



2012 EU PLEDGE SURVEY

EASA

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

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

EASA editorial team

Sibylle Stanciu, Project and EU Affairs Manager

Maria Tsoumou, Project Assistant

Chiara Odelli, Project Assistant

Renée Brautigam, Communications Manager

EASA contact information

Sibylle Stanciu

0032 (0)2 513 78 06

sibylle.stanciu@easa-alliance.org

Copyright

The complete or partial reproduction of this publication is forbidden without the prior express written permission from the EU Pledge secretariat.

Compiled in September 2012

Content

Introduction	4
Project overview	4
Methodology	5
Note from the independent reviewer	7
Important note	10
Executive summary	10
Monitoring results	11
1. General information	11
2. Product promotion	11
3. Age screening / Parental consent	11
4. Licenced characters	12
5. Games	12
6. Animation and sound effects	14
7. Toys/Premiums	14
8. Creative execution	15
9. Compliance with the EU Pledge criteria	17
10. Breaches of the code	17

Figures

Fig. 1: Number of websites featuring licensed characters (N=210)	12
Fig. 2: Number of websites featuring games (N=210)	13
Fig. 3: Main indicators for games considered primarily appealing to under-12s (N=54)	13
Fig. 4: Number of websites featuring animation (N=210)	14
Fig. 5: Number of websites featuring toys or premiums (N=210)	15
Fig. 6: Number of websites designed to appeal primarily to young children (N=210)	16
Fig. 7: Number of websites designed to appeal primarily to young children (N=41)	16
Fig. 8: Number of websites not compliant with EU Pledge criteria (N=210)	17
Fig. 9: Compliance results (N=210)	18
Fig. 10: Potential breaches of the advertising code or law (N=23)	19

Tables

Table 1: List of companies	6
Table 2: Number of websites reviewed per country	11

Introduction

EASA has been commissioned by the World Federation of Advertisers (WFA) and the EU Pledge Secretariat to review a number of food and beverage brand websites belonging to EU Pledge¹ member companies. The goal of the review was to determine whether the reviewed websites are compliant with the EU Pledge commitment on company-owned websites.

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

- The website features marketing communications,
- Such marketing communications are promoting food or beverage products, as opposed to a brand in general,
- Such food and beverage products meet or do not meet EU Pledge companies' nutritional criteria,
- Such marketing communications are designed to be targeted primarily at children under 12.

In order 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 the independent reviewer of this exercise, Verónica Donoso². The advertising self-regulatory organisations (SROs) were requested to surf the Internet for brand websites in the same way consumers look for information about a brand. They had to pick companies from a given list and review a number of their brand websites at random. Due to the nature of this project, the SROs also had the task to try and think from the perspective of a child younger than twelve 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 website that would make it appealing to children younger than twelve.

Project overview

Seven European self-regulatory organisations (SROs) were chosen by EASA and the EU Pledge Secretariat to conduct the monitoring exercise from May to July 2012 in order to assess the appeal of marketer-owned websites to children under twelve. The chosen SROs represent different systems in terms of size (big vs. small SROs), location (geographical coverage) and maturity (new vs. old systems).

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 high nutritional standards (as defined by each company). This pledge was initiated in response to calls by the European Union and the World Health Organisation (WHO) for industry to help combat obesity and take responsibility for building a healthier environment.

² Verónica Donoso (PhD) is a Research fellow at the Catholic University Leuven (KUL), Project manager e-safety at the Child Focus NGO in Belgium, as well as an independent consultant. Her main areas of expertise are user experience research, children and young people's uses of new media and e-safety. Verónica has worked on a number of European and Belgian projects, including the EU Kids Online I, II and III. She also coordinated the 2nd Assessment of the Safer Social Networking Principles for the EU.

Czech Republic (CRPR), established in 1994
France (ARPP), established in 1935
Germany (DW), established in 1972
Poland (RR), established in 2006
Spain (Autocontrol), established in 1977
Sweden (Ro), established in 2009
UK (ASA), established in 1962

Methodology

The seven national SROs were asked to review, when available, national brand websites of all the EU Pledge member companies listed in table 1 (see page 6). They could review national brand websites as well as promotional websites set up by the companies, but not the main corporate websites as these are per definition more intended to inform the public rather than to provide services and entertainment, especially to children.

Each SRO was asked to review a total of 30 brand websites. The SRO needed to make sure it covered national brand websites of all the EU Pledge member companies unless a company had no brand website available in the SRO's country. The SRO was then requested to review if the selected marketer-owned websites complied with the EU pledge criteria using a dedicated questionnaire and methodology developed by EASA, the EU Pledge secretariat and Verónica Donoso.

During the review of the websites, the SROs had to first identify if the brand websites promoted products. Subsequently, they needed to check if the websites contained elements, such as games, animation, licensed characters and toys and to decide if these were in their view primarily designed for children under 12. Lastly, they had to judge if these elements, in conjunction with the 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.

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

After the completed review process the respective EU Pledge member companies were sent a list of products which had been reviewed during this exercise, and were asked to check whether these products met the company's nutritional criteria. The EASA secretariat matched all the information received and determined the final compliance figures.

Table 1: List of companies

EU Pledge Signatories	
Burger King	Kraft Foods
Chips Group	Lorenz Snack-World
Coca-Cola Company	Mars
DANONE	McDonald's
Estrella-Maarud	Nestlé (and Cereal Partners)
Ferrero*	PepsiCo
FrieslandCampina	Unichips-San Carlo
General Mills	Unilever
Intersnack	Zweifel Pomy-Chip
Kellogg's	

* In line with the [enhanced EU Pledge commitments](#) (see Footnote 1 on page 4), Ferrero will apply the commitment concerning their company websites from 01/01/2013. Nevertheless, Ferrero websites have been reviewed and problematic items on the websites have been highlighted to the company. However, as these websites are to date beyond the scope of the EU Pledge commitment, any problematic aspects found on these websites were not considered as “in breach” for the purposes of this report.

SROs also flagged any items on a website that breached either one or several of the following advertising codes or laws:

- ICC Food Framework,
- Relevant national advertising standards codes and national sectoral codes,
- Relevant national advertising laws.

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

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

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

Note from the independent reviewer

My background

I was invited by the European Advertising Standards Alliance (EASA) to be the independent reviewer of this year's survey on food and non-alcoholic beverage brand websites, commissioned by the World Federation of Advertisers (WFA) and the EU Pledge Secretariat because of my expertise in user experience research, as well as my research experience on children and young people's uses of new media and e-safety.

The project

The goal of this monitoring exercise was to review a number of brand websites of food and non-alcoholic beverage producers, who had signed up to the EU Pledge, in order to determine whether they were compliant with the EU Pledge criteria. More specifically, my role was to help design a thorough methodology that would make it possible to establish, in the most objective and unbiased way possible, whether a particular (commercial) website had been designed to primarily target children under the age of twelve.

Methodology

The methodology developed was based on existing research on online advertising and web usability with children. The existing literature was useful to develop objective indicators that could help determine whether a particular website was appealing to children younger than 12. These indicators included "observable" website elements such as whether the website contained specific children's sections, games, animations, toys, etc. Other parameters such as the "look & feel" and the perceived user and child-friendliness of the website were also taken into consideration.

Even though a certain degree of subjectivity is inevitable in this type of assessment especially because different reviewers assessed different websites, the methodology employed aimed at being as reliable and objective as possible in order to ensure consistent results across the 210 websites tested. Some of the main strengths of this methodology lies thus in the fact that it is applicable to different types of websites and that it offers comparable results.

Results

In total, 210 national brand websites were reviewed of which 41 were considered as appealing to children younger than 12 (20% of the websites analysed). Some of the elements employed to determine if a website was primarily designed for children were the presence of games, toys or animations as well as the ease of language and navigation, among others. Of these, the most child-appealing element employed were games (on 38 websites) and animations (on 37 websites) followed by licensed characters (on 9 websites) and toys (on 9 websites). Out of these 41 websites, 11 were found not to comply with EU Pledge criteria as

they promoted products to children, which did not meet the nutritional criteria of the companies. Furthermore, 14 out of the 210 websites reviewed contained items that were in breach of national advertising codes or relevant advertising laws. In total 23 problematic items were flagged by the SROs.

In 14 of the 210 websites analysed age screening was employed as a mechanism to verify the age of the user visiting (specific sections of) the website. Age screening is employed to prevent children younger than a certain age to be confronted with “inappropriate” content and/or advertising. Nevertheless, current research indicates that these types of age-control mechanisms are not really effective because they can be rather easily bypassed by children and teenagers. It would, therefore, be advisable to evaluate the efficacy of such mechanisms in future versions of this assessment.

Challenges & suggestions

One of the most important challenges encountered during this assessment was developing an objective and sound methodology. Also important to take into consideration is the fact that even though a huge effort was made to ensure the consistency and validity of the methodology, some aspects of the assessment would have been more accurately evaluated if children (interacting with these websites) had been involved in the assessment process. On the contrary, all the results presented in this report are based on the expert assessment carried out by adults. However, by encouraging reviewers to perform expert evaluations that took into consideration children’s perspectives they were able to develop empathy with the potential young users and so could look at the websites beyond an adult-only perspective. We must also recognise, however, that attempting to think from the perspective of young users/consumers has its limitations because the adult reviewer cannot accurately know for sure if a certain website (or parts of its content) would really be appealing to children younger than 12.

Another limitation of the methodology is the fact that each website was reviewed by only one expert at each SRO. Usability research has demonstrated that the results from expert evaluations can be maximised when these are carried out by several experts (at least two) rather than by one single individual (Nielsen, 1990). However, by facilitating the close collaboration between the SROs and EASA throughout the whole testing and analysis process this second shortcoming was overcome.

Conclusions

Marketing techniques have extended, and in many cases even migrated to online environments. Potential customers of all backgrounds and ages, including children and teenagers, are being targeted in ever more personalised ways via all sorts of online platforms ranging from the more traditional e-commerce websites to the popular social networking sites (SNS). In order to carry out a sound and more exhaustive assessment methodology, it is necessary to start including popular children’s websites and online

services such as SNS in future versions of this assessment. It is exactly in these online platforms where young children may be more likely to be confronted with direct and indirect advertising and brand awareness practices.

Finally, I would like to point out EASA's professionalism, objectiveness, and dedication throughout the whole assessment exercise. Self-regulatory, transparent and fair advertising and marketing practices, especially those targeting minors, can only succeed if objective and critical assessment of such practices is in place. By continuously performing this type of independent assessment we can guarantee the rightful implementation of self-regulatory practices and ensure, to the extent possible, that marketing communication is both responsible and sensitive towards children, their needs and their rights.

Verónica Donoso

Important note

In collaboration with the EU Pledge secretariat and the independent reviewer Verónica Donoso, EASA has taken great care to ensure that the results of this project are comparable and accountable. It has done so by developing a detailed methodology. However, while it might be relatively easy to determine if a website appeals to children in general, it is much harder to determine if a website is designed to appeal primarily to children younger than twelve. Therefore, despite all the measures taken to ensure objectivity, decisions of reviewing SROs retain an unavoidable degree of subjectivity. Readers are requested to bear this in mind.

Executive summary

- A total of 210 national brand websites were reviewed.
- All of the websites reviewed contained product promotion.
- Out of the 210 websites, 41 were considered to be appealing primarily to children under 12 as they contained elements, such as games, toys or animations 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.
 - 38 websites featured games that can be considered as designed for under-12s
 - 37 websites contained animations appealing to under-12s
 - 9 websites exhibited licensed characters
 - 9 websites were connected to a toy designed for under-12s
- 11 out of the 41 websites considered to be appealing to under-12s were found not to comply with EU Pledge criteria, as they promoted products that did not meet the nutritional criteria of the EU Pledge member companies.
- 14 out of the 210 websites reviewed contained items that were in breach of national advertising codes or relevant advertising laws. In total 23 problematic items were flagged by the SROs.

Monitoring results

1. General information

The table below provides an overview of the number of websites that were reviewed per country. A total of 210 websites were reviewed by the participating advertising self-regulatory organisations (SROs).

Table 2: Number of websites reviewed per country

Country	Number of websites reviewed
Czech Republic	30
France	30
Germany	30
Poland	30
Spain	30
Sweden	30
UK	30
TOTAL	210

2. Product promotion

The SROs identified product promotion on all websites reviewed.

3. Age screening / Parental consent

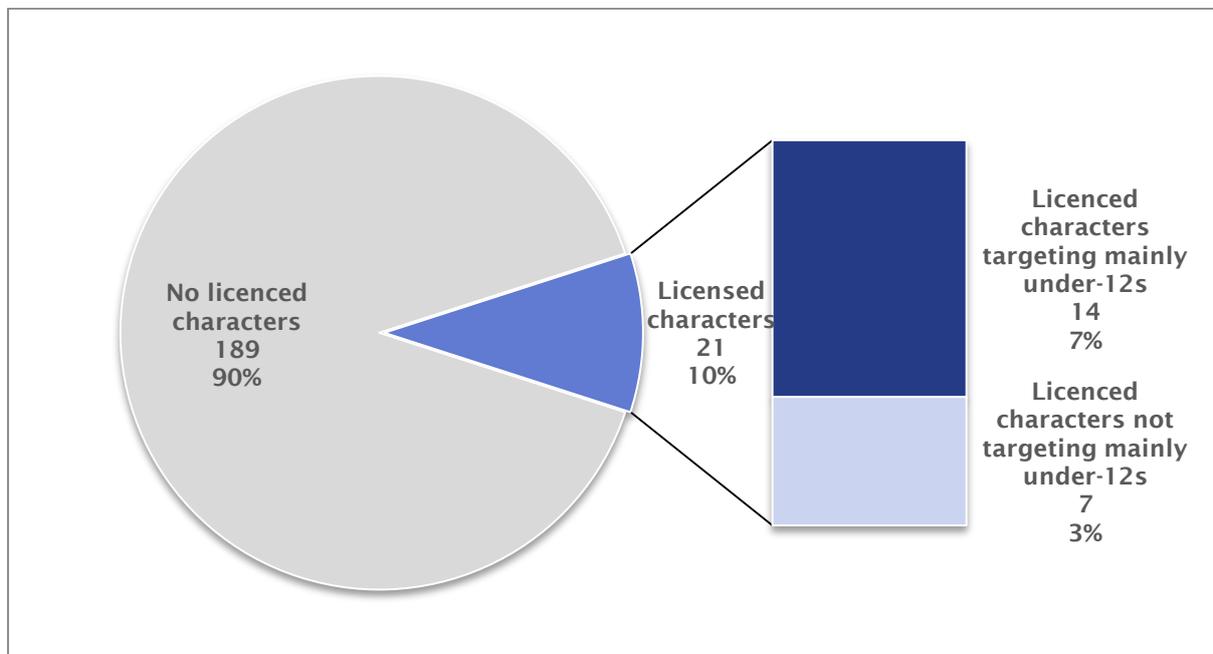
14 brand websites out of 210 reviewed websites contained a mechanism to screen the age of the website visitor. Methods ranged from a field where the visitor had to enter his/her age of birth to a pop-up asking whether the visitor was older than a certain age. Furthermore, out of the 14 websites, four notified children that they needed parental consent in order to surf the website in question.

While some age screenings were installed to ensure that a child of a certain age requests parental consent, others were intended to function as a gatekeeper to avoid that children younger than a certain age enter websites or sections of the website restricted to teens or adults.

4. Licensed characters

The SROs checked if the websites or the children’s section(s) of the website featured “licensed characters”, i.e. characters acquired externally and linked for example to movies, cartoons or sports, or if they featured movie tie-ins as a means to promote a food or beverage. 21 out of the 210 websites did feature such characters and the SROs considered that in 14 instances these characters or tie-ins were targeted primarily at an under-12 audience.

Fig. 1: Number of websites featuring licensed characters (N=210)

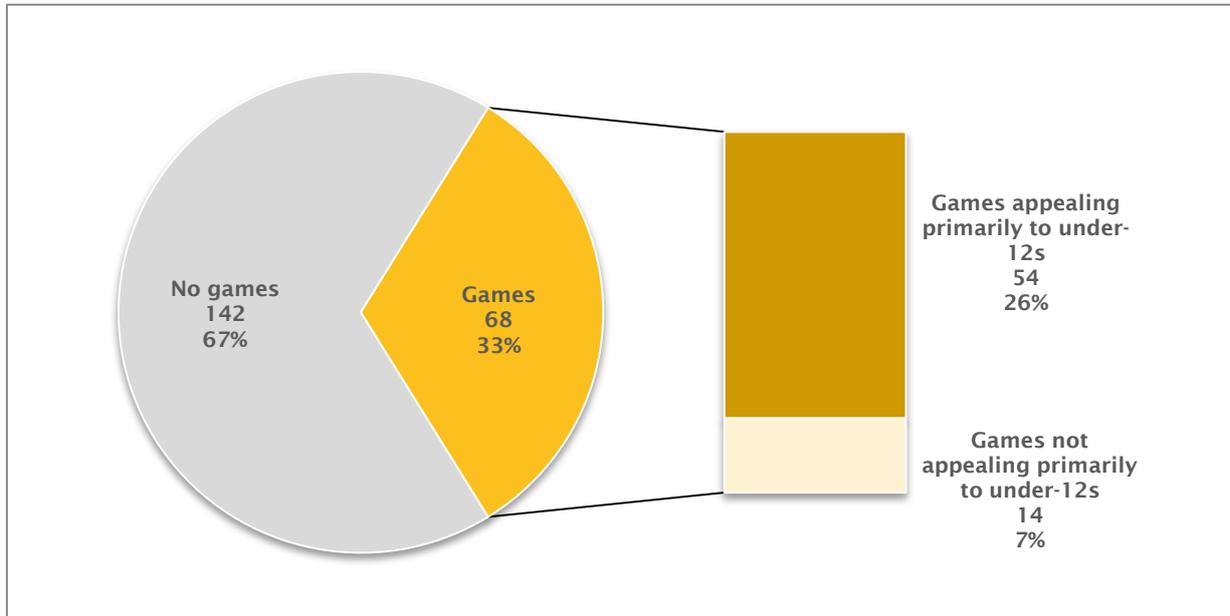


When deciding which kind of audience the licensed characters were mainly targeting, SROs considered both the characters themselves as well as the context in which they were used. However, the use of licensed characters that were considered as mainly appealing to an under 12 audience did not necessarily imply that the website as such was directed towards children.

5. Games

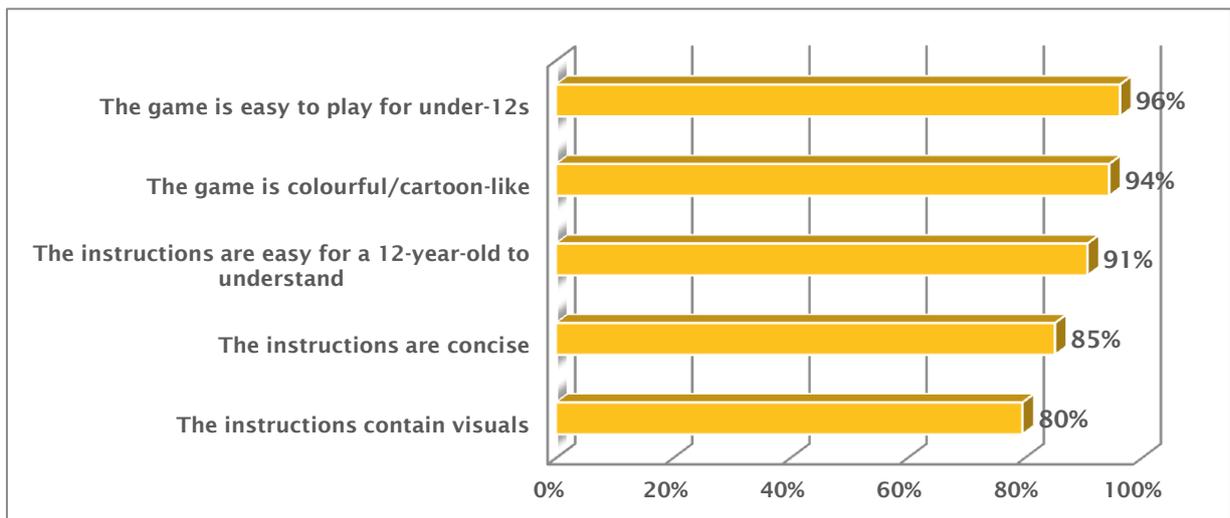
The possibility to engage with online games was featured in 68 of the 210 websites. In 54 instances, SROs considered that the games were designed to appeal primarily to under-12s and that 47 of these websites used the games to promote food or beverages.

Fig. 2: Number of websites featuring games (N=210)



Reasons as to why the SROs considered the games to be appealing primarily to under-12s are featured in the following chart. The combination of several of these criteria is a strong indicator that the game is primarily appealing to young children.

Fig. 3: Main indicators for games considered primarily appealing to under-12s (N=54)

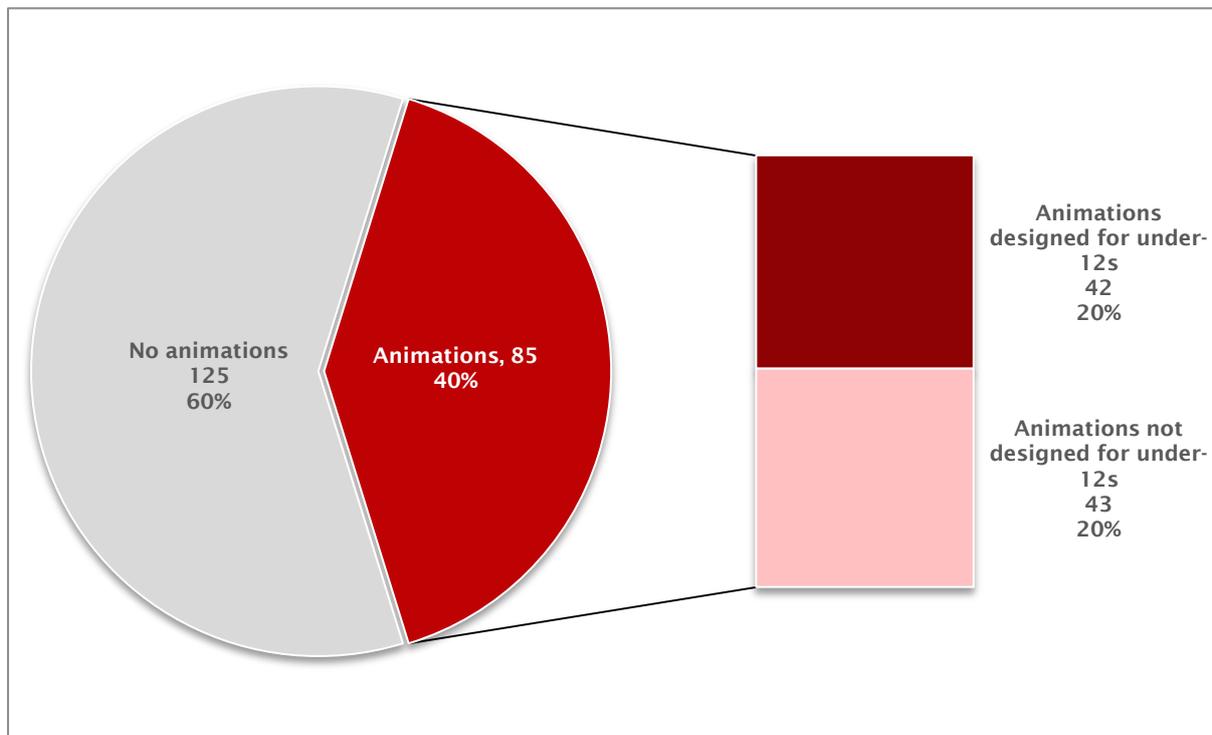


As illustrated in figure 3, almost all the games (96%) were easy to play for children younger than twelve. 94% were colourful and cartoon-like and contained animations that are appealing to young children. In 91% of the cases the instructions were easy for a 12-year-old to understand as they were concise (85%) and contained visuals (80%).

6. Animation and sound effects

85 (40%) of the 210 websites reviewed featured animations, such as cartoons, animations depicting fantasy situations, sound effects or music. According to the SROs, 42 of these websites used animations, which primarily appealed to under-12s. The SROs considered that the animations were designed for small children if they were colourful, resembled cartoons used in children’s programmes or were considered as too childish to be designed to appeal to teenagers and/or adults.

Fig. 4: Number of websites featuring animation (N=210)

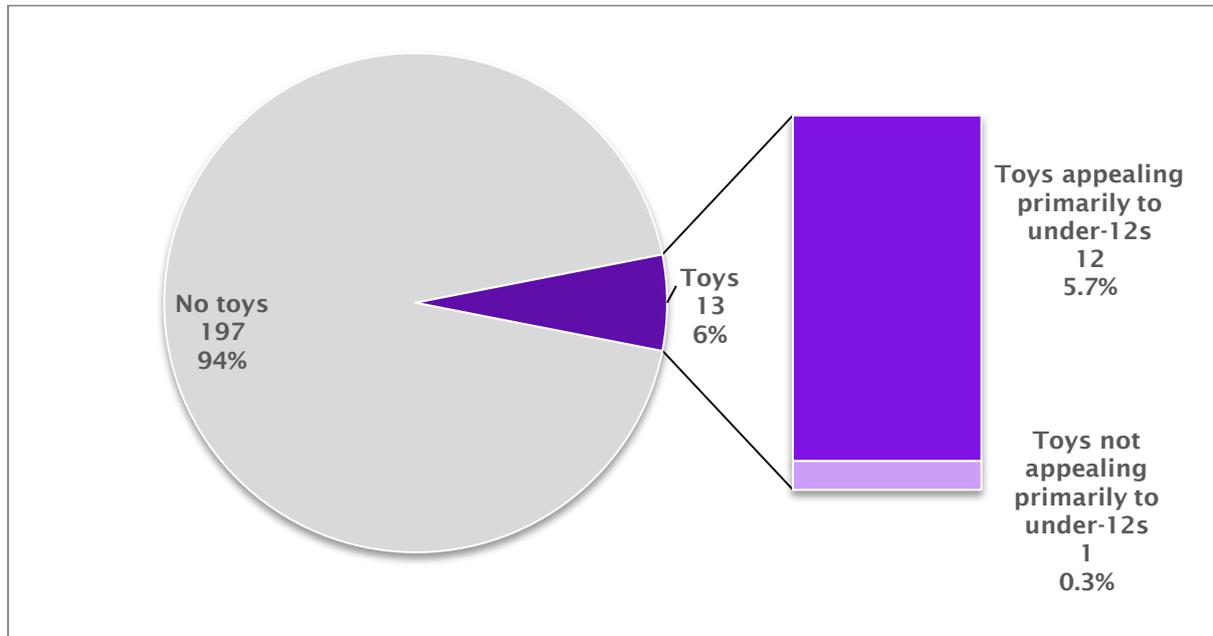


In 31 instances the SROs considered that the animations were used to promote a food or beverage product.

7. Toys/Premiums

SROs identified during their review 13 websites that used toys or other premiums to promote a food or non-alcoholic beverage product. Examples of toys include dolls, figures of cartoon characters, audiobooks, balls, card games and other premiums such as CDs. In the majority of the cases (12 websites) these toys were designed to appeal primarily to young children under the age of 12.

Fig. 5: Number of websites featuring toys or premiums (N=210)



8. Creative execution

As explained in the methodology all the previously identified elements, such as animations, games, toys or licensed characters had to be considered in conjunction with the creative execution of the website, that is the overall impression of the website design (use of colours, typeface, font size, language, etc.) in order to assess the target group of the website. Therefore, a combination of the different factors was used to assess if the marketing communications were intended to appeal primarily to under-12s (see also figure 7).

Keeping that in mind, SROs considered that 41 websites out of the 210 reviewed were designed to appeal primarily to children under 12. Decisive factors in judging the appeal of a website to young children were the usability of the websites (i.e. ease of navigation), font size, colour schemes as well as the level of entertainment offered on the websites³.

³ Nielsen (2010). Jakob Nielsen's Alertbox, Children's Websites: Usability Issues in Designing for Kids, September 13, 2010

Fig. 6: Number of websites designed to appeal primarily to young children (N=210)

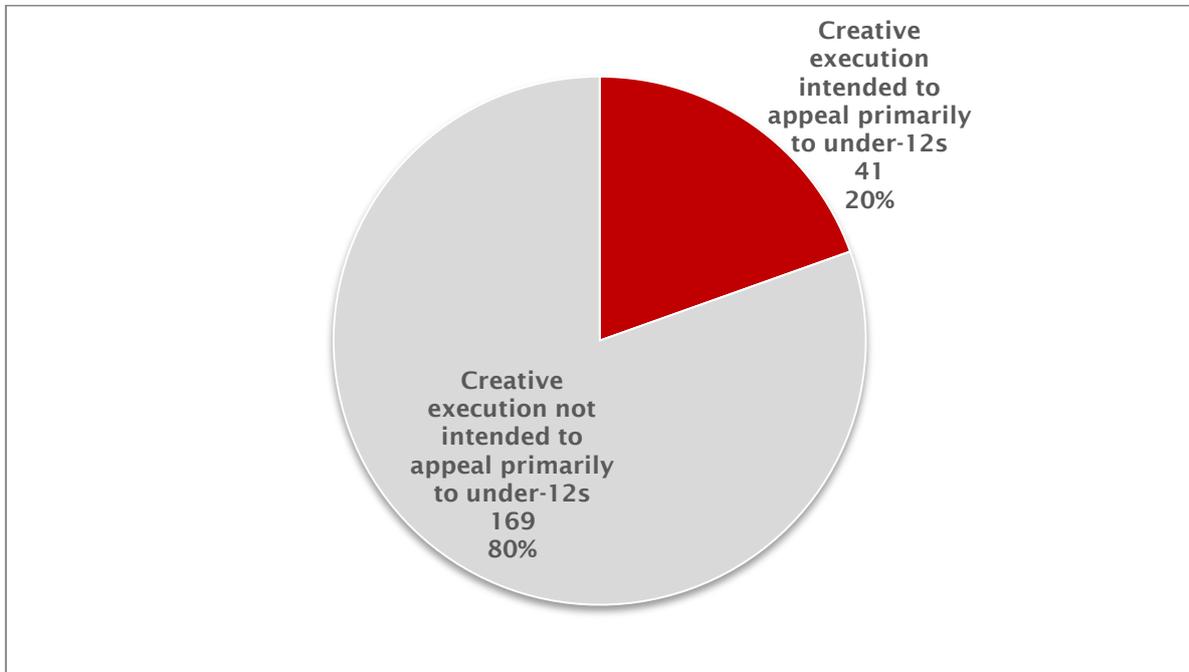
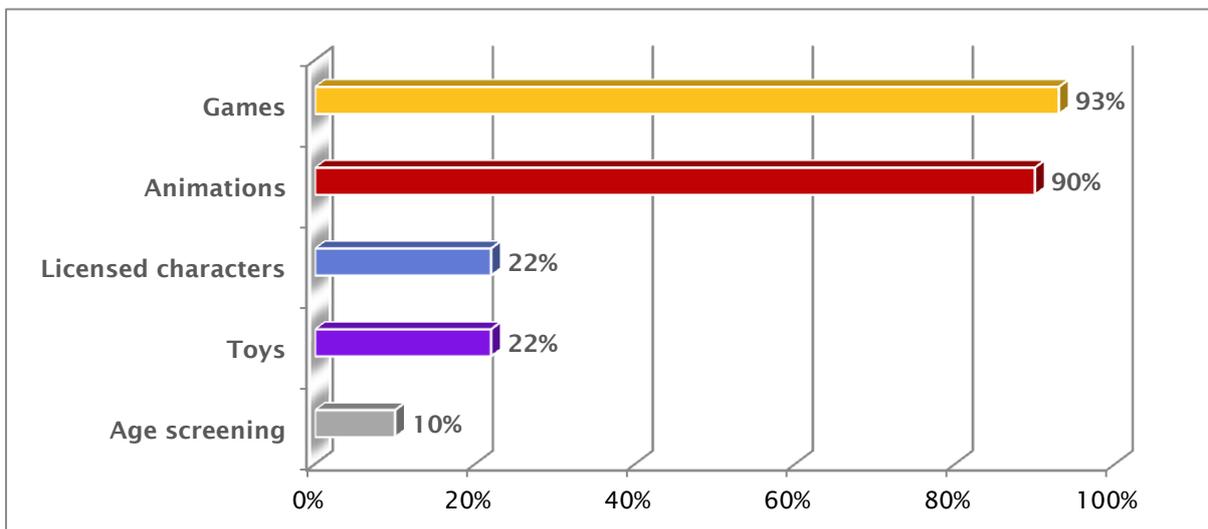


Fig. 7: Number of websites designed to appeal primarily to young children (N=41)



Almost all of the 41 websites considered as designed to appeal primarily to young children featured games designed for under-12s (38 websites, 93%) as well as animations considered to be appealing primarily to under-12s (37 websites, 90%). Furthermore, 22% (nine websites) exhibited licensed characters and 22% (nine websites) toys designed for children.

Four websites featured an age screening mechanism, out of which one website required parental consent.

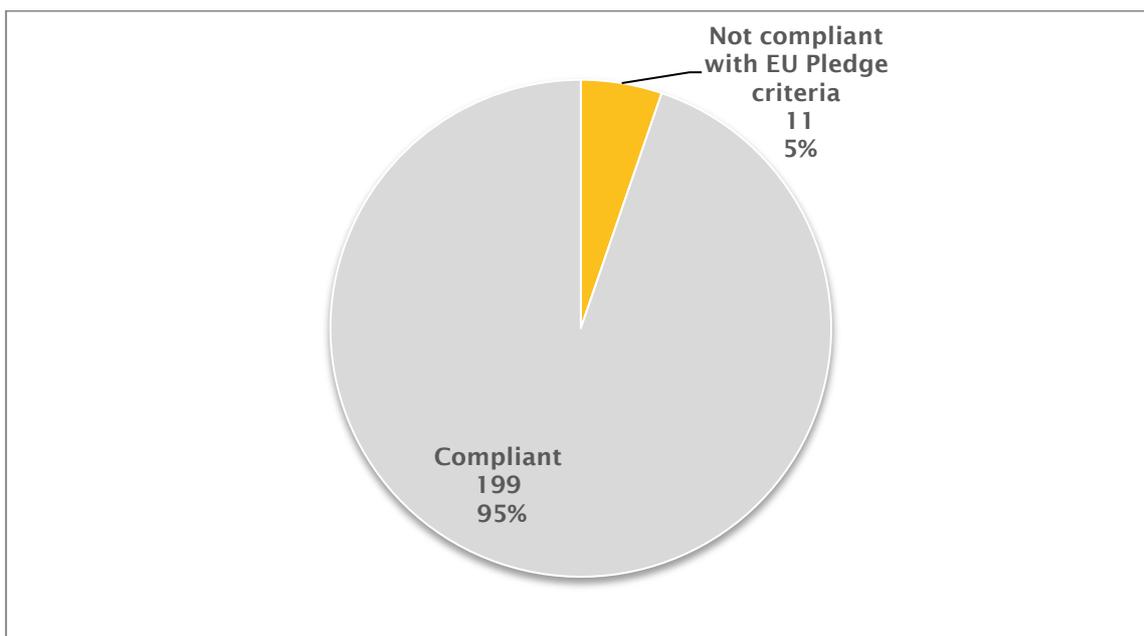
9. Compliance with the EU Pledge criteria

The final element used to determine compliance with the EU Pledge criteria was the examination of whether the products marketed on the websites reviewed met the nutritional criteria of the companies or not. If the product on a website did not meet the specific nutritional criteria established by the EU Pledge member company and the SRO considered the website designed to appeal primarily to under-12s, then the website was deemed to be non compliant with EU Pledge criteria.

In total 11 of the 210 analysed websites were found not to comply with EU Pledge criteria.

Some websites containing problematic items have not been considered as “in breach” under this Report as they do not fall under the scope of the EU Pledge. This is because the company to which the websites belong has made use of a transition period granted until 31/12/2012.

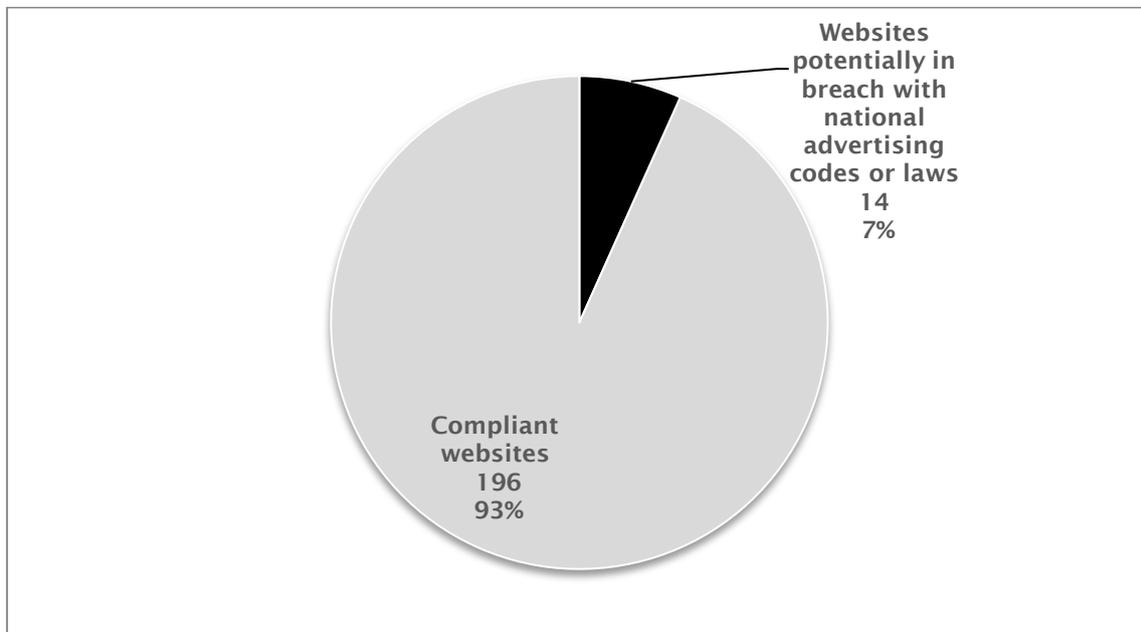
Fig. 8: Number of websites not compliant with EU Pledge criteria (N=210)



10. Breaches of the code

In 14 out of the 210 reviewed websites, the SROs identified items that were potentially in breach of national advertising codes or a relevant national advertising law.

Fig. 9: Compliance results (N=210)

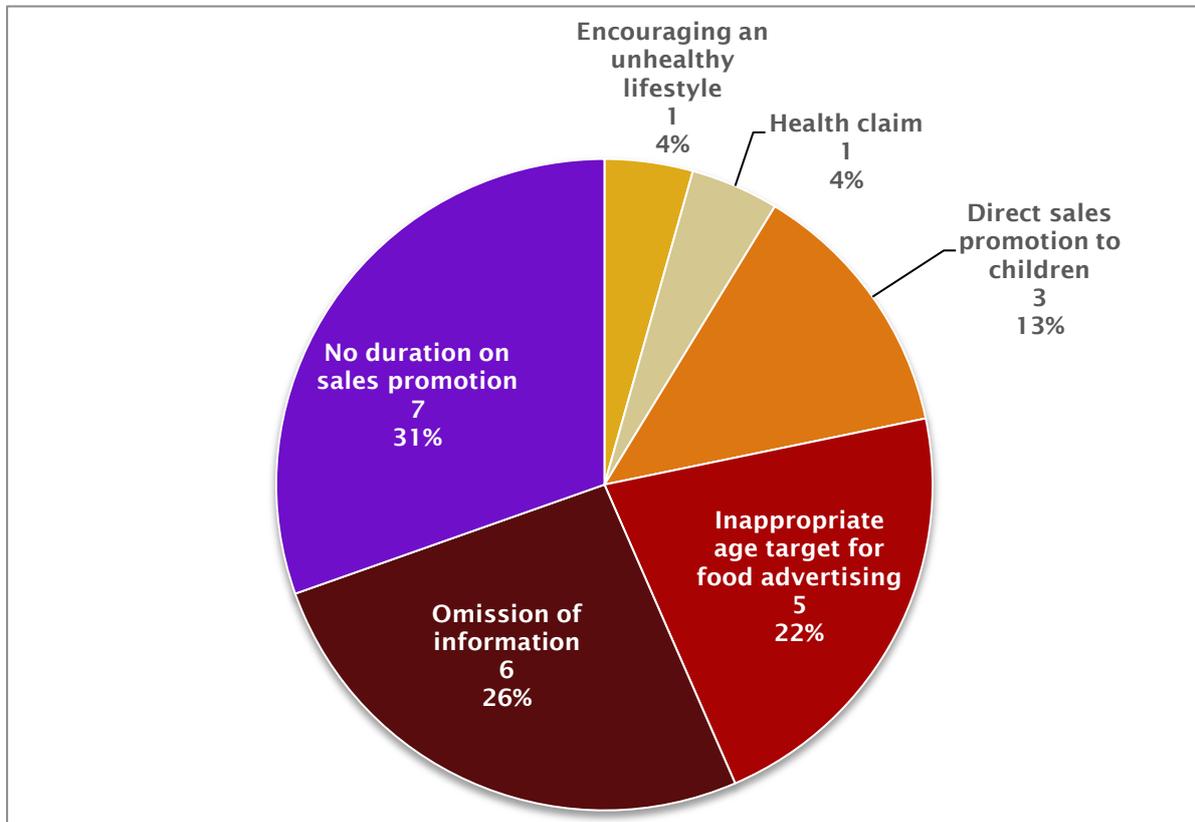


On these 14 websites a total of 23 problematic items were found.

Looking at the 23 items found to be likely in breach of national advertising codes or laws, the main issue identified during this survey was the lack of information regarding the duration of the sales promotion (seven websites), followed by the omission of information when it came to specifying the size reference of the promoted toys on the websites (six websites). Five websites were considered to be potentially in breach of the national Standards of Food Advertising Targeting Children, which specifies that food products should not be promoted directly to children younger than 12 unless the product meets nutritional criteria based on accepted scientific proofs and/or national or international nutritional recommendations.

Furthermore, SROs identified on three websites direct sales promotions to children, on one a problematic health claim and on another one a claim that could be considered as condoning or encouraging poor nutritional habits or an unhealthy lifestyle to children.

Fig. 10: Potential breaches of the advertising code or law (N=23)



On the remaining 196 websites no items were found that were in breach of either the national advertising codes or laws.

Report compiled by
European Advertising Standards Alliance
Rue de la Pépinière 10a | 1000 Brussels, Belgium
info@easa-alliance.org
www.easa-alliance.org