



EDA Reply to the TRIS notification from Norway on restrictions for marketing to children

January 2025

The **European Dairy Association (EDA)** has taken note of the [TRIS notification](#) made by Norway regarding **proposed amendments to the Norwegian Marketing Control Act** restricting the marketing of certain food products to minors under the age of 18 years old.

As an interested stakeholder, EDA would like to share some comments and concerns regarding this development.

We would first like to express our **alignment with other stakeholders such as the World Federation of Advertisers.**

Concerns from the European dairy sector:

From a nutritional point of view, it is not reasonable that categories with a similar nutritional composition, that can be consumed at the same times and with similar portions, are given **different considerations and different profiles.**

Moreover, from the equal competition perspective, **the proposed nutritional profiles should be fair and equitable.** The application of very different criteria in comparable categories in terms of nutrition and consumption would imply unequal treatment which would ultimately affect the freedom to carry out an essential business activity such as advertising, and therefore, would represent a difficulty in terms of competition.

- › **An illustrative example is milkshakes compared to similar dairy products such as yoghurts.** Dairy drinks qualifying as milkshakes would face a very severe treatment, such as, among others, a total ban on added sugars. Indeed, milkshakes belong to category 8 and, therefore, would be in the scope of the marketing restrictions if any sugar is added. However, yoghurts are considered in scope if their added sugar content exceeds 10 grams. **This situation generates a comparative disadvantage and discrimination,** especially when considering the similarity in the composition of these products, both being a source of important nutrients such as calcium, vitamin B, and proteins of high biological value.

In addition, the nutrition thresholds for products prohibited from marketing to children prohibit milk and yoghurt products with sweeteners superior to 0. This example **is stricter than the [EU pledge criteria](#) and is counterproductive in encouraging consumers to choose 'healthier' alternatives.**

Conclusions:

EDA is concerned with this development and would like to highlight its **discriminatory nature**. We would also like to point out that **Norway has already a voluntary scheme** in place which takes into account the same food categories and profiles to restrict advertising to children under the age of 13.