MONITORING
REPORT

2017

EU PLEDGE

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March 2018

EXECUTIVE SUMMARY & KEY RESULTS

Background

The EU Pledge is a voluntary initiative by leading food and beverage companies to change food and beverage advertising to children under the age of twelve in the EU, in line with Article 9.2 of the Audiovisual Media Services Directive, which calls for codes of conduct on the marketing of certain food and beverage products to children.

Signatories have committed to changing the way they advertise to children under 12 years old by respecting the two following minimum common requirements:

★ No advertising of products to children under 12 years, except for products which fulfil common nutrition criteria[1]. Some EU Pledge member companies have taken the decision not to advertise any of their products to children under 12.
★ No product marketing communications to children in primary schools.

This is the ninth annual monitoring report of the EU Pledge. In addition to the monitoring of "traditional" TV advertising, which has been the object of monitoring since the first report of the EU Pledge in 2009, the compliance monitoring also focuses on company-owned websites since 2012.

This year, the monitoring also looked at company-owned social media profiles on Facebook, YouTube and Instagram.

The monitoring was carried out in 2017 by the following independent third parties:

★ **Accenture Media Management**[2], to review EU Pledge member companies' compliance with the commitment relating to TV advertising;
★ **EASA – The European Advertising Standards Alliance**, to review EU Pledge companies' branded websites and social media profiles, for compliance with the EU Pledge commitment.

The methodology and process of the monitoring of company-owned websites and social media profiles were reviewed by Professors Liselot Hudders, assistant professor at the Department of Communication Sciences at Ghent University and a postdoctoral fellow of the FWO at the Marketing Department and Dr Dieneke Van de Sompel, visiting Professor at the Department of Communication Sciences at Ghent University.

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1   Common EU Pledge nutrition criteria – for those member companies that do use nutrition criteria – entered into force across the EU on 1 January 2015. Those are available on www.eu-pledge.eu.

2   Accenture is a global management consulting, technology services and outsourcing company. Accenture Media Management helps companies measure and optimise investments in marketing, media, retail and digital. It also provides independent media auditing services, which is the function it performs with regard to the EU Pledge.

Key 2017 results

The record of compliance is positive and consistent with previous years:

★ **TV: The overall compliance rate is 97.4%**

For the sixth time since the extension of the EU Pledge commitment to company-owned websites at the end of 2011, EASA - the European Advertising Standards Alliance, monitored member companies' brand websites.

For the first time since the adoption of the enhanced commitments on 31 December 2016 EASA also monitored company-owned social media profiles on Facebook, YouTube and Instagram.

224 national brand websites and 107 brand social media profiles were monitored in six EU countries. The results show that:

★ **99% of websites reviewed were deemed compliant with the EU Pledge. 2 out of 224 websites were found non-compliant with the commitment.**
★ **98% of social media profiles reviewed were deemed compliant with the EU Pledge. 2 out of 107 profiles were found non-compliant with the commitment.**

Implementation of common EU Pledge nutrition criteria

The EU Pledge was further strengthened through the adoption of harmonised nutrition criteria, applicable since 1 January 2015, for those companies that so far have used company-specific criteria to determine what foods they may advertise to children under 12.

The common criteria set energy caps, maximum thresholds for nutrients to limit (salt, saturated fat and sugar) and minimum requirements for positive nutrients, category by category.

EU Pledge member companies that do not advertise any of their products to children under 12 at all have decided to maintain their policies. Therefore, the common nutrition criteria are not relevant for them.

The common nutrition criteria were revised in the course of 2017 and further strengthened in several categories, with regard in particular to applicable thresholds for sugar and salt content. The updated nutrition criteria are due to be published in 2018 and the changes are to be implemented for the most part by the end of the year.

Growth in membership

The EU Pledge was launched in December 2007 by eleven leading food and beverage companies, representing approximately two-thirds of food and non-alcoholic beverage advertising spend in the European Union.

In 2010, the European Snacks Association (ESA) and its leading corporate members joined the EU Pledge. Today, those are: Intersnack (including Estrella Maarud acquired in May 2014), KiMs (owned by Orkla Confectionery and Snacks), Lorenz Snack-World, Unichips San Carlo, Zweifel Pomy-Chips, Amica Chips and ICA Foods (which both joined in July 2014).

McDonald's joined the EU Pledge in November 2011, Royal FrieslandCampina in 2012, the Quick Group in 2013 (before its acquisition by Group Bertrand in 2016) and Bel Group in 2016. Arla Foods

implemented the commitment in September 2017 and will be included for the first time in next year's monitoring programme.

With this latest addition, the EU Pledge membership counts twenty-two leading food and beverage companies. Together, EU Pledge member companies account for over 80% of food and beverage advertising spend in the EU.

Further enhanced commitments

In November 2014, EU Pledge member companies announced plans to extend the scope of the EU Pledge commitment to cover a number of additional media and to address the content of their marketing communications by the end of 2016:

★ **Extension of scope:** the EU Pledge initially covered commercial communications on TV, print, third-party internet and company-owned websites. Since 31 December 2016, EU Pledge member companies have expanded this commitment to radio, cinema, DVD/CD-ROM, direct marketing, product placement, interactive games, apps, mobile and SMS marketing.

★ **Addressing creative execution:** The new policy ensures that where no reliable audience measurement data is available, advertisers consider not only the placement, but also the overall impression of the marketing communication, to ensure that if the product in question does not meet the common nutrition criteria, the communication is not designed to appeal primarily to children.[3]

Public monitoring of compliance with the enhanced commitments officially began this year. Pilots were carried out in 2015 and 2016 to prepare for the entry into force of the new commitments.

Increased transparency

To facilitate the implementation of the new commitments, EU Pledge members adopted an implementation guidance document which outlines how the commitment applies in practice. The guidance note is publicly available and can be accessed on the EU Pledge website[4].

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3 Further information about the enhanced commitments can be found here:
   www.eu-pledge.eu/content/enhanced-2014-commitments

4 The EU Pledge implementation guidance report is available here: http://eu-pledge.eu/sites/eu-pledge.eu/files/misc/
   Implemension_Guidance_Report.pdf

ABOUT THE EU PLEDGE

The EU Pledge was launched in December 2007 as part of signatories' commitment to the European Union Platform for Action on Diet, Physical Activity and Health, the multi-stakeholder forum set up by the European Commission in 2005 to encourage stakeholders to take initiatives aimed at promoting healthy lifestyles in Europe. In the context of the EU Platform, the EU Pledge commitment is owned by the World Federation of Advertisers (WFA), which also supports the programme.

EU Pledge Members

The founding members of the EU Pledge are the following companies: Burger King, Coca-Cola, Danone, Ferrero, General Mills, Kellogg, Mars, Mondelez, Nestlé, PepsiCo and Unilever. The membership has since been expanded, representing 22 leading food and beverage companies, accounting for over 80% of EU food and non-alcoholic beverage advertising spend.

The initiative is open to any food and beverage company active in Europe and willing to subscribe to the EU Pledge commitments.

The EU Pledge commitments

The EU Pledge is a framework initiative whereby signatories are committed to changing the way they advertise to children under 12 years old by respecting the two following requirements:

★ **No advertising of products to children under 12 years, except for products which fulfil common nutrition criteria**[5]. **Some EU Pledge member companies have taken the decision not to advertise any of their products to children under 12.**
   For the purpose of this initiative, "advertising to children under 12 years" means advertising to media audiences with a minimum of 35%[6] **of children under 12 years**[7].

★ **No communication related to products in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes.**

Participating companies must all meet these criteria, but can go further. The framework EU Pledge commitments provide a common benchmark against which companies can jointly monitor and verify implementation.

Since the initiative was launched, all participating companies have made their individual corporate commitments within the framework of the EU Pledge programme. All founding member company commitments, published on the EU Pledge website (www.eu-pledge.eu), were implemented across the EU by 31 December 2008[8]. Members that joined the EU Pledge in 2010 implemented the commitment by the end of that year. McDonald's and Friesland Campina implemented the commitment upon joining, in January and September 2012 respectively. Amica Chips and ICA Foods both implemented the commitment in 2014, and the Bel Group in 2016. Arla Foods joined in September 2017 and was therefore not included in this year's monitoring exercise.

To facilitate compliance with the EU Pledge commitments, member companies developed detailed implementation guidance for all relevant staff in marketing, media planning and corporate affairs departments in all EU markets.

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5   Common EU Pledge nutrition criteria – for those member companies that do use nutrition criteria – entered into force across the EU on 1 January 2015. All applicable guidelines are published as part of the individual company commitments under the EU Pledge on www.eu-pledge.eu.

6   This is a commonly agreed benchmark to identify media with an audience composed of a majority of children under 12 years old. This method of audience indexing has been agreed as a pragmatic system to determine the applicability of advertising rules. Nevertheless, this is a minimum common benchmark for all EU Pledge member companies. For further detail see: www.eu-pledge.eu

7   The rationale for this threshold is the strong degree of academic consensus that by the age of 12 children develop their behaviour as consumers, effectively recognise advertising and are able to adopt critical attitudes towards it. Although children between the ages of 6 and 12 are believed to generally understand the persuasive intent of advertising, care should be taken because they may not have a fully developed critical understanding.

8   In case of mergers or acquisitions, an agreed transition period is allowed for the implementation of measures taken under the EU Pledge.

Third-Party Monitoring

In line with the Terms of Reference of the EU Platform for Action on Diet, Physical Activity and Health, EU Pledge signatories are required to monitor and report on the implementation of their commitments. EU Pledge member companies have committed to carry out independent third-party compliance monitoring of the EU Pledge commitments.

This is the ninth monitoring exercise. All previous Monitoring Reports are available on www.eu-pledge.eu.

In 2017, EU Pledge member companies commissioned the following independent third parties to monitor implementation of the EU Pledge commitments:

★ **Accenture Media Management**[9], to review EU Pledge member companies' compliance with the commitment relating to food and beverage advertising on TV.

★ **EASA – The European Advertising Standards Alliance**[10], to review EU Pledge companies' brand websites for compliance with the EU Pledge commitment.

The EASA monitoring programme was externally reviewed by Professors Liselot Hudders and Dieneke Van de Sompel from Ghent University (Belgium).

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9   Accenture is a global management consulting, technology services and outsourcing company. Accenture Media Management helps companies measure and optimise investments in marketing, media, retail and digital. It also provides independent media auditing services, which is the function it performs with regard to the EU Pledge.

10 The European Advertising Standards Alliance brings together national advertising self-regulatory organisations in Europe. Based in Brussels, EASA is the European voice for advertising self-regulation.

Objective and Scope

Accenture Media Management was commissioned to carry out the independent monitoring of member companies' compliance with the following EU Pledge commitment:

"No advertising of products to children under 12 years, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international guidelines. For the purpose of this initiative, "advertising to children under 12 years" means advertising to media audiences with a minimum of 35% of children under 12 years."

This is the sixth monitoring exercise assessing the compliance of EU Pledge member companies with the enhanced commitment. Until the end of 2011, the audience threshold used was 50% children under 12. By lowering the audience threshold to 35% of children under 12 years, the EU Pledge commitment covers more media channels that have a significant child audience. This commitment entered into force on 1 January 2012.

For this exercise, six sample EU markets were chosen: **France, Germany, Hungary, Italy, Romania and Spain**. The intent has been to cover a number of new markets each year, within the limits of data availability and affordability, so as to assess performance in as broad a sample of Member States as possible. Some markets have been covered repeatedly in order to provide a benchmark.

Methodology

Accenture Media Management was commissioned to analyse national audience data in the sample markets over a full three-month period. This data is provided by official national TV audience measurement agencies. Viewing estimates are obtained from panels of television-owning private homes representing the viewing behaviour of households.

The data provides detailed statistics about advertising spots: advertiser, product, channel, programme, date and time of broadcast, estimated audience and demographic breakdown – typically including the segment 4-12 years of age.

In Romania anomalies were found in the panel of 4-11 years old, where the representation was often small or based on an estimation rather than actual audience data and is therefore unreliable. The implication according to Accenture is a likely overstatement of non-compliance in this market with respect to the EU Pledge commitment.

On this basis, Accenture gathered and reviewed all advertising spots for products marketed by EU Pledge member companies aired in the six markets during the period 1 January to 31 March 2017 – 690,943 spots were reviewed.

Spots for products that do not meet the EU Pledge nutrition criteria, where applicable, were identified, on the basis of full product lists submitted by each member company for each market. For those member companies that do not apply nutrition criteria and do not advertise any products to children under twelve, all spots were included.

For all these spots, audience composition at the time of broadcast was analysed on the basis of national ratings data. This allowed Accenture to isolate ads aired at a time when more than 35% of the audience was composed of children under twelve years of age.

All spots for products that EU Pledge member companies have committed not to advertise to children under twelve, aired at times when the audience was composed of over 35% children under twelve, were deemed non-compliant with the EU Pledge.

Results

The overall compliance rate was as follows:

★ 97.4% of signatories' TV advertising spots were compliant with the EU Pledge commitment

This figure is comparable to those reported in previous years in different markets (2013 compliance rate: 98.1%, 2014: 98.5%, 2015: 98.6%, 2016: 98.7%). Without Romania the 2017 rate would be 99.1%. The detailed compliance rates reported by Accenture per market can be found in the Accenture presentation included in this report.

Statistical anomalies and overstatement of non-compliance

It is worth noting that of the vast majority of spots found technically non-compliant (i.e. achieving an under-twelve audience share above 35%, regardless of the time of broadcast and of the adjacent programme), only a few can be considered to be certainly in breach of the spirit of the EU Pledge commitment, i.e. broadcast in or around children's programmes as such.

Most spots included as non-compliant in this report are spots broadcast in or around general/adult programmes that were reported in national ratings data as displaying a share of children under 12 above 35%.

The reason for this discrepancy is that audience statistics for programmes and advertising spots with a small audience – included in these monitoring results – are not reliable: a small audience means a small sample of households, rendering the demographic analysis of the audience unreliable. For statistical reliability, marketers typically exclude advertising spots below 1 Gross Rating Point (GRP). GRPs are the measure of television ratings. They are calculated in relation to the target audience – children under 12 for the purposes of this analysis. In this case a spot with less than 1 GRP is a spot that reaches less than 1% of the under-12 audience in the country in question. These spots often display an implausible share of under-12 viewers: e.g. a spot during a

sports programme broadcast at 2am shows a child audience of 100%. This is the result of statistical anomalies.

All non-compliant spots were nonetheless included in the reported non-compliance rates for the sake of transparency and simplicity.

Follow-up

All instances of non-compliance were reported to the EU Pledge member companies concerned. Companies were thus able to identify each non-compliant spot by market, product, channel and time. This has allowed companies to take corrective action where necessary, to adapt media planning where appropriate, and to update guidance to marketing departments where needed.

COMPLIANCE MONITORING: COMPANY-OWNED WEBSITES & SOCIAL MEDIA PROFILES

In 2011, EU Pledge members decided to enhance their framework voluntary commitments by **improving the coverage of the commitment in the online sphere. Since its inception**, the EU Pledge commitment has applied to advertising on TV, print media and third-party internet advertising. In January 2012, **EU Pledge member companies extended their commitment to company-owned websites.** By extending the coverage of the commitment to cover both third-party online advertising and brand websites, the EU Pledge covers online marketing comprehensively. In 2014, the EU Pledge commitment was further strengthened to cover all digital marketing communications, including **social networking sites and mobile apps from 31 December 2016 onwards.**

Methodology

The European Advertising Standards Alliance (EASA) was commissioned to undertake a compliance audit of EU Pledge branded websites, company-owned social media profiles and mobile apps.

Compliance with the EU Pledge commitment is determined on the basis of whether:

★ The website/social media profile features marketing communications
★ Such marketing communications promote food or beverage products, as opposed to a brand/ corporate brand in general
★ Such food and beverage products meet or do not meet the EU Pledge common nutrition criteria
★ Such marketing communications are designed to be targeted primarily at children under 12.

A methodology with a 'consumer-oriented approach' was drawn up by the EASA secretariat in collaboration with the EU Pledge Secretariat and the independent reviewers of this exercise, Professors Liselot Hudders and Dieneke van de Sompel.

National self-regulatory organisations for advertising (SROs) from six countries (Bulgaria, France, Germany, Italy, the Netherlands and Spain) were asked to review a selection of EU Pledge member companies' national brand websites which promoted products not meeting the applicable nutrition criteria. The six chosen SROs represent different systems in terms of size, geographical location and maturity.

Each SRO was asked to review a total of 40 national brand websites and 15 social media profiles, depending on the size of the market, including at least one or two websites per company, where available, in October and November 2017. SROs could review national brand websites as well as promotional websites set up by the companies, but not the main corporate websites as these are by definition intended more to inform the public rather than to provide services and entertainment,

and their content is generally not aimed at children. 40 national brand websites were reviewed in France, Hungary, the Netherlands and Spain, including where available at least two websites per company. Experts from the German SRO reviewed 45 national EU Pledge company brand websites. Due to limited availability, Bulgaria reviewed 19 marketer-owned websites.

The Hungarian, Spanish and Dutch SROs reviewed 15 social media profiles, while Bulgaria, France and Germany respectively reviewed 36, 16 and 18 social media profiles.

COUNTRY	WEBSITES	SOCIAL MEDIA PROFILES
Bulgaria	19	36
France	40	16
Germany	45	10
Hungary	40	15
Spain	40	15
The Netherlands	40	15
TOTAL	224	107

When making their selection of websites to review, the SROs were requested to take into account products that are popular amongst children in their country. The reviewers were requested to check if the marketer-owned websites complied with the EU Pledge criteria, using a dedicated questionnaire and methodology developed by EASA, the EU Pledge secretariat and the independent reviewers.

The reviewers noted whether a website contained features to screen the age of the website visitor. This element was, however, not considered as sufficient to ensure compliance if the marketing communications on the website were clearly designed to appeal primarily to children under 12.

The reviewers were asked to check whether the websites contained elements, such as games, animation, licensed characters and toys and to decide if these were in their view primarily designed for children under 12. Lastly, they had to judge if these elements, in conjunction with the overall creative execution of the website (i.e. simplicity of language, use of font size and typeface, use of colours etc.), were clearly intended to make the marketing communication(s) on the website primarily appealing to under-12s.

On the basis of the level of appeal of the creative execution to under-12s and the overall findings reported by the SROs, EASA determined the final compliance of the websites with the EU Pledge criteria in cooperation with the independent academic reviewers.

In addition, SROs monitored EU Pledge company owned mobile applications to determine whether these were primarily appealing to children under 12 and in breach of the enhanced EU Pledge commitment.

Beyond EU Pledge compliance, self-regulation experts also flagged any item on a website that potentially breached either one or several of the following advertising codes or laws:

★ ICC Framework for Responsible Food and Beverage Marketing Communications;
★ Relevant advertising standards and national sectoral codes;
★ Relevant advertising laws.

All reviews were performed by self-regulation experts from national SROs, whereas EASA ensured that the results were reported in a consistent manner.

Monitoring results

A total of 224 national brand websites and 107 company-owned social media profiles were reviewed, all of which contained product promotion.

Out of these 224 websites, 2 websites were found not to comply with EU Pledge commitment, as they were deemed to be designed to be of particular appeal to children under 12 and promoting products that did not meet the nutrition criteria of the EU Pledge member companies.

Out of the 107 company-owned social media profiles reviewed, 2 were found in breach of the EU Pledge commitment.

11 out of the 224 websites reviewed contained items that were in breach of advertising codes or relevant advertising laws. In total 17 problematic items were flagged by the SROs.

10 out of the 107 social media profiles reviewed contained items that were in breach of advertising codes or relevant advertising laws. In total 17 problematic items were flagged by the SROs.

★ **99% of the company-owned websites reviewed were in compliance with the EU Pledge commitment.**
★ **98% of the brand social media profiles reviewed were compliant with the EU Pledge commitment.**

EASA was also requested to monitor the compliance of mobile apps with the EU Pledge commitment. However, due to an insufficiently large sample of apps featuring non-compliant products required to successfully carry out the monitoring exercise and offer a comprehensive analysis, EASA decided not to pursue this element of the monitoring programme further.

In 2016, a pilot monitoring exercise found that only one out of the 20 apps reviewed was primarily targeted at children under 12 and featured non-compliant product promotions. The app was considered as potentially in breach of the EU Pledge commitment. The app is no longer available.

Follow-up

The four instances of non-compliance were reported to the EU Pledge member companies concerned, allowing them to take corrective action in a timely manner.

REVISION OF THE EU PLEDGE COMMON NUTRITION CRITERIA

In March 2017, two years after the implementation of the common nutrition criteria, the EU Pledge announced changes to the Nutrition White Paper. Members committed to a 10% sugar and sodium reduction to the thresholds applicable in several product categories by the end of 2018.

The EU Pledge is a voluntary initiative and as such, it is able to respond promptly to new challenges and evolving consumer expectations. Since its adoption in 2007, the EU Pledge has significantly enhanced its commitment by increasing the types of media covered and by increasing its membership. These changes are the result of a constant review of the commitments and an on-going dialogue with key stakeholder and decision-makers, first and foremost in the context of the Platform on Diet, Physical Activity and Health.

EU Pledge member companies embarked in 2012 on an ambitious project to respond to concerns regarding the nutrition criteria applied by those companies that chose to continue advertising certain of their products to children under 12. Until their entry into force on 1 January 2015, members used company-specific nutrition criteria which, although science-based, raised potential problems of transparency and consistency. The EU Pledge therefore committed to developing common category-based criteria, applicable only to those companies that use nutrition criteria. The criteria are not applicable to companies that do not advertise any of their products to children under 12.

No nutrition criteria were developed for certain categories, such as chocolate, confectionery and soft drinks. This reflects existing commitments by several member companies active in these categories and it confirms that none of the EU Pledge member companies will advertise these products to children under 12, as defined in the EU Pledge commitments.

The common nutrition criteria are based on a set of "nutrients to limit" and "components to encourage" (nutrients and food groups). A system taking both into account is in line with the core objective of the EU Pledge – to foster innovation, reformulation and competition for a shift towards advertising of products meeting nutrition criteria – rather than a system based solely on "nutrients to limit".

The "nutrients to limit" - sodium, saturated fat and total sugars – were chosen on the basis of widely available evidence that they are of public health concern because population average intakes are in excess of those recommended or desirable for health.

The common nutrition criteria entered into force on 1 January 2015. In line with the framework approach of the EU Pledge, whereby companies must meet a common benchmark but can go beyond if they wish, member companies may use different nutrition criteria than the common criteria, but on condition that they are demonstrably more stringent than the common ones.

In 2017 EU pledge members agreed to strengthen the criteria by further reducing the sugar and sodium thresholds for several categories. The following changes, most of which will enter into force by the end of 2018, were agreed:

· **Breakfast Cereals**
10% sugar reduction
(end 2019)

· **Potato chips**
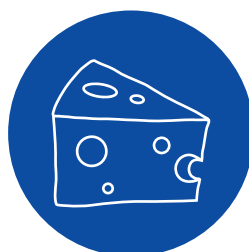· **Extruded/pelleted snacks**
10% sodium reduction
(end 2019)

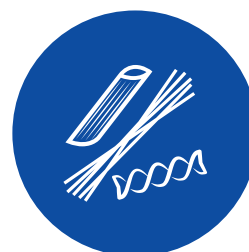· **Seeds & Nuts**
10% sodium reduction

· **Meal sauces**
10% sodium reduction
+ 10% sugar reduction

· **Dairy products other than cheeses**
10% sugar reduction
+ sodium reduction
(from 300 to 160mg)

· **Cheese**
· **Savoury dairy-based products**
5% sodium reduction

· **Cereal & cereal products except breakfast cereals, biscuits and fine bakery wares**
10% sodium reduction

· **Meals**
10% sugar reduction

· **Soups**
10% sodium reduction
+ 10 % sugar reduction

The full EU Pledge Nutrition Criteria White Paper is available at www.eu-pledge.eu. The changes described above will be incorporated in a revised White Paper, which will be published on the EU Pledge website in the course of 2018.

CONCLUSIONS & NEXT STEPS

After nine years of independent third-party monitoring, the EU Pledge has been able to demonstrate a high level of member companies' compliance with their commitments, as well as a significant change in the balance of food advertising to children in the EU towards options that meet common nutrition criteria. The membership of the initiative has also grown from 11 to 22 member companies, to cover over 80% of food and beverage advertising spend in the EU.

The EU Pledge is a dynamic initiative. While it provides a common framework, member companies can make commitments that go beyond it, and several do. Since its launch, most of the founding member companies have stepped up their corporate commitments, tightening the way they define advertising to children, broadening the scope of their actions and strengthening the nutrition criteria.

In the same spirit and following constructive dialogue with stakeholders, the EU Pledge enhanced its framework voluntary commitments in 2012 and 2014, applicable to all members throughout the EU.

The decision announced in 2017 to strengthen the common nutrition criteria by the end of 2018 follows the same line.

The monitoring pilot carried out in 2016 helped members prepare for the entry into force of the enhanced commitments on 31 December 2016:

★ **Extension of scope:** The EU Pledge commitment was extended to cover not only TV, print, third-party internet and company-owned websites, but also radio, cinema, DVD/CD-ROM, direct marketing, product placement, interactive games, apps, mobile and SMS marketing.

★ **Addressing creative execution:** Where no reliable audience measurement data is available, the new commitments ensure that advertisers consider not only the placement, but also the overall impression of the marketing communication, to ensure that if the product in question does not meet the common nutrition criteria, the communication is not designed to appeal primarily to children.[11]

The 2017 monitoring programme has shown that member companies were able to achieve high compliance levels with the enhanced commitments. The ongoing improvement in compliance rates for company-owned websites and social media profiles evidences members' commitment to the EU Pledge and points to the usefulness of the implementation guidance[12] released in 2016.

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11 Further information about the enhanced commitments can be found here: http://www.eu-pledge.eu/content/enhanced-2014-commitments

12 The EU Pledge implementation guidance report is available here: http://eu-pledge.eu/sites/eu-pledge.eu/files/misc/Implementation_Guidance_Report.pdf

The sixth digital monitoring programme for company-owned websites has enabled the EU Pledge to draw lessons on how to further refine the monitoring methodology for the future.

In 2017, the EU Pledge also announced the development of an accountability mechanism to allow members of the public to question the compliance of members' marketing communications with the EU Pledge commitment.

The system, developed in partnership with EASA and inspired by SROs' best practice at national level, will be launched in 2018 and presented to the EU Platform for Diet Physical Activity and Health.

EU PLEDGE

Advertising to Children Commitment

Compliance Report 2017

ACCENTURE
MEDIA
MANAGEMENT
GlobalScale.CustomResults.

1. **TV COMPLIANCE MONITORING**
2. APPENDICES
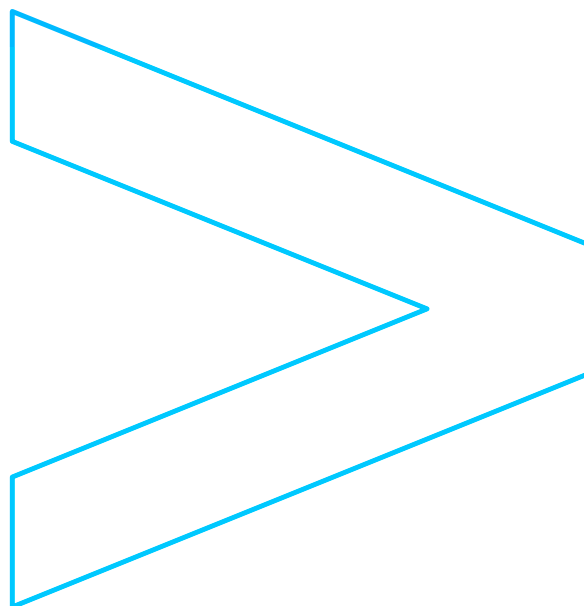
ACCENTURE
MEDIA
MANAGEM
GlobalScale.Cu

TV METHODOLOGY

- Assess EU Pledge member companies' compliance with the following commitment:

"No advertising of products to children under 12 years, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines. For the purpose of this initiative, "advertising to children under 12 years" means advertising to media audiences with a minimum of 35% of children under 12 years."

- Six sample EU Pledge markets were chosen for monitoring: France, Germany, Hungary, Italy, Romania and Spain. All spots aired in these markets in Q1 2017 were reviewed for audience composition at time of broadcast. Spots for products not meeting nutritional criteria and reporting an audience >35% children under 12 were deemed non-compliant.

- EU Pledge member companies covered: Amica Chips, Bel Group, Burger King, Coca-Cola, Danone, Ferrero, FrieslandCampina, General Mills, Intersnack, Kellogg's, Lorenz Snack-World, Mars, McDonalds, Mondelez, Nestle, PepsiCo, Unichips and Unilever.

TV METHODOLOGY

- The following total number of spots were analysed across the six EU Pledge markets and eighteen member companies:

Country	Total Spots	Total Spots for Restricted Products
France	33,841	23,464
Germany	44,728	39,969
Hungary	173,502	159,461
Italy	174,319	111,090
Romania	140,562	127,063
Spain	123,991	83,780
TOTAL	**690,943**	**544,827**

TV METHODOLOGY

- For TV advertising the compliance rates in this report are provided in two forms:

- **For all spots aired**: this is the formal EU Pledge compliance rate.

- **For daytime (06h00-20h59) spots with at least 1 GRP**: This second measure of compliance is intended to help member companies identify genuine breaches, i.e. instances where spots for restricted products were placed in or around daytime programmes reaching 35% or more children under 12. The demographic audience breakdown for _spots below 1 GRP_ is often unreliable, due to small audience size. These spots and those broadcast at night time are included in the overall EU Pledge compliance results nonetheless, in view of transparency and simplicity of external communication.

TV METHODOLOGY

- **Statistical anomalies and overstatement of non-compliance**
It is worth noting that of the vast majority of spots found technically non-compliant (i.e. achieving an under-twelve audience share above 35%, regardless of the time of broadcast and of the adjacent programme), only a few can be considered to be certainly in breach of the spirit of the EU Pledge commitment, i.e. broadcast in or around children's programmes as such. Most spots included as non-compliant in this report are spots broadcast in or around general/ adult programmes that were reported in national ratings data as displaying a share of children under 12 above 35%. The reason for this discrepancy is that audience statistics for programmes and advertising spots with a small audience – included in these monitoring results – are not reliable: a small audience means a small sample of households, rendering the demographic analysis of the audience unreliable. For statistical reliability, marketers typically exclude advertising spots below 1 Gross Rating Point (GRP). GRPs are the measure of television ratings. They are calculated in relation to the target audience – children under 12 for the purposes of this analysis. In this case a spot with less than 1 GRP is a spot that reaches less than 1% of the under-12 audience in the country in question. These spots often display an implausible share of under-12 viewers: e.g. a spot during a sports programme broadcast at 2am shows a child audience of 100%. This is the result of statistical anomalies. All non-compliant spots were nonetheless included in the report for the sake of transparency and simplicity, even though they are, at worst, examples of "technical" non-compliance.

OVERALL COMPLIANCE RESULTS – ALL SPOTS

97.4% compliance was achieved across all markets.

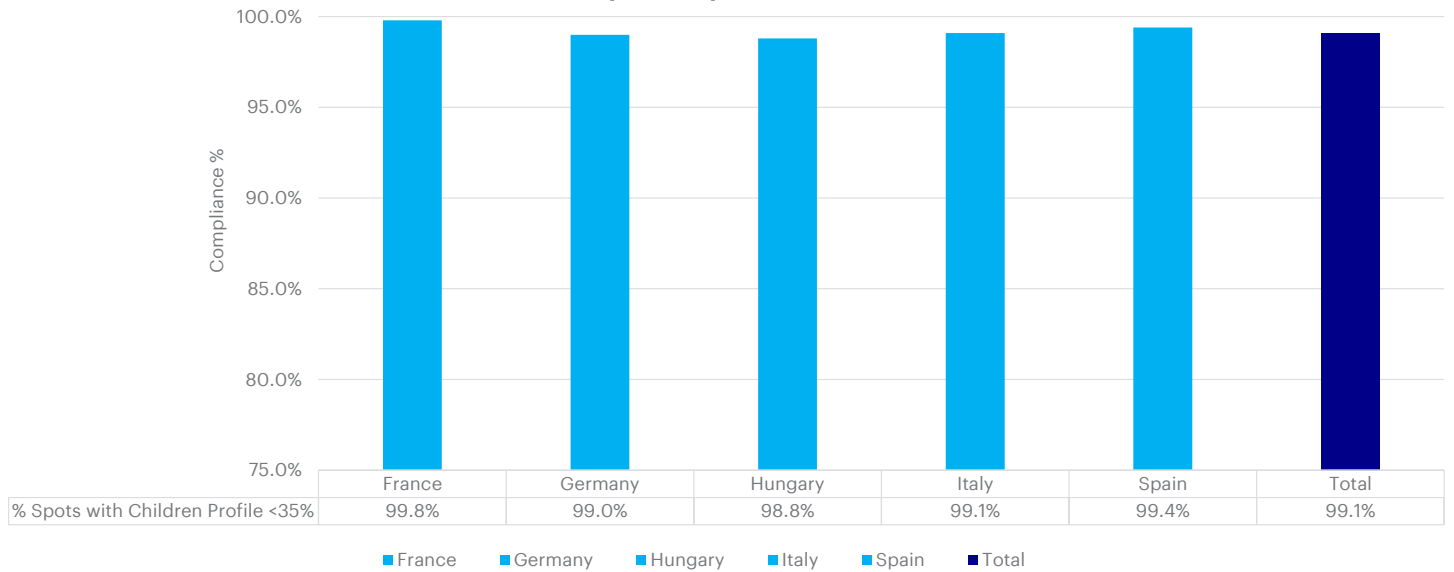**% compliance by market based on number of occurrences**
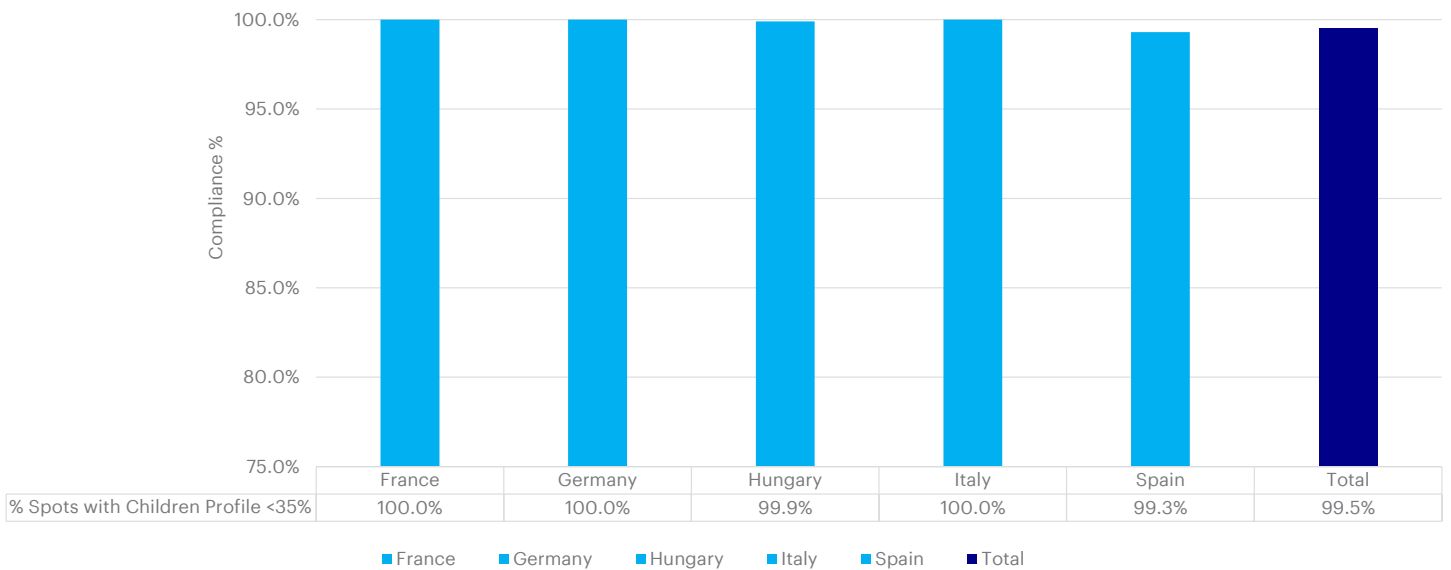
	France	Germany	Hungary	Italy	Romania*	Spain	Total
% Spots with Children Profile <35%	99.8%	99.0%	98.8%	99.1%	92.0%	99.4%	97.4%

■ France ■ Germany ■ Hungary ■ Italy ■ Romania* ■ Spain ■ Total
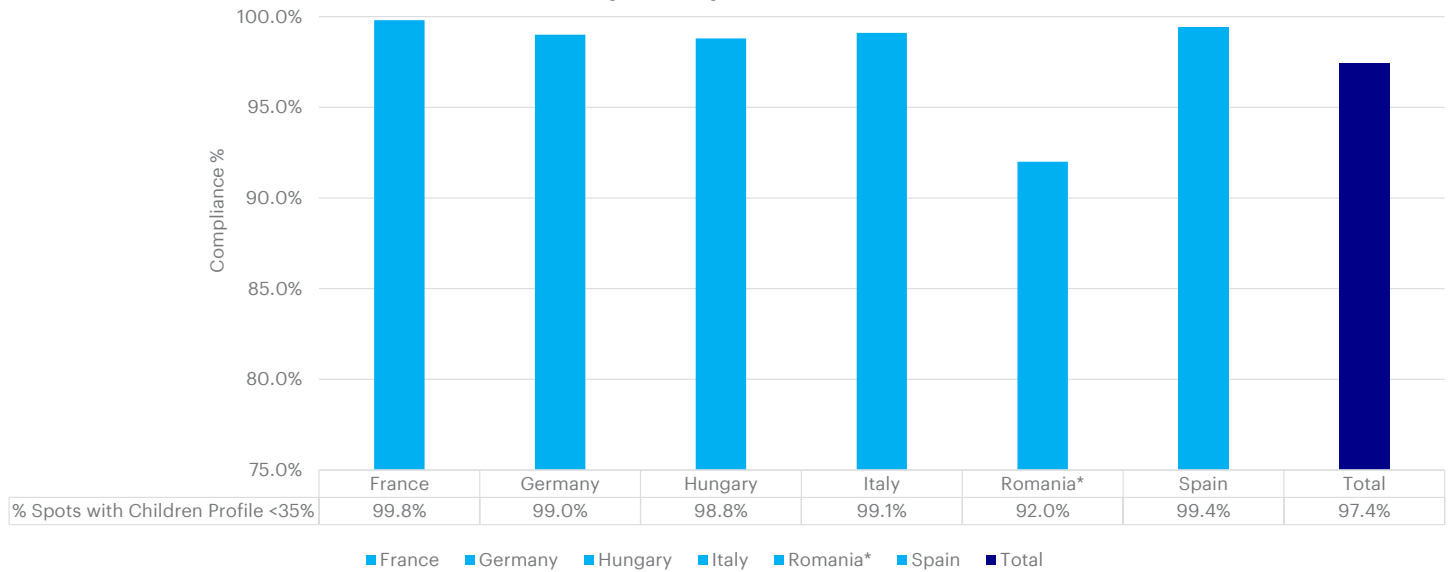
Note*: Further anomalies to the norm were found in Romania TV panel data 'Children 4-11' where the representation is often small, or an estimation, and therefore unreliable.

OVERALL COMPLIANCE RESULTS – ALL SPOTS w/o ROMANIAN MARKET

99.1% compliance was achieved across all markets when Romania is not considered.

% compliance by market based on number of occurrences

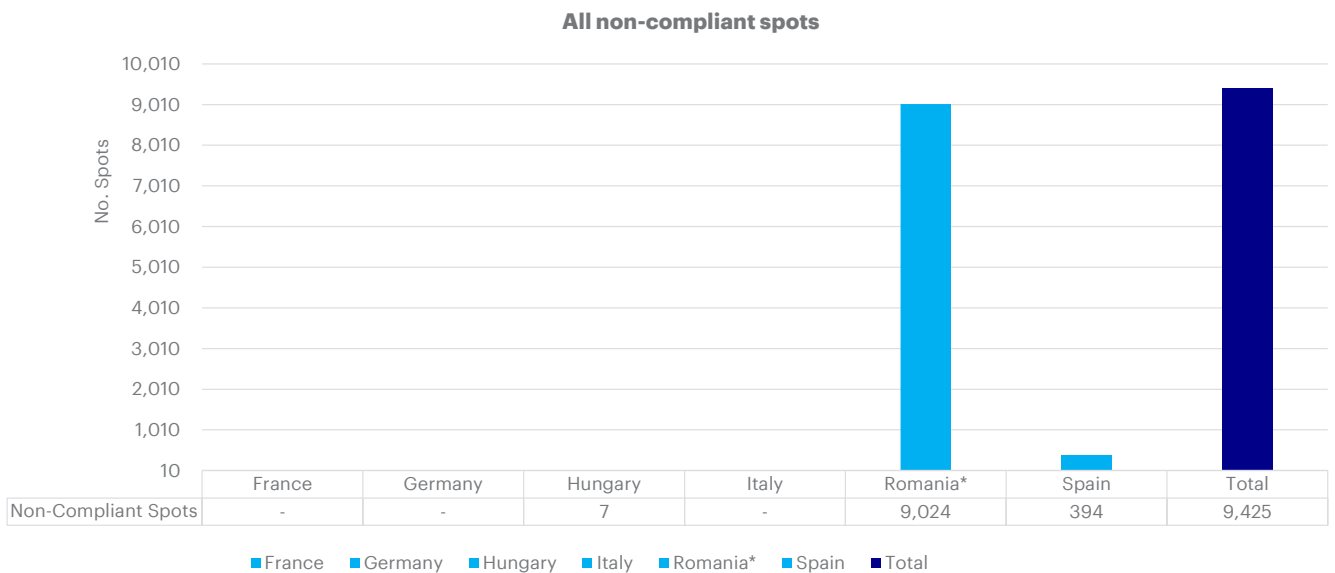|	France	Germany	Hungary	Italy	Spain	Total
% Spots with Children Profile <35%	99.8%	99.0%	98.8%	99.1%	99.4%	99.1%

■ France ■ Germany ■ Hungary ■ Italy ■ Spain ■ Total

OVERALL COMPLIANCE RESULTS – DAY TIME SPOTS & >1GRP

92.9% compliance was achieved across all markets.

% compliance by market based on number of occurrences

% Spots with Children Profile <35%	France	Germany	Hungary	Italy	Romania*	Spain	Total
	100.0%	100.0%	99.9%	100.0%	84.3%	99.3%	92.9%

■ France ■ Germany ■ Hungary ■ Italy ■ Romania* ■ Spain ■ Total
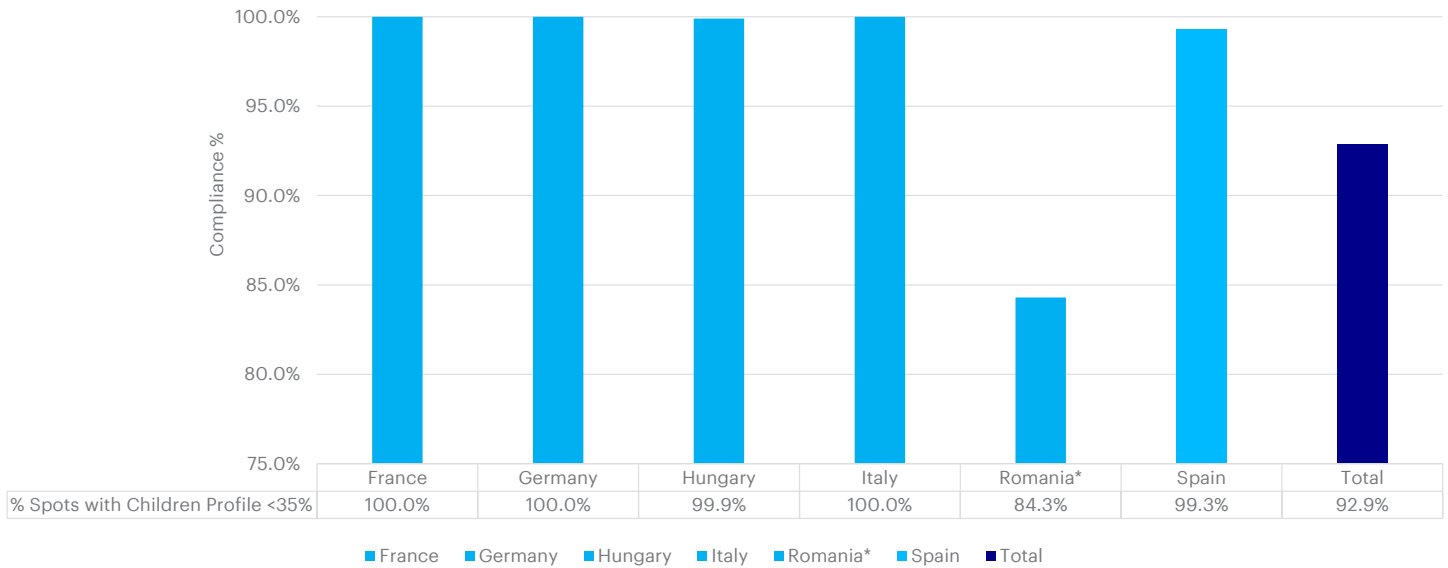
Note*: Further anomalies to the norm were found in Romania TV panel data 'Children 4-11' where the representation is often small, or an estimation, and therefore unreliable.

OVERALL COMPLIANCE RESULTS – DAY TIME SPOTS & >1GRP w/o ROMANIAN MARKET

99.5% compliance was achieved across all markets when Romania is not considered.

% compliance by market based on number of occurrences

% Spots with Children Profile <35%	France	Germany	Hungary	Italy	Spain	Total
	100.0%	100.0%	99.9%	100.0%	99.3%	99.5%

■ France ■ Germany ■ Hungary ■ Italy ■ Spain ■ Total

NON COMPLIANT SPOTS – ALL SPOTS

There was a total of 14,117 spots that were non-compliant across all markets.
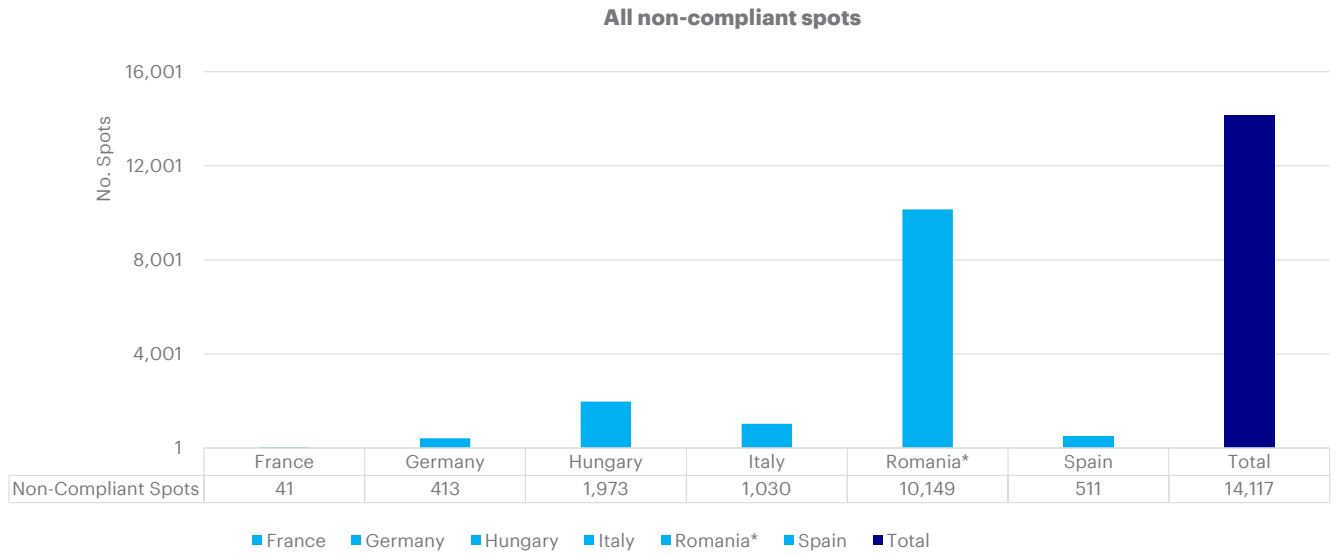
All non-compliant spots

	France	Germany	Hungary	Italy	Romania*	Spain	Total
Non-Compliant Spots	41	413	1,973	1,030	10,149	511	14,117

■ France ■ Germany ■ Hungary ■ Italy ■ Romania* ■ Spain ■ Total

Note*: Further anomalies to the norm were found in Romania TV panel data 'Children 4-11' where the representation is often small, or an estimation, and therefore unreliable.

NON COMPLIANT SPOTS – DAY TIME SPOTS & >1GRP

There was a total of 9,425 spots that were non-compliant across all markets.

All non-compliant spots

	France	Germany	Hungary	Italy	Romania*	Spain	Total
Non-Compliant Spots	-	-	7	-	9,024	394	9,425

■ France ■ Germany ■ Hungary ■ Italy ■ Romania* ■ Spain ■ Total

Note*: Further anomalies to the norm were found in Romania TV panel data 'Children 4-11' where the representation is often small, or an estimation, and therefore unreliable.

ACCENTURE
MEDIA
MANAGEMENT
GlobalScale.CustomResults.
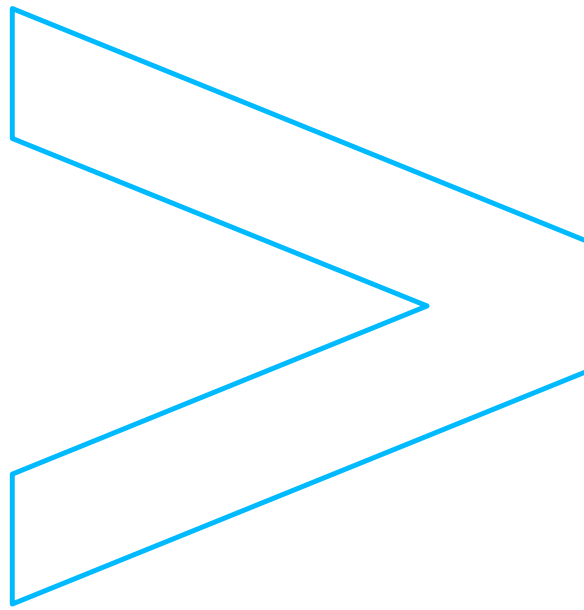
TV DEFINITIONS

- **Spot -** Each individual advertising activity - the airtime used by the advertiser

- **Restricted products -** Products that do not meet the EU Pledge common nutrition criteria for marketing to children

- **Profile -** Demographic breakdown of the audience at spot level, with regard to children under 12

- **Impacts (Impressions) -** Number of times a message is seen by the audience

- **GRP (Gross Rating Point) -** Percentage of the target audience reached by an advertisement, multiplied by the frequency that the audience sees it.

    For example, a TV advertisement that is aired 5 times reaching 50% of the target audience, would have 250 GRPs
    (GRP = 5 x 50%)

TV CHANNELS MONITORED

France	C8+	PUISSANCE TNT	CSTAR	TF1	FRANCE 2
	FRANCE 3	FRANCE 5	M6	TMC	NT1
	NRJ12	GULLI	HD1	NUMERO 23	CHERIE25
	FRANCE O	FRANCE 4			

Germany	RTL	SAT.1	PRO7	RTL II	SUP RTL
	VOX	COMEDY C	Tele 5	DMAX	KABEL 1
	N-TV	N 24	SPORT1	Nick	DisneyChan
	Nitro	Pro7 MAXX	SAT.1 Gold	sixx	ZDF
	VIVA	ARD	TLC		

TV CHANNELS MONITORED

Hungary	AMC	ATV	AXN	CARTOON NETWORK	CHILI TV
	COMEDY CENTRAL	COOL	DISCOVERY CHANNEL	DISNEY CHANNEL	DOQ
	DUNA TV	DUNA WORLD	F+	FEM3	FILM CAFE
	FILM MANIA	FOX	Galaxy TV	HUMOR+	ID Xtra
	IZAURA	KIWI TV	LifeTv	M1	M2
	M3	M4 Sport	M5	MOZI+	MUSIC CHANNEL
	MUZSIKA TV	NAT GEO WILD	NATIONAL GEOGRAPHIC	OzoneTv	PARAMOUNT
	PRIME	RTL Gold	RTL+	RTL II	RTL KLUB
	RTL Spike	SLAGER TV	SOROZAT+	SPEKTRUM	SPEKTRUM HOME
	SPILER TV	SPORT1	SPORT2	STORY4	STORY5
	Super TV2	TLC	TV2	TV PAPRIKA	VIASAT3
	VIASAT6	VIVA	ZENEBUTIK		

TV CHANNELS MONITORED

Rai 1	Rai 2	Rai Premium	Canale 5	Rai 3
Rai News 24	Rai 4	La7	Rete 4	Nove
Tgcom 24	Real Time	Real Time +1	Italia 1	La7d
Mediaset Extra	La5	Top Crime	Iris	Rai Movie
Premium Sport/HD	Premium Sport 2/HD	Premium Calcio 1	Animal Planet	Vh1
Comedy +1	Dmax	Sky Uno	Giallo	Discovery Travel e Living
ID Investigation Discovery	Focus	Dmax +1	Sky Uno +1	Premium Action
Cielo	NatGeo People	Studio Universal	Premium Crime	Premium Stories
Discovery Channel	Fox Life	Joi	Premium Cinema	Discovery Science
Discovery Channel +1	Fox Life +1	Gambero Rosso Channel	Eurosport 2	Cinema Emotion
Tv8	Lei	Lei +1	Eurosport/HD	Premium Cinema Comedy
Cinema Energy	Comedy Central	Paramount Channel	Radio Italia Tv	Italia 2 Mediaset
Sportitalia	Sky Cinema Hits	Fox Animation	Fox Comedy	Sky Super Calcio
Sky Cinema Comedy	Sky Sport 2	Sky Sport Moto GP	Crime+Investigation HD	Sky Cinema Uno
Sky Cinema +24	Sky Cinema +1	Sky Cinema Passion	Fox Crime/HD	Fox Crime +1
Dove Tv	AXN/HD	AXN +1	Sky Calcio 6	National Geographic
National Geographic +1	Fox Crime +2	AXN Sci-Fi	Sky TG24 (DTT)	Frisbee
K2	Sky TG24 Primo Piano	Sky Sport 3	Sky Meteo24	NatGeo Wild +1
Fox/HD	Fox +1	NatGeo Wild	History HD	History +1
Sky Cinema Cult	Sky Sport Plus	Fox Sports Plus Sat	Sky Cinema Family	Sky Cinema Family +1
Sky Calcio 8	Nickelodeon +1	Nickelodeon	Nick Jr.	Boing
Nick Jr. +1	Super!	Rai Gulp	La 3	Sky TG24 (DTH)
Sky Atlantic	Sky Atlantic +1	Teen Nick Music Party	Premium Calcio 2	Sky Sport F1
Sky Sport 1	Sky Calcio 5	Sky Calcio 2	Sky Calcio 1	Sky Calcio 4
Sky Sport Mix	Sky Calcio 9	Fox Sports Sat	Rai Sport	Rai Sport 2
Cartoonito	Sky Sport 24			

Italy (row label for the above table)

TV CHANNELS MONITORED

Romania	Pro TV	Antena 1	Acasa	Prima TV	Kiss TV
	Sport.ro	National TV	AXN	Antena 3	U TV
	Kanal D	Antena Stars	Music Channel	ZU TV	Hit Music
	Acasa Gold	Digi 24	History	Pro Cinema	Comedy Central
	Discovery	Animal Planet	AXN Black	AXN White	Paramount
	TLC	B1TV	Realitatea TV	National Geographic Wild	Romania TV
	National Geographic	TVR 1	TVR 2	Happy Channel	TV Paprika
	Diva	Film Cafe	TNT	DigiSport 1	DigiSport 2
	Disney	Boomerang	Disney Junior	Minimax	Cartoon Network
	N24 PLUS	Nickelodeon	AMC	Eurosport 1	Favorit TV
	ETNO				

TV CHANNELS MONITORED

	T5	A3	TV3	ETB2	ETB4
	8TV	CUATRO	LA SEXTA	NEOX	NOVA
	A&E	HISTORIA	CALLE 13	SUNDANCE TV	DISCOVERY
	EUROSPORT	FDF	FOX	MTV ESP	NATIONAL GEOGRAPHIC
	ODISEA	COMEDY CENTRAL	SYFY	VIAJAR	CRIMEN + INVESTIGACION
	NGC WILD	DIVINITY	ENERGY	DMAX	PARAMOUNT CHANNEL
	AXN WHITE	FOX LIFE	AMC	MEGA	ATRESERIES
	BEMADtv	TEN	REAL MADRID HD	DKISS	GOL
	LALIGA 1|2|3TV	BEIN LIGA	C.SUR	TVG	TELEMADRID
Spain	TVCAN	CMM	LAOTRA	TPA2	ARAGON TV
	TPA	IB3	SUPER3/33	TV MEDITERRANEO	AXN
	13 TV	CYL7	45352	BEIN LIGA1	TNT
	AND-TV	LALIGA 1|2|3TV MULTI 1	LALIGA 1|2|3TV MULTI 2	CANAL COCINA	CANAL HOLLYWOOD
	COSMOPOLITAN	DARK	DECASA	XTRM	SOMOS
	CANAL HOLLYWOOD +1	MOVISTAR PARTIDAZO	NICK	BOING	NICK JR
	DISNEY CH +1	DISNEY CHANNEL	MOVISTAR ACCION	MOVISTAR COMEDIA	MOVISTAR DCINE
	MOVISTAR CINE ESPAÑOL	MOVISTAR XTRA	MOVISTAR SERIES	MOVISTAR ESTRENOS	MOVISTAR SERIES XTRA
	#0	LALIGA 1|2|3TV MULTI 3	ESPORT3	LALIGA 1|2|3TV MULTI 4	La1
	BEIN SPORTS	LA 7TV	BEIN MAX1	CSUR-AND	MOVISTAR DEPORTES 2
	CLAN	MOVISTAR DEPORTES 1	MOVISTAR FUTBOL	MOVISTAR GOLF	EUROSPORT 2
	TELEDEPORTE				

AGE GROUP DEFINITIONS

Country	All Persons	Children Under 12
France	all indiv	Under 12's
Germany	A 3+	Kids 04-12
Hungary	Total Individuals	All 4-12
Italy	all indiv	Under 12's
Romania	4+	Children 4-11
Spain	Ind. 4+	Ind 4-11

2017

EU PLEDGE SURVEY

EASA

The European Advertising Standards Alliance (EASA) is the single authoritative voice of advertising self-regulation in Europe. EASA promotes high ethical standards in commercial communications by means of effective self-regulation for the benefit of consumers and business. For further information, please visit: www.easa-alliance.org.

As a non-profit organisation based in Brussels, EASA brings together national advertising self-regulatory organisations and associations representing the advertising industry in Europe.

EASA editorial team

Francesca Fabbri, Project Officer

Federico Lazzari, Project Assistant

EASA contact information

Francesca Fabbri

francesca.fabbri@easa-alliance.org

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Introduction

EASA was commissioned by the EU Pledge Secretariat to review a number of food and beverage brand websites, social media profiles and mobile apps belonging to the EU Pledge [1] member companies and independently check compliance with the EU Pledge criteria as well as SR codes and national laws.

The goal of the project was to determine whether the reviewed company-owned websites, social media profiles and mobile apps were compliant with the relevant EU Pledge commitment.

Compliance with the EU Pledge commitment, for brand websites, social media profiles and mobile apps, is determined on the basis of whether:

- The website or social media profile or mobile app features marketing communications;
- If these marketing communications promote food or beverage products, as opposed to a brand in general;
- Such food and beverage products meet or do not meet the EU Pledge common nutritional criteria;
- Such marketing communications are designed to be targeted primarily at children under 12.

Please note that the apps segment is absent from this project, due to an insufficient sample of apps featuring non-compliant products required to successfully carry out the monitoring exercise and offer a comprehensive analysis.

Advertising self-regulation experts were requested to try and think from the perspective of a child younger than 12 while reviewing brand websites and social media profiles and keep in mind what a child of this age would find interesting and attractive. Special attention had to be paid to specific aspects of the websites and social media profiles that would make them appealing to under-12s.

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[1] The EU Pledge is a voluntary commitment of leading food and non-alcoholic beverage companies to limit their advertising to children under 12 to products that meet specific nutritional standards. The EU Pledge is a response from industry leaders to calls made by the EU institutions for the food industry to use commercial communications to support parents in making the right diet and lifestyle choices for their children. The EU Pledge programme is endorsed and supported by the World Federation of Advertisers.

In order to offer unbiased, independent and accountable results, a 'consumer oriented approach' has been drawn up by the EASA Secretariat in collaboration with the EU Pledge Secretariat and Dr. Verónica Donoso, the independent reviewer of the exercises that were conducted between 2011-2016. The 2017 methodology was adapted by EASA, the EU Pledge Secretariat and Professors Liselot Hudders[2] and Dieneke Van de Sompel[3], independent reviewers of this exercise. The role of the independent reviewers is to verify that appropriate criteria have been set up in the methodology, perform quality check on SROs' reviews, testify to the correctness of the monitoring procedure, and sign off on the EASA top line report.

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[2] **Liselot Hudders** is an assistant professor at the department of communication sciences at Ghent University and a postdoctoral fellow of the FWO at the marketing department. She teaches courses on Consumer Behavior, Communicative Skills and Organizational Psychology and she serves as ad hoc reviewer for journals as Journal of Happiness Studies, Journal of Adolescence, and Journal of Brand Management and for conferences as EMAC, and ICORIA. She participated in many international conferences and published in various international journals. Her research interests include Persuasive Communication, Consumer Behavior and Advertising Literacy. Her research focus lays on how consumption affects an individual's well-being. In particular, she is conducting research on how materialism and luxury consumption, green consumption practices, and food consumption may contribute to an individual's happiness (both for children and adults). In addition, she investigates how children and youngsters cope with (new) advertising techniques. She is particularly interested in 1) how minor's advertising literacy can be improved, using advertising cues and advertising literacy training sessions and 2) how parental mediation and peer influences moderate these effects.

[3] **Dieneke Van de Sompel** is a visiting professor at the Department of Communication Sciences at Ghent University. She obtained a PhD in Applied Economic Sciences ("Insights in children's consumer related activities and reactions to advertising") in 2016 at the department of Marketing, Faculty of Economics and Business Administration of Ghent University. The dissertation explored two touch points children have with consuming, namely play activities and advertising exposure. She has worked as a research and teaching assistant at the marketing department of the Faculty of Economics and Business Administration of Ghent University and the department of Business Administration and Public Administration of University College Ghent, where she has given courses such as Marketing planning, Marketing strategy, Sales management etc. Dieneke is interested in research combining the domains of Communication sciences, Psychology and Marketing and she specifically centers her research on children's Consumer behavior and the effects of Advertising on children. Her research looks for example into how consumerism has an effect on children (for example on the development of materialistic goals, purchase intentions, ad preferences). She also works on projects that examine the effects of advertising cues (such as exposure to attractive models) on children's self-esteem and well-being.

Project Overview

Experts from 6 European self-regulatory organisations (SROs) were invited by EASA and the EU Pledge Secretariat to conduct the monitoring exercise starting mid-October until the end of November 2017, in order to assess the appeal of marketer-owned websites and social media profiles to children under 12. The 6 chosen SROs represent different systems in terms of size (big vs. small SROs), location (geographical coverage) and maturity (new vs. old systems).

Table 1: List of the participating countries/SROs

Country	SRO
Bulgaria	NCSR
France	ARPP
Germany	DWR
Hungary	ÖRT
Spain	AUTOCONTROL
The Netherlands	SRC

Self-regulation experts from the 6 SROs reviewed a sample of 331 items, including national brand websites[4] and social media profiles of EU Pledge company members.

Table 2: Number of websites and social media profiles reviewed per country

Country	Websites	Social Media profiles
Bulgaria	19[5]	36
France	40	16
Germany	45	10
Hungary	40	15
Spain	40	15
The Netherlands	40	15

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4 Where available, at least 1 website per company.
5 Due to limited availability.

Below is a list of the EU Pledge member companies.

Table 3: List of the EU Pledge member companies

EU Pledge member companies	
Amica Chips	Bel Group
Burger King	Coca-Cola
Danone	Ferrero
General Mills	ICA Foods
Intersnack	Kellogg's
KiMs	Lorenz Snack-World
Mars	McDonald's
Mondelēz	Nestlé
PepsiCo	Royal Friesland Campina
Unichips-San Carlo	Unilever
Zweifel Pomy-Chips	

Methodology

The EU Pledge Secretariat provided EASA with a list of all products promoted by the EU Pledge member companies in the selected markets. The list indicated whether these products met the applicable nutritional criteria set out in the EU Pledge Nutrition White Paper. From this, EASA compiled a list of websites and social media profiles that promoted products that did not meet the nutritional criteria. Based on EASA's list the self-regulatory experts selected websites and social media profiles to review. When making their selection, reviewers were requested to consider products popular amongst children in their country.

EASA carried out a thorough search of existing apps in the selected markets, but could not identify a sufficient number of apps promoting non-compliant products to ensure a meaningful analysis of compliance.

To offer unbiased, independent and accountable results, a 'consumer oriented approach' was drawn up by the EASA Secretariat in collaboration with the EU Pledge Secretariat and Dr. Verónica Donoso, the independent reviewer of the 2011-2016 exercises. The methodology was revised in 2017 by EASA, the EU Pledge Secretariat and the current independent reviewers Professors Liselot Hudders and Dieneke Van de Sompel.

The questionnaire for the **websites** asked the self-regulatory experts if the website being reviewed contained elements such as games/entertainment activities[6], animations/sound effects/videos, licensed characters[7] and toys, and to decide if these were in their view primarily designed for children under 12. Reviewers then had to judge if these elements, in conjunction with the creative execution of the website (i.e. simplicity of language, use of font size and typeface, use of colours, etc.), were clearly intended to make the marketing communication(s) on the website primarily appealing to under-12s.

A number of websites contained features to screen the age of the visitor and the reviewers were asked to note if a website contained such features. However, this element was <u>not</u> considered to be sufficient to ensure compliance if the marketing communications on the website were clearly designed to appeal primarily to children under 12.

Based on the level of appeal of the creative execution to under-12s as well as the overall findings reported by the self-regulatory experts, the reviewers determined the final compliance of the websites with the EU Pledge criteria.

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[6] A game/entertainment activity is an activity engaged for diversion or amusement. A non-exhaustive list of games/entertainment activities are: online interactive games, casual/social games, puzzles, board games, role-playing games, trivia, card games, racing, arcade, colouring sheets, activity sheets, do it yourself activities, etc.

[7] Characters acquired externally and linked for example to movies, cartoons or sports.

The questionnaire for the **social media profiles** asked the experts if the reviewed profiles allowed children under 12's access without registration[8] and if they featured licensed characters, games/entertainment activities, contests and promotional events, and to decide if the reviewed profiles were primarily designed for children under 12.

Reviewers then had to judge if these elements, in conjunction with the overall look and feel of the social media profile, were clearly intended to make the marketing communication(s) primarily appealing to under-12s.

Beyond compliance of websites with the EU Pledge and primary appeal of social media profiles to children under 12, the experts also flagged any items on the websites and social media profiles reviewed that potentially breached any applicable advertising codes or relevant legislation.

The following were considered:

- ICC Framework for Responsible Food and Beverage Marketing Communications;
- Relevant advertising standards and national sectoral codes;
- Relevant advertising laws.

All reviews were performed by experts from national SROs. EASA's role in the project was to ensure that the results were reported on in a consistent manner.

Note on the Methodology

In collaboration with the EU Pledge Secretariat and independent reviewers Professors Liselot Hudders and Dieneke Van de Sompel, EASA has taken great care to ensure that the results of this project are objective and consistent. They have - as explained above - developed a detailed methodology which was applied by all self-regulatory experts when assessing brand websites and social media profiles.

However, although it may be relatively easy to determine if a website or a social media profile appeals to children in general, it is much harder to determine if a website or a social media profile is designed to **appeal primarily to children younger than 12**. As a result, the decisions of the self-regulatory experts retain an unavoidable degree of subjectivity, although it is informed by their extensive day-to-day professional experience. Readers are requested to bear this in mind.

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[8] Given the fact that children under 13 are not allowed to create a profile on Facebook, Instagram, and YouTube, the questionnaire included a question aimed at checking if the pages of this social media platforms were accessible without registration and if they included language that encouraged the interaction or active participation of children under 12.

Note from the Independent Reviewers

This note is based on a thorough analysis of a random sample of 56 company-owned websites and 28 social media sites. This analysis has been conducted by a team of independent reviewers working at Ghent University, Center for Persuasive Communication, Dept. Of Communication Sciences. The team consists of two PhD students, Hayley Pearce and Melanie Verstockt and two Professors, Dieneke Van de Sompel and Liselot Hudders. The results of this analysis are discussed in this note.

1. Research Methodology

The 2017 monitoring research attempted to determine whether the company-owned websites, social media channels and mobile applications of the signatories of the EU Pledge were compliant with the EU Pledge Commitment. As youngsters grow up in the digital era, social media like Facebook, YouTube and Instagram play a significant role in their lives. Therefore, these social network sites were also included in the monitoring project this year.

In total, a sample of 224 company-owned websites and 107 social media channels were analysed by Self-Regulatory Organizations (SROs) in 6 different countries (France, Bulgaria, Germania, Hungary, Spain and The Netherlands). A team of independent coders at Ghent University double checked the coding done by the SROs by recoding a random sample of 25% of websites and social media profiles. The team reviewed a total of 56 websites and 28 social media profiles. Extra attention has been paid to websites and social media profiles that were indicated as not compliant with the EU Pledge criteria.

2. Main conclusions analysis SROs

In what follows, we summarize the main conclusions of the analysis of the SROs concerning the company-owned websites:

- Of the 224 national brand websites reviewed, 2 websites (1% in 2017, compared to 5% in 2016 and 3% in 2015) were considered to be in breach of the EU Pledge.

- There is a decrease in websites that are using an age-screening mechanism. Only 9% use one of these in 2017 as compared to 13% in 2016 and 2015.

- The number of websites that feature licensed characters went down in 2017 (16%), compared to previous years (19% in 2016 and 18% in 2015). Only 5% of the websites featuring licensed characters were found to be primarily appealing to children under 12 (as compared to 11% in 2016, 5% in 2015). In 2017, 3% of the websites used licensed characters/tie-ins/celebrities to explicitly promote a food/beverage product to children under 12.

- 31% of the websites contained games or entertainment activities (as compared to 30% in 2016 and 28% in 2015). Most of these games were targeting older children or adults due to higher complexity and a less appealing design. Only 2% of these games or entertainment activities (compared to 9% in 2016 and 10% in 2015) were primarily designed to target children under 12.

- There is also a decrease in the number of websites displaying animations (48% in 2017, 52% in 2016, 58% in 2015). Likewise, the use of animations designed to primarily appeal to children under 12 is less common than in previous years (4% in 2017, compared to 8% in 2016). Of the websites using animations to target children, 4% explicitly promoted a food/beverage product to children under 12 (for instance, food products that were promoted in videos directed to children).

- 3% of the websites included a direct link to their social media sites and/or mobile applications which were primarily appealing to children under 12, providing children with an easy access to social media and mobile applications.

The results of the assessment of company-owned social media profiles are similar to the results of the company-owned websites. Some interesting trends are summarized below:

- Of the 107 social media profiles reviewed, the SROs flagged 2 of them as being primarily appealing to children under 12.

- 1 social media page used a language that was clearly directed at children under 12. Only 4 social media (4%) pages encouraged the active participation of children. Nevertheless, interactions with children younger than 12 were found on 10 social media pages (9%).

- Brands often use licensed characters to help promote their products. Those were found on 26 social media pages (24%), 9 (8%) of them targeted primarily at an under-12 audience. 7 (6%) of them were used to promote food and beverage products.

- When looking at the use of games on brand-owned social media pages, 27 (25%) profiles featured an entertainment activity. Only 6% of these games were elementary enough to be played by children younger than 12 years old.

- 49% of the social media profiles reviewed featured pictures and videos. 14 (27%) of the 52 pictures and videos were found to be interactive and easy for children younger than 12 to understand. However, only 2 (4%) videos/pictures videos contained appealing music, 8 (15%) featured characters from movies that youngsters typically like and 23 (23%) were considered primarily appealing to children under 12 because of the colours and cartoon-like nature.

- 20 (19%) pages included competition and promotional events. Only 1 Facebook page included a competition promoted directly to an under-12 audience. 2 promotional events appeared to be appealing for children under 12.

3. Critical Notes on the SROs' review based on an Analysis of Inter-Coder Reliability

3.1 Research Methodology and Sample

Independent reviewers of Ghent University recoded a random sample of company-owned websites and social media profiles (25% has been double-coded). 56 websites and 28 social media sites were recoded according to the coding scheme developed by the EASA. 9 websites and 18 social media sites were deliberately included in the sample because of the potential breaches reported by the SROs. One reviewer at Ghent University coded the websites, the other one coded the social media profiles. After recoding, the inter-coder reliability was analysed in SPSS Statistics by calculating *Cohen's Kappa* (the closer the Cohen's Kappa is to one, the more agreement in coding between the independent coder and the SROs' coding; the closer the Cohen's Kappa is to zero, the more disagreement there is between the coders)[9]. The results were further discussed in the team and are reported in this note.

The results of the Cohen's Kappa analysis show a general reliability of .73 for the websites and .43 for the social media sites. This indicates a good agreement for the websites and a moderate agreement for the social media profiles. The reasons for the differences in evaluation could be the different timing of the review periods (a delay of one month and a half). Given the nature of online media and especially social media channels, changes in the profiles are likely, which in turn, changed thus the material that has been reviewed. Furthermore, SROs reviewed national websites and social media profiles locally giving them access to local content which was not necessarily available to the reviewers in Belgium. The local SR experts could also complete the review in the local language of the website or social media page, which was not necessarily possible for the control researchers. Finally, differences could also arise by having a different interpretation of the questions as well as a different understanding of the analysed elements. An improvement of the questionnaire and clearer definitions could lead to more agreements on the evaluation.

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[9] Cohen's Kappa is a measure used to assess inter-rater reliability in nominal data and compares to what extent the observations of two coders can be perceived as being alike. By doing so, measurement errors can be reduced. More agreement between the values of two coders (which is related to values closer to 1) indicates that there is more consensus about the question between the coders. Cohen, J. (1960). *A coefficient of agreement for nominal scales*. *Educational and psychological measurement*, 20(1), 37-46.

3.2 Inter-coder reliability analysis of company-owned websites

Our analysis confirmed the findings of the SROs for the websites that were flagged as being in breach. We double-checked the coding for these websites and would like to highlight that we found that several websites have elements that we consider not fully compliant with the EU Pledge. For several sites, the look and feel of the website seemed to be designed to target children, some websites included cartoon-like animations and pictures or contained videos and entertainment activities primarily targeting young children. Some websites contained information that tried to persuade children to buy products by offering them gifts. Based on our independent analysis on a random sub-sample of 56 websites, we also concluded that at least 7 websites additionally contained elements that appealed to young children. These websites were not considered by SROs as being in breach as a whole, but were flagged by the independent-coding team to be in breach with at least 1 element of the EU Pledge, for example because they included contests that stimulated product trial in which licensed characters or gadgets were offered as reward, or because they contained visuals (e.g. bright colours, less text, attractive animations) and animations appealing to children below 12.

3.3 Inter-coder reliability analysis of company-owned social media profiles (Instagram, Facebook and YouTube)

The SROs flagged 2 company-owned social media profiles as being in breach. We do agree with the fact that 1 profile mainly targeted young children by using videos that are clearly directed to children. However, our assessment of the other 1 differed because we considered the overall profile as not primarily aimed at children under 12. In addition, 16 other social media profiles were signaled by the SROs to feature elements in breach of the EU Pledge. We double-checked the coding for these profiles and found that indeed, several profiles contained videos appealing to young children, visual layouts that were appealing (e.g., showing colorful, happy and child-targeted pictures), pictures of branded characters making the profile very appealing to young children, licensed characters or advertising for products-tie-ins that were appealing to children etc. Additionally, our analysis found 5 additional brand-owned social media pages that featured elements we considered to be attractive to children younger than 12. Some other profiles were indicated by the SROs as potentially being in breach. These profiles mainly used licensed characters and promoted games that were targeting young children and movies encouraging children younger than 12 to buy the product.

4. General Conclusions

To conclude, we aim to formulate some final notes:

- Most of the websites featuring an *age-screening mechanism* ask the visitor to enter his/her age or date of birth. Children can easily enter a false age or birth date in the blank field provided. Other websites use a pop-up asking whether the visitor is older than a certain age, which children can also easily bypass. Company-owned websites should consider more creative ways to prevent children younger than 12 from entering. Some companies request parental permission by asking parents some elaborate questions, taking the age screening more seriously than others.

- Another note that we would like to make is about the use of licensed characters and *brand equity characters*. We have ethical issues with EU Pledge's decision to exclude brand equity characters from the analyses and suggest altering the EU Pledge to include these characters. Brand equity characters are also marketing tools and even more powerful ones for children under 12, which is why we can't come to terms with the reasons provided to exclude them from the commitment.

- Despite the fact it may occur that animations, videos, etc. do not specifically appeal to young children, the general look and feel of websites using such techniques (colours, etc.) often gives the impression that the website or profile is targeting young children. For many websites and social media profiles, the presence of brand characters makes the website appealing to children under 12. However, since brand characters fall outside the scope of the EU Pledge, it can happen that no breach is officially coded. We believe that these sites are targeting young children because of this aspect and should therefore be considered to be included in the scope of the EU Pledge.

- Furthermore, it is difficult for adults to determine whether games, animations, etc., are primarily designed to target children. We therefore believe it is necessary to *include children as coders* in order to objectively decide if the website is primarily designed for children younger than 12 years old.

- We also would like to add that children are also being targeted by advertising channels and advertising techniques that are currently not included in this exercise, such as influencer marketing, sponsoring of vloggers, pre-roll ads etc. It seems essential to also include these in the scope of future EU Pledge monitoring exercise.

Executive Summary

Brand-Owned Websites:

- A total of 224 national brand websites were reviewed;

- Out of the 224 websites, 2 were considered in breach of the EU Pledge criteria as they contained elements, such as entertainment activities or games, toys used as premiums or animations, videos, sound effects designed primarily for under-12s, as well as language, text or navigation clearly intended to make the marketing communications on the website appealing primarily to under-12s;

- Out of the 224 reviewed websites, 11 contained items that were in breach of advertising codes or relevant advertising laws. In total, 17 problematic items were flagged.

Brand-Owned Social Media Profiles:

- A total of 107 social media profiles were reviewed;

- Out of 107 reviewed social media profiles, 2 were considered in breach as they were deemed appealing primarily to children under 12 as they contained elements, such as videos/photos, entertainment activities/games, contests/competitions/promotional events, licensed characters as well as language addressed to children under 12 and encouraging their active participation;

- Out of the 107 reviewed social media profiles, 10 contained items that were in breach of advertising codes or relevant advertising laws. In total, 17 problematic items were flagged.

1. Brand-Owned Websites

1.1   Sample of Brand-Owned Websites

A total of 224 websites were reviewed by the experts. The table below provides an overview of the number of websites that were reviewed per country.

Table 4: Number of websites reviewed per country (N=224)

Country	Number of Websites Reviewed
Bulgaria	19
France	40
Germany	45
Hungary	40
Spain	40
The Netherlands	40
TOTAL	**224**

1.2   Product Promotion

The reviewers identified product promotion on all 224 websites reviewed. All reviewed websites featured at least 1 product that did not meet the common nutritional criteria.

1.3   Age screening/Parental Consent

20 out of 224 websites reviewed contained mechanisms to screen the age of the website visitor. Methods ranged from a field where the visitor had to enter his/her date of birth to a pop-up asking whether the visitor was older than a certain age.

Figure 1: Number of websites featuring age screening (N=224)
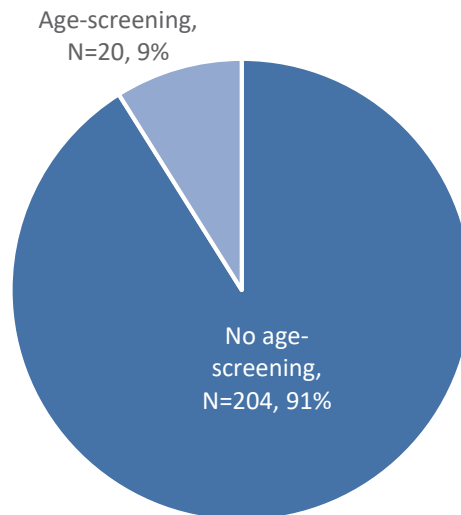
Below is an overview of the age screening's methods.

Figure 2: Types of age screening (N= 20)
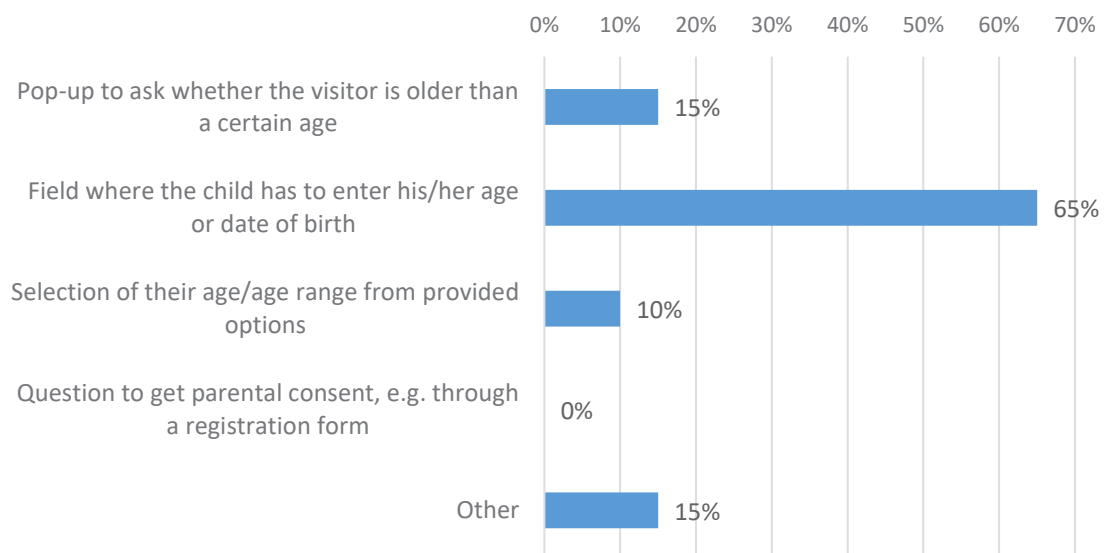
1.4   Licensed Characters/Tie-ins/Celebrities

The reviewers checked if the websites or the children's section(s) of the website featured licensed characters or movie tie-ins as means to promote food or beverage products. 35 out of 224 websites featured licensed characters/tie-ins. In 11 instances, the reviewers considered these characters/tie-ins as designed to target primarily under-12. In addition, 7 of these websites used the licensed characters/tie-ins to promote food or beverage products.

Figure 3: Number of websites featuring licensed characters/tie-ins (N=224)
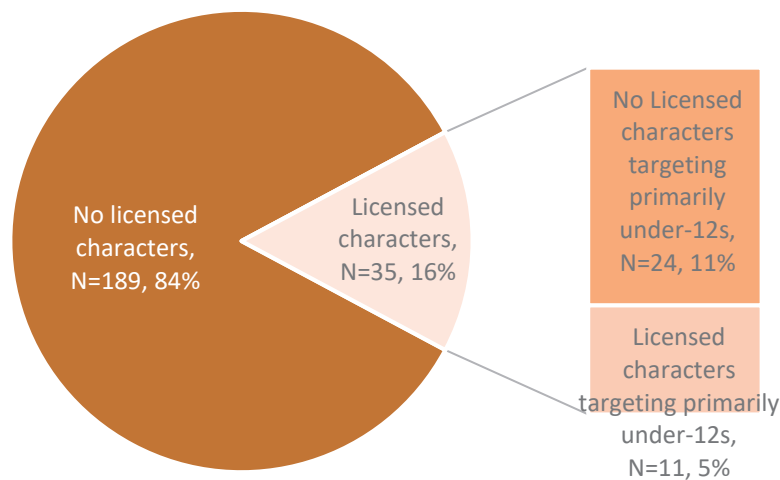
Reasons as to why the reviewers considered the licensed characters/tie-ins to be appealing primarily to under-12s are featured in the following chart (Figure 4). The combination of several of these criteria is a strong indicator that the licensed character is primarily appealing to young children.

*Figure 4: Main indicators for licensed characters/tie-ins considered primarily appealing to under-12s (N=11)*
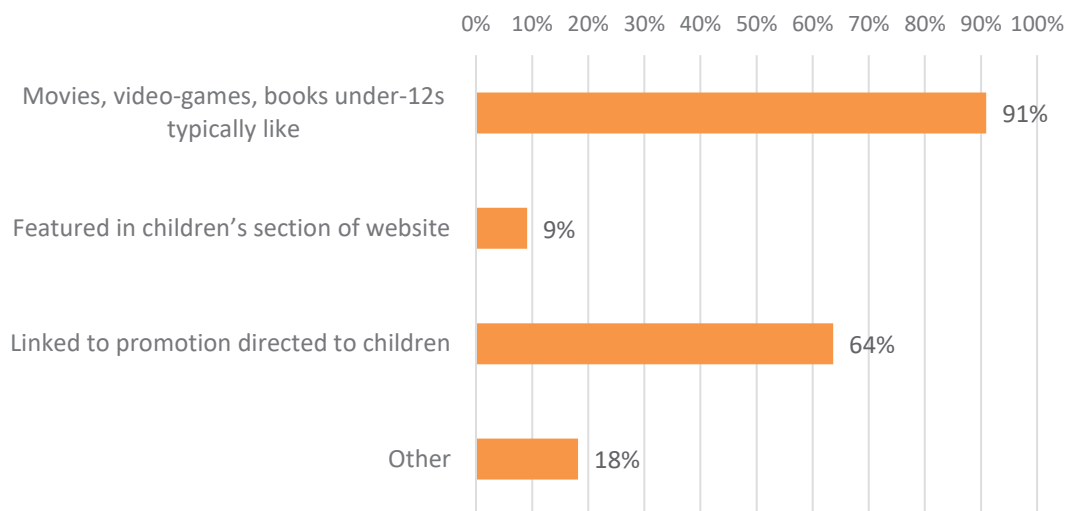
1.5   Games/Entertainment Activities

The reviewers identified entertainment activities/games on 69 reviewed websites. In 5 instances, the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s. In addition, 4 of these websites used the entertainment activities/games to promote food or beverage products to children.

Figure 5: Number of websites featuring entertainment activities/games (N=224)
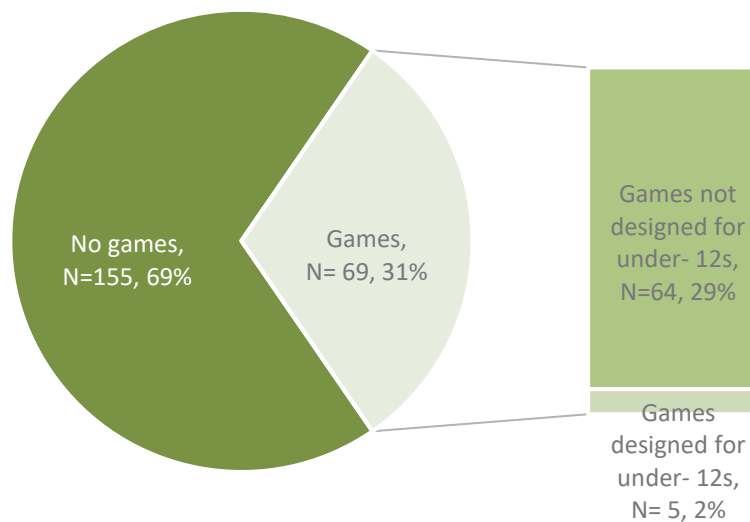
Reasons as to why the reviewers considered the entertainment activities/games to be appealing primarily to under-12s are featured in the following chart (Figure 6). The combination of several of these criteria is a strong indicator that the entertainment activity/game is primarily appealing to young children.

Figure 6: Main indicators for entertainment activities/games considered primarily appealing to under-12s (N=5)
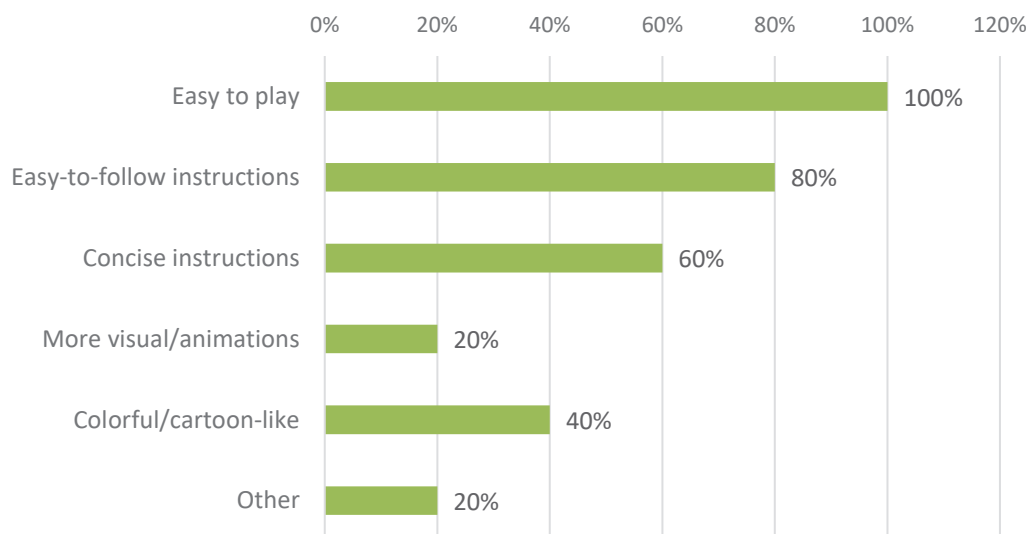
1.6   Animation/Sound Effects/Videos

107 of the 224 reviewed websites featured animations such as cartoons, animations depicting fantasy situations, sound effects or videos. According to the reviewers, 9 of these websites featured animations, sound effects or videos which were designed to appeal primarily to under-12s. In addition, 8 of these websites used these animations, sounds effects or videos to promote food or beverage products to children.

Figure 7: Number of websites featuring animation, sound effects or videos (N=224)
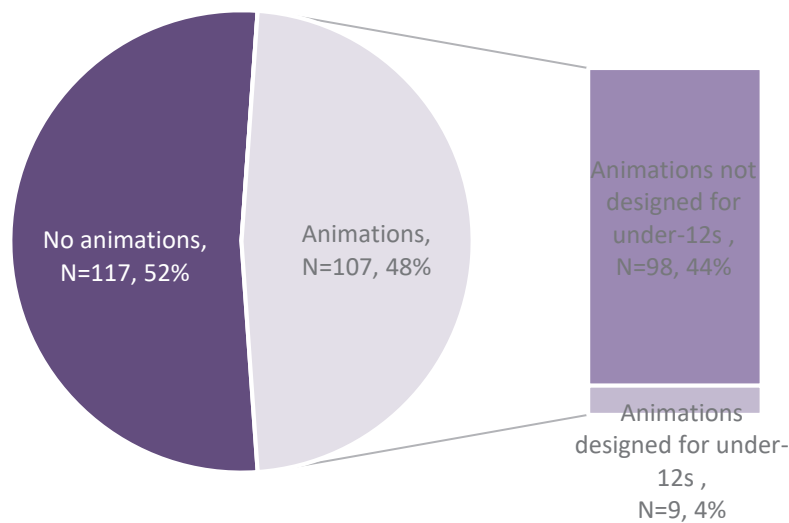
Reasons as to why the reviewers considered the animations, sound effects or videos to be appealing primarily to under-12s are featured in the following chart (Figure 8). The combination of several of these criteria is a strong indicator that the animations are primarily appealing to young children.

Figure 8: Main indicators for animation/sound effects/ videos considered primarily appealing to under-12s (N= 9)
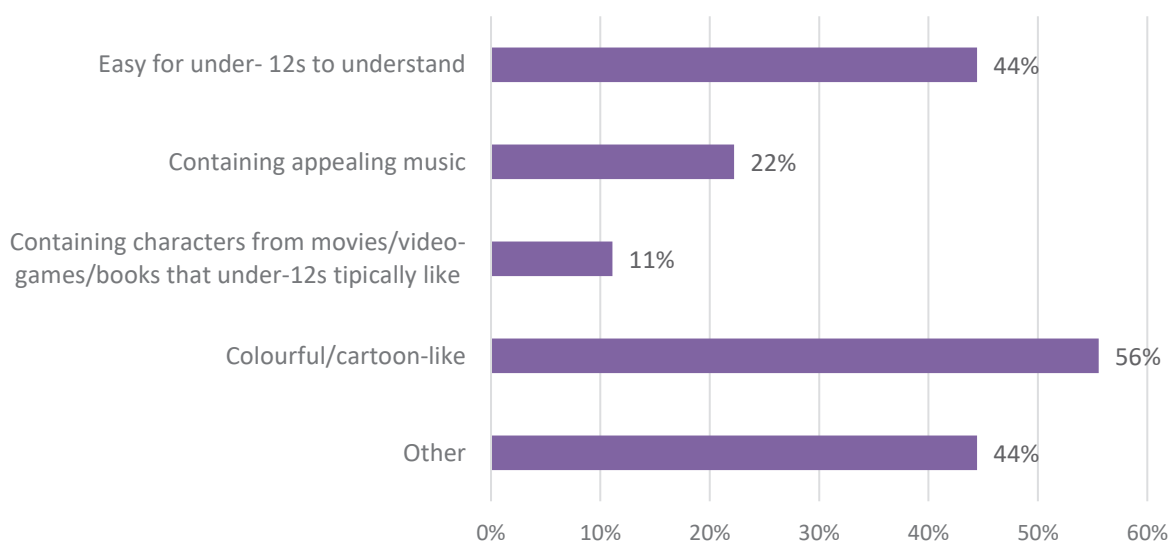
1.7 Contest/Competitions

The reviewers identified 34 websites that featured contests/competitions to promote food or non-alcoholic beverage products. In 2 of the 34 cases the contests/competitions were considered to be designed to appeal primarily to children under 12.

Figure 9: Number of websites featuring contests/competitions (N=224)

No contest, N=184, 84%

Contest, N=34, 16%

Contest not appealing primarily to under-12s, N=32, 15%

Contest appealing primarily to under-12s, N=2, 1%
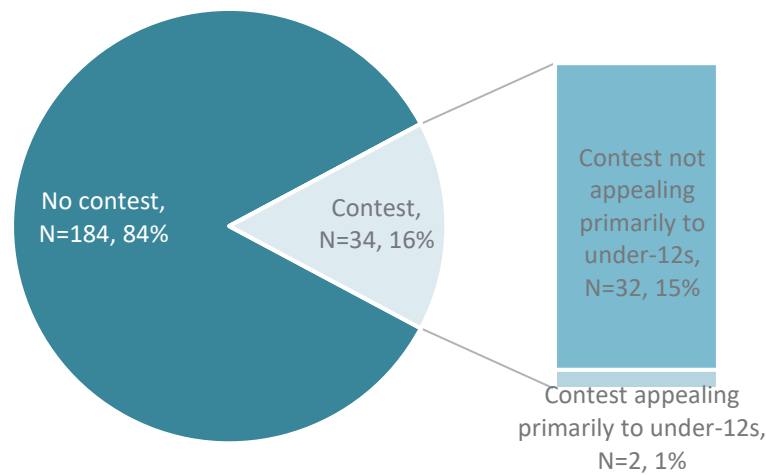
1.8 Toys Used as Premiums/Prizes

The reviewers identified 4 websites that used toys as premiums to promote a food or non-alcoholic beverage products. Examples of toys included figures of cartoon characters, stickers, board games, soccer balls and school supplies such as pencil cases. In all 4 cases, the toys were considered to be designed to appeal primarily to under-12, and promoting food or beverage products to children.

Figure 10: Number of websites featuring toys used as premiums (N=224)

No toys, N=220, 98%

Toys, N=4, 2%

Toys appealing primarily to under-12s, N=4, 2%
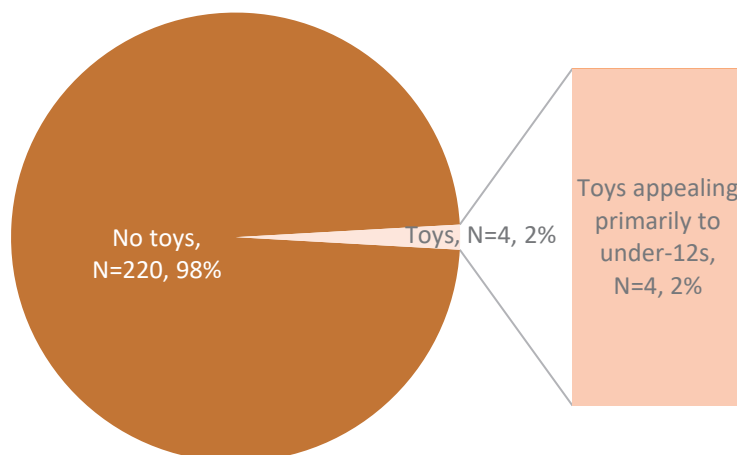
1.9   Compliance with the EU Pledge Criteria

In order to determine whether a website was designed to target primarily under-12s, and subsequently to assess if the marketing communications were intended to appeal primarily to under-12s, all previously identified elements had to be considered. This included the use of animations/sound effects/videos, entertainment activities/games, toys or licensed characters/tie-ins/celebrities as well as the creative execution of the website, i.e. the overall impression of the website design (use of colours, typeface, font size, language, etc.).

Decisive factors in judging the appeal of a website to young children were the usability of the websites (i.e. ease of navigation), simplicity of language, font size, colour schemes and the level of entertainment offered on the websites.

After careful review, the experts concluded that 222 out of 224 reviewed websites were found to be compliant with the EU Pledge commitment.

Figure 11: Compliance with the EU Pledge criteria (N=224)

Non-compliant
with EU Pledge
criteria,
N=2, 1%
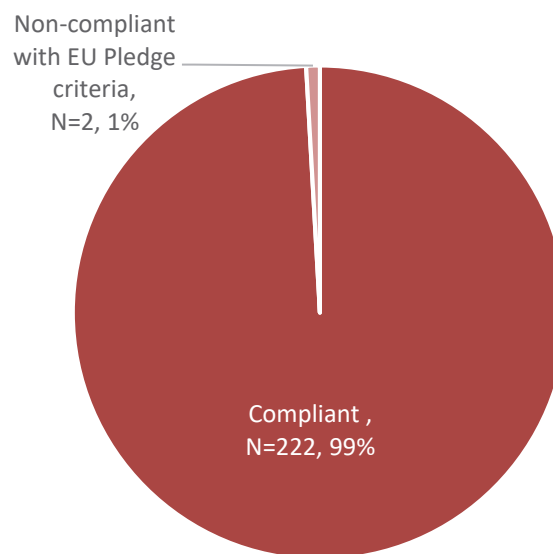
Compliant ,
N=222, 99%

1.10 Compliance with Advertising Codes/Laws

On 11 out of 224 websites, the reviewers identified items that were considered as potentially in breach of advertising codes and/or relevant advertising laws.

Figure 12: Compliance with advertising codes/laws (N=224)

Breaches,
N=11, 5%
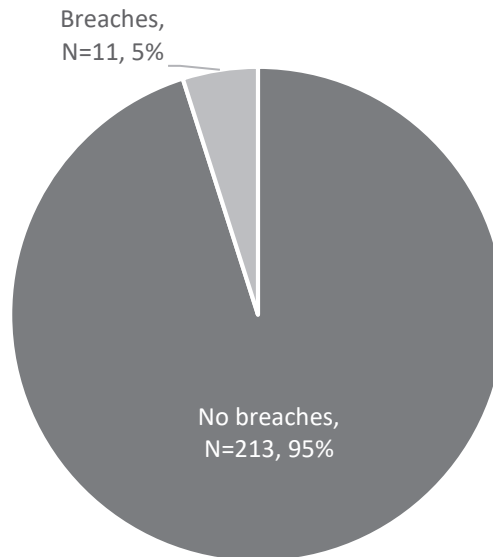
No breaches,
N=213, 95%

On these 11 websites, a total of 17 problematic items were found.

Figure 13: Potential breaches of advertising codes/laws (N=224)

Illegal use of
testimonials ,
N=1, 6%

Misleading
health/nutritional
claim,
N=1, 6%

Direct
exhortation to
purchase,
N=2, 12%

Expired sales
promotion,
N=5, 29%

Inappropriate
use of licensed
characters,
N=1, 6%

Omission of
information,
N=7, 41%
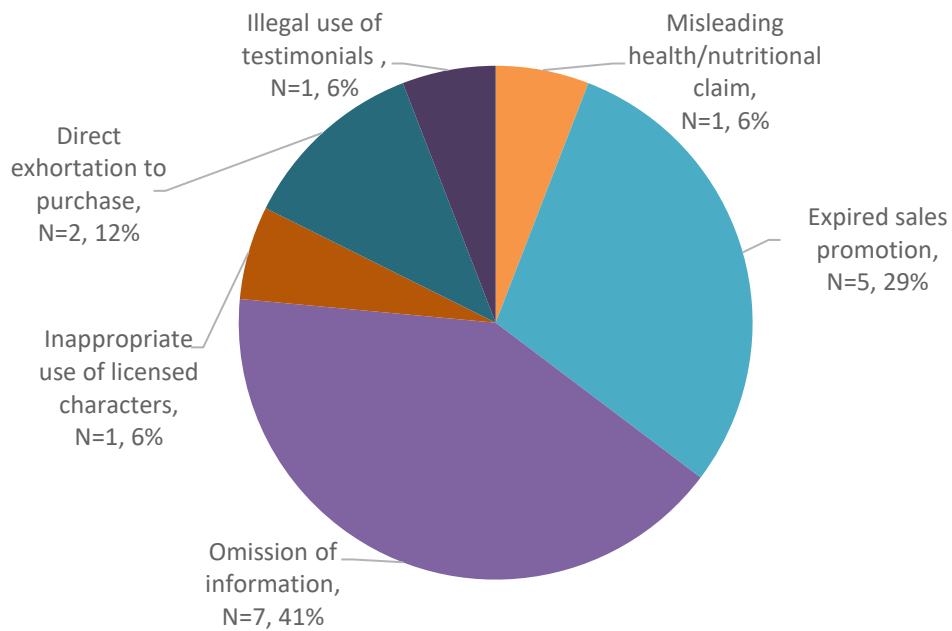
In 5 cases, the reviewers found on the websites sales promotions that had already expired at the time of the review.

Furthermore, the reviewers flagged 7 cases of omission of information, such as lack of size reference of the toys or information on conditions and expiration dates of the advertised promotions.

1 website contained problematic nutritional claims, while 1 other website featured the real or presumed scientific testimony of a healthcare professional/nutritionist endorsing the product.

Finally, 1 website was flagged for using inappropriate licensed characters which enjoy a high degree of popularity among child audiences, and 2 websites included a direct invitation to buy the advertised products.

1.11 Links to social media profiles and/or mobile apps

6 of the 224 reviewed websites include links to social media profiles and/or mobile apps that were considered to be primarily appealing to children under 12.

Figure 14: Potential breaches of advertising codes/laws (N=224)

Links,
N=6, 3%

No links,
N=218, 97%
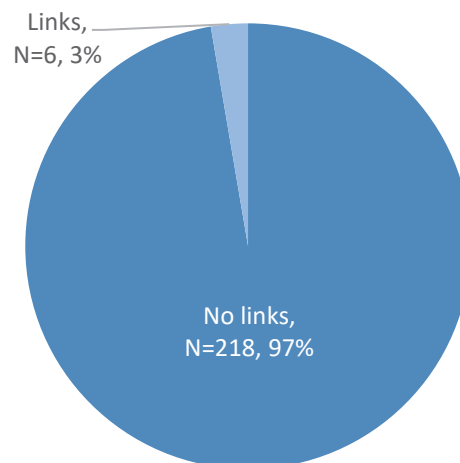
2. Brand-Owned Social Media Profiles

2.1   Sample of Brand-Owned Social Media Profiles

A total of 107 social media profiles were reviewed by experts. 49 out of the 107 reviewed profiles were brand-owned Facebook pages, while 34 were brand-owned YouTube channels and 24 were brand-owned Instagram profiles. The table below provides an overview of the number of social media profiles that were reviewed per country.

Table 5: Number of social media profiles reviewed per country (N=107)

Country	Number of Social Media Profiles Reviewed
Bulgaria	36
France	16
Germany	10
Hungary	15
Spain	15
The Netherlands	15
TOTAL	**107**

2.2   Product Promotion

The reviewers identified product promotion on all the 107 reviewed social media profiles. All the reviewed profiles featured at least 1 product that did not meet the common nutritional criteria.

2.3   Accessibility

102 out of the 107 reviewed social media profiles had their content accessible without registration or logging in.

Figure 15: Number of social media profiles accessible without registration/logging in (N=107)

Login;
N=5; 5%

No login;
N=102; 95%
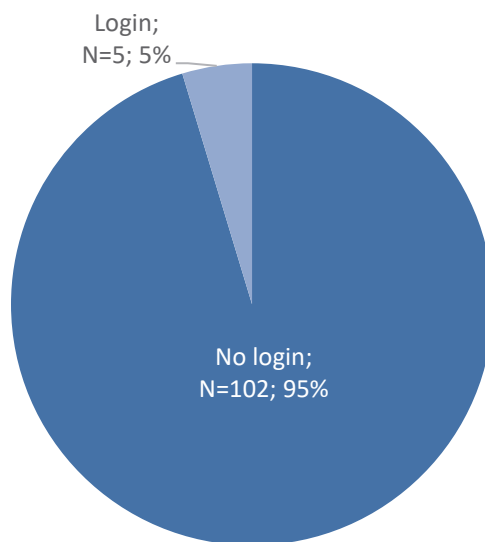
2.4 Language/Interaction

1 of the 107 reviewed social media profiles used language that was deemed as directed at children under 12, as it was considered plain and easy to understand by under-12s.

Figure 16: Number of social media profiles using language directed at children under 12 (N=107)
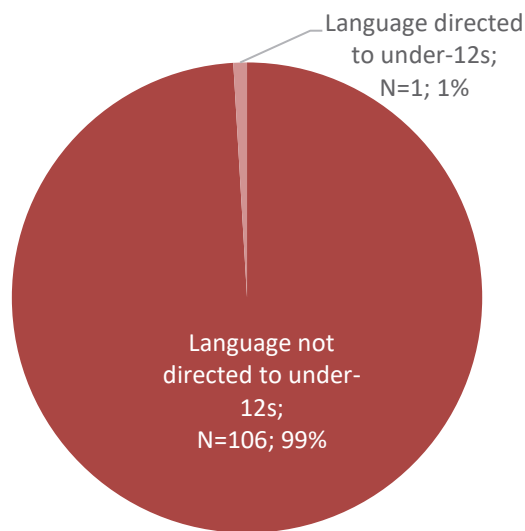
In 10 other social media profiles, the reviewers identified posts and comments which were likely to have been made by children younger than 12.

Figure 17: Number of social media profiles including any posts/comments/interactions from children under 12 (N=107)

{ 28 }
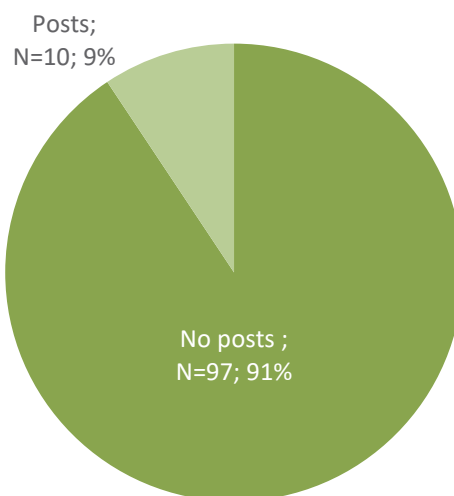
According to the reviewers, 4 out of 107 reviewed social media profiles seemed to encourage the interaction and active participation of children under 12.

Figure 18: Number of social media profiles encouraging interaction and/or active participation of children under 12 (N=107)

Interaction;
N=4; 4%

No interaction;
N=103; 96%
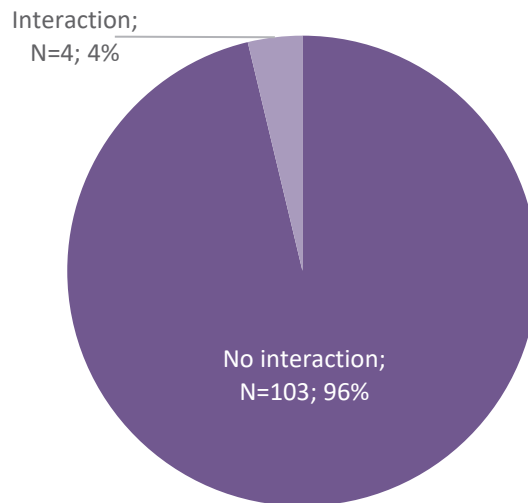
Reasons as to why the reviewers considered that the social media profiles seemed to encourage interaction and active participation of children under 12 are featured in the following chart.

Figure 19: Main indicators for encouraging interaction and/or active participation of children under-12 (N=4)

Downloading of apps	11%
Participation in contests	33%
Playing games	33%
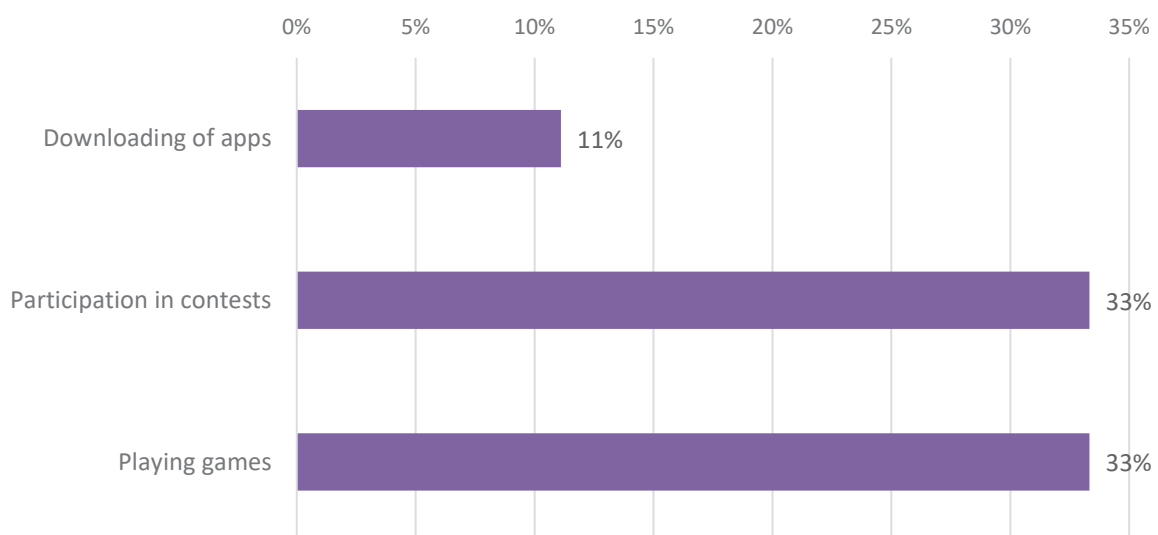
2.5 Licensed Characters/Tie-ins/Celebrities

26 out of the 107 reviewed social media profiles featured "licensed characters". In 9 instances, these characters/tie-ins were considered to be designed to target primarily children under 12. In addition, 7 of these social media profiles used the licensed characters/tie-ins to promote food or beverage products.

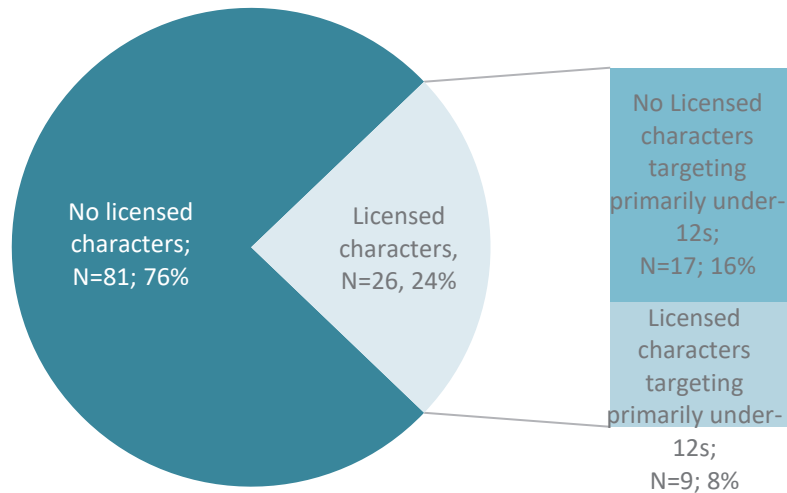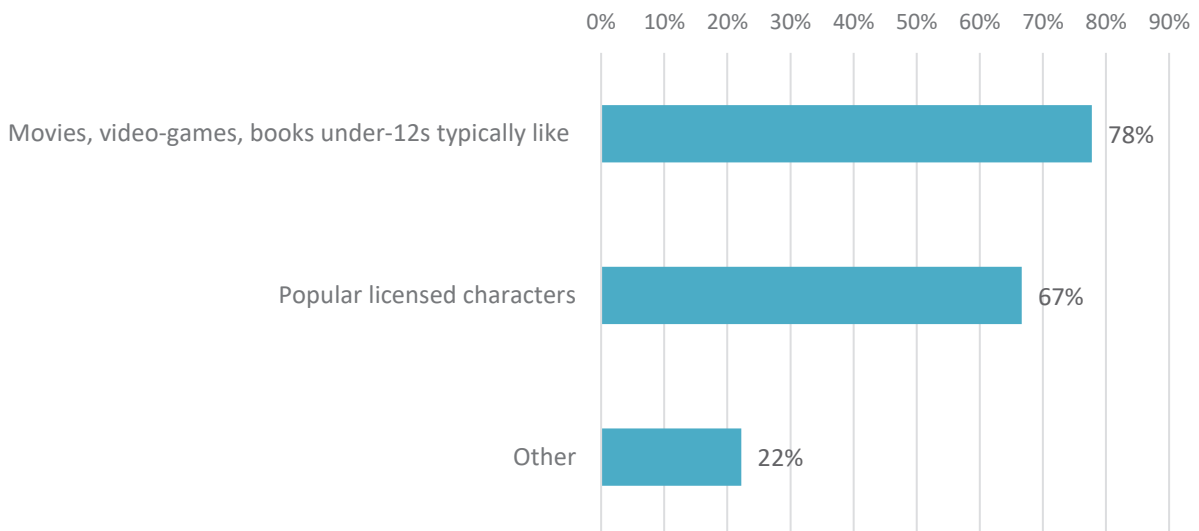*Figure 20: Number of social media profiles featuring licensed characters, tie-ins or celebrities (N=107)*

Figure 21: Types of licensed characters, tie-ins or celebrities featured in the social media profiles (N=26)

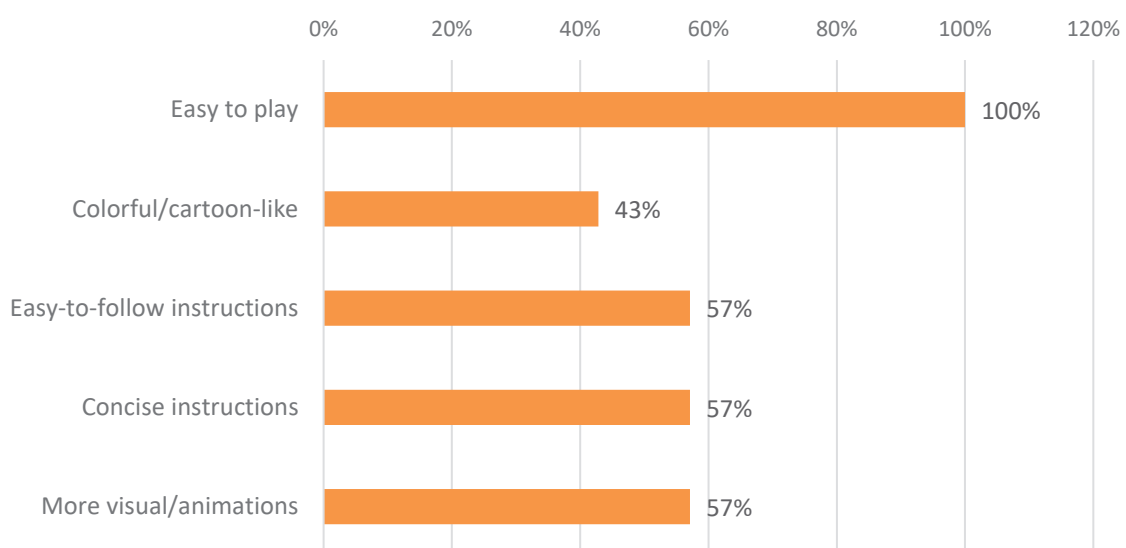## 2.6 Games/Entertainment Activities

The reviewers identified entertainment activities/games on 27 of the 107 reviewed social media profiles. In 7 instances, the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s. In addition, 7 of these profiles used the entertainment activities/games to promote food or beverage products to children.

*Figure 22: Number of social media profiles featuring entertainment activities/games (N=107)*
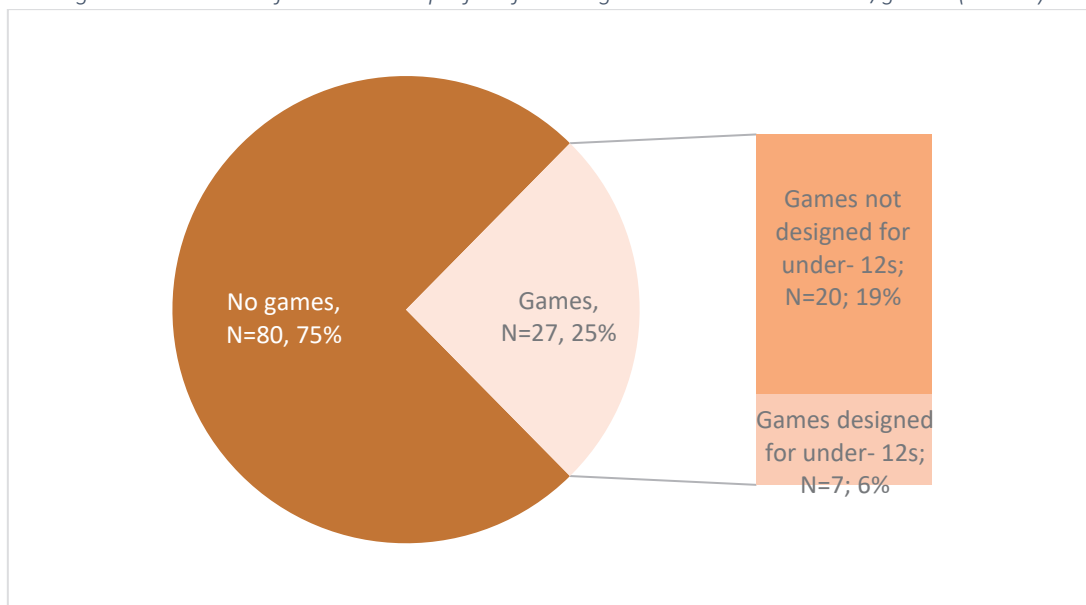
Reasons as to why the reviewers considered that the entertainment activities/games were primarily appealing to children under 12 are featured in the following chart (Figure 23).

Figure 23: Main indicators for entertainment activities/games considered primarily appealing to under-12s (N=7)

31

Reasons as to why the reviewers considered that the entertainment activities/games were used to promote the advertised product to children under 12 are featured in the following chart (Figure 24).

Figure 24: Main indicators for entertainment activities/games used to promote product to under-12s (N=7)
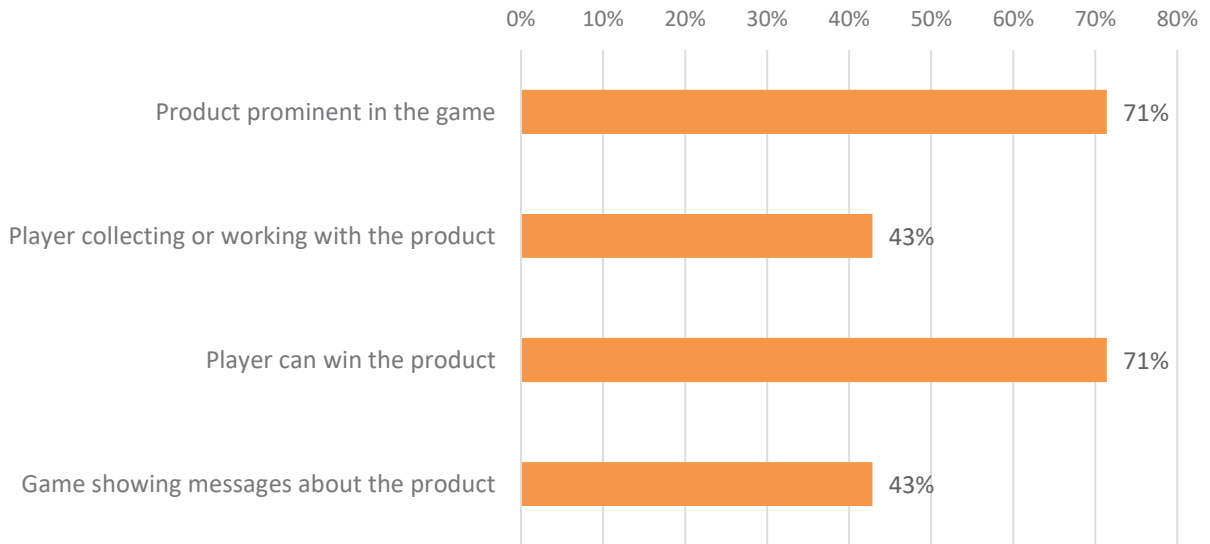
2.7   Videos/Photos

52 of the 107 reviewed social media profiles featured videos and/or photos. According to the reviewers, all these 52 profiles included videos and/or photos that were designed to appeal primarily to under-12s. 14 of these profiles used videos and/or photos to promote food or beverage products to children.

Figure 25: Number of social media profiles featuring videos/photos (N=107)
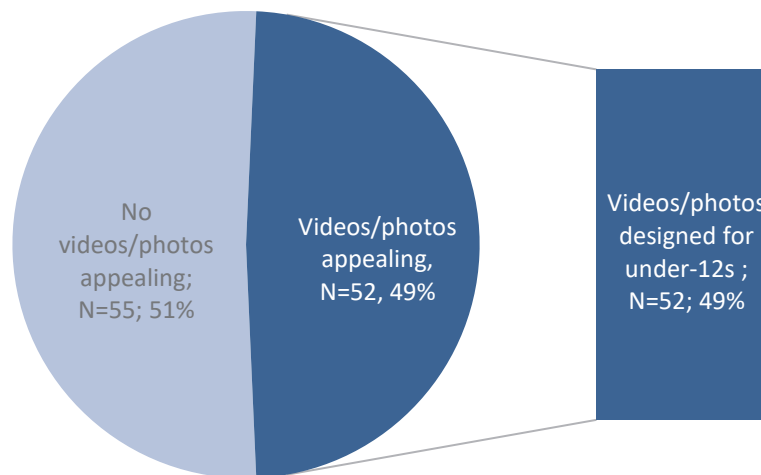
Reasons as to why the reviewers considered the videos and/or photos as primarily appealing to children under 12 are featured in the following chart.

Figure 26: Main indicators for videos/photos considered primarily appealing to under-12s (N=52)
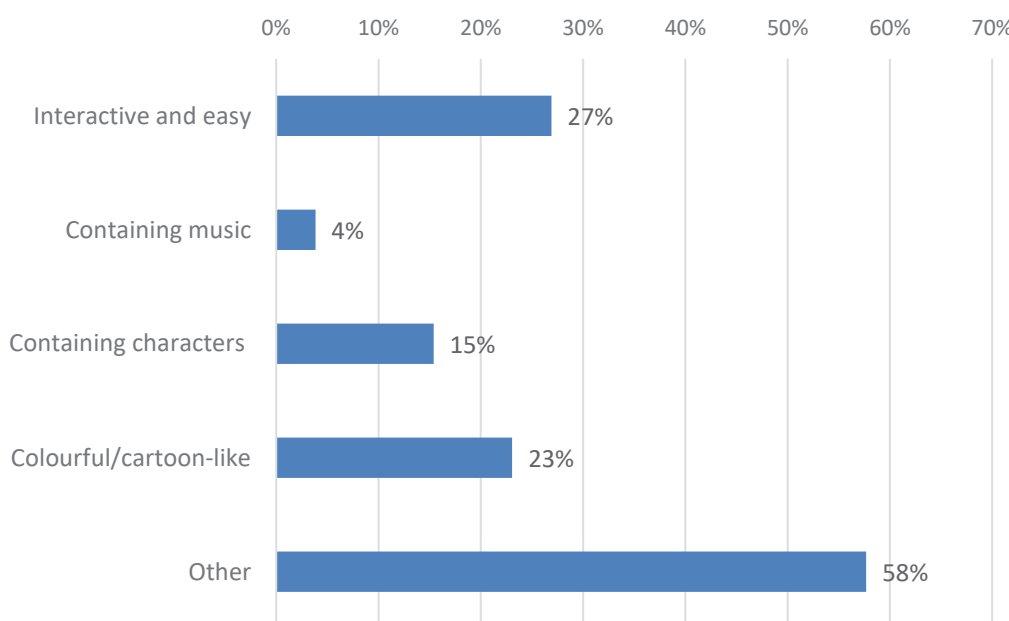
2.8   Contests/Competitions

20 out of the 107 reviewed social media profiles included contests or competitions. In 1 case, the reviewers considered that these contests and competitions were appealing primarily to children under 12.
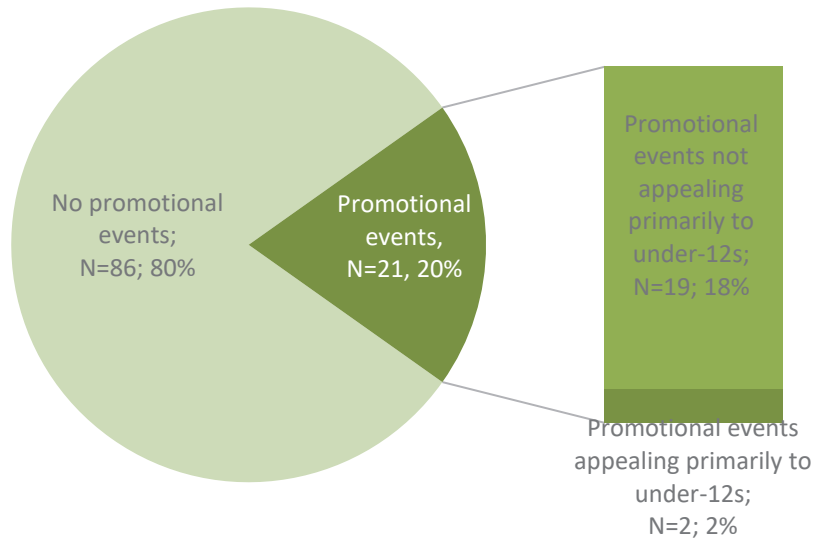
Figure 27: Number of social media profiles featuring contests/competitions (N=107)
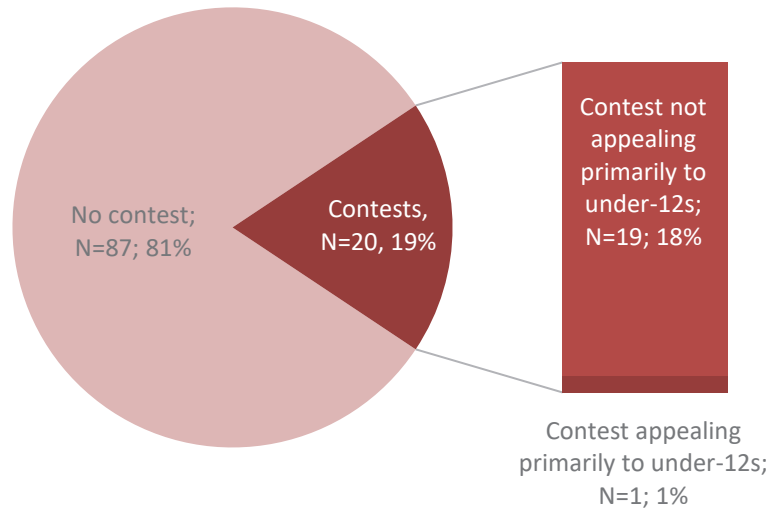
2.9 Promotional events

21 out of the 107 reviewed social media profiles included promotional events. In 2 instances, the reviewers considered that the promotional events were appealing primarily to children under 12.

Figure 28: Number of social media profiles featuring promotional events (N=107)

2.10 Primary Appeal of Brand Social Media Profiles to under-12s

In order to determine whether a social media profile was designed to target primarily under-12s, and subsequently to assess if the marketing communications were intended to appeal primarily to under-12s all of the previously identified elements had to be considered. This included the presence of videos/photos, entertainment activities/ games, contests/competitions and promotional events or licensed characters as well as the language and/or level of interaction of the page.

After careful assessment, the reviewers decided that 2 out of the 107 reviewed social media profiles were primarily appealing to children under 12.

Figure 29: Number of social media profiles primarily appealing to under-12s (N=107)

Non-compliant with EU Pledge criteria; N=2; 2%

Compliant ; N=105; 98%
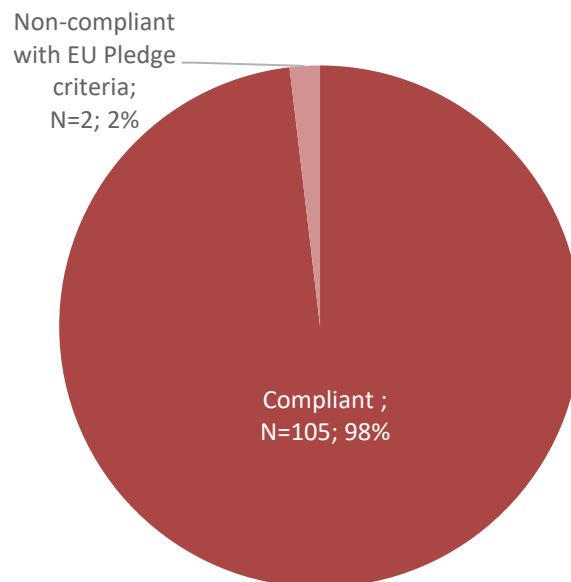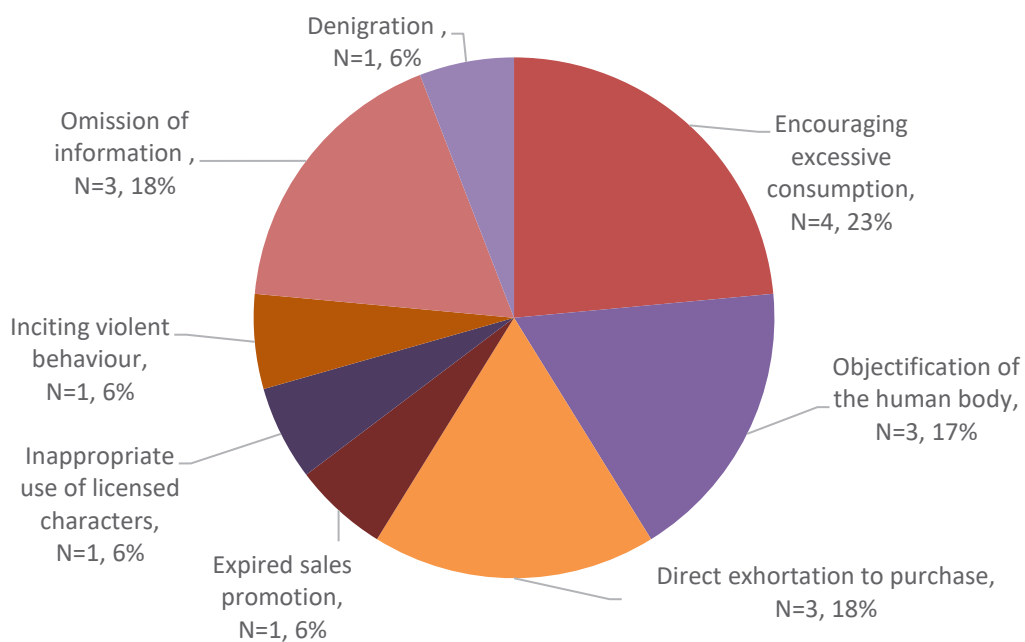
2.11 Compliance with Advertising Codes/Laws

10 out of the 107 reviewed social media profiles featured items that were considered to be potentially in breach of advertising codes or relevant national advertising laws.

Figure 30: Compliance with advertising codes/laws (N=107)

Breaches;
N=10; 9%
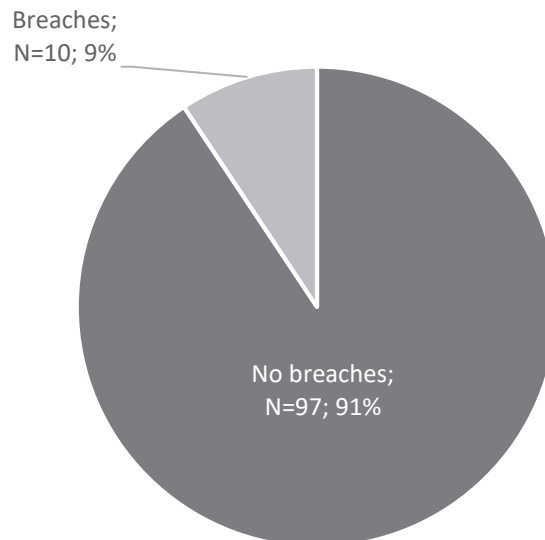
No breaches;
N=97; 91%

On these 10 social media profiles, a total of 17 problematic items were found.

Figure 31: Potential breaches with advertising codes/laws (N=10)

Denigration ,
N=1, 6%

Omission of
information ,
N=3, 18%

Inciting violent
behaviour,
N=1, 6%

Inappropriate
use of licensed
characters,
N=1, 6%

Expired sales
promotion,
N=1, 6%

Encouraging
excessive
consumption,
N=4, 23%

Objectification of
the human body,
N=3, 17%

Direct exhortation to purchase,
N=3, 18%

4 social media profiles promoted and encouraged excessive consumption, whereas 3 social media profiles included direct exhortation to purchase the advertised products.

In 1 case, the reviewers found on the social media profile sales promotions that had already expired at the time of the review.

Furthermore, the reviewers flagged 3 cases of omission of information, such as lack of size reference of the toys and products, or information on conditions and expiration dates of the advertised promotions.

3 social media profiles contained problematic images objectivising the female body, while 1 social media profile featured messages denigrating another product.

Finally, 1 social media profile was flagged for using inappropriate licensed characters which enjoy a high degree of popularity among child audiences, and 1 social media profile included a video encouraging a violent behavior.

2.12 Links to other social media profiles and/or mobile apps

9 of the 107 reviewed social media profiles included links to other social media profiles and/or mobile apps that were considered to be primarily appealing to children under 12.

Figure 32: Links to other social media profiles and/or mobile apps (N=107)