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EUROPEAN ADVERTISING STANDARDS

ALLIANCE

EUROPEENNE POUR L'ETHIQUE EN PUBLICITE

EU PLEDGE SURVEY TOP LINE REPORT

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.

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Introduction

EASA was commissioned by the EU Pledge Secretariat to review a number of food and beverage brand websites and social media profiles 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, and social media profiles were compliant with the relevant EU Pledge commitment.

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

- The website or social media profile 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.

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.

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

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.

Secretariat and Professors Liselot Hudders² and Dieneke Van de Sompel³, 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

Project Overview

Experts from 8 European self-regulatory organisations (SROs) were invited by EASA and the EU Pledge Secretariat to conduct the monitoring exercise assessing the appeal of marketer-owned websites and social media profiles to children under 12. The 8 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
JEP - Belgium
NCSR - Bulgaria
ARPP - France
DWR - Germany
SEE - Greece
IAP - Italy
AUTOCONTROL - Spain
Ro. - Sweden

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 behaviour 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.

Self-regulation experts from the 8 SROs reviewed a sample of 258 items, including national brand websites⁴ and social media profiles⁵ of EU Pledge company members.

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

Country	Websites	Facebook	YouTube	Instagram	SM	Tot
JEP - Belgium	20	7	1	4	12	32
NCSR - Bulgaria	17	7	4	4	15	32
ARPP - France	20	6	2	3	11	31
DWR - Germany	22	3	4	5	12	34
SEE - Greece	14	6	7	5	18	32
IAP - Italy	20	1	5	6	12	32
AUTOCONTROL - Spain	20	4	4	4	12	32
Ro. - Sweden	12	8	5	8	21	33
Total	145	42	32	39	113	258

Below is a list of the EU Pledge member companies.

Table 3: List of the EU Pledge member companies

Company
Amica Chips
Arla Foods
Bel Group
Burger King
Coca-Cola
Danone
Ferrero
General Mills
Intersnack
KiMs
Kellogg's
Lorenz Snack-World
Mars
McDonalds Europe
Mondelēz
Nestlé
PepsiCo
Royal FrieslandCampina
Unichips - San Carlo
Unilever
Zweifel Pomy-Chips

⁴ Where available, at least 1 website per company.

⁵ Influencers' profiles were monitored as part of the pilot exercise.

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.

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 Dienneke Van de Sompel.

The questionnaire for the **websites** asked the self-regulatory experts if the website being reviewed contained elements such as games/entertainment activities⁶, animations/sound effects/videos, licensed characters⁷ 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 not 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.

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 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.

Executive Summary

Brand-Owned Websites:

- A total of 145 national brand websites were reviewed;
- Out of the 145 websites, 1 was considered in breach of the EU Pledge criteria as it 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 145 reviewed websites, 7 contained items that were in breach of advertising codes or relevant advertising laws. In total, 9 problematic items were flagged.

Brand-Owned Social Media Profiles:

- A total of 113 social media profiles were reviewed;
- Out of 113 reviewed social media profiles, 3 were considered in breach as they were deemed appealing primarily to children under 12 due to 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 113 reviewed social media profiles, 6 contained items that were in breach of advertising codes or relevant advertising laws. In total, 17 problematic items were flagged.

1. Brand-Owned Websites

Sample of Brand-Owned Websites

A total of 145 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=145)

Country	Websites
JEP - Belgium	20
NCSR - Bulgaria	17
ARPP - France	20
DWR - Germany	22
SEE - Greece	14
IAP - Italy	20
AUTOCONTROL - Spain	20
Ro. - Sweden	12
Total	145

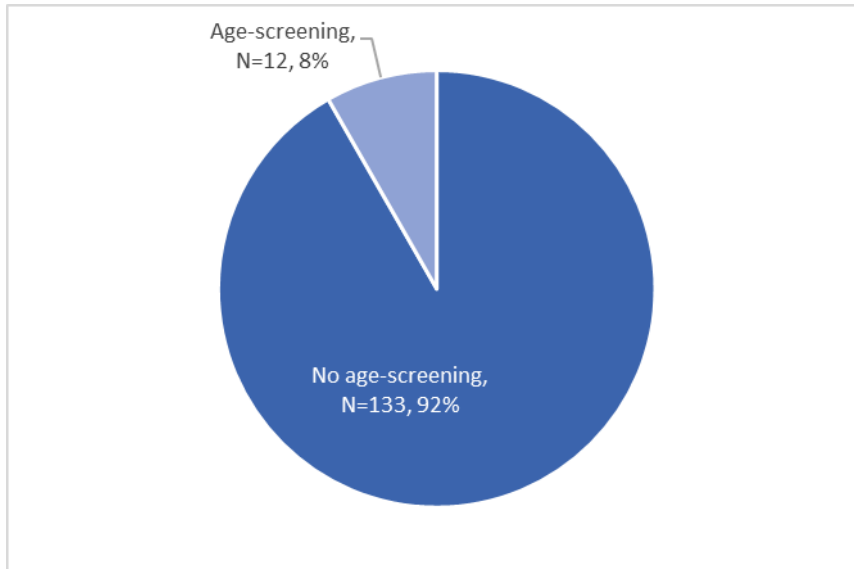
Product Promotion

The reviewers identified product promotion on all 145 websites reviewed. All reviewed websites featured at least 1 product that did not meet the common nutritional criteria.

Age screening/Parental Consent

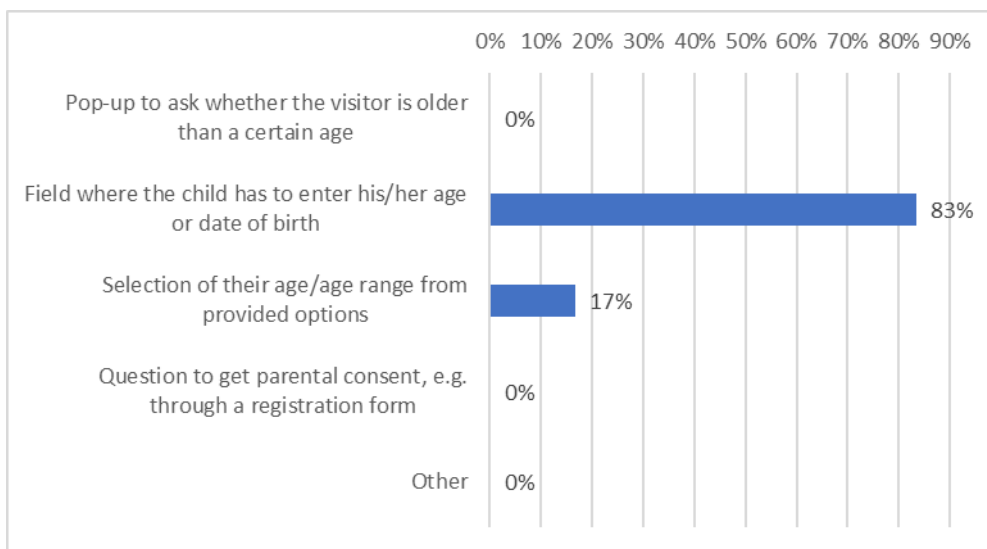
12 out of 145 websites reviewed contained mechanisms to screen the age of the website visitor. Methods ranged from a field where the visitor had to enter his/her date of birth to a pop-up asking whether the visitor was older than a certain age.

Figure 1: Number of websites featuring age screening (N=145)



Below is an overview of the age screening's methods.

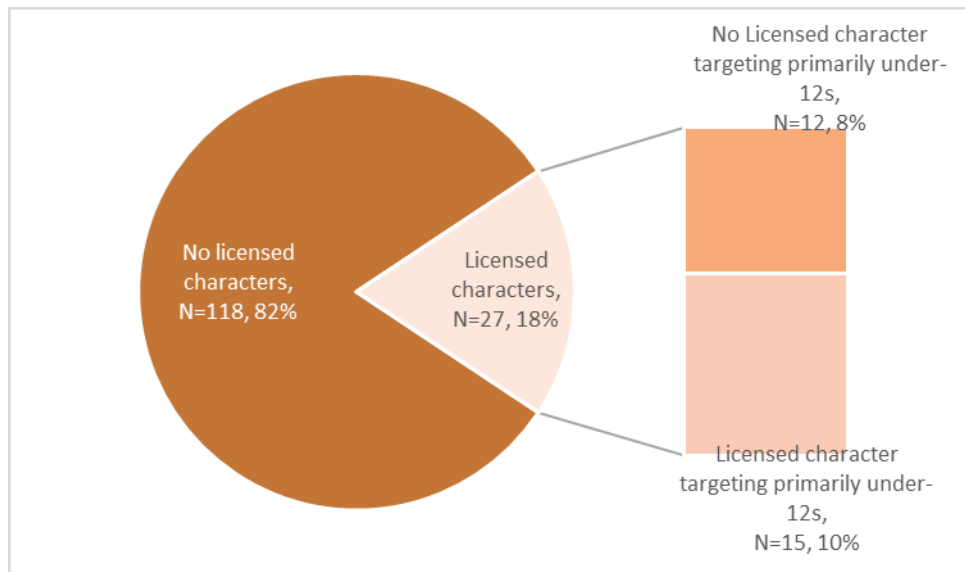
Figure 2: Types of age screening (N=12)



Licensed Characters/Tie-ins/Celebrities

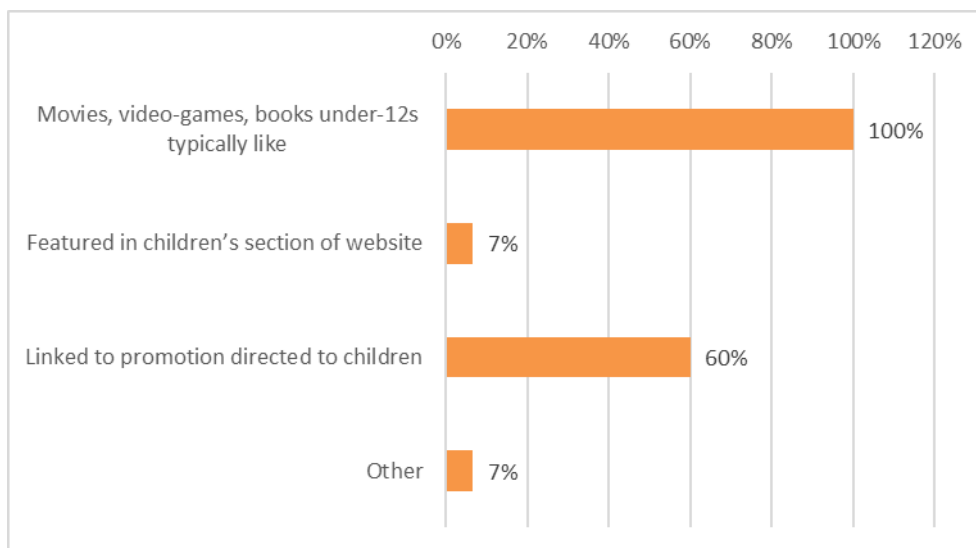
The reviewers checked if the websites or the children’s section(s) of the website featured licensed characters or movie tie-ins as means to promote food or beverage products. 27 out of 145 websites featured licensed characters/tie-ins. In 15 instances, the reviewers considered these characters/tie-ins as designed to target primarily under-12s. In addition, 10 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=145)



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.

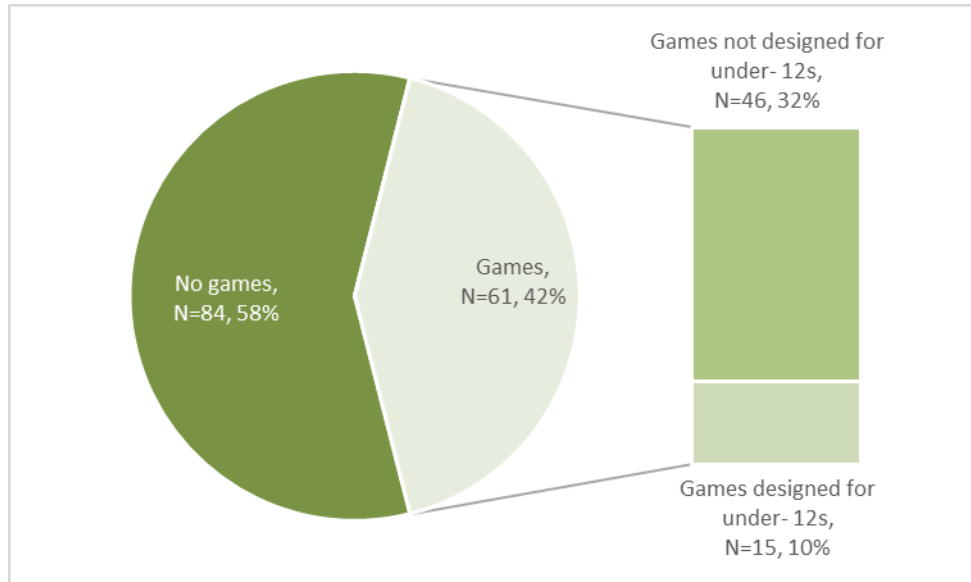
Figure 4: Main indicators for licensed characters/tie-ins considered primarily appealing to under-12s (N=15)



Games/Entertainment Activities

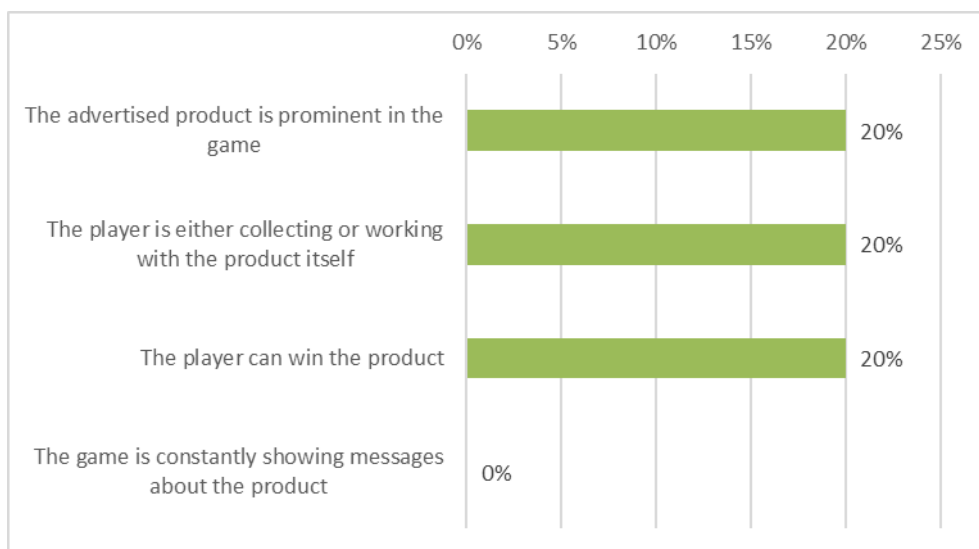
The reviewers identified entertainment activities/games on 61 reviewed websites. In 15 instances, the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s.

Figure 5: Number of websites featuring entertainment activities/games (N=145)



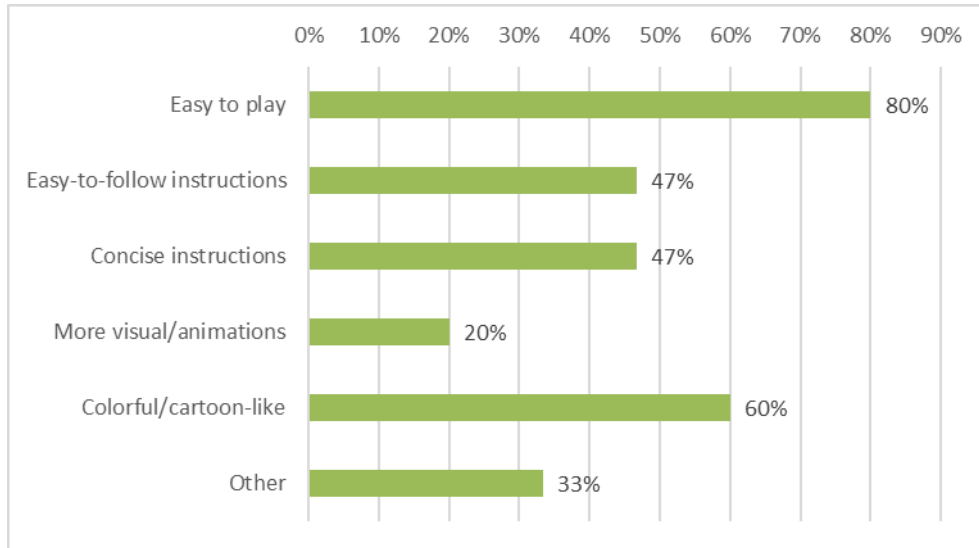
5 of these websites used the entertainment activities/games to promote food or beverage products to children. Reasons as to why the reviewers considered the entertainment activities/games to be used as a means to promote a food/beverage product to children under 12 are featured in the following chart (Figure 6).

Figure 6: Main indicators for entertainment activities/games used as a means to promote a food/beverage product to children under 12 (N=5)



In addition, 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 7). The combination of several of these criteria is a strong indicator that the entertainment activity/game is primarily appealing to young children.

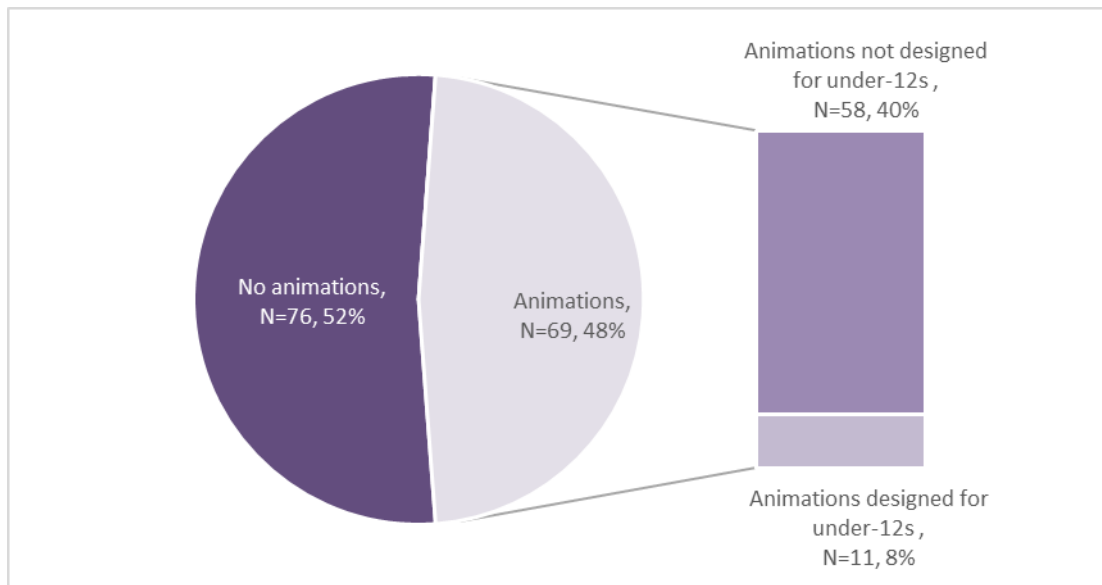
Figure 7: Main indicators for entertainment activities/games considered primarily appealing to under-12s (N=15)



Animation/Sound Effects/Videos

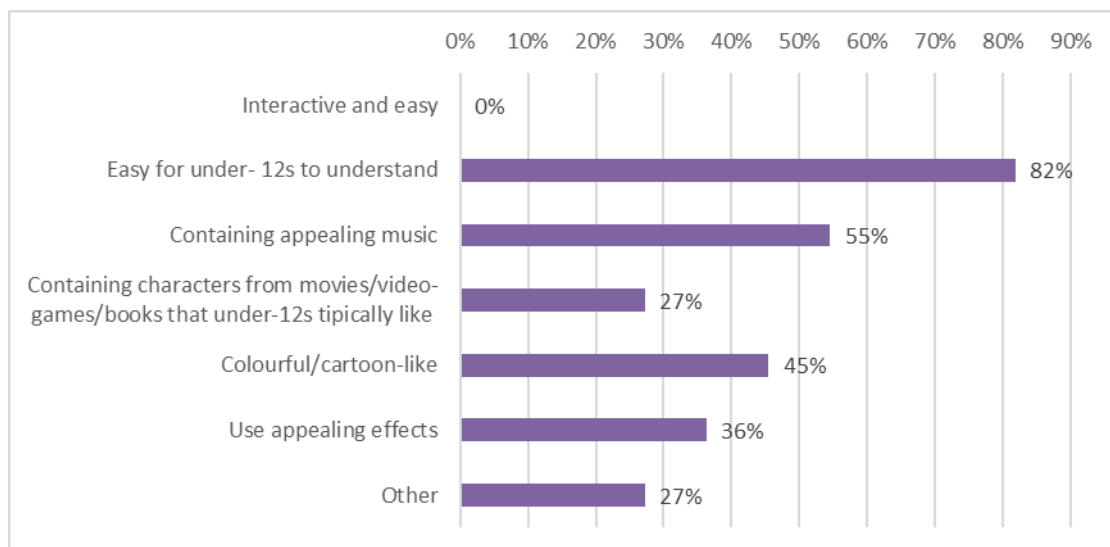
69 of the 145 reviewed websites featured animations such as cartoons, animations depicting fantasy situations, sound effects or videos. According to the reviewers, 11 of these websites featured animations, sound effects or videos which were designed to appeal primarily to under-12s. In addition, 10 of these websites used these animations, sounds effects or videos to promote food or beverage products to children.

Figure 8: Number of websites featuring animation, sound effects or videos (N=145)



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 9). The combination of several of these criteria is a strong indicator that the animations are primarily appealing to young children.

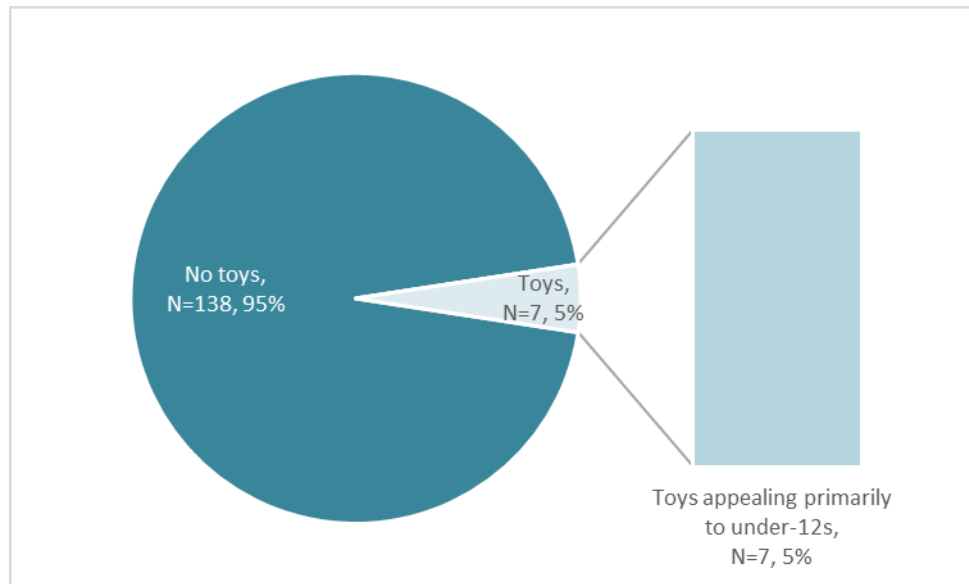
Figure 9: Main indicators for animation/sound effects/ videos considered primarily appealing to under-12s (N=11)



Toys Used as Premiums/Prizes

The reviewers identified 7 websites that used toys as premiums to promote a food or non-alcoholic beverage products. In all 7 cases, the toys were considered to be designed to appeal primarily to under-12s.

Figure 10: Number of websites featuring toys used as premiums (N=145)



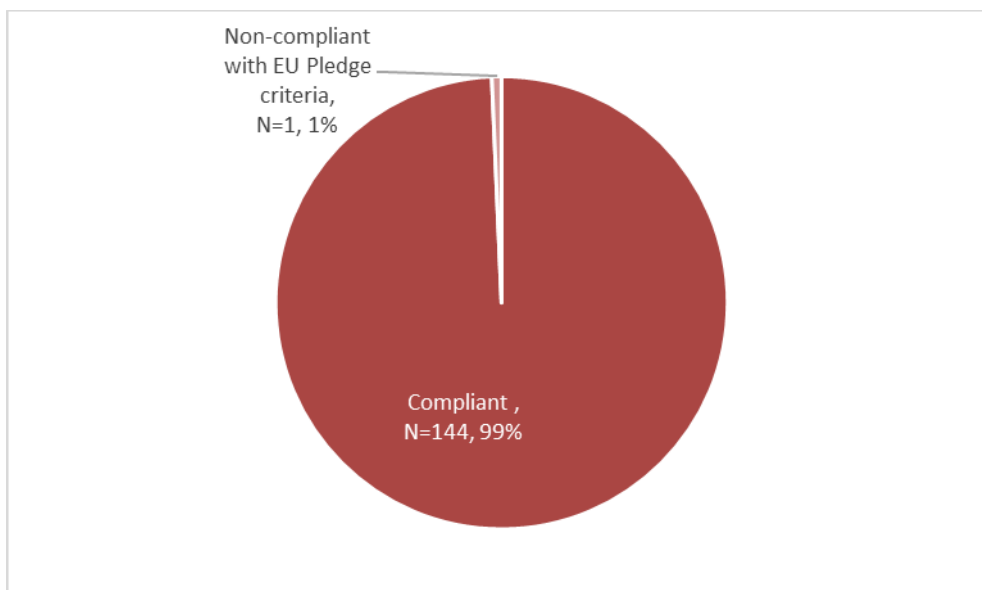
Compliance with the EU Pledge Criteria

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 144 out of 145 reviewed websites were found to be compliant with the EU Pledge commitment.

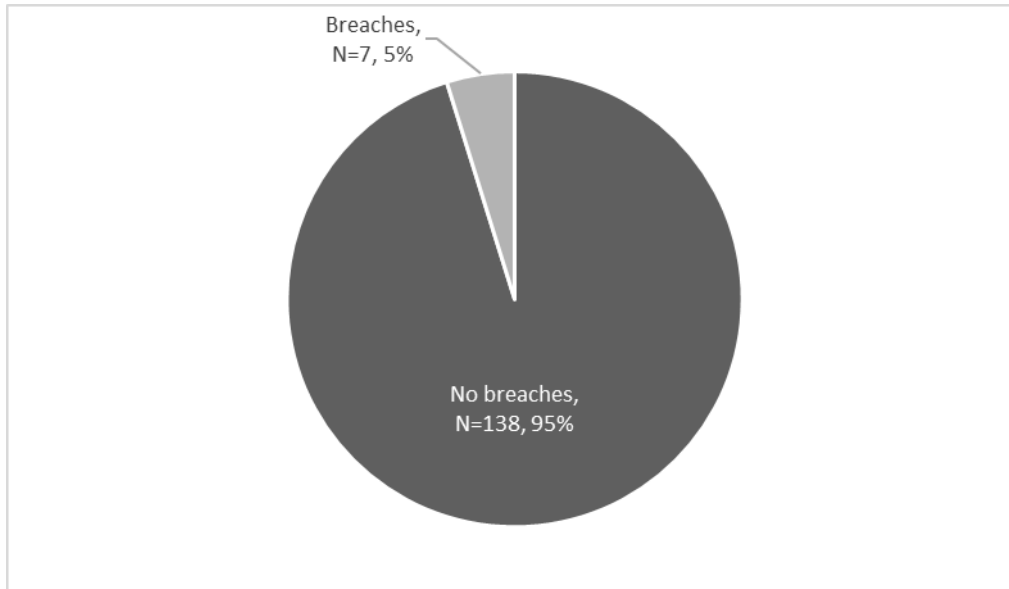
Figure 11: Compliance with the EU Pledge criteria (N=145)



Compliance with Advertising Codes/Laws

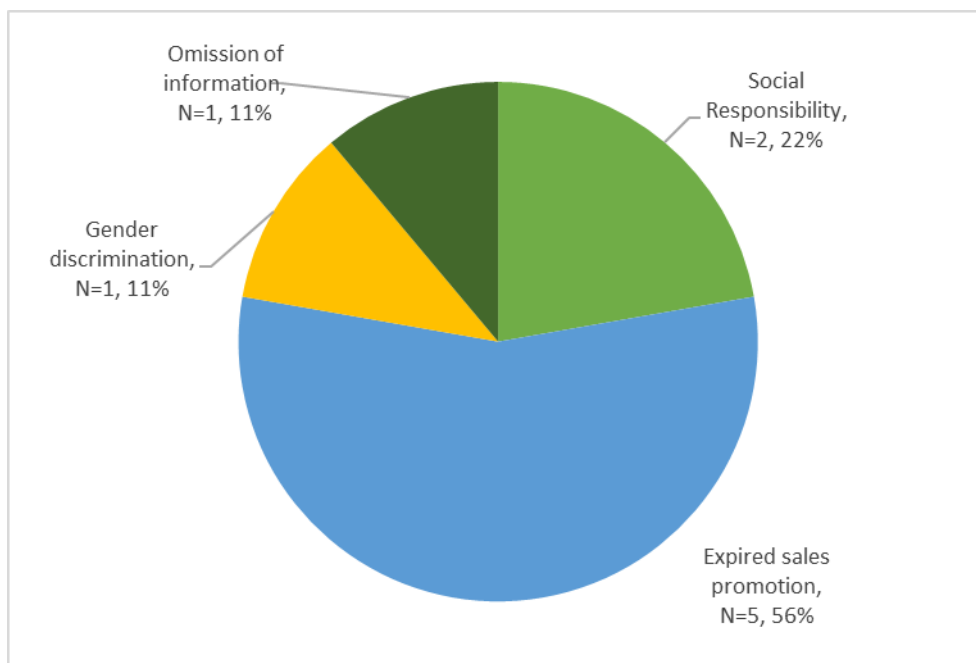
On 7 out of 145 websites, the reviewers identified items that were considered as potentially in breach of advertising codes and/or relevant advertising laws.

Figure 12: Compliance with advertising codes/laws (N=145)



On these 7 websites, a total of 9 problematic items were found.

Figure 13: Potential breaches of advertising codes/laws (N=145)



In 5 cases, the reviewers found on the websites sales promotions that had already expired at the time of the review.

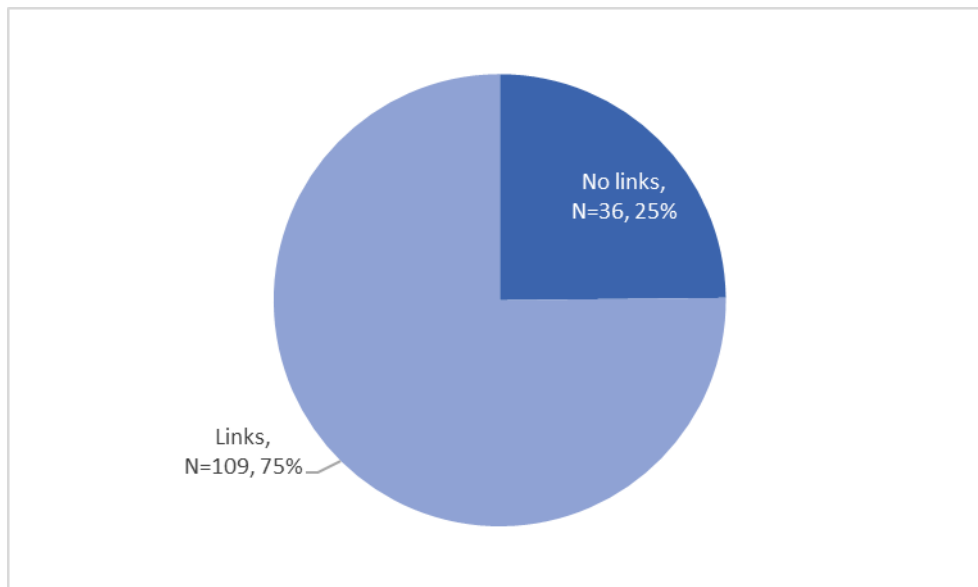
Furthermore, the reviewers flagged 1 website as it omitted important information on the toys that were part of the promotion. Another website was flagged for gender discrimination.

Finally, 2 websites were flagged for containing inappropriate role models for children (social responsibility).

Links to social media profiles

109 of the 145 reviewed websites include links to social media sites – either brand-owned or influencers profiles (Facebook, YouTube, Instagram, Snapchat, etc).

Figure 14: Potential breaches of advertising codes/laws (N=145)



2. Brand-Owned Social Media Profiles

Sample of Brand-Owned Social Media Profiles

A total of 113 social media profiles were reviewed by experts. 42 out of the 107 reviewed profiles were brand-owned Facebook pages, while 32 were brand-owned YouTube channels and 39 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=113)

Country	Facebook	YouTube	Instagram	SM
JEP - Belgium	7	1	4	12
NCSR - Bulgaria	7	4	4	15
ARPP - France	6	2	3	11
DWR - Germany	3	4	5	12
SEE - Greece	6	7	5	18
IAP - Italy	1	5	6	12
AUTOCONTROL - Spain	4	4	4	12
Ro. - Sweden	8	5	8	21
Total	42	32	39	113

Product Promotion

The reviewers identified product promotion on all the 113 reviewed social media profiles. All the reviewed profiles featured at least 1 product that did not meet the common nutritional criteria.

Licensed Characters/Tie-ins/Celebrities

34 out of the 113 reviewed social media profiles featured “licensed characters”. In 12 instances, these characters/tie-ins were considered to be designed to target primarily children under 12. In addition, 9 of these social media profiles used the licensed characters/tie-ins to promote food or beverage products.

Figure 15: Number of social media profiles featuring licensed characters, tie-ins or celebrities (N=113)

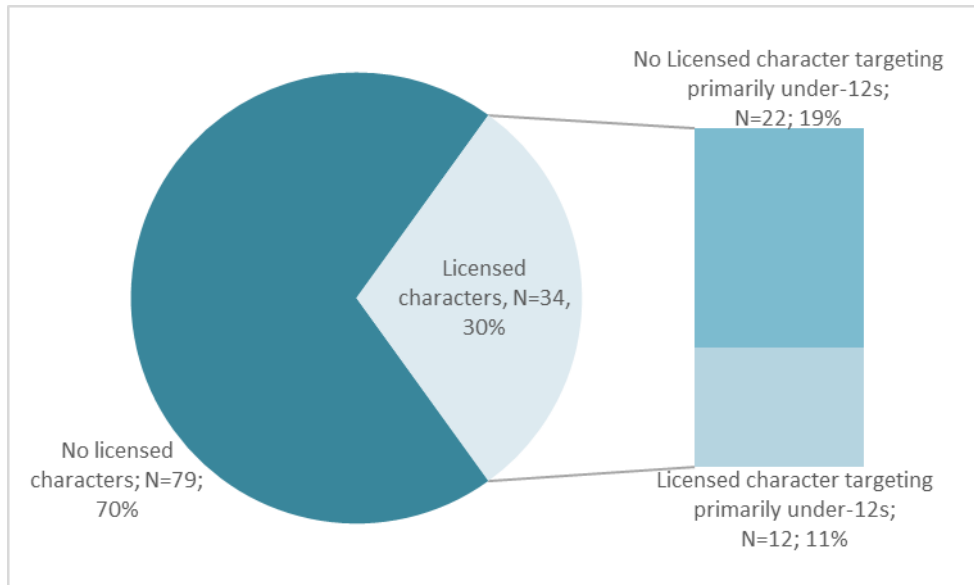
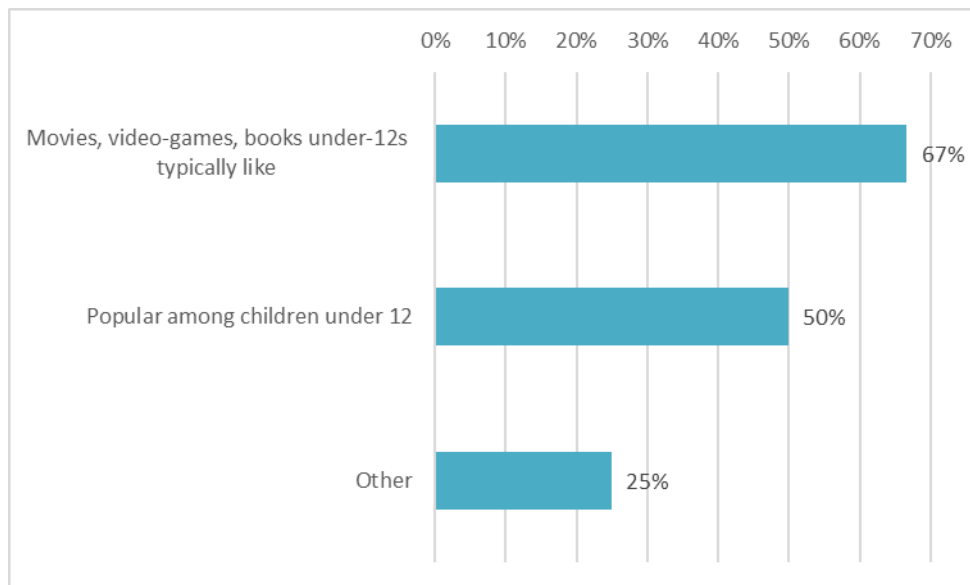


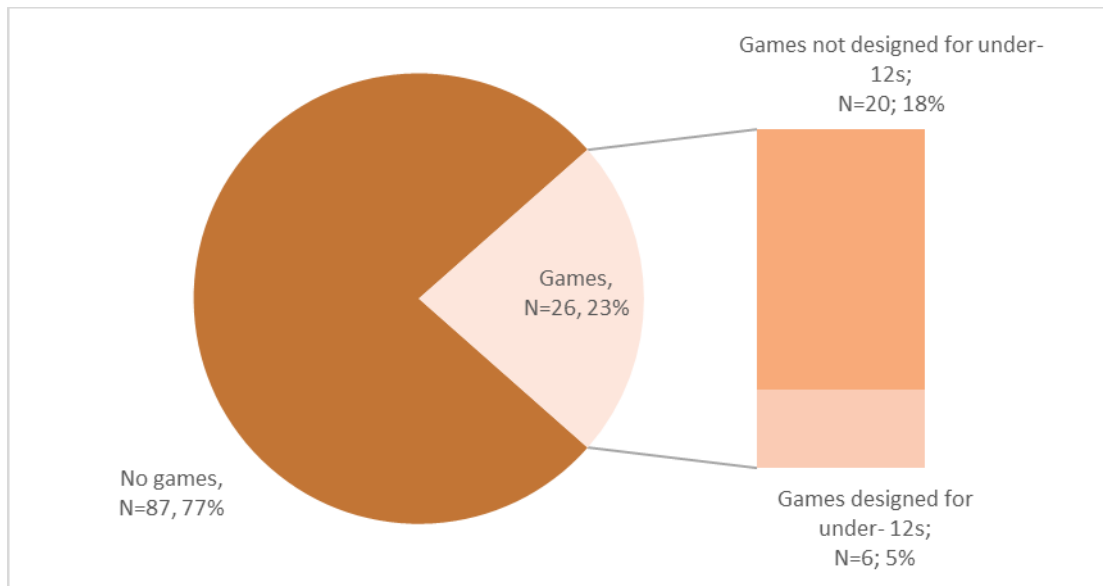
Figure 16: Types of licensed characters, tie-ins or celebrities featured in the social media profiles (N=34)



Games/Entertainment Activities

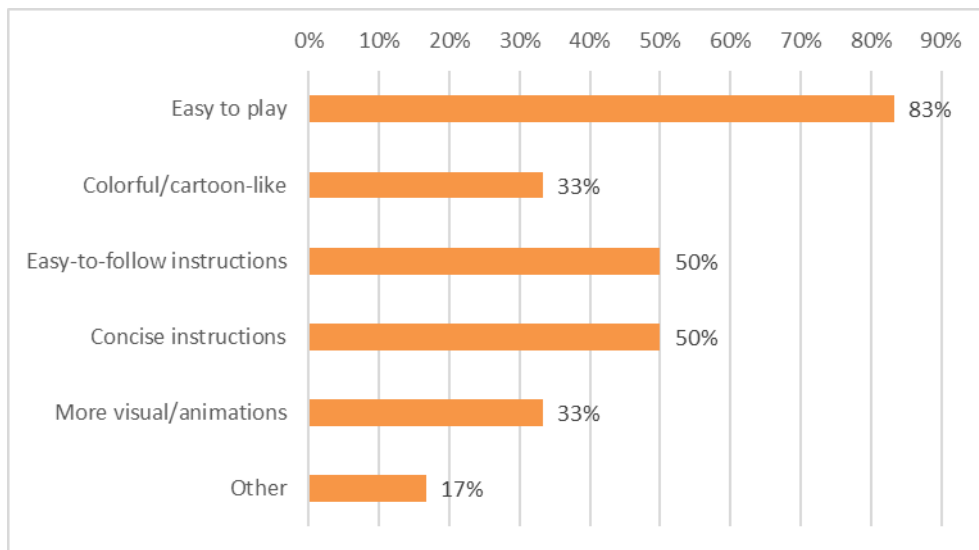
The reviewers identified entertainment activities/games on 26 of the 113 reviewed social media profiles. In 6 instances, the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s. In addition, 5 of these profiles used the entertainment activities/games to promote food or beverage products to children.

Figure 17: Number of social media profiles featuring entertainment activities/games (N=113)



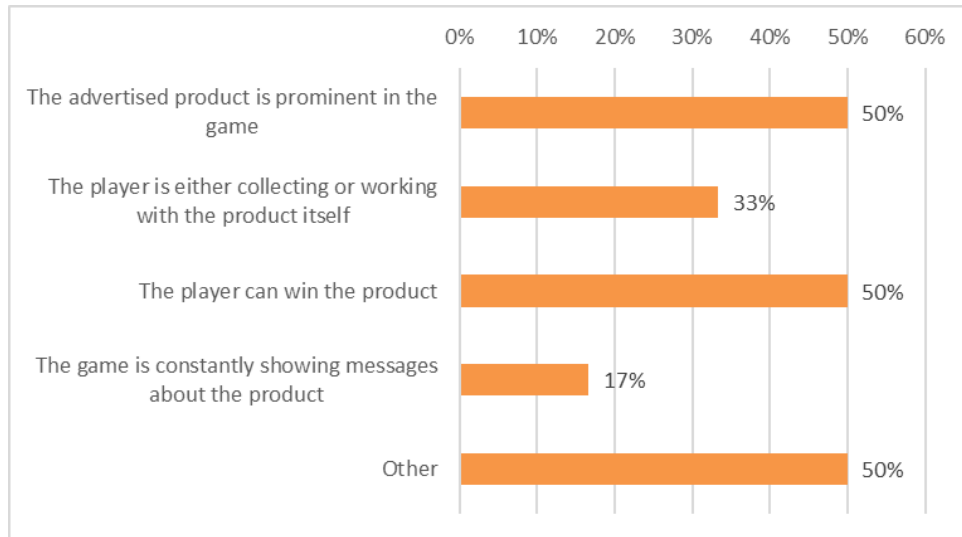
Reasons as to why the reviewers considered that the entertainment activities/games were primarily appealing to children under 12 are featured in the following chart (Figure 18).

Figure 18: Main indicators for entertainment activities/games considered primarily appealing to under-12s (N=6)



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 19).

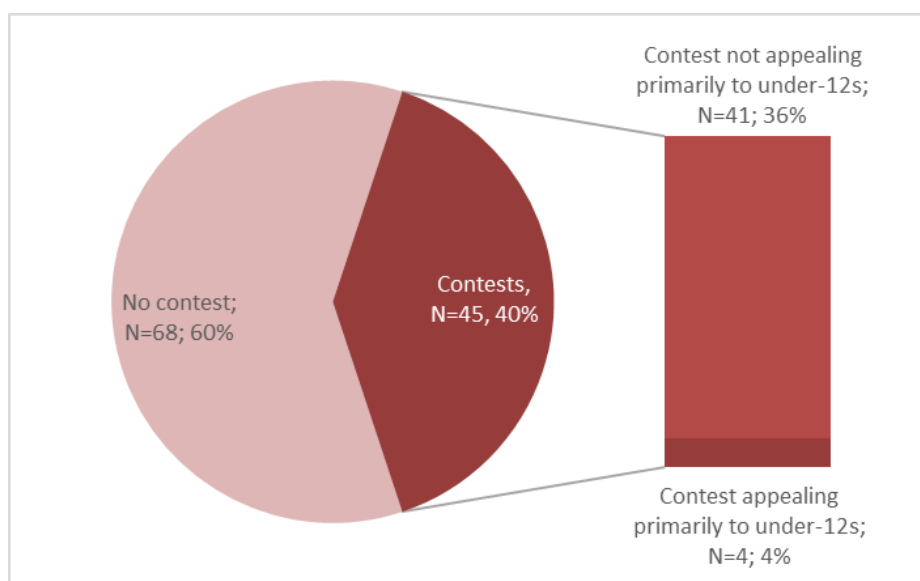
Figure 19: Main indicators for entertainment activities/games used to promote product to under-12s (N=5)



Contests/Competitions/Promotional events

45 out of the 113 reviewed social media profiles included contests or competitions or promotional events. In 4 cases, the reviewers considered that these contests/competitions /promotional events were appealing primarily to children under 12. In all 4 cases, the contests/competitions /promotional events were used as a means to promote a food/beverage product to children under 12.

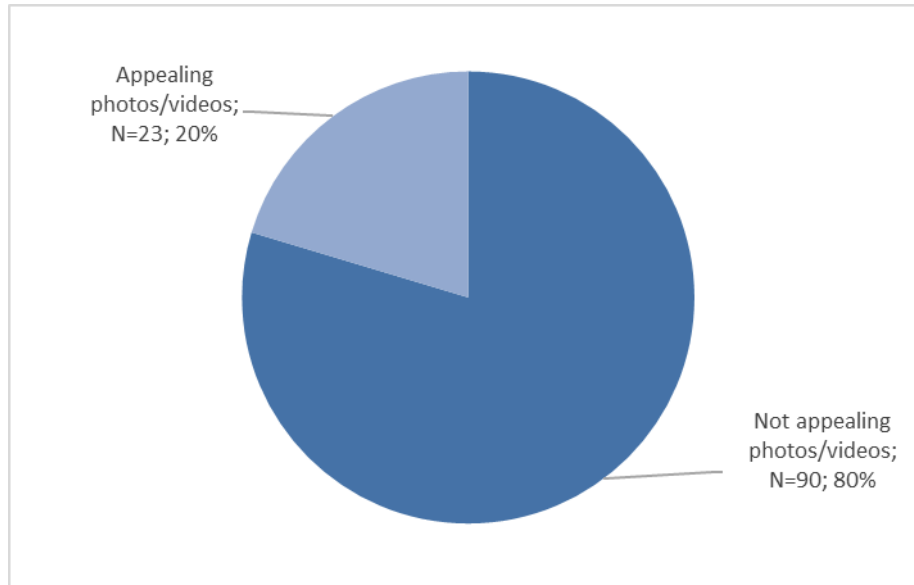
Figure 20: Number of social media profiles featuring contests/competitions (N=113)



Videos/Photos

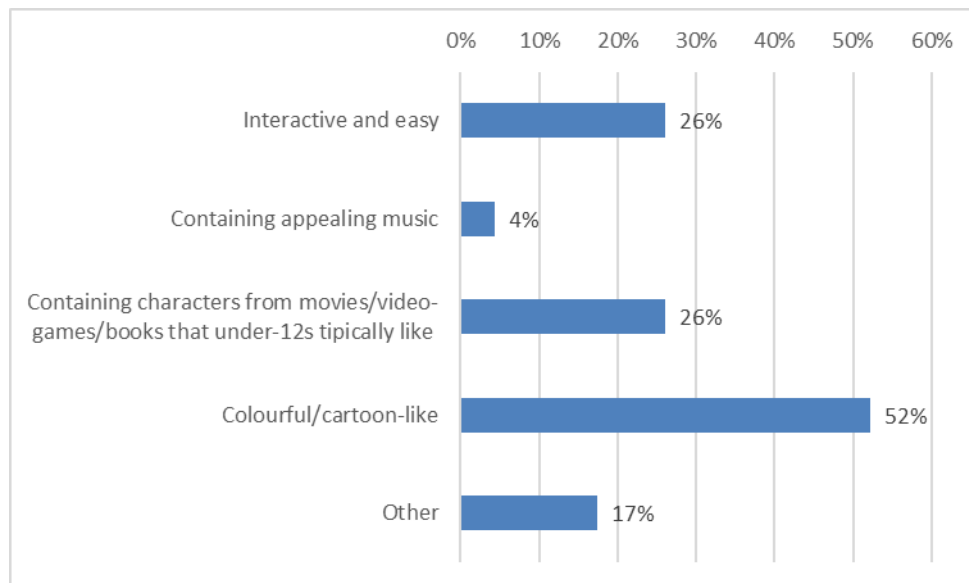
23 of the 113 reviewed social media profiles featured videos and/or photos that were considered to be primarily appealing to under-12s. 13 of these profiles used videos and/or photos to promote food or beverage products to children.

Figure 21: Number of social media profiles featuring videos/photos (N=113)



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.

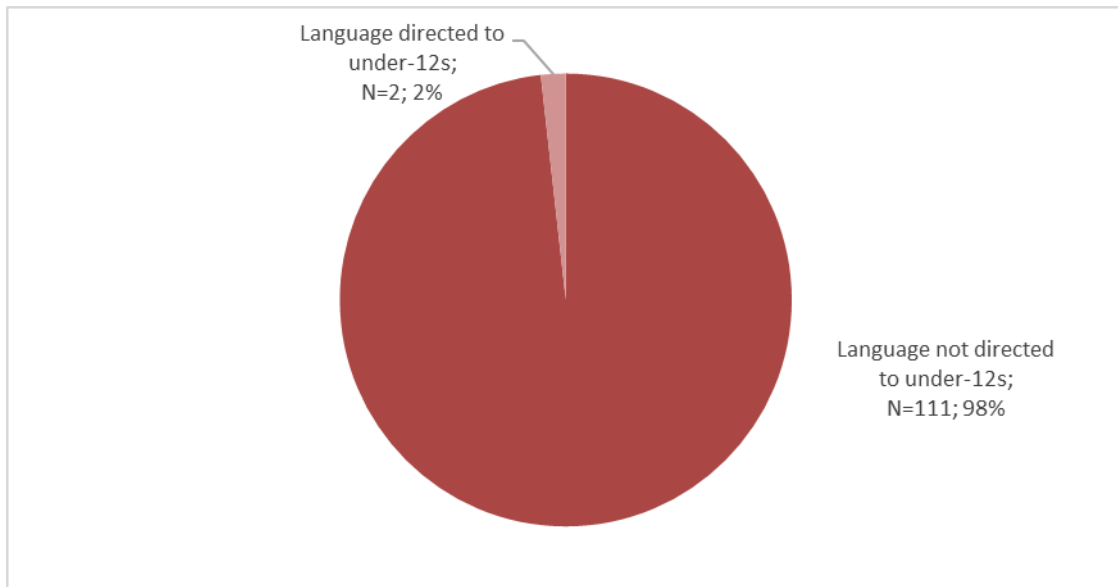
Figure 22: Main indicators for videos/photos considered primarily appealing to under-12s (N=23)



Language/Interaction

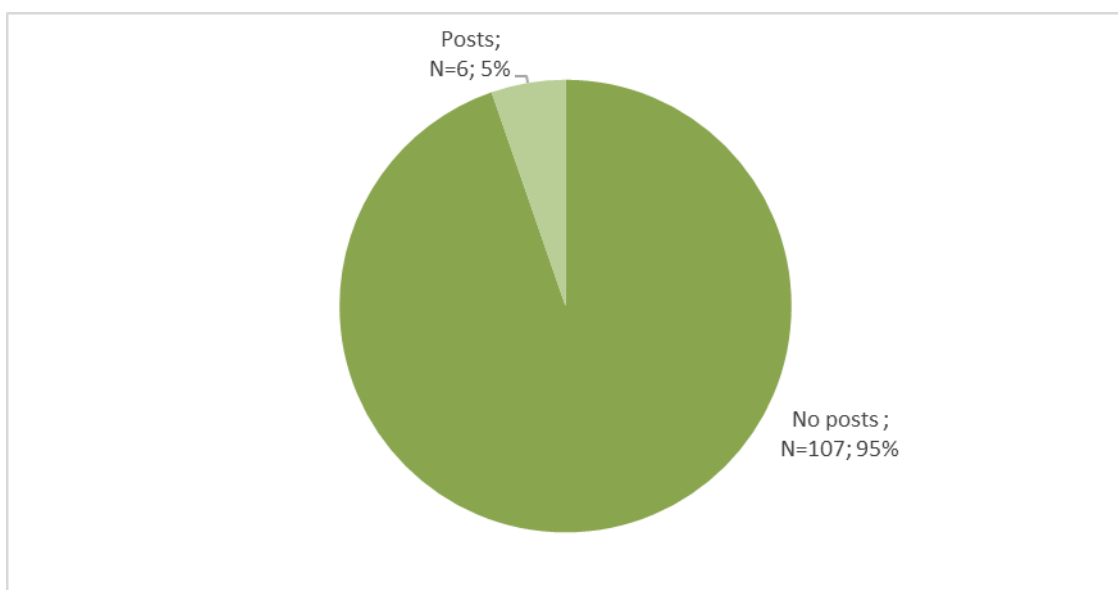
2 of the 113 reviewed social media profiles used language that was deemed as directed at children under 12, as it was considered plain and easy to understand by under-12s, as well as directly addressing under-12s.

Figure 23: Number of social media profiles using language directed at children under 12 (N=113)



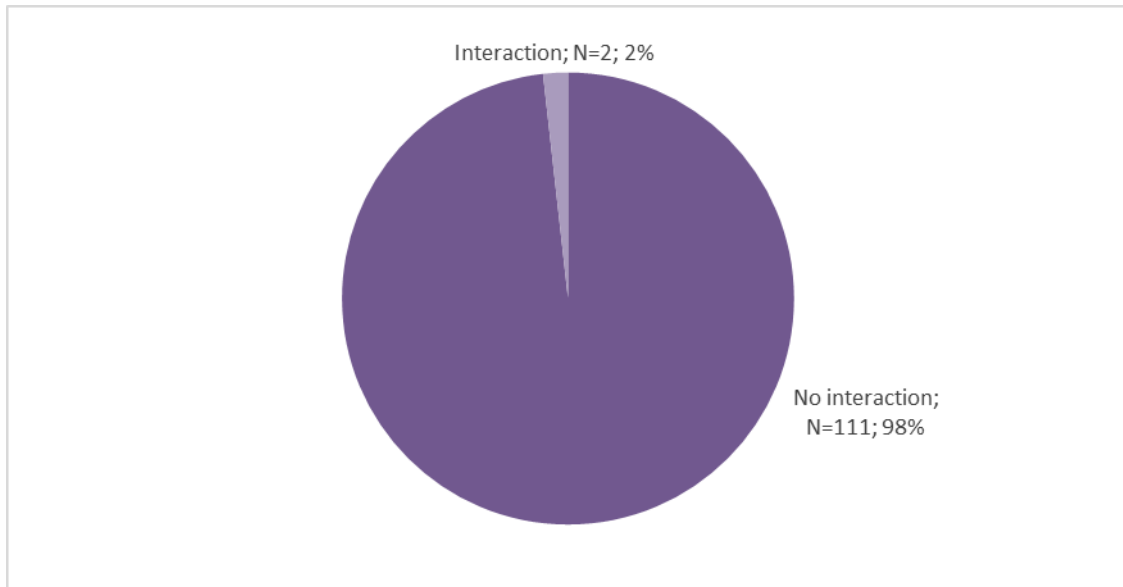
In 6 other social media profiles, the reviewers identified posts and comments which were likely to have been made by children younger than 12.

Figure 24: Number of social media profiles including any posts/comments/interactions from children under 12 (N=113)



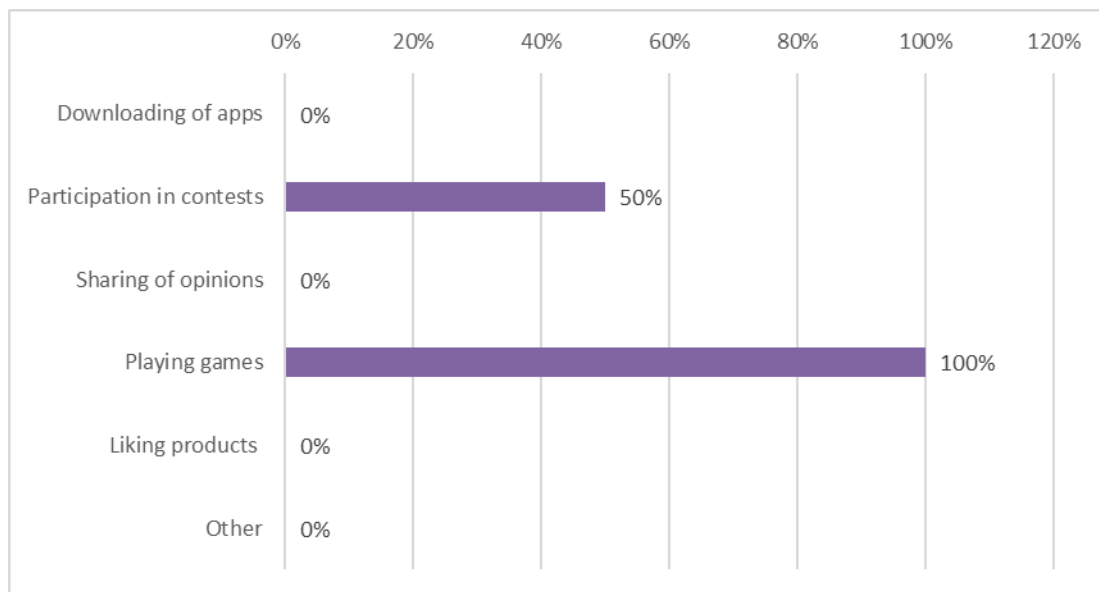
According to the reviewers, 2 out of 113 reviewed social media profiles seemed to encourage the interaction and active participation of children under 12.

Figure 25: Number of social media profiles encouraging interaction and/or active participation of children under 12 (N=113)



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 26: Main indicators for encouraging interaction and/or active participation of children under 12 (N=2)

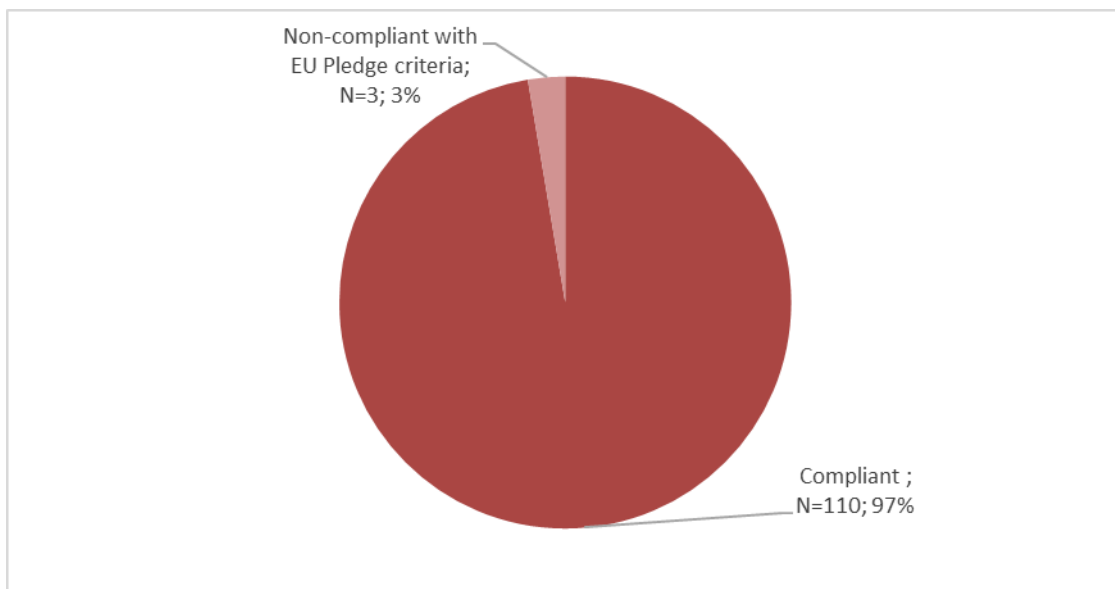


Primary Appeal of Brand Social Media Profiles to under-12s

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 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 3 out of the 113 reviewed social media profiles were primarily appealing to children under 12.

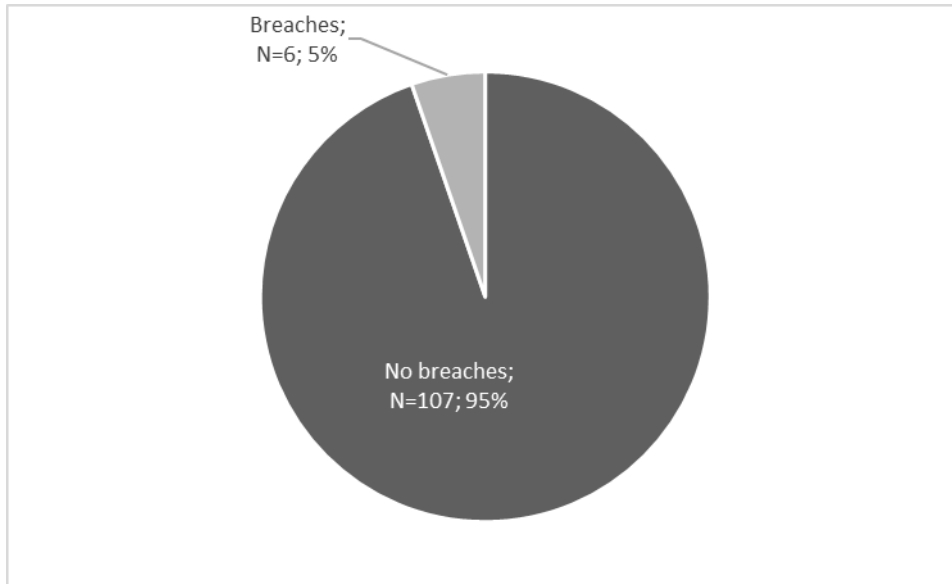
Figure 27: Number of social media profiles primarily appealing to under-12s (N=113)



Compliance with Advertising Codes/Laws

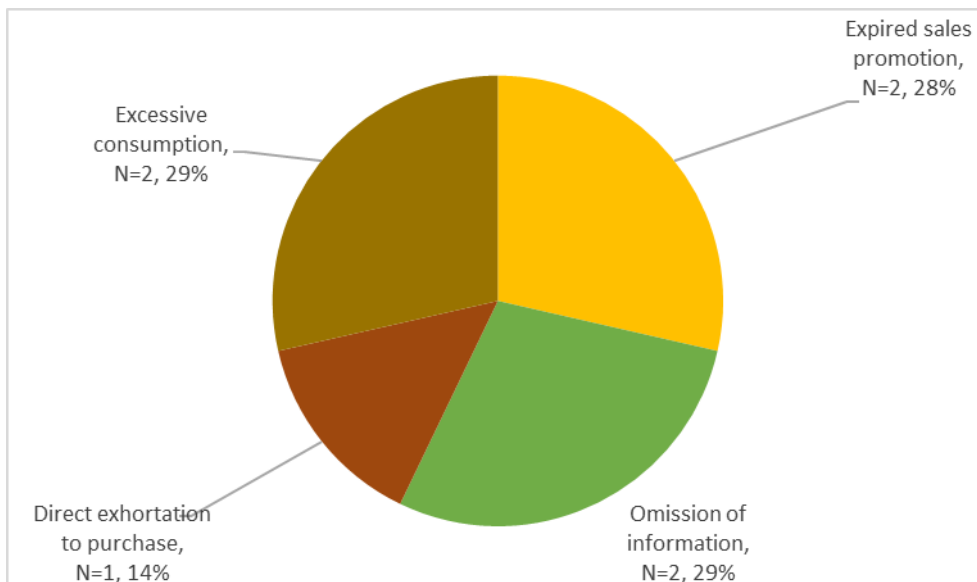
6 out of the 113 reviewed social media profiles featured items that were considered to be potentially in breach of advertising codes or relevant national advertising laws.

Figure 28: Compliance with advertising codes/laws (N=113)



On these 6 social media profiles, a total of 7 problematic items were found.

Figure 29: Potential breaches with advertising codes/laws (N=7)



2 social media profiles promoted and encouraged excessive portions and consumption, whereas one social media profile included direct exhortation to purchase the advertised products.

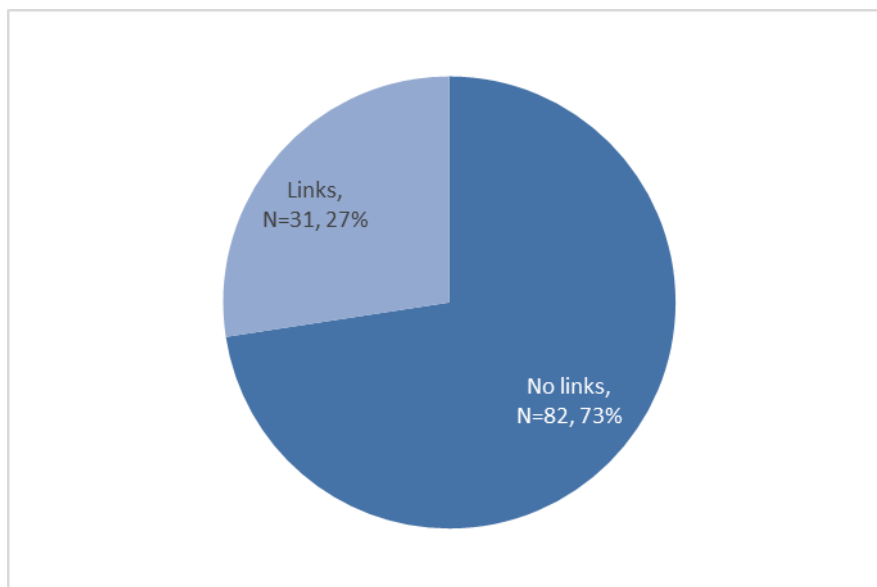
In 2 cases, the reviewers found on the social media profile sales promotions that had already expired at the time of the review.

Finally, the reviewers flagged 2 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.

Links to other social media profiles

31 of the 113 reviewed social media profiles included links to other social media sites – either brand-owned or influencers profiles (Facebook, YouTube, Instagram, Snapchat, etc).

Figure 30: Links to other social media profiles (N=113)



Note from the Independent Reviewers

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

1.1 Research Methodology and Sample

A total of 145 websites, 113 social media pages (39 Instagram, 32 YouTube and 42 Facebook), and 40 profile pages of influencers (32 Instagram, 2 YouTube and 6 Facebook) from 8 different countries were reviewed by SROs based on a standardized coding scheme. An independent team of reviewers at Ghent University double coded 25% of these pages (based on a random selection, N = 73) to check the quality and reliability of the coding. In addition to this random selection, the independent reviewers also double-coded all cases for which breaches were found by the SROs (N = 4). This eventually resulted in a total of 37 websites, 30 company owned social media pages (10 Instagram, 8 YouTube and 12 Facebook) and 10 influencer profile pages (8 Instagram and 2 Facebook) that have been coded by the Ugent team.

The coding occurred based on the coding scheme and all data were entered in SPSS. Subsequently, the inter-coder reliability between the coding of Ghent University and the SROs 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 coders⁸. 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 .75 for the websites, .68 for the social media profiles and .40 for the influencer profiles. This indicates a good agreement for the websites, a good agreement for the social media profiles and a fair agreement for the influencer profiles. Below we explain the reasons that may explain the (minor) disagreement in coding:

- Firstly, some disagreement can be explained due to the ***difference in timing*** between the reviews of the independent coders and the SROs (a delay of one month and a half). In that period, there may have been some changes to the websites/ social media. For example, competitions, videos, etc., could have been added or removed.
- A second point is the ***difference in language***. The different languages form a barrier when it comes to evaluating the language used on the websites and social media profiles. All content has been translated by the coders, however, small nuances might have been missed which could have led to a different end result. Also, each SRO coded cases for its own country, which might also generate differences in coding across SROs. The independent coding team coded cases across countries and was able to compare these different cases and evaluate them accordingly.

⁸ 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.

- The third point is about the reviews of the *posts by the influencers*. The difference in coding can be explained by the fact that the SROs only found one or two branded posts while the independent reviewers found three or more posts containing a product.
- Finally, depending on the interpretation of the concept “**primarily appealing under 12**” nuances between codes might arise. It is sometimes difficult to estimate what a child under 12 finds appealing. Therefore, it is possible that the SROs find something not attractive for children under 12, but the independent reviewers think differently.

1.2 Inter-coder reliability analysis of company-owned websites

The results of the inter-coder reliability for the websites are reported in **table 14** below. Thirty-seven websites were coded by the independent reviewers, 36 of these sites were randomly selected from the full list and one website was deliberately included because breaches were found by the SROs.

The results of the inter-coder reliability between the work of the SROs and of the independent coders show a good agreement. Our analysis confirmed the findings for the one website that was flagged as being in breach by the SROs. Additionally, the independent-coding team flagged 2 more websites as being in breach. These websites contained several elements that were not in line with the EU Pledge criteria. For example, cartoon-like animations and information that tried to persuade children to buy products by offering them gifts.

Based on our independent analysis on a random subsample of 37 websites, we also concluded that at least 3 more website, that were not flagged by the SROs, additionally contained elements that appealed to young children. These websites were not entirely in breach with the EU Pledge but were in breach with at least 1 element. As such, the independent reviewers did not flag them as red but gave them the color orange because some of the elements on the website seemed to be designed to target children. For example, these websites included a game that could easily be played by children under 12.

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

Table 15 (below) provides an overview of the Cohen’s Kappa of the coding of the social media sites. Thirty social media sites were double coded by the independent reviewers. Three of them were deliberately included because breaches were found by the SROs, 27 of them were randomly selected from the full list.

When examining the questions separately, all Cohen’s Kappa appear to be medium to high, indicating good reliability, except for the question concerning contests/competitions. We will report our findings below.

First, we discussed the finding on the 3 social media sites that were signaled in breach with the EU Pledge by the SROs. We double-checked the coding for these sites and agreed on two social media sites being in breach while one social media site was flagged orange. The two social media sites we agreed on, contained videos appealing to young children, visual lay-outs 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. We however believe that one social media site which was flagged did not primarily appeal to children but to teen-agers. Therefore, this social media site was flagged orange instead of red by the independent reviewers.

We further flagged two additional social media pages that we believed really appeal to young children. This mainly because of colorful images or videos and the use of contests or language that stimulate interaction with children younger than 12. We also added the color orange to four social media sites which we believe should not be flagged red but are situated in a gray zone. These social media pages mainly target parents - therefore they do not directly appeal to children when strictly following the Pledge. The content however is easy enough to be understood by children, the recipes and craft activities might stimulate pester power and some of the posts are clearly directed at children.

1.4 Inter-coder reliability analysis of influencer social media profiles (Instagram, Facebook & YouTube)

Table 16 (below) provides an overview of the Cohen's Kappa of the coding of the influencer profiles. The SROs provided a list of 40 influencer profiles in red. The independent reviewer selected a random sample of 10 influencer profiles.

Only one of the ten profiles that were double coded was primarily appealing to children under twelve. This profile was also flagged by the SROs. The influencer was a child himself and the content on the profile was designed for children under twelve. There were several posts and stories about products of a certain brand, but the influencer did not disclose any of the posts. Therefore, the profile is in breach with the EU-Pledge.

Next to the one profile targeting children there was one influencer targeting parents. He posted pictures of his child with the product and recommended the product used in the post as suitable for children. The SROs did not consider this profile as targeting parents.

Additionally, the independent reviewers flagged four other influencers. They were not primarily targeting children under 12 but they did not disclose any promotional posts according to the independent reviewers. Some SROs did consider the reference to the brand in a post as a disclosure. However, the independent reviewers did not share the opinion.

2. General Conclusions

Based on our analysis, we formulate some general concerns and conclusions:

- **Overall assessment**

Overall, the majority of the analyzed websites and social media pages are primarily designed for teenagers and adults. The general look and feel give the impression that the pages are not primarily targeting children. Only a few websites and social media pages made their content specifically attractive for children.

- **Appealing character of brand characters to young children**

In many of the websites and profiles, branded characters stimulate the child-like character of the site (animal or human-like characters). Because of this, no breach is officially coded in the coding system (as branded characters are not included in the Pledge). However, we believe that including these characters in the site makes the site particularly appealing to young children. Accordingly, we suggest that brands should try to adjust these characters so that they appeal to older consumers instead of the young ones (as several brands already do). These brand characters are often portrayed in a funny situation or are designed to be liked by children. Brand equity characters are also marketing tools and even more powerful ones for children under 12. For example, a study by McGale, Halford, Harrold and Boyland (2016) showed that using a brand equity character on food packaging evokes unhealthy food choices in children⁹.

- **Childish videos and animations may cause confusion about the primary target group**

While some sites were clearly not primarily designed to appeal to children under 12, they still contained several elements which can be found attractive by young children. Accordingly, in our analysis, we distinguished between sites who were primarily targeting children (flagged as red) and sites which contained different elements that might be appealing to young children (flagged orange).

Despite the fact it may occur that the general look and feel of the websites or social media pages do not specifically appeal to young children, some elements (e.g., pictures, videos, games, recipes) often give the impression that it is targeting young children. For example, often sites do not use language that is clearly directed at children, but they contain recipes specifically designed to target children. Some sites are clearly directed at older children (teenagers) however also children around the age of 10-11 might be visiting these sites and find them appealing.

- **A strong focus on parents is debatable**

Some brands mainly used their websites to convince parents of the suitability of the product for their children. The websites tried to persuade the parents that their children were considered as target group by adding textual and/or visual elements to the website. Although this is in agreement with the commitments of the EU Pledge, we make a plea for a cautious use

⁹ McGale, L. S., Halford, J. C. G., Harrold, J. A., & Boyland, E. J. (2016). The influence of brand equity characters on children's food preferences and choices. *The Journal of Pediatrics*, 177, 33-38. doi: 10.1016/j.jpeds.2016.06.025

of such tactics. For instance, claims need to be put in such a way that they are clear to parents and provide correct information that is fully comprehensible to them and not misleading (e.g. 'Do you have everything ready for your children?' or 'play these games with your little children'). Additionally, adding recipes and pictures of children to the websites or social media pages, may make those pages also appealing for the young children (even when the general tone of voice and textual elements are mainly targeting parents).

- **Influencer Marketing should be disclosed correctly**

Most influencers included in the sample did not primarily target children under 12. However teenagers are also a vulnerable target group and should not be misled. Many influencers did not disclose the branded post properly which makes it very difficult for children and teenagers to critically process the post. Another group of influencers did disclose their branded posts but the disclosure was not clear. For example, an influencer wrote a little text and added in the middle of text 'in collaboration with'. All branded posts should be disclosed in a transparent and correct way.

- **An ethical use of offline sponsoring and product packaging is necessary**

In a final note, we would like to state that offline sponsoring tactics are more often used to target young children and families. This is also debatable and should be included in the commitments of the EU Pledge. Similar to tactics added on product packaging (e.g., links to digital games and collection actions in product packages).

Table 14: Inter-coder reliability websites (Cohen's Kappa)

Main questions of the website survey	Cohen's Kappa
<i>Do the website or sections of the website, have an age-screening/parental consent mechanism aimed at verifying the age of visitors before allowing the access</i>	.91
<i>Does the website feature licensed characters/tie-ins/celebrities (i.e. celebrities or fictional characters which are not owned by the company)</i>	.64
<i>If yes, are the licensed characters/tie-ins/celebrities targeted primarily at an under-12 audience</i>	.67
<i>If yes, are the licensed characters/tie-ins/celebrities used as means to promote a food/beverage product to children under 12</i>	.62
<i>Does the website feature any type of games and/or other entertainment activities such as puzzles, card games, racing, recipes, colouring or activity sheets, "Do it yourself" type of activities, etc.-</i>	.57
<i>If yes, are the games/entertainment activities designed for children younger than 12</i>	.69
<i>Does the website feature animations (i.e. cartoons, animations depicting fantasy situations) and/or music/sound effects and/or videos</i>	.71
<i>If yes, are the animations and/or sound effects and/or video used designed to appeal primarily to under-12s</i>	.66
<i>Does the website feature toys used as premiums/prizes to promote a food/beverage product- Please don't include cases where toys are an inherent part of the food product.</i>	.38
<i>Are they designed to appeal primarily to children younger than 12</i>	.44
<i>Taking into account your answers to all the previous questions and all the aspects of a website's design like language/text/navigation, do you think that the website is clearly intended to be primarily appealing to children under 12</i>	.48

Table 15: Inter-coder reliability social media profiles (Cohen's Kappa)

Main question of the Social Media Survey	Cohen's Kappa
<i>Is the content of the social media site accessible without registration/logging in?</i>	.474
<i>Is the language used on the social media platform clearly directed at children under 12?</i>	.634
<i>Do you think the social media profile encourages the interaction and/or the active participation of children under 12?</i>	.634
<i>Does the social media platform feature licensed characters/ movie tie-ins/ celebrities (i.e. celebrities or fictional characters which are not owned by the company, e.g. sports athletes, actors, celebrities, or fictional characters linked to movies/entertainment, e.g. Shrek, Harry Potter?</i>	.561
<i>Are the licensed characters/tie-ins/celebrities targeted primarily at an under-12 audience?</i>	.474
<i>Does the social media profile feature any type of games and/or other entertainment activities such as puzzles, card games, racing, recipes, colouring or activity sheets, "Do it yourself" type of activities, etc.?</i>	.857
<i>Are the games/entertainment activities designed for children younger than 12 (i.e. are they easy enough to be played/performed by children younger than 12)?</i>	.535
<i>Does the social media profile feature videos/photos?</i>	.520
<i>Is the product featured in the videos/photos, i.e. are the videos/photos used as means to promote a food/beverage product to children under 12?</i>	.516
<i>Does the social media profile feature contests/competitions?</i>	.308
<i>Are the contests/competitions used to appeal primarily to under-12s?</i>	.211
<i>Taking into account your answers to all the previous questions and all the aspects of a social media profile, do you think that the profile is clearly intended to be primarily appealing to children under 12?</i>	.630

Table 16: Inter-coder reliability influencer profiles (Cohen's Kappa)

<i>Main question of the Influencer Survey</i>	<i>Cohen's Kappa</i>
<i>Is the food/beverage product non-compliant ?</i>	.16
<i>If the product is non-compliant, do you think the way it is advertised by the influencer could be considered primarily appealing to children under 12?</i>	.33
<i>Are there any disclosures in the post/video (i.e. paid partnership with, hashtags used by the influencer #ad, #sponsored, etc)?</i>	.23
<i>Does the influencer use any of the following techniques that appeal to children under 12?</i>	-0.8 (not significant)
<i>Do you think the influencer is targeting children under 12 in his/her post/video?</i>	.40
<i>Do you think the influencer is targeting parents of children under 12 in his/her posts/videos (indirectly addressing parents to buy unhealthy products their children)?</i>	.30



EUROPEAN ADVERTISING STANDARDS

ALLIANCE

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