

2010 TOP LINE REPORT

Food and non-alcoholic beverages
Websites compliance monitoring



TABLE OF CONTENTS

INTRODUCTION.....	2
Independent Reviewer – A. Houdmont, Generation Europe Foundation	3
COMPLIANCE RESULTS.....	6

Abbreviations

EASA European Advertising Standards Alliance
SRO Self-Regulatory Organisation
WFA World Federation of Advertisers

June 2010
Project manager: Laure ALEXANDRE
Project assistant: Maria TSOUMOU

INTRODUCTION

EASA has been commissioned to conduct for the first time a monitoring exercise entirely focused on advertiser-owned websites.

Following the adoption of the EASA Digital Marketing Communications Best Practice, national self-regulatory organisations (SROs) were enabled by the EASA Self-Regulatory (SR) Committee to conduct reviews of advertiser-owned websites.

The monitoring exercise was designed as a methodology trial and a learning exercise for both SR practitioners, the sponsors of the exercise and the WFA.

In order to offer representative and accountable results, a new methodology based on a 'consumer oriented approach' has been drawn up by the EASA secretariat.



Imagine yourself as consumer looking for information about a brand. You would probably enter the brand's name in your preferred search engine (such as Google, Bing or Yahoo). You probably use a search engine which gives preference to search results in your local language (e.g. Yahoo.de, Google.pl,

Bing.nl) and click through to the brand websites listed in the results.

We proposed to SROs to adopt the same approach to identify advertiser-owned websites in their country and language. A minimal sample size was required, but brands and websites have been chosen at random.

Eight countries, providing a comprehensive coverage of markets, languages and levels of SR practice have been selected to participate in the review:

Country	SRO	Abbreviation
Austria	Österreichischer Werberat	OWR
Greece	Συμβούλιο Ελέγχου Επικοινωνίας	SEE
Hungary	Önszabályozó Reklám Testület	ÖRT
Italy	Istituto dell'Autodisciplina Pubblicitaria	IAP
Netherlands	Stichting Reclame Code	SRC
Poland	Związek Stowarzyszeń Rada Reklamy	RR
Sweden	MarknadsEtiska Rådet	MER
UK	Advertising Standards Authority	ASA

The 8 national SROs selected were asked to review, when available, the national websites of the following sponsor companies:

- | | |
|---------------|-------------|
| 1. Coca Cola | 6. Mars |
| 2. Ferrero | 7. Nestlé |
| 3. Kraft | 8. PepsiCo |
| 4. Kellogg's | 9. Unilever |
| 5. McDonald's | |

These included brand websites as well as promotional websites set up by the advertisers, and a sample size of 5 websites per company was recommended. The fact that sponsors companies may only have one or two brand websites available at national level or not be available at all some markets needed to be acknowledged. Should the minimum sample size of 40 websites not be reached, SROs were asked to review additional websites of other sponsor companies which have more brand websites available in the SRO country.

The following texts and codes were used as the basis of the SRO reviews:

- a. ICC Food framework
- b. Relevant national advertising standards codes and national sectoral codes
- c. Relevant national advertising laws

For reasons of impartiality and due process, independent reviewer, knowledgeable in both digital media and youth issues, has been appointed to perform the following functions:

- Verify that the appropriate criteria have been set up;
- Check that due process is observed throughout;
- Verify the EASA report that is created from the monitoring results for release and testify to the correctness of the monitoring procedure and the scoreboard.



The aim of this exercise was not to declare a website compliant or non-compliant as a whole (as they constantly change and evolve) but rather to flag items that may not be in line with the codes applicable to food and non-alcoholic beverages advertising.

The EASA secretariat suggested that SROs vary their entry points on the site reviewed, and look for potentially problematic areas (promotion, shop, video ads etc...).

When reviewing a website, both the content as well as the general “look and feel” needed to be considered.

All reviews have been performed by national SROs. EASA only ensured that the results were reported in a consistent manner.

Independent Reviewer – A. Houdmont - Generation Europe Foundation



Following the review of the European Advertising Standards Alliance report on advertisements for alcoholic beverages in 2009, Generation Europe Foundation (GEF) was invited to review this year's Food Advertising Monitoring Report.

Besides an expertise in consumer protection issues, GEF has a finger on the pulse of the younger generation thanks to its online community of savvy consumers and users of new media. For this reason I am very grateful to have this opportunity to critically engage with the issue of food advertising.

The monitoring exercise focused entirely on reviewing the online presence of food advertisers. At a first stage GEF was consulted on the methodology employed and found it to be complete and comprehensive. The newly adopted EASA Digital Marketing Communications Best Practice provides an appropriate framework to look at self-regulation practices online. The new approach provides a solid sample of advertiser-owned websites from 9 different food and beverage companies selected at random, reflecting a wide variety of different markets in the EU represented by 8 specific countries. The EASA secretariat was most helpful in providing the required information and GEF had access to all the necessary material to perform its review.

A total of 346 websites were reviewed by the Self-Regulatory Organisations (SROs) from the different countries against the ICC Food framework and other relevant advertising codes and laws. It was found that food advertisers by and large abide by self-imposed rules. However, with 23 issues of concern, results show that substantiation of health and nutritional claims can still be improved upon. The prospect of the future development of the role of EFSA regarding health and nutrition claims is likely to go a long way towards solving these issues, as it will be responsible for verifying the scientific basis of the submitted claims and report on the findings.

The issue of substantiation together with some other issues such as privacy, misleading information or the encouragement of dangerous behavior, added up to only a small number of websites being identified as problematic. Of 38 problematic items only 2 were flagged as being in breach of the self-regulation codes. Whereas this in itself can be interpreted positively, it does suggest that the self-regulation code remains open for interpretation.

All in all, the types of issues uncovered, echo the results found in more traditional media during previous reviews suggesting that there is a consistency between advertising messages online and offline. The general perception of the internet is that of a deregulated medium with very few restrictions that is hard to monitor or control. Advertisers, however, appear to apply the same standards of self-regulation as they do in other media.

An important caveat however remains: the internet is an expansive decentralized arena accessible to everyone. Therefore limiting the review of advertising standards to corporate websites or advertiser-owned product-specific websites merely deals with the tip of the iceberg. It is vital to take into account the numerous platforms available for brands to engage in indirect forms of advertising, be it on online social networks or through viral marketing. Brands such as Coca-Cola, McDonalds and Red

Bull command several million followers on Facebook, many of them kids or teens that are attracted by the incentives of games, videos and forums that are available for all to engage with the brand in one way or another. Although food advertising to teenagers is not unlawful or banned by self-regulation guidelines, it is important to mention the fact many of the corporate websites that were reviewed are designed to appeal to kids or teenagers with the front page linking to games and social networks, hence we would recommend reviewing corporate communication on those platforms.

Whereas I believe that the SROs performed their duties with the utmost diligence, the principal activity of online food advertising is to be found on social networks where they enjoy a very large following. The aim of this online presence is not to increase online sales but rather to create brand awareness on a large scale. A review of online advertising activities should therefore comprise the entire internet. Since the nature of internet is such that websites constantly evolve, and marketing campaigns can pop up from one day to the next, GEF also recommends that this exercise be performed regularly.

In the name of Generation Europe Foundation I would like to praise the EASA team for their dedication to the review of self-regulatory activities in Europe and professionalism as well as thank them for this opportunity. Self-regulation is a very efficient mechanism to ensure a better protection of consumers but it is crucial for independent reviewers to maintain a critical eye on the parties involved in order to keep the advertisers and producers on their toes. Having an independent reviewer is particularly important since the SROs are typically sponsored by industry associations and thus face the dilemma of “biting the hand that feeds them”.

Arnaud Houdmont
Generation Europe Foundation

Generation Europe and its Foundation operates a two-way communication platform enabling exchanges of views between young people, the private and public sectors. Generation Europe is experienced in providing educational information material covering a wide range of issues in 24 languages through a variety of media. Their aim is to engage tomorrow's decision-makers, today. Generation Europe's National Ambassadors are Generation Europe's local eyes and ears on the ground. As bridging points, National Ambassadors are there to inform of what GE is doing on a European level and inform us of what is happening locally.

COMPLIANCE RESULTS

1. Sample reviewed

The table below provides an overview of the number of websites reviewed per country. A total of 352 websites were reviewed by the participating SROs.

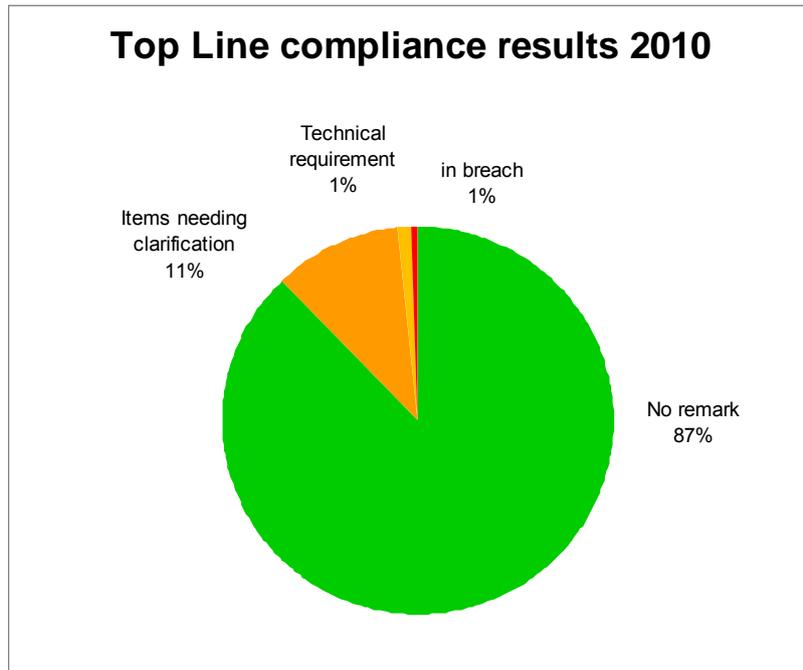
Austria	50
Greece	51
Hungary	41
Italy	40
Netherlands	44
Poland	39
Sweden	40
UK	47
Total	352

2. Overall compliance results



For reasons of clarity and thanks to the substantial sample size, the results are presented below in percentages. Nevertheless, it has to be mentioned that this should not be interpreted as definitive compliance figures, as websites evolve and vary constantly. The results only reflect the sample reviewed, at the time the review was performed (April-May 2010)

Out of these 352, 309 were not subject to further remarks. 2 websites had items found in breach of the codes and 37 websites carried information that would require further substantiation or can be potentially considered as problematic. 4 items failed to mention the toothbrush compulsory for snacks and confectionery advertising in The Netherlands as they either did not display the symbol at all, or not in an appropriate manner (length, size...).



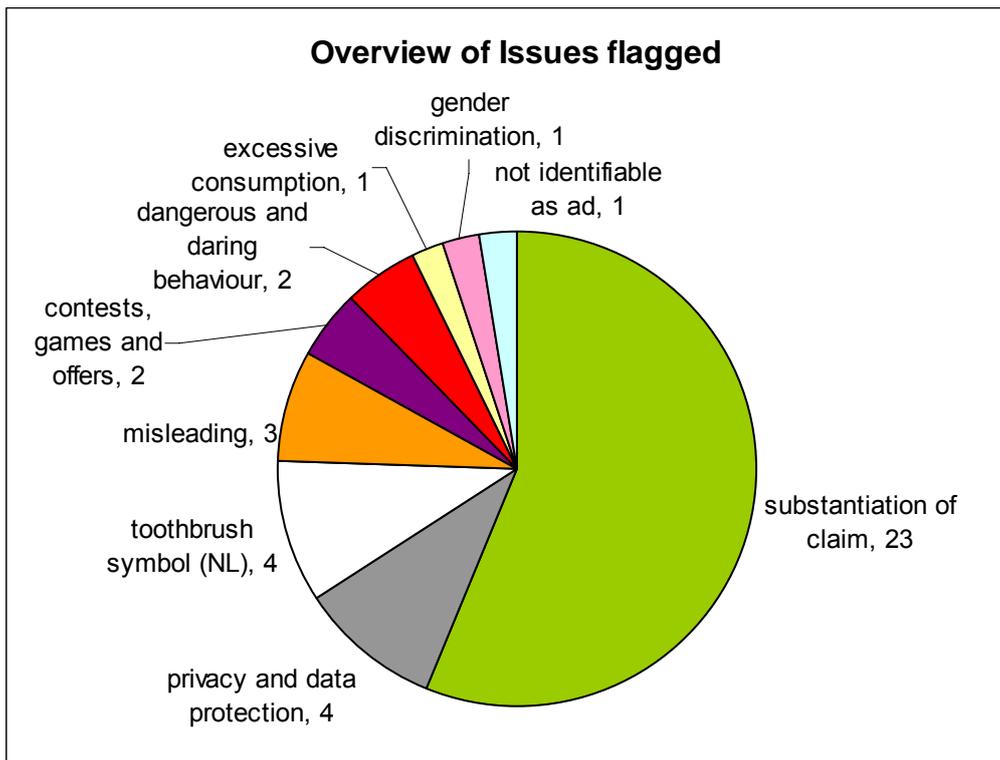
Graph 1: Compliance results for the 2010 website review

No remark	309
Items needing clarification	37
Technical requirement	4
in breach	2
Total	352

Table 1: Compliance results for the 2010 website review

3. Overview of issues identified as problematic or in breach

As presented above, 37 items appeared to the person conducting the review as being potentially problematic or were considered as requiring further information for SROs to judge on compliance. Two further items were found in breach of the codes. For reasons of clarity and consistency, the 41 items above are represented jointly in the graph below.



Graph 2: Overview of problematic issues for the 2010 website review

Issues	N° of items
Substantiation of claim	23
Privacy and data protection	4
Toothbrush symbol (NL)	4
Misleading	3
Contests, games and offers	2
Dangerous and daring behaviour	2
Excessive consumption	1
Gender discrimination	1
Not identifiable as ad	1
Total	41

Table 2: Overview of problematic issues for the 2010 website review

4. Complaints.

One website reviewed was linked to a campaign complained about in Sweden. The campaign included execution in several media. At the time of the review, the decision was pending. The website itself has been identified as potentially problematic and therefore included in the pie chart presented above.

Published by:
European Advertising Standards Alliance (EASA)
Rue de la Pépinière 10-10a | B-1000 Brussels
Tel: +32 (0)2 513 7806
Fax: +32 (0)2 513 2861
Email: info@easa-alliance.org
www.easa-alliance.org