# INDEX

**EASA’S ANNUAL REVIEW - 2020**

## 01 FOREWORD
- Chairwoman 4
- Officers 6
- Director General 7
- Board and Executive Committee 9

## 02 ABOUT EASA
- EASA’s Members 12
- Secretariat 14
- Key Statistics 15

## 03 DEVELOPING EASA’S NETWORK
- EASA’s Network 19
- Cross border Complaints 22
- CBC Referrals 22
- Expanding the Network 23
- Technological Developments 29

## 04 SERVING EASA’S NETWORK
- EASA’s Projects 34

## 05 PROMOTING ADVERTISING SELF-REGULATION
- Policy and Advocacy 38
- Outreach and Communication 43
- Publications 44
A WORD FROM EASA’S CHAIRWOMAN

We all, people and organisations, have had to be resilient and give the very best of us to overcome adverse sanitary, economic and social circumstances that we have never met before. EASA has not been an exception and the response of its people, staff and members has been exemplary.

2020 has been a year that will be forever engraved in our individual and collective memories. The COVID pandemic has tested us in many ways, both personally and professionally. Those who have lost loved ones or been ill have been particularly hard hit. My heart goes out to them.

We all, people and organisations, have had to be resilient and give the very best of us to overcome adverse sanitary, economic and social circumstances that we have never met before. EASA has not been an exception and the response of its people, staff and members has been exemplary.

The EASA team has demonstrated, once again, its professionalism and commitment to the association. They all have made a great effort to adapt, in record time, their work processes to the digital environment, maintaining, thanks to successful management, the vital coordination of the team and the efficient provision of services to its members with the same high-quality standards.

EASA’s partners - national self-regulatory bodies and industry associations - have also been exemplary. Despite the enormous difficulties they had to face last year, they have been more committed than ever to continue working collectively for responsible advertising in Europe.

2020 will be recorded in EASA’s history as the year of the pandemic, of course, but also as the year in which the first large digital platform joined the alliance. I hope that Google’s excellent example will encourage other major digital players to follow. We will continue working to achieve it.

EASA has also made decisive progress this year in the implementation of new technologies. First, concerning the organisation of its governing bodies’ meetings, that, for the first time, have been held virtually, without affecting in any way the necessary exchange that must take place or the decision-making process that allows the association to move forward and fulfill its objectives. In parallel, the number of workshops, webinars and other meetings has been significantly diversified and expanded, with the online format facilitating greater attendance and active participation by all EASA members. In addition, this year, we have started to make decisive progress in developing Artificial Intelligence projects. These projects aim to enhance the tools provided by SROs to the industry to help it carry out responsible advertising in a new era.

Therefore, we can affirm that we are already actively responding to the first of the challenges we are facing, which is none other than the unstoppable digitalisation of advertising.

The second challenge is the new connected and empowered consumer who increasingly demands brands and companies a clear purpose and more responsible advertising, asking companies not only to comply with regulation and SR but to contribute to change in aspects like minors’ protection, women’s portrayal, sustainability, diversity and inclusion, transparency or privacy. In this scenario, SR needs to be able to continue helping companies to respond to these new consumer requirements by adapting SR codes of conduct accordingly.

And third, globalisation. We must, therefore, together with ICAS, continue working on the SR harmonised developments that large companies demand of us. We must, however, be mindful of the value and effectiveness of self-regulation at the national level.

Moreover, we must make a special effort to reduce the gap between large and small SROs.

To do so, we will continue building on the foundation that was put in place by the former Executives, who I want to thank: Stéphane Martin, EASA’s former Chairman, who served two terms from 2016 to 2020, and a few additional months in the critical months of the pandemic, and Stephan Loerke (WFA) and Mathilde Figuet (FEDMA), who completed their terms as EASA Officers. It has been a great joy and honour to work with them.

My time serving as EASA’s Chairwoman has begun in a year that, as I said earlier, has marked a ‘before’ and an ‘after’ in our lives; a year that somehow started a new era. I see it as a privilege for which I thank EASA’s members. As I thank Angela Mills Wade (epta), Orla Twomey (ASAI) and Conor Murray (egta), who are working with me as part of EASA’s new Executive Office.

One year after the start of the pandemic, the real extent and long-term consequences of it remain to be seen. But there is already consensus that a new social consciousness is emerging on health, environmental, societal and governance topics. For an organisation as EASA, whose DNA is companies’ responsibility, this is a great challenge and a huge opportunity.

We look at the future with hope. At EASA, we will work, all together, to do our best to make the most of it.

CHARO FERNANDO MAGARZO
Chairwoman
In a world of increased concern about the trustworthiness of content, national advertising self-regulatory organisations provide standards and processes to promote and ensure trust and transparency in marketing communications, to the benefit of consumers, industry, and society.

EASA has built a strong reputation for delivering high standards in advertising self-regulation, and deservedly so. With the support of its members from both the national self-regulatory bodies, and the media and advertising industry organisations, EASA continues to innovate in tackling the new and emerging trends and challenges facing the advertising sector.

Today, more than ever, EASA’s trusted and unique network of SRO and industry members is needed to steer the advertising industry on a responsible and engaging path forward.

Despite the difficult conditions, we kept our staff’s well-being and our members’ interests at heart. EASA and its membership adapted, collaborated and grew throughout 2020.
Indeed, in 2020 we were delighted to sport a vibrant and growing self-regulatory network. EASA welcomed NAESO, its newest SRO member from Serbia. Another key - if not historic - milestone is EASA launching a new membership category - digital pure-play companies - welcoming Google as its first digital pure-play company member. It is paramount that all the stakeholders that benefit from the trust generated by responsible advertising contribute to advertising self-regulation. We hope that other digital players will soon follow in the footsteps of Google. Moreover, EASA members’ technological and digital developments have sped up. This journey has taken us to new heights in the fields of A.I. and machine learning, bringing EASA members together and working on new programmes. EASA also continued working on industry projects together with self-regulatory organisations. It deepened its interactions with sectoral organisations which led to new service proposals, including a tailored gap analysis.

We were very saddened to cancel the Biannual Meetings in Ljubljana and Barcelona, which were set to bring our members together, but it did not hold us back. In place, EASA quickly adapted and successfully organised 18 online sessions, including webinars with notable guests as well as informal catch-up calls. Besides events, EASA continued delivering newsletters, managed info requests and cross border complaints. Additionally, EASA collaborated with ICAS to showcase the relevance of ad SR in times of COVID through the publication of a joint report on Advertising Self-Regulation in Times of COVID-19. On the policy front, EASA was no less active, with many legislative initiatives being shaped by EU policymakers as the new Parliament and Commission settled into Office. EASA worked on a number of files important to advertising self-regulation, such as the Digital Services Act, the New Consumer Agenda, environmental claims, Code of Conduct on Responsible Business and Marketing Practices as well as the monitoring of the transposition of the AVMSD.

Lastly, my foreword would not be complete without thanking all our members for their tremendous and unfailing support during these challenging times. Also, a special thanks to all those involved in making Google’s membership possible – accomplishments in 2020 were the result of the outstanding work done over several years. A big thanks also to EASA’s outgoing Officers for their vision and commitment. It was a pleasure working with them, contributing to the advance of EASA and advertising self-regulation. We look forward to contributing to the continued growth of EASA’s strength, recognition, relevance, and influence, working hand in hand with the recently elected EASA’s Officers and Chairwoman.

### BOARD OF DIRECTORS AND THE EXECUTIVE COMMITTEE

EASA’s Board of Directors is responsible for the administration of EASA. The current Board members took office following elections held during the Extraordinary General Meeting in October 2020. Charo Fernando Magarzo (AUTOCONTROL) was elected as the Chairwoman of EASA. Ms Fernando Magarzo took over the Chairmanship from Stéphane Martin (ARPP), who served as EASA’s Chair for two terms. EASA would like to hereby express its gratitude to Mr Martin for his valuable leadership from 2016 to 2020. EASA’s new elected Officers are two Vice-Chairs, Angela Mills Wade (EPC) and Orla Twomey (ASAI), as well as Conor Murray (egta), EASA’s Treasurer. The Alliance would also like to warmly thank its outgoing Vice-Chair, Stephan Loerke (WFA) after 4 years in office and its outgoing Treasurer, Mathilde Fiquet (FEDMA), after 7 years in office for their valuable dedication and contribution. On the occasion of its October 2020 Extraordinary General Assembly EASA welcomed three new Board Directors: Wil Gilroy (WFA), Mark Howe (Google) and Géraldine Proust (FEDMA).

#### SELF-REGULATORY ORGANISATION MEMBERS

Charo FERNANDO MAGARZO, Chairwoman, AUTOCONTROL, Spain
Orla TWOMEY, Vice-Chair, ASAI, Ireland
Jennifer BEAL, WBZ, Germany
Markus DEUTSCH, OWI, Austria
Eleni DONTA, SEE, Greece
Ulya DURAN, ROK, Turkey
Ildeks FAZEKAS, ORT, Hungary
Vincenzo GUGGINO, IAP, Italy
Otto VAN DER HARST, SRC, the Netherlands
Piotr KWIĆIEŃ, RR, Poland
Niamh McGUINNESS, Clearcast, UK
Stéphane MARTIN, ARPP, France
Miguel MORAIS VAZ, ARPP, Portugal
Bernd NAUEN, DWR, Germany
Paula PALORANTA, LTL, Finland
Guy PARKER, ASA, UK
Ana PREDOVČ, SOE, Slovenia
Eva RAIČAKOVA, SRPR, Slovakia
Sandrine SEPUL, CP-JEP, Belgium
Elisabeth TROTZIG, Ro, Sweden

Invited participating member for consultative purposes:
Laura FRUNZETI,
(CEE/SR Development Council Leader – RAC, Romania)

#### INDUSTRY AND DIGITAL PURE PLAY COMPANY MEMBERS

Angela MILLS WADE, Vice-Chair, EPC
Conor MURRAY, Treasurer, EGTA
Tamara DALTROFF, EACA
Nina ELZER, EACA
Sue EUSTACE, AIG
Francesca FABBRI, AER
Townsend FEEHAN, IAB-Europe
Wil GILROY, WFA
Mark HOWE, Google
Ilias KONTEAS, EMMA
Stephan LOERKE, WFA
Joy de LOOZ-CORSWAREM, ENPA
Joris POLLET, WFA (PRG)
Géraldine PROUST, FEDMA
Richard SATURLEY, WOO
Dagmara SZULCE, IAA
Wout VAN WIJK, NME

#### BOARD OF DIRECTORS (as of 31/12/2020)

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<tr>
<th>Name</th>
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<tr>
<td>Angela Mills Wade</td>
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<td>Orla Twomey</td>
<td>ASAI</td>
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<td>Conor Murray</td>
<td>Treasurer, EGTA</td>
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<td>Mathilde Fiquet</td>
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<td>Richard Saturley</td>
<td>WOO</td>
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<td>Dagmara Szulce</td>
<td>IAA</td>
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<td>Wout Van Wijk</td>
<td>NME</td>
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Invited participating member for consultative purposes:
Laura Frunzeti,
(CEE/SR Development Council Leader – RAC, Romania)
EASA’s Executive Committee is led by EASA’s Chairwoman with the support of EASA’s two Vice-Chairs and a Treasurer. On the occasion of its October 2020 Extraordinary General Assembly, EASA welcomed two new Executive Committee members, Will Gilroy for WFA and Géraldine Proust for FEDMA, as well as a new observer member on the Committee, Mark Howe from Google.

EXECUTIVE COMMITTEE (as of 31/12/2020)

SELF-REGULATORY ORGANISATION MEMBERS

Charo FERNANDO MAGARZO, Chairwoman, AUTOCONTROL
Charo FERNANDO MAGARZO, Chairwoman, AUTOCONTROL
Orla TWOMEY, Vice-Chair, ASAI
Orla TWOMEY, Vice-Chair, ASAI
Markus DEUTSCH, DWR
Markus DEUTSCH, DWR
Ildiko FAZEKAS, ORT
Ildiko FAZEKAS, ORT
Vincenzo GUGGINO, IAP
Vincenzo GUGGINO, IAP
Otto VAN DER HARST, SRC
Otto VAN DER HARST, SRC
Stéphane MARTIN, ARPP
Stéphane MARTIN, ARPP
Bernd NAUEN, DWR
Bernd NAUEN, DWR
Guy PARKER, ASA
Guy PARKER, ASA
Invited for consultative purposes:
Invited for consultative purposes:
Anders STENLUND, Ro
Anders STENLUND, Ro
Angela MILLS WADE, Vice-Chair, EPC
Angela MILLS WADE, Vice-Chair, EPC
Conor MURRAY, Treasurer, EGTA
Conor MURRAY, Treasurer, EGTA
Tamara DALTROFF, EACA
Tamara DALTROFF, EACA
Sue EUSTACE, AIG
Sue EUSTACE, AIG
Townsend FEEHAN, IAB Europe
Townsend FEEHAN, IAB Europe
Invited for consultative purposes:
Invited for consultative purposes:
Mark HOWE, Google
Mark HOWE, Google
Will GILROY, WFA
Will GILROY, WFA
Ilias KONTEAS, EMMA
Ilias KONTEAS, EMMA
Géraldine PROUST, FEDMA
Géraldine PROUST, FEDMA
Wout VAN WIJK, NME
Wout VAN WIJK, NME

2 ABOUT EASA
EASA’S MEMBERS

The European Advertising Standards Alliance (EASA) is the single authoritative voice on advertising self-regulation. In 2020, EASA brought together 42 organisations committed to ensuring ads are legal, decent, honest and truthful. Advertising self-regulation protects expressive and artistic freedom, respects national differences in culture, law and commerce, and encourages high ethical standards. EASA provides guidance on how to practice it, which thereby encourages responsible advertising to the benefit of both consumers and businesses.

28
EUROPEAN SELF-REGULATORY ORGANISATIONS (SROs)

Covering 26 countries

13
INDUSTRY ORGANISATIONS

Representing the advertising value chain (advertisers, agencies, various forms of traditional and digital interactive media)

1
DIGITAL PURE PLAY COMPANY

EASA’s industry members represent the advertisers, agencies and media, which are actively engaged to ensure creative and responsible advertising. EASA’s SRO network is active in ensuring responsible advertising through the handling of consumer complaints but also through preventive work providing opinions on the compliance of ads before they are made public via ‘copy advice’ or ‘preclearance’ services. EASA’s digital pure play members are companies with a commercial presence across European and world markets, deriving a significant annual turnover from advertising running on their owned and operated digital properties.
Based in Brussels, the Secretariat is responsible for the daily work of EASA and acts as its voice to European and international institutions. EASA supports its members in advertising self-regulation matters, coordinates committees and task forces, develops Best Practice Recommendations, engages in sectoral monitoring exercises, and monitors developments in advertising self-regulation.

EASA collects complaints and copy advice statistics from its advertising self-regulatory organisation (SRO) members each year. Copy advice is provided by an SRO as a voluntary service for companies wishing to receive feedback on a confidential basis whether their ads meet the required advertising standards. The annual statistical reports are published online and contain analyses of complaints, copy advice requests and pre-clearance.

In 2019, EASA's SRO network received and dealt with a TOTAL COMPLAINTS of 60,682. On average, SROs RESOLVED 94% of received complaints within 2 months.

87% of complaints were resolved within 1 month.

87,194 ADS PRE-CLEARED by the three SROs providing this service.

95,252 COPY ADVICE provided by SROs.
The UK, Germany and the Netherlands accounted for a total of 60% + 15% + 7% of all complaints received in Europe.
EASA’S NETWORK
EXCHANGING INFORMATION

INFO REQUESTS

EASA promotes information sharing among its members by disseminating information requests across its network, thus gathering relevant data on topics of high interest for its members.

OVERALL, EASA SENT OUT 45 INFO REQUESTS AND SURVEYS IN 2020:

- **SROs**: 56%
- **EASA**: 42%
- **Industry**: 2%
In 2020, EASA was planning to hold the Spring Biannual Meetings in Ljubljana, Slovenia and the Autumn Biannual Meetings in Barcelona, Spain. Due to the COVID-19 outbreak, EASA had to adjust and bring its members together in a brand-new format. As an alternative to face-to-face meetings as of May, EASA successfully organised virtual meetings. Each session brought together between 30 to 60 participants.

**EASA WEBINAR SERIES PROGRAMME**

**BIANNUAL MEETINGS 2020 - From physical to virtual meetings**

Altogether, EASA organised 18 online sessions:

- 12 webinars from May to December in collaboration with ICAS
- 2 informal catch-up calls with EASA and ICAS members
- 6 online sessions: webinars from May to December in collaboration with ICAS
- 2 informal catch-up calls with EASA and ICAS members

- **May 19**
  - Ensuring Responsible Advertising in COVID-19 Times

- **May 26**
  - Cross Border Complaints Workshop

- **May 28**
  - AVMSD Transposition

- **June 11**
  - Influencer Marketing and Pressure for Enhanced Disclosure

- **June 18**
  - Policy Workshop: European Digital Services Act Updates and Next Steps

- **Sept. 14**
  - Google’s HFSS Policy Update

- **Oct. 8**
  - European Green Deal: Impact for Advertising SR

- **Oct. 16**
  - Online EASA SR Committee

- **Oct. 29**
  - Diversity and Inclusion in the Advertising Industry and the Self-Regulatory Network (with ICAS)

- **Nov. 17**
  - SR Committee II

- **Dec. 3**
  - Technology for Good: employing AI, machine learning and other automated tools for innovative SR solutions

- **Dec. 10**
  - Financial Models for SROs (with ICAS)
CROSS BORDER COMPLAINTS & CBC REFERRALS

EASA’s cross-border complaint (CBC) system ensures that concerns and complaints of the European consumers are addressed no matter where the advertising campaign originates from. EASA has facilitated the handling of CBSs since 1992.

In 2020, EASA published its 2019 Cross-Border complaints Report which highlights the activity with regard to the transfer and handling of cross-border complaints across EASA’s network. Key findings were as follows:

- **Advertisements from the Netherlands and Ireland generated the highest number of cross-border complaints.**

  - Netherlands: 28%
  - Ireland: 36%
  - Other: 36%

- **Most cross-border complaints were lodged by UK complainants.**

  - 88% of all complaints

- **Misleading advertising was the main issue complained.**

  - 85% complained

- **Digital Marketing Communications was the most complained about medium.**

  - 89%

- **Leisure services were the most complained about industry sector.**

  - 54%

- **Cross border complaints per country of origin in 2019.**

  - Netherlands: 33%
  - Spain: 27%
  - France: 6%
  - UK: 5%
  - Germany: 5%
  - Other: 19%

EXPANDING THE NETWORK

SERBIA - NAESO JOINS EASA

On the occasion of EASA’s Board and General Assembly meetings on May 14, EASA welcomed its newest member - the National Association for Ethical Standards in Advertising (NAESO) from Serbia.

“We are very excited to join EASA family of European self-regulatory organisations in the field of advertising. This is an important achievement and a milestone for our organisation. A group of Serbian advertising industry, marketing and creative industry professionals and sector representatives have been working very diligently over the past years to establish Serbia’s self-regulatory body. In this journey to establish NAESO, EASA has been a strong supporter and a valuable partner to us by providing guidance, advice, best practices, and putting us in touch with other national SROs (Spanish, Greek, Hungarian and Romanian SROs - to name a few) that have shared their expertise and knowledge with us. As we grow and develop our organisation, we look forward to continue working with EASA and its members to further advance the self-regulation in the Serbian advertising field”, said Vanda Kučera, the President of the NAESO Managing Board.

NAESO was established in April 2019 with 17 founding members, which include advertising agencies, advertisers, marketing industry sector representatives and media associations. NAESO Managing Board members and professionals who founded the organisation, promoted the concept of co-regulation and self-regulation in advertising over the past years, and were able to successfully advocate for the concept of self-regulation to be recognised and included in text of The Advertising Law (passed in 2016). Establishment of NAESO was also preceded by drafting the national Code of Marketing Communications, that has been harmonised with both local and European regulatory principles.
GOOGLE JOINS EASA

Google is both delighted and honoured to become the first corporate member of EASA. We firmly believe that maintaining consumer trust in the ads they see online is vital for the future of our industry, as well as to keep the web open and affordable for everyone. EASA and its network of European ad regulators play an absolutely vital role in this effort. We look forward to supporting EASA to maintain high standards of safe, responsible digital advertising for European consumers, whilst its members continue to evolve to keep pace with our rapidly changing digital advertising ecosystem.

MARK HOWE
Google Managing Director, EMEA, Ads Industry Relations & Agencies

In 2020, EASA was delighted to welcome Google as the first digital pure-play company member of the Alliance and a partner of the ad self-regulatory network. With this membership, EASA also introduced a brand-new membership category - digital pure-play companies - bringing together more responsible players of the advertising ecosystem.

This new partnership demonstrates Google’s continued commitment to responsible advertising. It will also help ensure EASA’s ad SR network is stronger and remains relevant, especially addressing issues of responsible online advertising through the use of technology.

It has been a real pleasure personally to join EASA, to see the great work and collaboration of the membership. I have been especially impressed by the progress on machine learning to improve processes now and in the future and I look forward to Google working ever more closely with EASA across many markets.

MATT BRITTIN
President, Google EMEA Business and Operations

ENGAGING WITH DIGITAL PLAYERS

In 2020, EASA continued its conversations with digital players, some of which were initiated back in 2017. Thanks to the working group members on the collaboration with digital players, EASA has been able to develop contacts with a broader number of digital platforms and carry out the necessary adaptations, especially from a legal standpoint, to welcome such a new category of players in EASA’s membership.

These efforts came to fruition. 2020 was a key milestone for EASA, with Google joining as the Alliance’s first digital pure-play company member and, more generally, supporting EASA’s network of self-regulatory organisations across Europe. This was made possible thanks to the commitments and drive of Mark Howe, Managing Director, EMEA Agencies, Michael Todd, Head of Advertising Industry Relations and their colleagues at Google, and of Guy Parker, Chief Executive of the Advertising Standards Authority as well as all the other members of EASA’s working group on the collaboration with digital players.

In parallel to Google, EASA had regular meetings with a series of new interlocutors at Facebook, both in the Brussels office and in the respective offices for EMEA Client Councils. As well, EASA raised with the SRO members in countries where further collaboration with Facebook was sought.

Furthermore, EASA initiated contacts with Amazon, Microsoft and TikTok to raise awareness about advertising self-regulation and promote the benefits of partnering with the Ad SR network.

Whilst deepening its relationship with Google and developing mutual understanding, EASA will pursue conversations with other digital players to secure further engagement and investment in advertising self-regulation.
COLLABORATING WITH PARTNERS

The European Interactive Digital Advertising Alliance (EDAA)’s principal purpose is to provide the ‘AdChoices Icon’ to companies involved in data-driven advertising (or OBA) across Europe. The AdChoices Icon is a consumer-facing, interactive symbol that links consumers to an online portal, www.youronlinechoices.eu, where consumers can, in clear, user-friendly language, find out about their online ad choices, how online advertising is used to support the sites and services they use and how they can safeguard their privacy. Over 150 companies are actively participating in the Programme, using the AdChoices Icon and/or integration on the YourOnlineChoices Platform, which is available in 33 countries and 27 languages, averaging tens of millions of visitors each year.

Picking up on its 2019 Consumer Research on European perceptions and attitudes towards digital advertising since GDPR, EDAA developed a brand new educational resource in 2020. This resource, developed in collaboration with Media Smart UK, aims to help young people understand the world of online advertising, and how they can get the best experience from it. It features a three-minute animated film, as well as classroom resources, to support pupil discussions around what is interest-based advertising, why it exists and how can young people best manage it. It also aims to explain how this advertising funds many of the platforms that young people use every day, from apps and websites, to search engines.

EDAA also conducted a new iteration of its longstanding European Advertising Consumer Research, providing a panoramic view of consumer attitudes and awareness of the European Self-Regulatory Programme for Online Behavioural Advertising (OBA) across Europe. The full results and accompanying materials will be published in early Q1.

Drawing on the success of the ubiquitous AdChoices icon, EDAA reinforces real-time, contextual and meaningful information towards consumers as to how they can be empowered with choice and control. Through recognition and understanding, EDAA is determined to bridge this trust gap by promoting greater consumer favourability through meaningful industry best practice. From an operational perspective, EASA and its network continues to support EDAA through the carrying out of an annual OBA complaints report, highlighting the involvement of 13 European SRO members which have extended remit to cover OBA as consumer-facing entities addressing enquiries and complaints.

The involvement of self-regulatory organisations is a key component of the consumer-facing component of the EDAA programme.

ANGELA MILLS WADE
Chair, EDAA

The International Council for Advertising Self-Regulation (ICAS), of which EASA is a founding member, promotes advertising standards and responsible marketing practices at the global level. As of 1 January 2021, ICAS had 31 members from across Europe, the Americas, Asia-Pacific, Africa and the Middle East.

In 2020, due to the health and economic crisis caused by the pandemic, ICAS focused in particular on the support of its members and facilitated information sharing between them. ICAS organised webinars on specific topics to share information and best practice as well as regular informal meetings which allowed members to discuss and share information or ask advice in a confidential setting. This increased the level of support between members and helped them work more closely together. To strengthen the global SR network, ICAS also increased its collaboration with EASA and its European members which allowed for a more comprehensive and rich information exchange and formed valuable synergies between the associations.

ICAS also continued to drive important discussions and maintained its outreach and advocacy efforts wherever possible. ICAS focused on considerations particularly around the best approach to engage with digital platforms at a global level and met with major digital platforms to start building relationships and trust. ICAS also increased its involvement and collaboration with the ICC, engaged with ICPEN, the FTC, ISO, and the WHO.


In November 2020, the third edition of the Global SR Database was released together with the 2019 Factbook, presenting basic facts and figures on existing self-regulatory systems in the markets covered by ICAS.

ICAS appreciates EASA’s pioneering work in developing European advertising self-regulation and its active role in the development of the “bones” for global cooperation that has become ICAS today. EASA’s work continues to play an integral role in demonstrating the global utility of self-regulatory mechanisms to government, consumers and the advertising industry and its work with ICAS is a mode of collaboration.

LEE PEELER
ICAS President
Throughout 2020, EASA continued playing an active part in the International Chamber of Commerce (ICC) Advertising and Marketing Commission as a member of its Commission on Marketing and Advertising. EASA contributed to ICC by providing updates on the legislative and policy developments in the EU as well as on ad SR practices from its network of self-regulatory organisations in Europe. In 2020, the International Chamber of Commerce published a toolkit “The Benefits of Advertising Self-Regulation in Ensuring Responsible and Compliant Advertising”, which outlines the benefits of advertising self-regulation. EASA led the ICC’s Working Group in which several EASA’s members contributed to the development and content of the toolkit. The publication focuses on how advertising and marketing self-regulation protects citizens, strengthens consumer trust, builds trust among businesses, and complements existing national legal standards. Since mid-2020, EASA is also involved in the working group in charge of updating ICC’s Framework for Responsible Environmental Marketing Communications.

The ICC Code represents a fundamental underpinning of advertising self-regulatory systems around the world. The credibility of self-regulation, however, depends on effective implementation. EASA’s network of self-regulatory organisations is instrumental in ensuring that the principles laid out in the ICC Code are enshrined in the national codes of practice applied and enforced by its network to ensure responsible advertising in Europe. EASA is an integral partner whose support is invaluable in enhancing the Code’s value and effectiveness in building consumer trust through responsible advertising.

In June, EASA participated and presented at a live webinar of the ICC Academy COVID-19 Briefing on Ethical Marketing in the Era of COVID.

The Advertising Standards Authority (ASA) in the UK continued their innovation journey successfully started with avatar monitoring in 2019, and expanded data and automated technology driven work stream into their long term Tech4Good programme. In 2020, it covered four projects, including CCTV monitoring of advertising on websites visited by children, expanded Avatar Monitoring to investigate targeted advertising of restricted products in general interest website/channels, monitoring of targeting approaches of alcohol advertisers in logged-in social media environments, and investigation of existing targeting patterns for vulnerable adults online.

Guy Parker, the Chief Executive of the ASA, shared his views that “AI and other automated tech will increasingly be a normal part of how advertising self-regulatory bodies carry out their regulation and deliver their services” and will be in particular important in responding to the scale challenge of regulating online advertising.

AI including machine learning is already an important, every-day technology, which has the potential to deliver efficiency in our operations and improve the effectiveness of our regulation. We believe that regulators that don’t embrace it, will be left behind.
The French ad standards body, Autorité de Régulation Professionnelle de la Publicité (ARPP), which also started using AI in its operations in 2019, as part of the SRO’s programme “Compliance as a Service (CaaS)”, extended the scope of its technology-driven projects in 2020 and, together with tech-partners launched the Invenio project. This sophisticated and tailor-made machine learning system comprised of four modules: a web-crawler for automatic ad collection on a list of websites, detection of potential breaches using AI based on computer vision and text analysis, reporting of breaches and validation by ARPP’s lawyers and experts, which looped back data into the model to improve its accuracy, and an automatically triggered alert system when an ad pointing to the specified prohibited sites was found. Invenio means “I found” in Latin, a suitable name for the project, which helps to significantly save time in identifying non-compliance cases and tackle more breaches, according to Mohamed Mansouri, Deputy Director of ARPP. However, Invenio’s value was also seen as providing education and enabling various players in the ad value chain to audit their program flow.

Technologies, implemented on a European scale, are a response to the digital advertising challenges, which are cross-border. Equipping ourselves with common tools, while respecting the specificities of each SROs, is a way of being even more united to demonstrate the validity of self-regulation at the European level.

The Dutch SRO, Stichting Reclame Code (SRC), started exploring different possible applications of automated technologies in 2020 as well, making an important step into proactive monitoring with an aim to bring back more trust in media and advertising online. With their technology partners, they explored four pilot projects: avatars collecting ads directed at specific target groups, an artificial intelligence system that can analyse, categorise and report on avatar-collected data, analysis and tests of social media ‘listening/monitoring’ tools and an audit of the data-flow display advertising ecosystem. Otto van der Harst reassures that the dream of having AI-enabled SR services is already there ‘on the horizon’, and the coming years will be about experiments, discussions with advertising self-regulatory bodies, platforms and agencies, where he expects to align all serious parties involved: “AI and machine learning are just instruments to see that online world remains a safe advertising space.

I’m not overstating this by saying that we are standing at the dawn of a new decade in online commerce and advertising. The growth is spectacular, and we need to get a grip as independent self-regulators if we want to be relevant in the future. Whether AI is the solution remains to be seen, but we will need technology to have some form of independent oversight and a credible answer to these developments.

On December 3rd EASA organised a webinar ‘Technology for good: employing AI machine learning and other automated technologies for innovative SR solutions.’ The session featured three presentations from the Dutch, French and the UK SROs on the tech innovations the organisations were exploring, demos of some of the tools already used in SROs’ daily activities and engaging discussions among all participants about the future of machine learning assisted ad SR.

EASA was also active to make sure that its network’s efforts in this area are well known and recognised by external stakeholders in the business, policy and regulatory circles. EASA promoted the working stream in events and conferences hosted by the European Parliament, ERGA, the Council of Europe, as well as industry’s roundtables throughout the year. Justina Raizyte, EASA’s Head of Development and Policy, also contributed to the annual publication by European Audiovisual Observatory which was dedicated to “Artificial intelligence in the audiovisual sector”. Justina’s chapter titled “AI in advertising: entering Deadwood or using data for good?” explored the use of machine learning in today’s advertising ecosystem, ethical principles behind harnessing algorithms and data for marketing purposes, as well as the benefits of using such advanced technologies to protect consumers from bad ads. Research and insights collected from the expert interviews, which included several EASA members and partners, led to a reassuring conclusion that building a sustainable AI framework for advertising and the use of technology for good is in the interest of the entire advertising community, which continuously seeks to earn lasting consumer trust. A goal which EASA is excited to contribute to and support in 2021!
4 SERVING EASA’S NETWORK
EASA’s PROJECTS

EASA’s MONITORING ACTIVITIES

2 monitoring exercises

1 International and 1 European exercises conducted

1 EU-WIDE GAP ANALYSIS FOR 1 ADVERTISING SECTOR

Assessing the discrepancy between sector-initiated rules and local self-regulatory rules for the sector

496 profiles checked

Including websites, social media profiles and apps

8 SROs in Europe

Participated in monitoring

EU PLEDGE MONITORING EXERCISE

In the scope of its long-standing collaboration with the EU Pledge, EASA ran in 2020 the 12th monitoring exercise to assess whether EU Pledge member companies respected their commitment to not advertise food and beverage products that do not meet the applicable nutritional criteria to children under the age of 12. During the exercise 8 SROs of EASA’s network reviewed company-owned websites, social media pages, and influencer profiles that companies collaborated with for marketing purposes. The findings were then shared during a dedicated workshop where companies and SROs discussed the findings and exchanged information on factors that contributed to ads appealing to children and local self-regulatory rules.

- Reviewed: 200 profiles (56 company-owned websites, 144 company-owned social media pages) and 96 influencer profiles.

This monitoring ensures that companies receive an independent, impartial, knowledgeable and experienced team of self-regulatory experts who review online content in a fair, consistent, and objective manner. The exercise allows for companies to follow the development of their yearly compliance rate, to demonstrate the solidity of their commitments, and identify possible improvements.

This 12th iteration of the monitoring exercise also implemented a category of compliant profiles that featured factors potentially problematic in terms of how appealing the creatives are for children under the age 12; it was named the orange category. This category consisted solely of compliant advertisements with regard to the EU Pledge commitment and was meant to provide context to marketers about how experts conduct the review of profiles. It also listed the specific aspects and elements contained in these compliant creatives that could appeal to children as much as to other demographics. The intent was to further strengthen the high-level compliance level of signatory companies and show in fact that the great majority of profiles did not contain any such factors.
ACCOUNTABILITY MECHANISM

The EU Pledge Accountability Mechanism was initially designed and implemented by EASA in 2018. Its purpose is to allow the handling of complaints revolving around alleged EU Pledge commitment breaches and to further increase the Pledge’s accountability and transparency. The mechanism features a panel of 9 experts coming from EASA member SROs. For every case received, 3 SRO experts assess the case and adjudicate with the support of EASA and the EU Pledge’s secretariat. The panel was convened during the year.

I am highly appreciative of our longstanding partnership with EASA. Thanks to its self-regulatory network, our member companies benefit from credible and robust monitoring and accountability mechanisms. We also very much value that our collaboration allows them to get important feedback in their efforts to fulfill their commitments.

ROCCO RENALDI
Founding Partner & Managing Director,
Landmark Public Affairs

WHAT’S NEXT FOR 2021?

Potentially 4 new monitoring exercises for 4 sectors

Potentially 2000 ads to monitor

PROMOTING ADVERTISING SELF-REGULATION
EASA EU POLICY WORK: MONITORING, INFORMATION AND OUTREACH

In 2020, EASA focused its attention on several policy topics that concern consumer, digital and environmental issues. Even though meeting in person was no longer possible, EASA invited EU policymakers to participate in webinars and exchange views about the benefits of advertising self-regulation and discuss issues impacting EASA’s network. Furthermore, the Alliance met with other stakeholders to address relevant policy matters. Throughout the year, EASA organised calls with its members to consult them and discuss policy issues. Additionally, EASA regularly attended meetings organised by its members and actively contributed to discussions on policy files. The Alliance provided monthly updates through a policy newsletter and prepared a more targeted quarterly newsletter for the Swedish Marketing Federation. EASA also attended numerous policy focused events on topics that could potentially impact advertising self-regulation.

EASA has been involved in all topical issues which could impact advertising self-regulation with the aim to ensure that its members’ SR systems can profit from a favourable EU regulatory environment where they can continue operating and thrive.

THE DIGITAL SERVICES ACT

In December 2020, the European Commission presented a Digital Services Act (DSA) that will reform the horizontal legal framework for digital services. The proposal aims to contribute to the protection of consumers, ensure higher standards on transparency and accountability of online platforms and foster innovation. The DSA will also address certain aspects of advertising and complement other legislation such as the Audiovisual Media Services Directive (AVMSD), which EASA kept playing an active role in shaping in previous years.

EASA provided its feedback to public consultations to showcase the relevance of advertising self-regulatory initiatives and emerging trends in the space of online advertising. In June 2020, a few months ahead of the publication of the proposal, EASA organised a webinar on the DSA and invited the European Commission to exchange views on any possible implications that the upcoming proposal could have on the online advertising ecosystem.
THE NEW CONSUMER AGENDA

In November 2020, the European Commission presented The New Consumer Agenda, which puts forward EU consumer policy actions for the next five years. According to the document, “it also aims to address consumers’ immediate needs in the face of the ongoing COVID-19 pandemic and to increase their resilience”. EASA responded to public consultations on the New Consumer Agenda underlying that any new legal framework on consumer issues and advertising should recognise the benefits of advertising self-regulation as an effective and consumer-friendly tool in ensuring responsible advertising.

ENVIRONMENTAL CLAIMS

The European Green Deal aims to make the EU’s economy more sustainable. EASA and its members share this commitment, especially on the topic of misleading environmental claims. EASA aimed to present the advertising self-regulatory system as an effective and consumer-friendly tool in dealing with misleading environmental claims operating within the existing legal framework. EASA organised a webinar on misleading green claims and other environmental challenges. The purpose of the webinar was to get an overview of the European Commission’s plans on misleading environmental claims/greenwashing, showcase best practices from selected SROs and finally to exchange views and opinions. Furthermore, EASA took part in a panel at the Stakeholder Workshop on “Empowering Consumers for the Green Transition” organised by the ICF consultancy where it had the opportunity to present the self-regulatory framework for environmental claims and the benefits of advertising self-regulation.

THE CODE OF CONDUCT ON RESPONSIBLE BUSINESS AND MARKETING PRACTICES

In May 2020, the European Commission presented the Farm to Fork Strategy. According to the Commission, the strategy “will enable the transition to a sustainable EU food system that safeguards food security and ensures access to healthy diets sourced from a healthy planet”. As part of the strategy, the Commission also announced the development of the EU Code of conduct for responsible business and marketing practices, which will be accompanied by a monitoring framework. During its engagement with European Commission, EASA presented the role and achievements of the advertising self-regulatory network across Europe and aimed to be actively involved in all discussions surrounding the code. EASA will continue to aim to ensure that commitments of the code do not undermine the currently well functioning national SR systems.
IMCO HEARING

On 17 February 2020, EASA participated in a Public Hearing on “Digital Advertising and Consumer Information” organised by the European Parliament’s Internal Market Committee (IMCO). EASA was invited to speak at the panel session. Presenters were asked to respond to a question, “Are consumers and especially vulnerable groups protected from disguised digital advertising?” particularly regarding influencer marketing. EASA first provided a general overview of its network and the comprehensive SR system in Europe and later focused on influencer marketing ad standards enforced across our network, provided examples of cases, monitoring practices and training programmes conducted by the SROs.

AVMSD

Throughout 2020, EASA was actively tracking the progress of the AVMSD transposition process at the Member State level and liaising with the relevant policymakers and regulators at the European level.

EASA also supported its national members in their respective actions and reached out to the local policy stakeholders on the transposition issue. The regulatory framework, established by the revised AVMSD, brought new challenges to the existing regulatory system (e.g. expanding regulators’ remit to the VSPs), but also provided a unique opportunity for the European ad SR network to showcase its experience and expertise in addressing new forms of commercial communications, the flexibility in adapting to novel arrangements and partnerships with public and private sectors, and the relevance of self-regulation as an instrument for effective and better regulation. Therefore, EASA facilitated multiple information exchanges and workshops dedicated to various AVMSD issues and created an in-house tracker – AVMSD transposition barometer, which helped identify how the member states moved through the different stages of discussing drafting and consulting on national laws implementing AVMSD provisions.

EASA also organised a webinar on AVMSD issues, “AVMSD Transposition: Key Challenges and Framework for VSP self/co-regulation in Europe”, on 28 May. Ľuboš Kukliš from European Regulators Group for Audiovisual Media Services (ERGA) joined the meeting and presented the novelties, challenges, and prospects for more cooperation under the new framework for VSPs regulation in Europe. He later participated in an engaging Q&A with EASA members on the topics like influencer marketing and UGC regulation, the question of jurisdiction and competent bodies to enforce the rules for the VSPs. He even commented on the intersection between the new AVMSD rules and the upcoming DSA.

COMMUNICATION AND PUBLICATIONS

EASÀ’S VISIBILITY ON SOCIAL NETWORKS

In 2020, EASA boosted its social media presence with systematic updates and posts, updated its website content with newest information, produced publications on statistical reports, best practice recommendations, updated its Bluebook and contributed to external publications.
EASA PUBLICATIONS

- EUROPEAN TRENDS IN ADVERTISING COMPLAINTS
- EASA ANNUAL CROSS-BORDER COMPLAINTS REPORT
- BEST PRACTICE RECOMMENDATIONS: SELF-REGULATORY ORGANISATION COMMUNICATIONS AND AWARENESS
- ICAS AND EASA REPORT: ADVERTISING SELF-REGULATION IN TIMES OF COVID-19
- DIGITAL BLUEBOOK

EASA CONTRIBUTIONS

- ICC TOOLKIT - THE BENEFITS OF ADVERTISING SELF-REGULATION IN ENSURING RESPONSIBLE AND COMPLIANT ADVERTISING
- THE EUROPEAN AUDIOVISUAL OBSERVATORY’S REPORT ON ARTIFICIAL INTELLIGENCE IN THE AUDIOVISUAL SECTOR: JUSTINA RAŽYTE ARTICLE - AI IN ADVERTISING: ENTERING DEADWOOD OR USING DATA FOR GOOD?