of the “warning clause” the formats specified below that don’t have the appeal to consume the product:

a. static advertising in stadiums, “sambodromos”, gymnasiums and other sports arenas, as long as they only identify the product, the brand or slogan;
b. a simple expression of the brand, its slogan or the exhibition of the product that uses competition vehicles as support;

c. the “calls” for sponsored programs on radio and TV, including the paid TV, as well as the sponsor characterizations of these programs;

d. rocket texts, transition vignette and alike.

7. Commerce: every time the product is mentioned whose advertisement is conducted by this Annex, the advertisement signed by a wholesaler, importer, distributor, retail outlets, bar, restaurant and alike, will be subjected to the norms predicted herein, specially on item 4.

8. Show houses: the airing on cinemas, theaters and lounges will take into consideration the provision on item 2, letter “c”.

9. Non alcoholic beer: the advertisement of “non alcoholic beer” shall highlight, compulsorily, such characteristic and is submitted, when necessary, to the norms of this Annex. It will be released from the “warning clause”, as long as it does not refer the promotional brand, slogan or phrase of products which are submitted to this Annex or Annexes “A” and “T”.

10. Point of sale: the advertisement in points of sale shall be directed to an adult audience, with a warning that the product is targeted to them. The messages within the service equipment, such as tables, chairs, fridges, lights, etc., shall not have an appeal for consumption, and for this reason, the “warning clause” is released.

11. Responsible consumption: this Code encourages advertising campaigns and initiatives to reinforce moderation in consumption, prohibition of sale and offering alcoholic drinks for minors, and responsible driving.

12. Interpretation: due to the nature of the product, CONAR, the Announcers, the Advertising Agencies, the advertising film Producers and the communication Vehicles shall adopt the most restrictive interpretation for the norms disposed in this Annex.

The complete Brazilian Code of Advertisement Self-Regulation is available on www.conar.org.br