2016

EU PLEDGE SURVEY

EUROPEAN ADVERTISING STANDARDS
ALLIANCE
EUROPEENNE POUR L'ETHIQUE EN PUBLICITE

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.

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Compiled in

November/December 2016

Table of Contents

Figures

Tables

Introduction

EASA was commissioned by the EU Pledge Secretariat to review a number of food and beverage brand websites belonging to the EU Pledge [1] member companies. The goal of the project was to determine whether the company-owned websites reviewed were compliant with the relevant EU Pledge Commitment.

In the framework of the 2016 EU Pledge monitoring project of brand websites, the EU Pledge Secretariat commissioned EASA to run a pilot project to monitor marketer-owned mobile applications and independently check compliance with the EU Pledge criteria.

Being a pilot exercise and taking into account the limited sample size at disposal, SROs were asked to review mobile applications including non-compliant products and also those featuring brand logos, to ensure that the results of the pilot analysis are as comprehensive and meaningful as possible.

The goal of the pilot project is to determine which of the brand mobile applications are considered by the SROs as primarily appealing to children under 12.

Compliance with the EU Pledge Commitment, for both brand websites and mobile applications, is determined on the basis of whether:

- The websites or mobile application feature 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 mobile applications 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 mobile applications that would make them appealing to under-12s.

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

In order to offer unbiased, independent and accountable results, a 'consumer-oriented approach' was drawn up by the EASA Secretariat in collaboration with the EU Pledge Secretariat, Dr. Verónica Donoso[2] and Doctoral Researcher Valerie Verdoodt[3], independent reviewers of this exercise. The role of the independent reviewers was to verify that appropriate criteria have been set up in the methodology, perform quality check on SROs' review, testify to the correctness of the monitoring procedure, and sign off on the EASA top line report.

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[2] Verónica Donoso (PhD) has more than 13 years of academic and professional experience in the field of children and child internet safety and is a strong advocate for the need to better protect and empower children online through effective and coordinated multi-stakeholder approaches. Through her career, Verónica has advised a number of institutions and organisations including the European Commission, the European Advertising Standards Alliance (EASA) and the World Federation of Advertisers. She has developed methodologies to assess the compliance of industry-based self-regulatory initiatives such as the Safer Social Networking Principles for the EU and the EU Pledge. 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. She currently serves on the International Advisory Board of the WePROTECT Global Alliance and on the Advisory Board of the EU-funded MANDOLA project on monitoring and detecting hate speech.

[3] Valerie Verdoodt is a Doctoral Researcher at KU Leuven Centre for IT & IP Law (CiTiP) and Ghent University (Law and Technology). At CiTiP, Valerie's research focuses on the topics of social media (literacy), privacy, data protection, user empowerment and the protection of minors. Since 2014, she has been involved in several European and Belgian research projects (i.e. EMSOC, SPION, ACDC, PREEMPTIVE). She was also involved in CiTiP's 'Facebook investigation' for which she co-authored a report analysing Facebook's revised policies and terms at the request of the Belgian Privacy Commission.

Project Overview

Experts from 10 European self-regulatory organisations (SROs) were invited by EASA and the EU Pledge Secretariat to conduct the monitoring exercise in September and October 2016 in order to assess the appeal of marketer-owned websites and mobile applications to children under 12. The 10 chosen SROs represent different systems in terms of size (big vs. small SROs), location (geographical coverage) and maturity (new vs. old systems).

Table 1: List of the participating countries/SROs

Country	SRO
Czech Republic	CRPR
France	ARPP
Germany	DWR
Italy	IAP
Lithuania	LRB
Poland	RR
Spain	AUTOCONTROL
Sweden	Ro.
The Netherlands	SRC
United Kingdom	CAP

Self-regulation experts from SROs in the Czech Republic, Poland and Sweden, each reviewed 22 national brand websites of EU Pledge company members, including, where available, at least 1 website per company. 28 national brand websites were reviewed in France, Germany, Italy, the Netherlands, Spain and the UK, including, where available, at least 2 websites per company. Due to limited availability, Lithuania reviewed 16 marketer-owned websites. Corporate websites[4] were excluded from the exercise.

Below is a list of the EU Pledge member companies.

Table 2: List of the EU Pledge member companies

EU Pledge member companies	
Amica Chips	Bel Group
Burger King	Coca-Cola
Danone	Ferrero
General Mills	ICA Foods
Intersnack	Kellogg's

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[4] A corporate website is a general informational website operated by a company.

EU Pledge member companies	
KiMs	Lorenz Snack-World
McDonald's Europe	Mars
Mondelēz International	Nestlé
PepsiCo	Quick Group
Royal FrieslandCampina	Unichips-San Carlo
Unilever	Zweifel Pomy-Chips

Methodology

For the markets selected for monitoring, the EU Pledge Secretariat provided EASA with a list of all products promoted by the EU Pledge member companies. The list indicated whether or not these products met the applicable nutritional criteria set out in the EU Pledge. From this, EASA compiled a list of websites that promoted products that do not meet the nutritional criteria; from EASA's list, the self-regulatory experts selected the websites to review. When making their selection, reviewers were requested to take into account products popular amongst children in their country.

EASA, the EU Pledge Secretariat and the independent reviewer Dr. Verónica Donoso, developed the methodology including a questionnaire for self-regulatory experts to answer when reviewing each website selected. The methodology and questionnaire were developed to ensure objectivity and consistency across the project.

The questionnaire for the websites asked the self-regulatory experts if the website being reviewed contained elements, such as games/entertainment activities[5], animations/sound effects/videos, licensed characters 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.

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[5]A game/entertainment activity is an activity engaged for diversion or amusement. A non-exhaustive list of games/entertainment activities are: online games which are played over the Internet, games such as Casual/Social Games, Puzzles, Board Games, Role-Playing Games Show, Trivia, Card Games, Racing, Arcade, colouring sheets, activity sheets, Do it yourself activities, etc

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

The questionnaire for the mobile applications, developed with both independent reviewers, asked the experts if the apps being reviewed allowed children under 12 to customise them, interact with other users, as well as including elements, such as licensed characters, games/entertainment activities, contests and promotional events 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 overall look and feel of the mobile application, were clearly intended to make the marketing communication(s) in the mobile applications primarily appealing to under-12s.

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

The following were taken into account:

- 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 in a consistent manner.

Note on the Methodology

EASA, in collaboration with the EU Pledge Secretariat and independent reviewers Dr. Verónica Donoso and Doctoral Researcher Valerie Verdoodt, has taken great care to ensure that the results of this project are objective and consistent.

To do this, detailed methodologies were developed; they were then applied by all self-regulatory experts when assessing both websites and mobile applications. However, although it may be relatively easy to determine if a website or a mobile application appeals to children in general, it is much harder to determine if a website or a mobile application 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.

Note from the Independent Reviewers

The 2016 monitoring exercise attempted to determine whether the company-owned websites reviewed were compliant with the EU Pledge Commitment. In addition to previous assessments this year's monitoring exercise broadened its scope to the pilot-testing of brand-owned mobile applications. Even though this was a pilot exercise it was useful to get a deeper insight into the complexities of marketing communications in an era where smartphones and portable connected devices such as tablets and IPads have become an indispensable tool for communications, entertainment and information, not only for adults but also for children.

The results of the assessment of brand-owned websites are not really surprising. They follow a similar pattern as observed in previous assessments. However, it is worthwhile noting that there is a small increase in the percentage of non-compliant websites. Other interesting results are summarised below:

- ✓ Of the 250 national brand websites reviewed, 13 websites (5% compared to 3% last year) were considered in breach of the EU Pledge as they contained elements assessed to be primarily appealing to children under 12. These elements included the use of games or entertainment activities, toys used as premiums, animations/videos/ sound effects as well as language, text or navigation considered to be designed primarily for under-12s.

- ✓ Emerging trends observed in the last editions of this assessment have remained. For instance, more websites are employing age-screening mechanisms (13% in 2016 and 2015 as compared to 14% in 2014 and only 8% in 2013), more websites feature licensed characters (19% in 2016 and 18% in 2015 as compared to 15% in 2014 and only 9% in 2013). Similarly, there is a significant increase in the use of licensed characters that are primarily targeting children under 12 (11% in 2016 as compared to only 5% in 2015).

- ✓ There is also a considerable presence of games or entertainment activities on websites (30% as opposed to 28% last year), however, only 9% (compared to 10% last year) were considered as primarily appealing to young children.

- ✓ While the amount of websites displaying animations has decreased (52% in 2016 as compared to 58% in 2015 and 60% in 2014) more of these animations have been assessed as designed to appeal primarily to children under 12 as compared to last year (8% compared to 5% respectively, but it is still less than 2014's 9%).

- ✓ The number of websites using toys as premiums, which were considered as primarily appealing to under-12s, remains low and only amounts to 6%.

On the basis of these results, we can conclude that, in general, the industry players committed to the EU Pledge are taking measures to ensure the compliance of their company-owned websites. This is particularly evident in the rather low percentage of company-owned websites (5%) considered in breach of the EU Pledge, as well as in the high increase of the age-screening

mechanisms present. It is also important to consider that even though specific websites may not be assessed as designed to appeal "primarily" to children under 12, they can still be attractive for younger audiences. Furthermore, the high presence of animations, licensed characters and games and the fact that, out of the 250 websites reviewed 35 (14%) contained items that were in breach of advertising codes or relevant advertising laws, make the results of this year's monitoring somehow worrying. One must also be aware that company-owned websites may not be necessarily popular among children. Conversely, marketing communications targeting children may be present and even be more effective through other online and offline channels including traditional TV ads, the packaging of products themselves or even social media and mobile applications. It was timely, therefore, to have added a pilot study of mobile applications to this assessment.

Regarding the pilot testing of mobile applications, several new criteria for the methodology were developed in order to deal with the unique features of mobile applications. For instance, as opposed to assessing brand-owned websites, in order to define whether or not a mobile application is designed to primarily appeal to children under 12, the difficulty of installing the app and its accessibility (i.e. are there any age screening or parental consent mechanisms at the level of the apps platform or upon accessing the app?) need to be assessed. Furthermore, mobile applications offer certain features that are particularly appealing to children, such as customisation (i.e. creating avatars, adding virtual elements, choosing characters), interaction with other app users (i.e. sharing creations) or the encouragement of some degree of physical activity (i.e. making use of virtual reality). These elements were included in the questionnaire for the national assessors. Finally, this pilot exercise made us aware of a number of methodological challenges including important ethical considerations with regards to the assessment of mobile applications. For example, mainly because of lack of resources, in order to assess the apps, these had to be downloaded on the personal smartphone of the person conducting the assessment. Accordingly, the assessors and the independent reviewers had to agree to the terms of use and privacy policies of the apps and, hence, to the collection of their personal data even when it was not their intention to be users of the mobile apps being tested.

As repeatedly pointed out in previous assessment exercises, the rapid evolution of digital technologies, their ubiquitous and interconnected nature, as well as the fact that more and more children including infants are using digital technologies on a daily basis, demands the continuous review of the objectives set by the EU Pledge and the methodologies employed to assess the signatories' compliance.

As a final recommendation, we cannot but stress once again, that better and more reliable results would be achieved if the current methodology was expanded to include actual children testing the appeal of specific websites (or elements thereof). The fact that the findings presented in this and previous reports are based solely on expert evaluations carried out by adults, highlights the limitations of this assessment exercise.

Lastly, we would like to thank the EU Pledge Secretariat, EASA, as well as all the participating SROs for carrying out a rigorous assessment of the EU Pledge. As pointed out before, even though there are a number of limitations present in this assessment, there is still great added value in the continuous monitoring of self-regulatory initiatives such as the EU Pledge. Through

assessments of this type, it is possible to identify new trends, to inform policy makers and to foster the effective implementation of advertising self-regulation and, ultimately, enhance marketing communication practices directed at children. Finally, we would also like to encourage the signatories of the EU Pledge to continue investing their efforts to make a positive change in the way food and beverage products are advertised to children.

Dr. Verónica Donoso and Valerie Verdoodt

Independent reviewers

Executive Summary

Brand-Owned Websites:

- A total of 250 national brand websites were reviewed;

- All of the websites reviewed contained product promotion and featured at least 1 product that was not compliant with the common nutritional criteria;

- 28 websites exhibited licensed characters, tie-ins or celebrities that were considered to be targeting primarily under-12s;

- 23 websites featured entertainment activities or games that were considered to be designed to appeal primarily to under-12s;

- 21 websites contained animations, videos or sound effects that were considered to be designed to appeal primarily to under-12s;

- 15 websites featured toys used as premiums that were considered to be appealing primarily to under-12s;

- Out of the 250 websites, 13 were considered in breach of the EU Pledge criteria as they contained elements, such as entertainment activities or games, toys used as premiums or animations, videos, sound effects designed primarily for under-12s, as well as language, text or navigation clearly intended to make the marketing communications on the website appealing primarily to under-12s;

- Out of the 250 websites reviewed 35 contained items that were in breach of advertising codes or relevant advertising laws. In total, 41 problematic items were flagged.

Brand-Owned Mobile Applications:

- A total of 20 mobile applications were reviewed;

- 8 of the mobile applications reviewed contained product promotion and featured at least 1 product that was not compliant with the common nutritional criteria; the other 12 mobile applications reviewed featured the company logo but not necessarily a non-compliant product;

- 8 mobile applications reviewed allowed children under 12 to interact, exchange information, their creations with other app users;

- 4 mobile applications reviewed contained features that allowed children to customise the app;

- 3 mobile applications reviewed encouraged kinetic movements, i.e. children were required to move around to complete certain tasks;

- 6 mobile applications reviewed used language clearly directed at children under 12;

- 14 mobile applications featured games and/or other entertainment activities such as puzzles, card games, racing games, recipes, coloring or activity sheets, "Do it yourself" type of activities, etc.;

- 15 mobile applications featured animations and/or music/sound effects and/or videos;

- 1 mobile application exhibited licensed characters/tie-ins/celebrities (e.g. celebrities or fictional characters which are not owned by the company, e.g. sports athletes, actors or fictional characters linked to movies/entertainment);

- 2 mobile applications featured games containing contextual ads[6], while 8 featured games containing embedded ads[7];

- 1 mobile application contained in-app purchases[8];

- 3 mobile applications included contests or competitions, while 1 featured events or promotional events which were considered to be appealing to children under 12;

- 1 mobile application featured toys used as premiums to promote a food/beverage product;

- Out of 20 mobile applications reviewed 8 were considered to be appealing primarily to children under 12 as they contained elements, such as entertainment activities/games, animations/music/sound effects/videos, licensed characters as well as language addressed to children under 12 and encouraging their interaction, the exchange of their information and creations; however, only 1 out of 8 featured non-compliant product promotions, therefore it was considered as potentially in breach of the EU Pledge.

- None of the 20 mobile applications reviewed contained items that were in breach of advertising codes or relevant advertising laws. No problematic items were flagged.

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[6] Contextual advertisement is a form of targeted advertisement appearing on websites, mobile apps and other media.
[7] Embedded advertisement is a type of "hidden" advertisement that often comes in the form of a picture of the product, a logo, a product symbol and so on.
[8] In mobile applications marketed as "free", players can typically only access portions of these games for free; to access new levels or to get more features, players can be required to pay a certain amount of money during the game.

1. Brand-Owned Websites

1.1   Sample of Brand-Owned Websites

A total of 250 websites were reviewed by the experts. The table below provides an overview of the number of websites that were reviewed per country.

Table 3: Number of websites reviewed per country

Country	Number of Websites Reviewed
Czech Republic	21
France	27
Germany	28
Italy	28
Lithuania	17
Poland	22
Spain	28
Sweden	22
The Netherlands	28
United Kingdom	29
TOTAL	**250**

1.2   Product Promotion

The reviewers identified product promotion on all of the 250 websites reviewed. All websites reviewed featured at least 1 product that did not meet the common nutritional criteria.

1.3 Age screening/Parental Consent

32 out of 250 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.

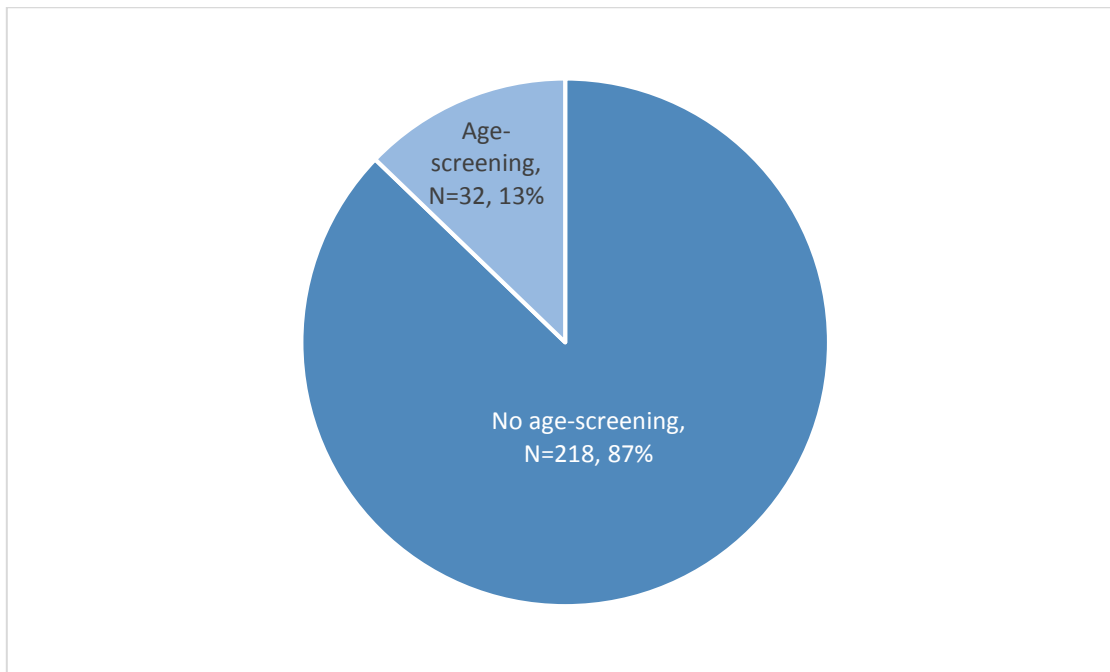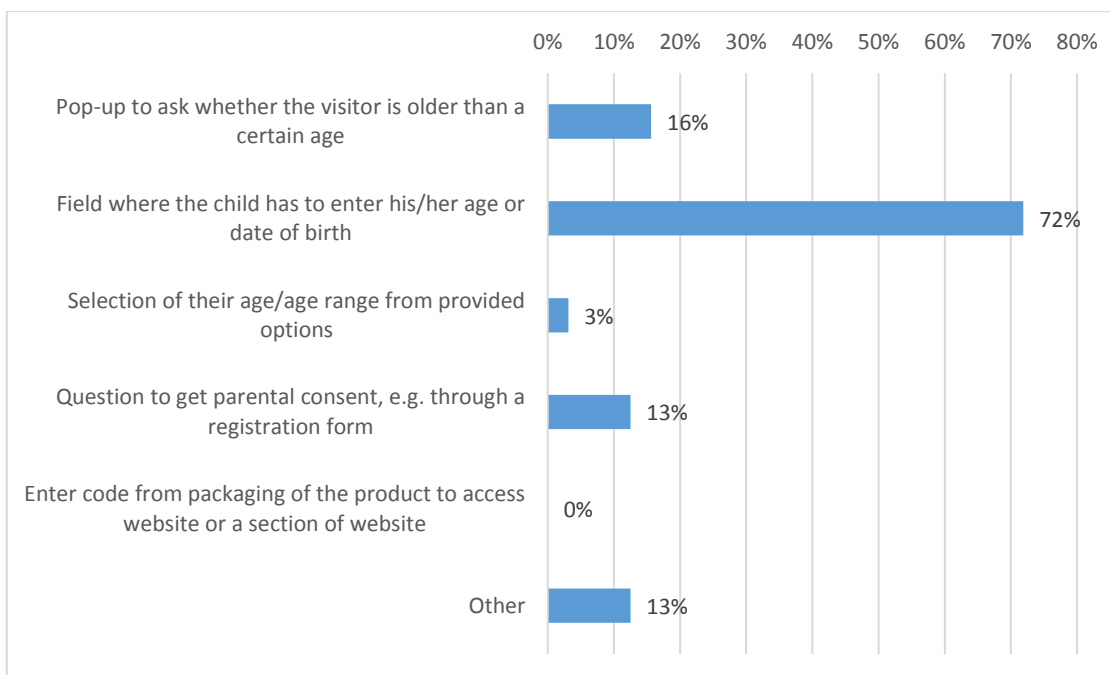*Figure 1: Number of websites featuring age screening (N=250)*

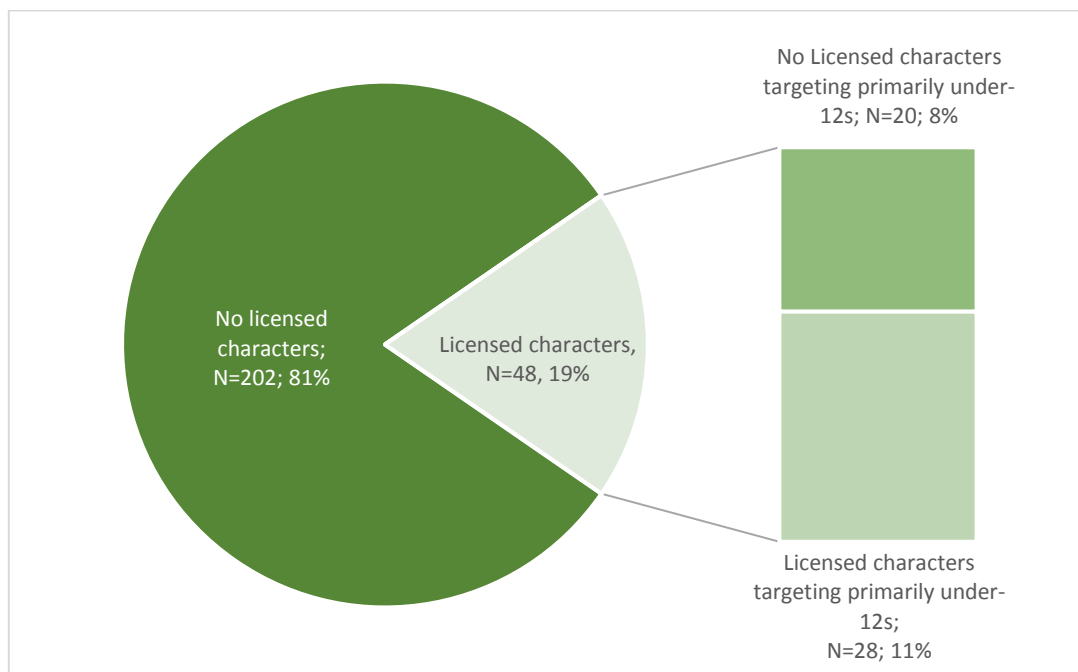*Figure 2: Types of age screening (N= 32)*

1.4   Licensed Characters/Tie-ins/Celebrities

The reviewers checked if the websites or the children's section(s) of the website featured ''licensed characters'', 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 food or beverage products.

50 out of the 250 websites reviewed featured licensed characters/tie-ins. In 28 instances the reviewers considered that these characters/tie-ins were designed to target primarily children under 12. In addition, 12 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=250)

No Licensed characters targeting primarily under-12s; N=20; 8%

No licensed characters; N=202; 81%

Licensed characters, N=48, 19%

Licensed characters targeting primarily under-12s; N=28; 11%

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. The combination of several of these criteria is a strong indicator that the licensed character is primarily appealing to young children.
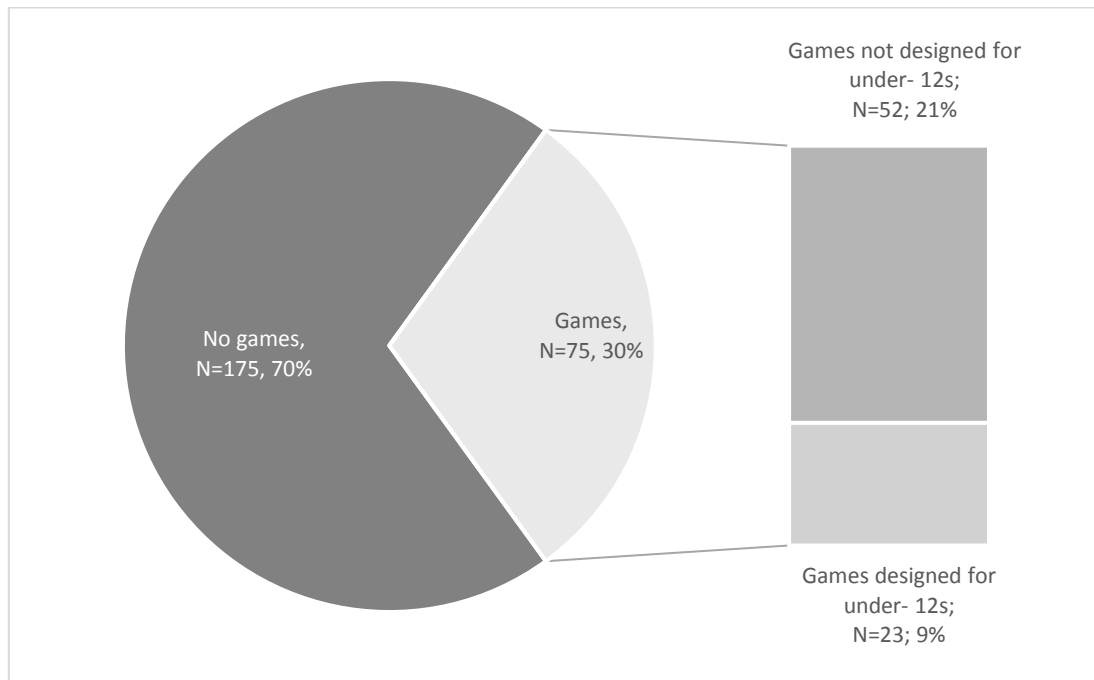
Figure 4: Main indicators for licensed characters/tie-ins considered primarily appealing to under-12s (N=28)
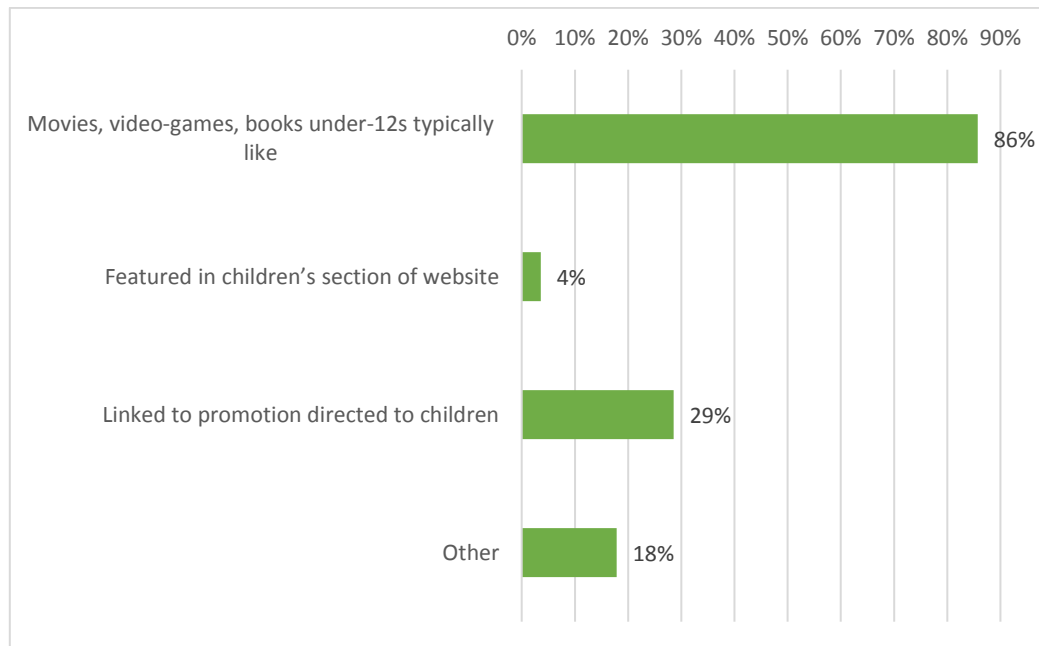
1.5   Entertainment Activities/Games

The reviewers identified entertainment activities/games on 75 of the 250 websites reviewed. In 23 instances the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s. In addition, 9 of these websites used the entertainment activities/games to promote food or beverage products to children.

Figure 5: Number of websites featuring entertainment activities/games (N=250)

Games not designed for
under- 12s;
N=52; 21%

No games,
N=175, 70%

Games,
N=75, 30%

Games designed for
under- 12s;
N=23; 9%

Reasons as to why the reviewers considered the entertainment activities/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 entertainment activity/game is primarily appealing to young children.

*Figure 6: Main indicators for entertainment activities/games considered primarily appealing to under-12s (N=23)*
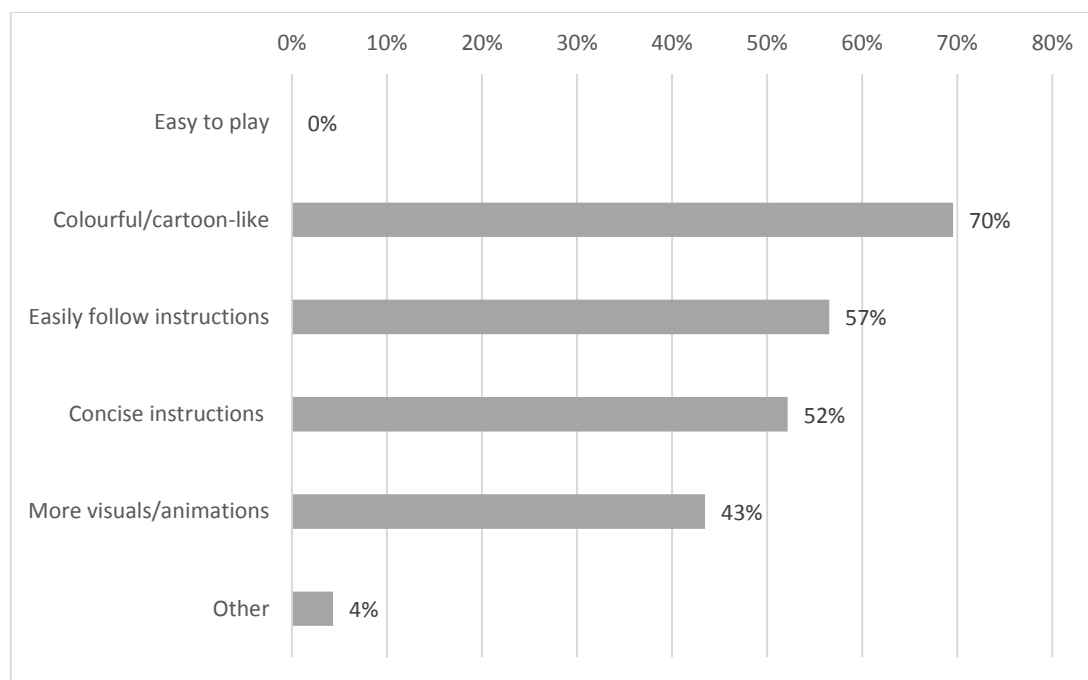
1.6   Animation/Sound Effects/Videos

130 of the 250 websites reviewed featured animations such as cartoons, animations depicting fantasy situations, sound effects or videos.

According to the reviewers, 21 of these websites used animations, sound effects or videos which were designed to appeal primarily to under-12s.

In addition, 15 of these websites used these to promote food or beverage products to children.

Figure 7: Number of websites featuring animation, sound effects or videos (N=250)
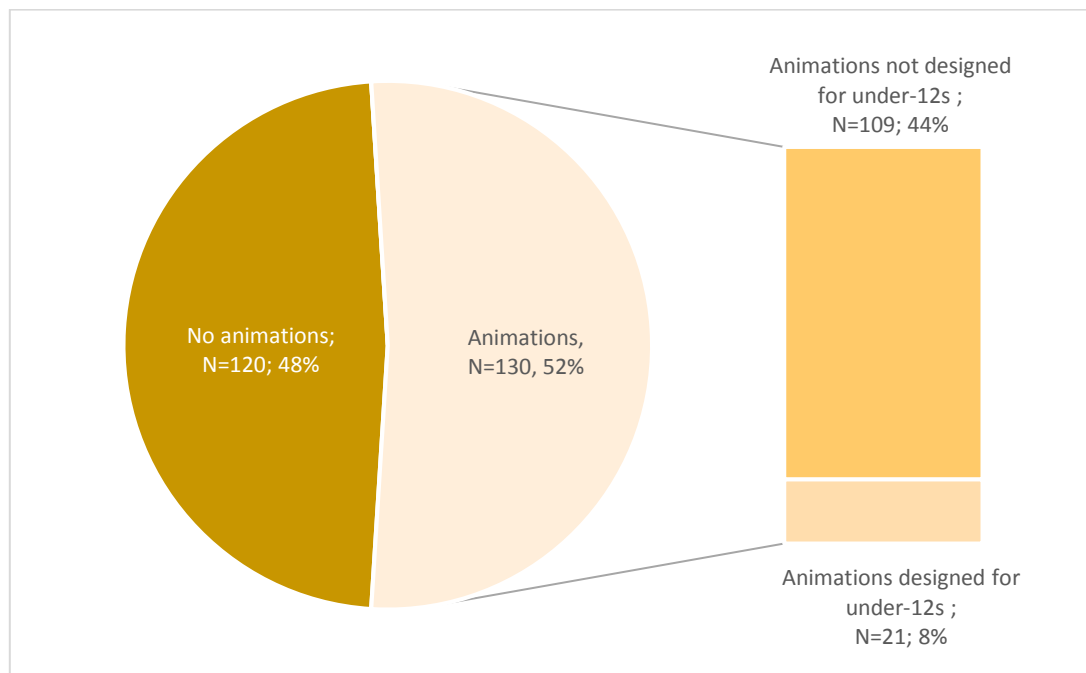
Reasons as to why the reviewers considered the animations, sound effects or videos to be appealing primarily to under-12s are featured in the following chart. The combination of several of these criteria is a strong indicator that the animations are primarily appealing to young children.

Figure 8: Main indicators for animation, sound effects or videos considered primarily appealing to under-12s (N= 21)
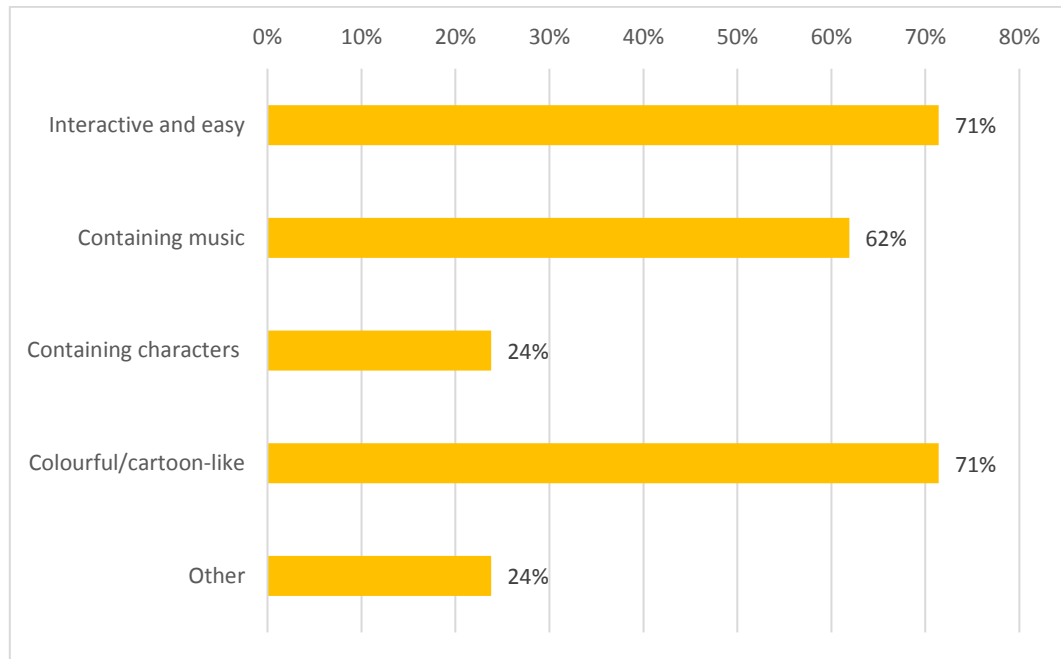
1.7   Toys Used as Premiums

The reviewers identified 19 websites that used toys or other premiums to promote a food or non-alcoholic beverage products. Examples of toys included figures of cartoon characters, stickers, board games, soccer balls and school supplies such as pencil cases.

In 15 of the 19 cases the toys were considered to be designed to appeal primarily to children under 12 and therefore promoting food or beverage products to children.

Figure 9: Number of websites featuring toys used as premiums (N=250)
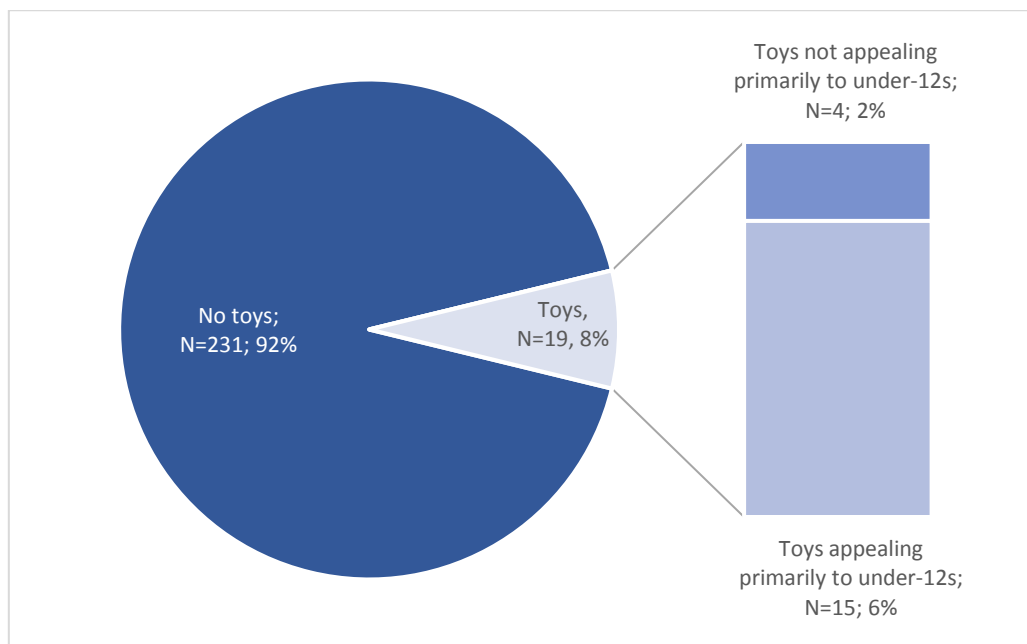
1.8   Compliance with the EU Pledge Criteria

13 of the 250 websites reviewed were found to be non-compliant with the EU Pledge.

In order to determine whether the 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 of the 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.

Figure 10: Compliance with the EU Pledge criteria (N=250)

Non-compliant with EU Pledge criteria; N=13; 5%

Compliant ; N=237; 95%
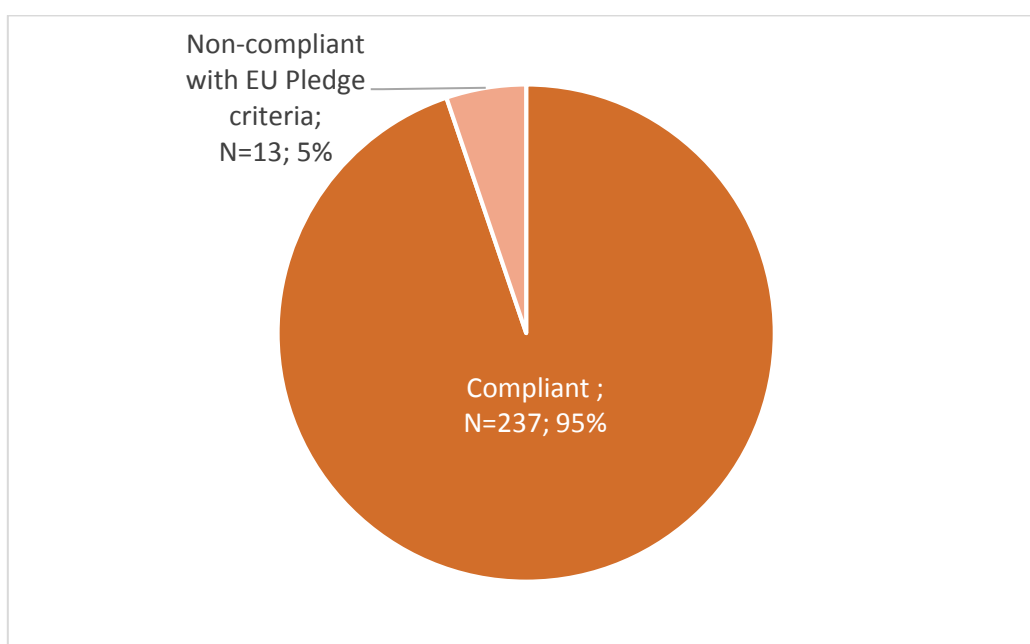
All of the websites that were considered as appealing primarily to children under 12 and therefore in breach of the EU Pledge, featured animation/sound effects/videos as well as entertainment activities/games designed for under-12s. 2 websites included toys designed for children under 12 and one website featured licensed characters/tie-ins/celebrities.

It is important to highlight that although the use of an age screening mechanisms may indicate the intent of the marketer to be compliant, it does not on its own render a website compliant with the commitment.

Figure 11: Elements of websites primarily appealing to under-12s (N=13)
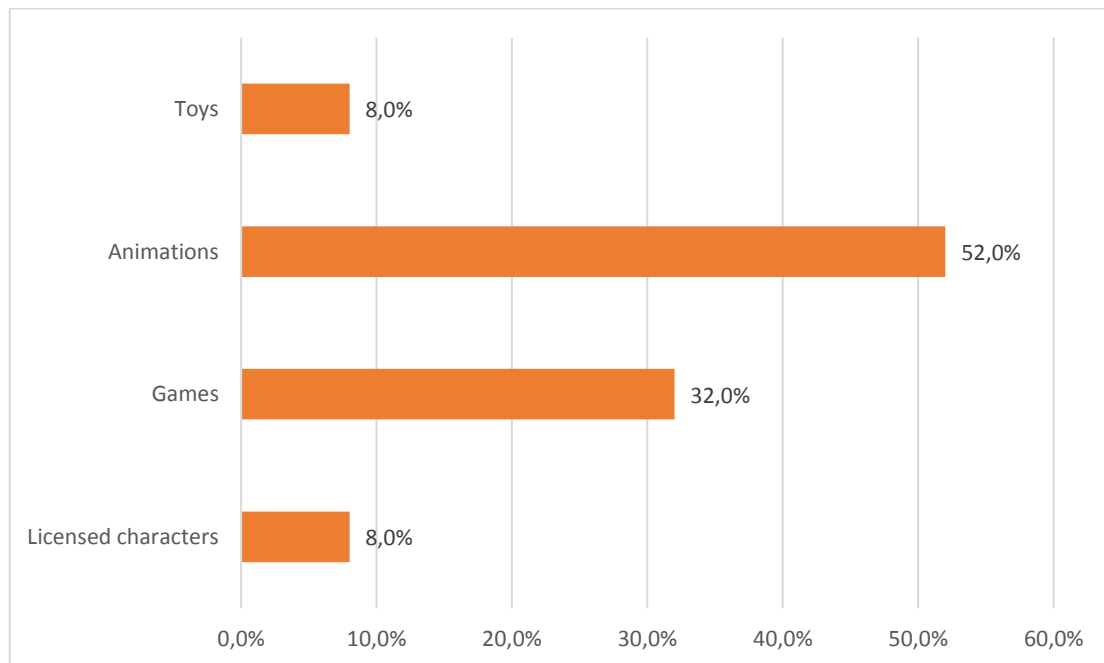
1.9   Compliance with Advertising Codes/Laws

On 35 out of the 250 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=250)
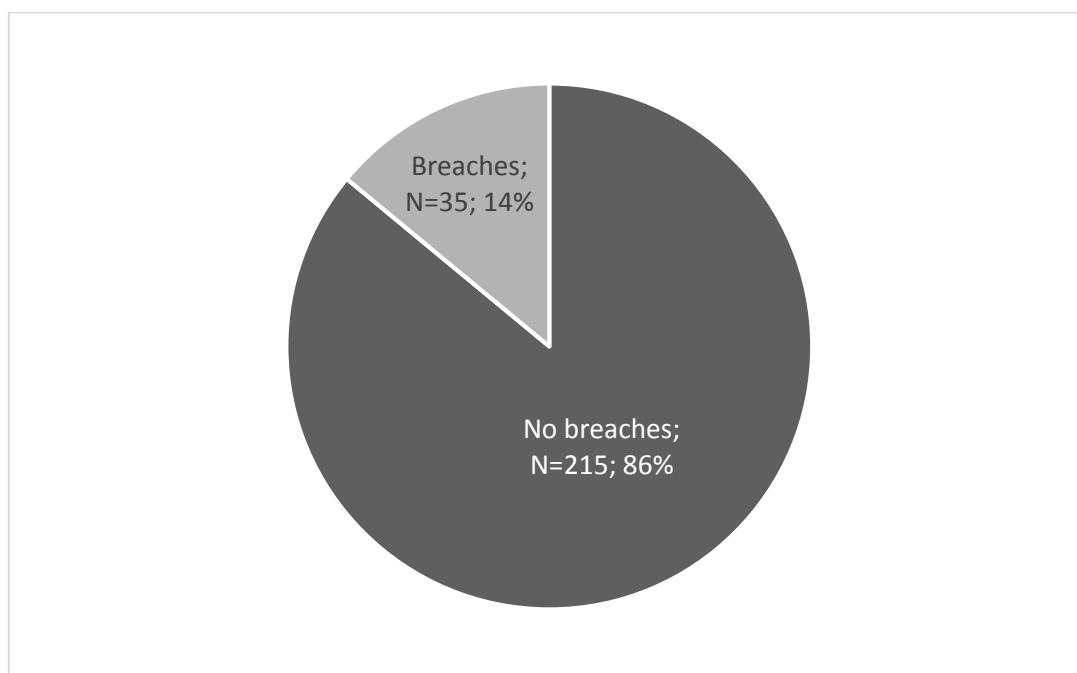
On these 35 websites, a total of 41 problematic items were found.

Figure 13: Potential breaches of advertising codes/laws (N=41)
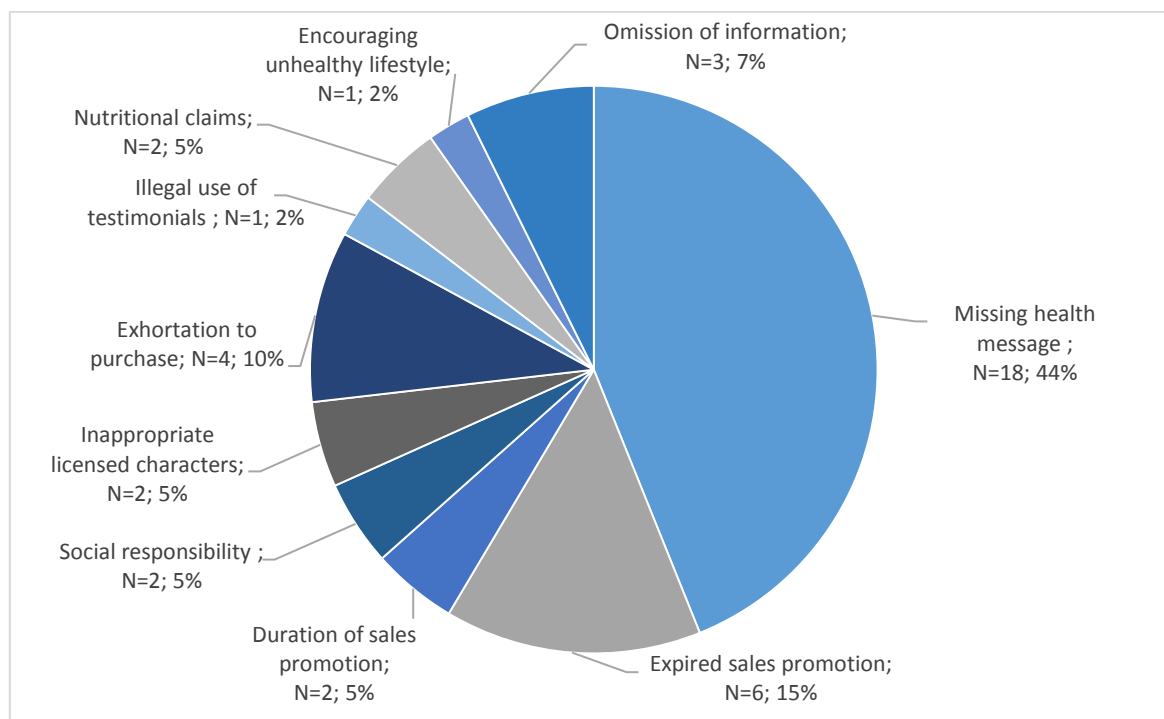
In 2 instances the websites were found to be potentially in breach of advertising codes or laws because a clear mention of the duration of the sales promotions was lacking.

In the other 6 cases, the reviewers found on the websites sales promotions that had already expired at the time of the review.

Furthermore, the reviewers flagged 3 cases for not showing the promoted toys nor including information regarding their size reference (omission of information).

2 websites were flagged for featuring statements inciting or condoning forms of discrimination, including that based upon national origin, religion or gender (social responsibility).

In 1 website the reviewers identified claims that were considered as encouraging poor nutritional habits or an unhealthy lifestyle, while 2 websites contained problematic nutritional claims.

In 18 instances the websites were considered to be potentially in breach of advertising codes or laws for not stating the required health message.

2 websites were flagged for using inappropriate licensed characters which enjoy a high degree of popularity among child audiences, while 1 other website featured the real or presumed scientific testimony of a healthcare professional/nutritionist endorsing the product.

Finally, the reviewers identified 4 websites including a direct invitation to buy an advertised product or encourage children to persuade an adult to buy the product for them.

2. Brand-Owned Mobile Applications

2.1   Sample of Brand-Owned Mobile Applications

A total of 20 mobile applications were reviewed by experts. 8 out of the 20 apps reviewed contained product promotion and featured at least 1 product that was not compliant with the common nutritional criteria, while the other 12 featured the company logo, but not the non-compliant product[9].

The table below provides an overview of the number of mobile applications that were reviewed per country.

Table 4: Number of mobile applications reviewed per country

Country	Number of Mobile Applications Reviewed
Czech Republic	2
France	2
Germany	2
Italy	2
Lithuania	2
Poland	2
Spain	2
Sweden	2
The Netherlands	2
United Kingdom	2
TOTAL	**20**

2.2   Product Promotion

The reviewers identified product promotion on 8 of the mobile applications reviewed. These 8 apps reviewed featured at least one product that did not meet the common nutritional criteria.

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[9] This is due to the limited sample size at disposal.

2.3   Age-screening

None of the mobile applications contained age-screening/parental consent mechanisms aimed at verifying the age of visitors before downloading the app, i.e. select age range, request parental consent, etc.

Figure 14: Number of mobile applications featuring age screening (N=20)
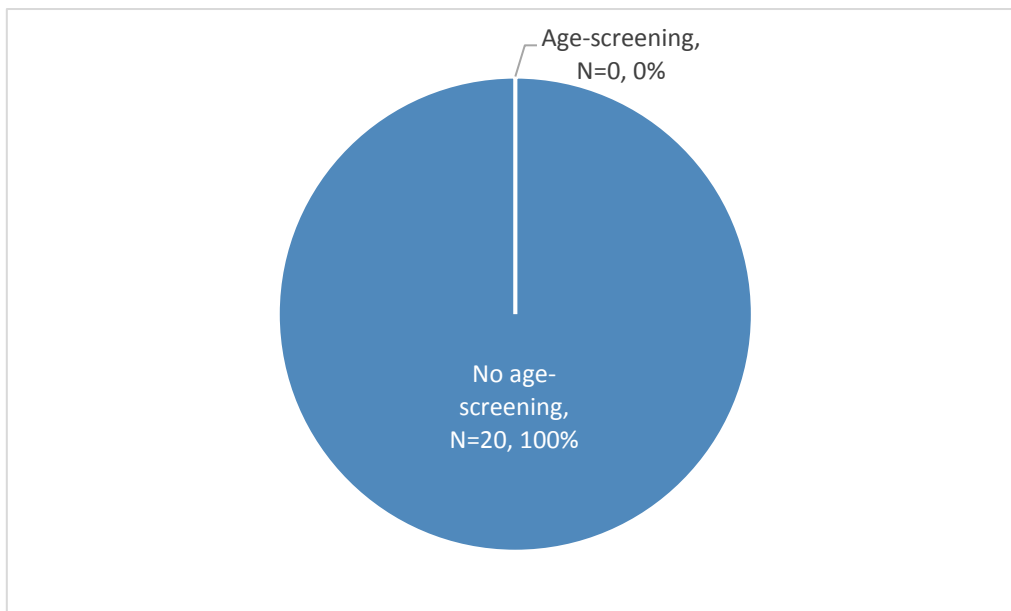
2.4   Interaction

According to the reviewers, 8 out of 20 mobile applications reviewed included features allowing children under 12 to interact, exchange information and the creation of their own content with other app users, i.e. via social media channels, via augmented reality, etc.

Figure 15: Number of mobile applications allowing interaction/exchange of information/creations (N=20)
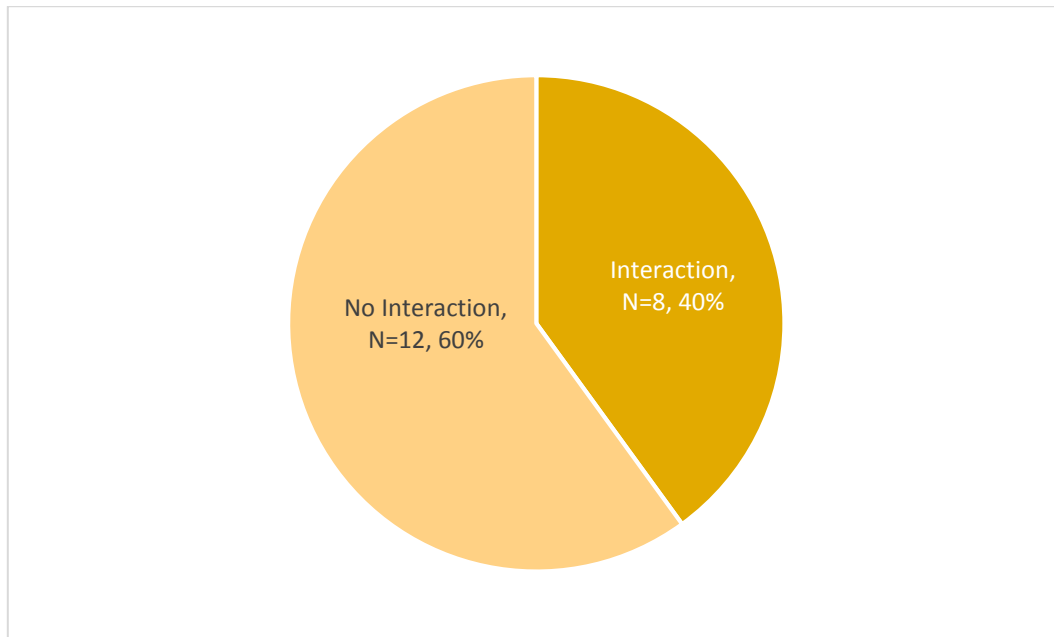
Reasons as to why the reviewers considered that the 8 mobile applications seemed to encourage interaction of children under 12 are featured in the following chart.

Figure 16: Main indicators for mobile applications allowing interaction/exchange of information/creations (N=8)
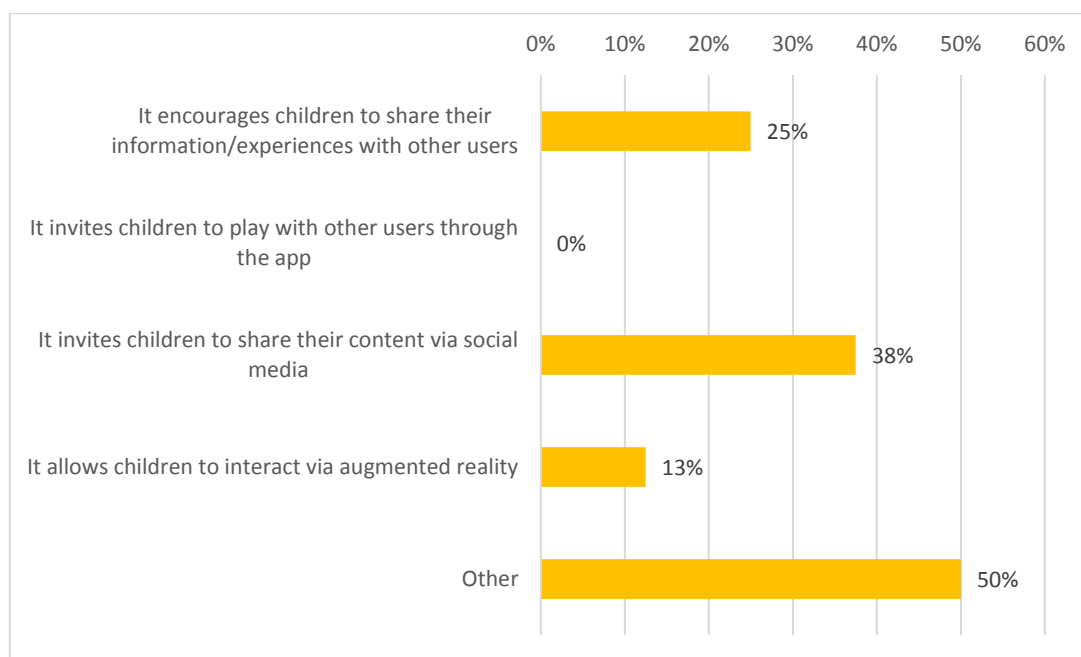
2.5 Customisation

4 of the mobile applications contained features that allowed children to customise the app, i.e. create their own avatar, adding virtual elements, choosing backgrounds, characters, etc.

Figure 17: Number of mobile applications allowing customisation (N=20)
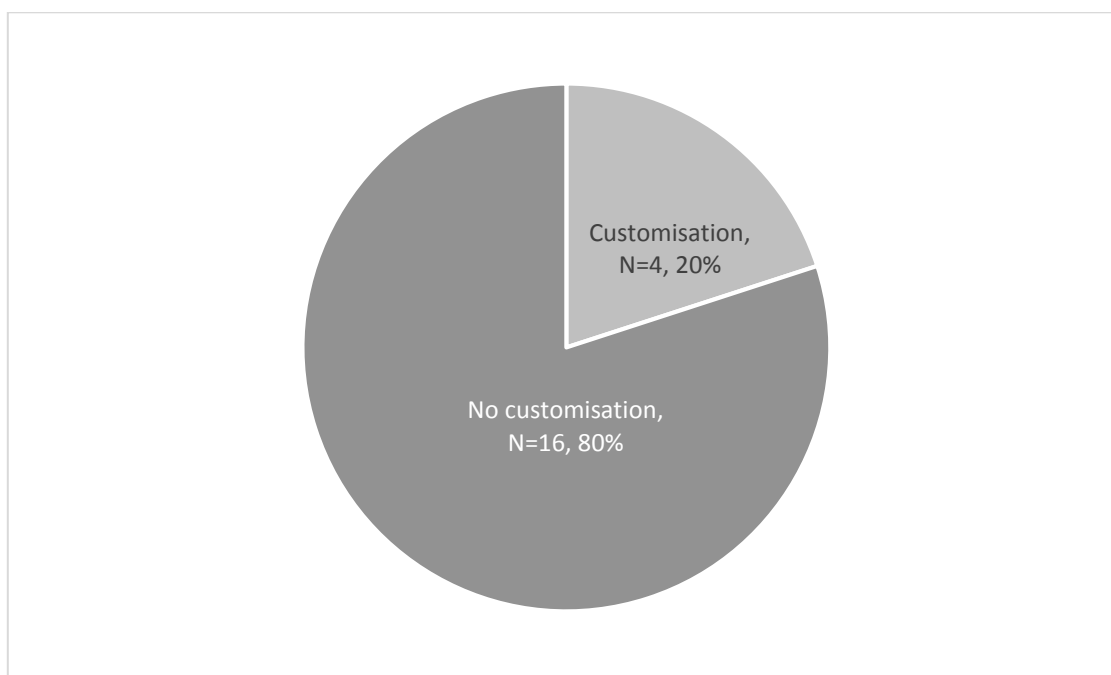
2.6 Kinetic movements

3 of the mobile applications encouraged kinetic movements, i.e. children are required to move around to complete certain tasks.

Figure 18: Number of mobile applications allowing kinetic movements (N=20)
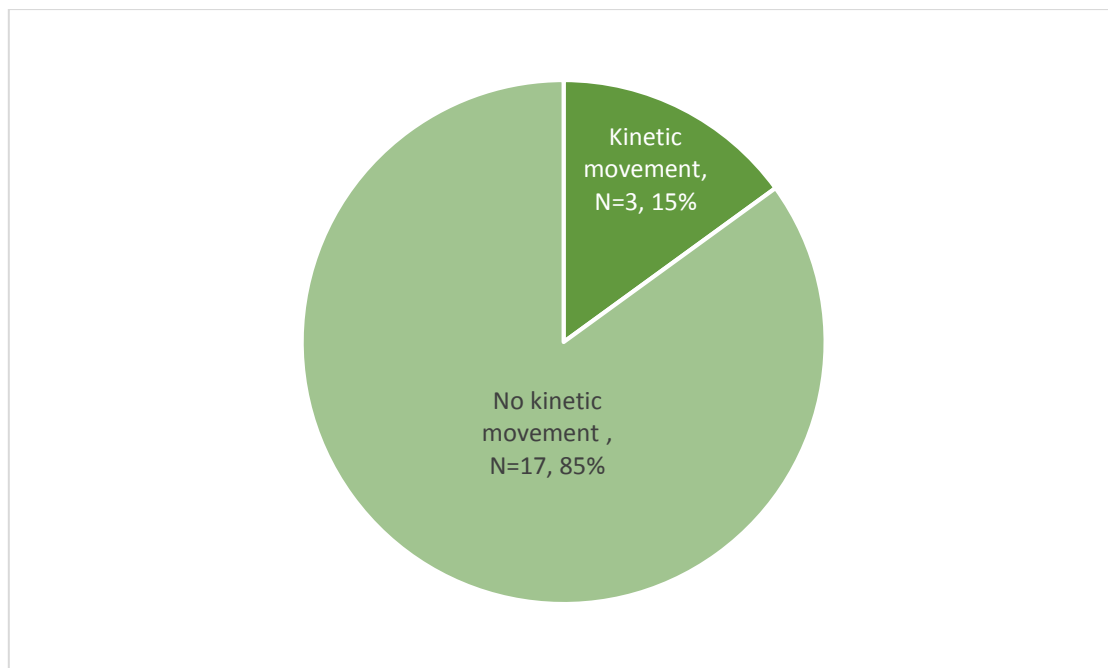
2.7   Language

6 of the 20 mobile applications reviewed used language that deemed as directed at children under 12, as it was considered to be plain and easy to understand by children under 12.

Figure 19: Number of mobile applications using language directed at children under 12 (N=20)

Language directed at <12s, N=6, 30%

Language not directed at <12s, N=14, 70%
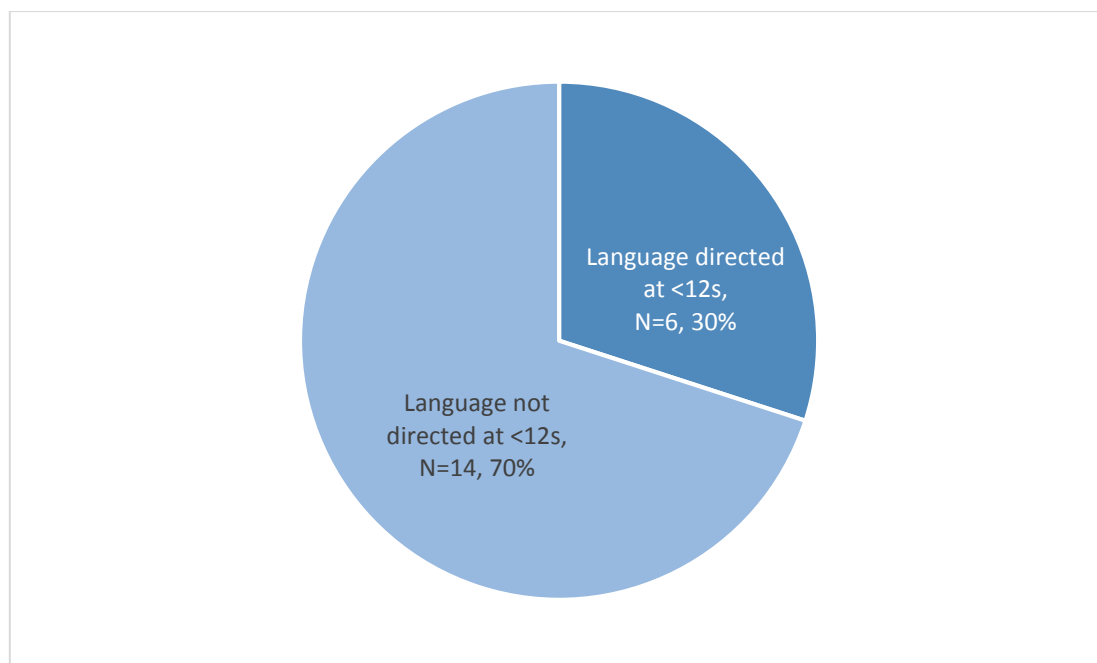
2.8   Entertainment Activities/Games

The reviewers identified entertainment activities/games on 14 of the 20 mobile applications reviewed.

In 11 instances the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s.

Figure 20: Number of mobile applications featuring entertainment activities/games (N=20)
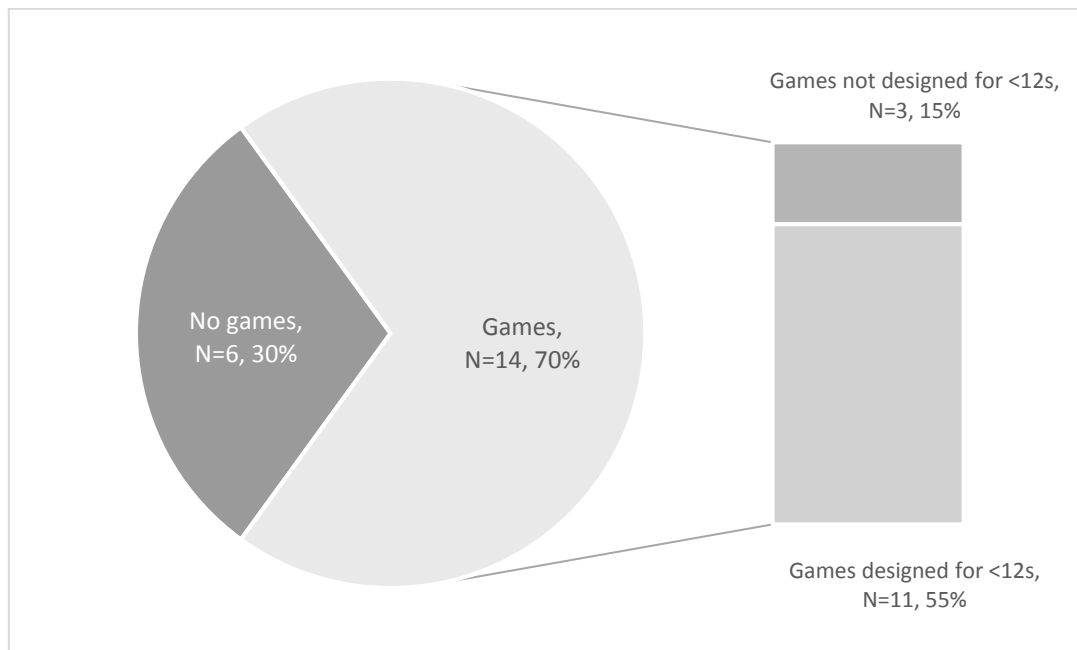
Reasons as to why the reviewers considered that the entertainment activities/games were primarily appealing to children under 12 are featured in the following chart.

Figure 21: Main indicators for entertainment activities/games considered primarily appealing to under-12s (N=11)
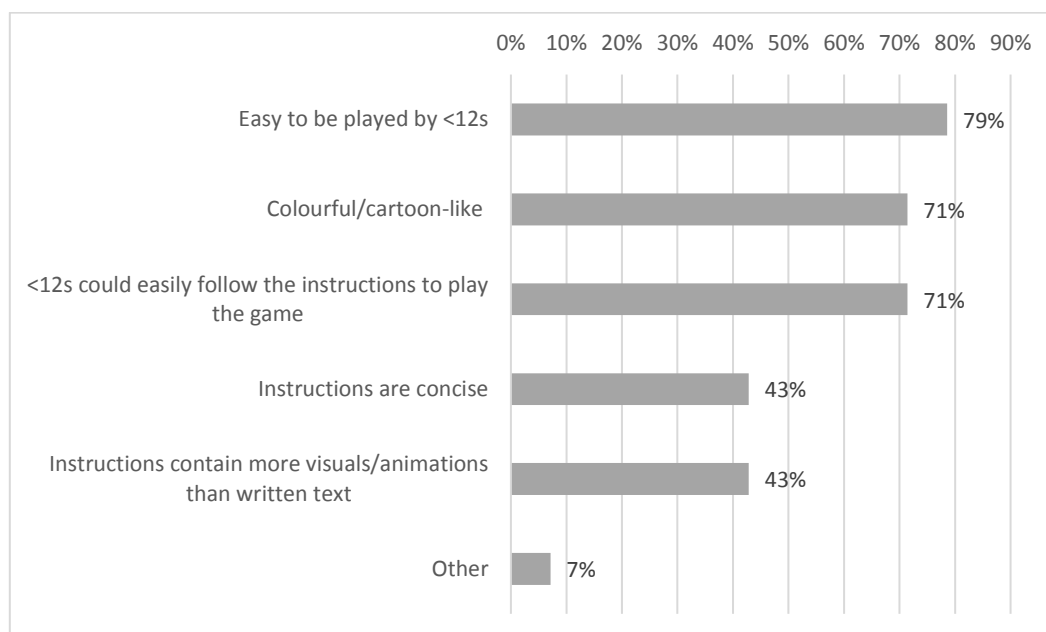
2.9   Animations/music/sound effects/videos

15 of the 20 mobile applications reviewed featured animations such as cartoons, animations depicting fantasy situations, sound effects or videos.

According to the reviewers, 7 of these mobile applications used animations, sound effects or videos which were designed to appeal primarily to under-12s.

In addition, 2 of these mobile applications used these to promote food or beverage products to children.

Figure 22: Number of mobile applications featuring animation, sound effects or videos (N=20)
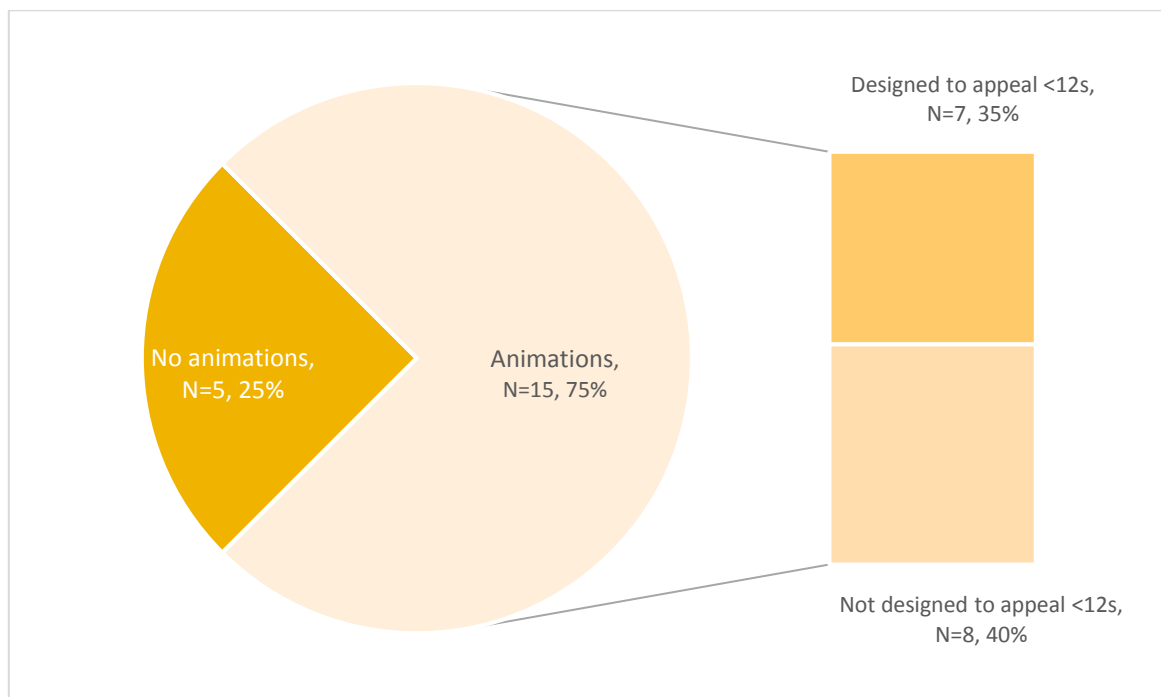
Figure 23: Main indicators for animation, sound effects or videos considered primarily appealing to under-12s (N= 7)
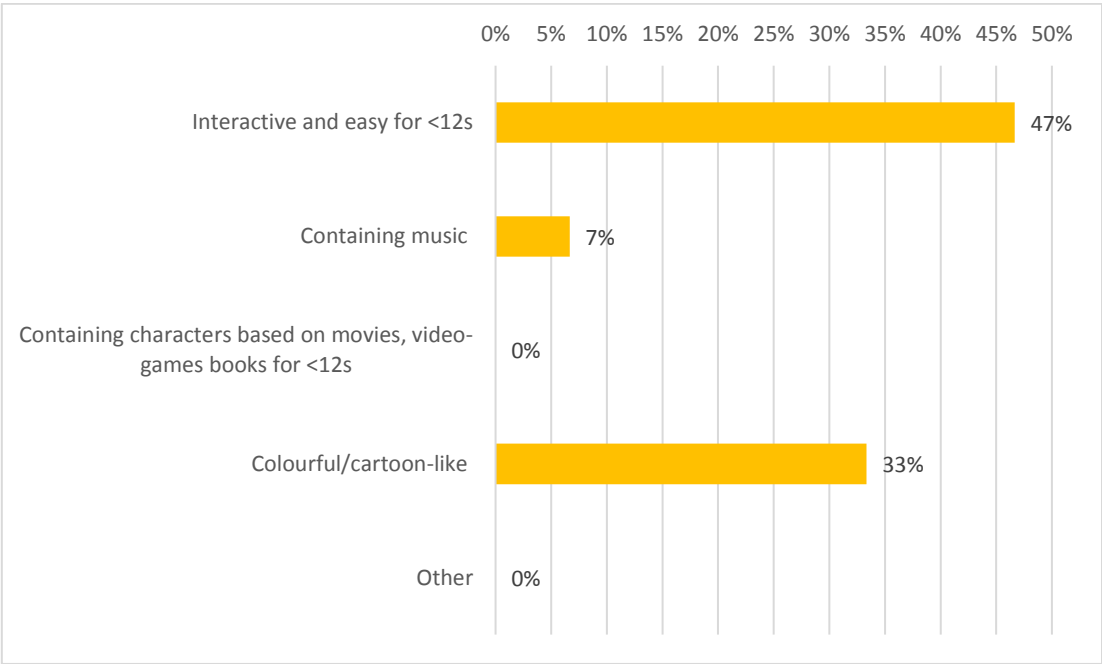
2.10 Licensed Characters/Tie-ins/Celebrities

1 out of the 20 mobile applications reviewed featured "licensed characters".

In this 1 instance these characters/tie-ins were considered to be designed to target primarily children under 12, as they are based on movies, video-games, books etc. that children under 12 would typically like.

The characters/tie-ins were not used as means to promote a food/beverage product or logo to children under 12.

Figure 24: Number of mobile applications featuring licensed characters, tie-ins or celebrities (N=20)
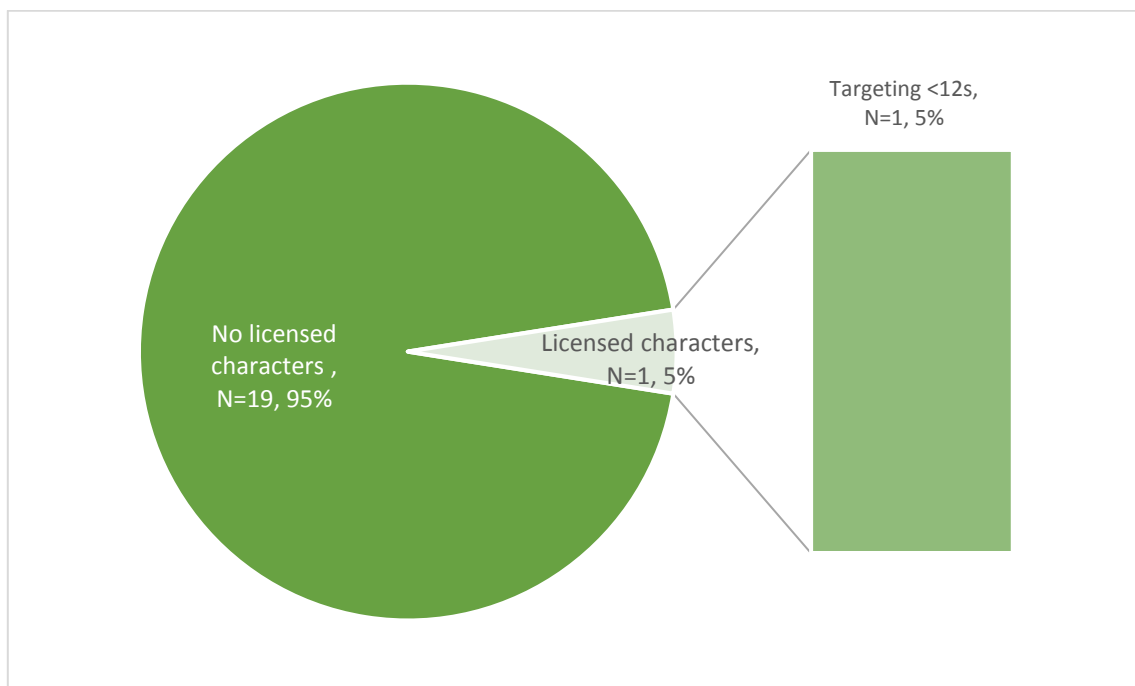
2.11 Games containing contextual ads

2 out of the 20 mobile applications reviewed featured games containing contextual advertisements.
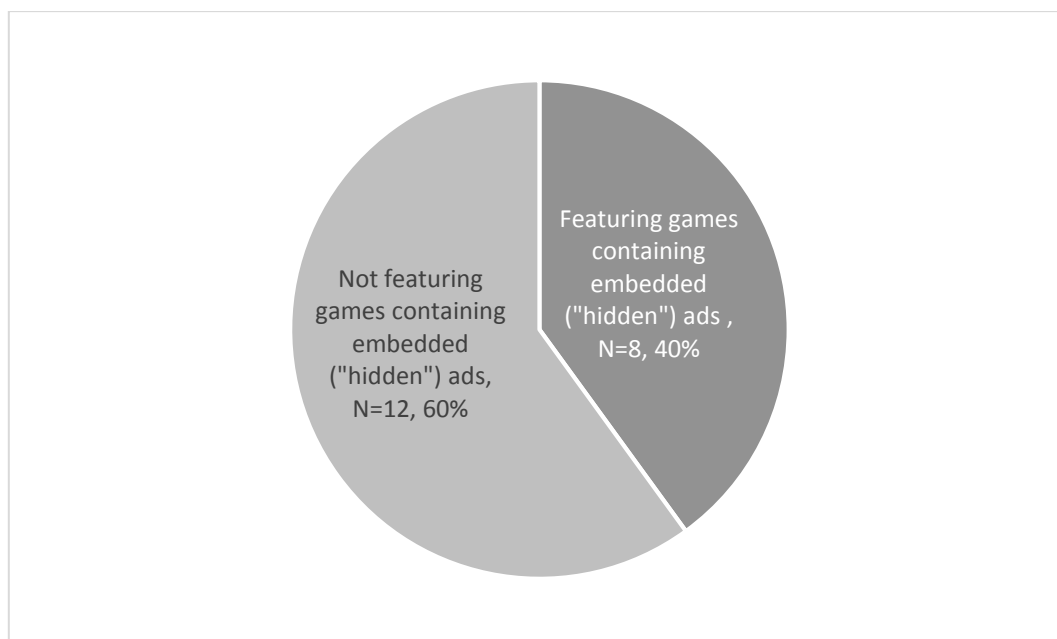
Figure 25: Number of mobile applications featuring games containing contextual ads (N=20)

Featuring game containing contextual ads, N=2, 10%

Not featuring game containing contextual ads, N=18, 90%
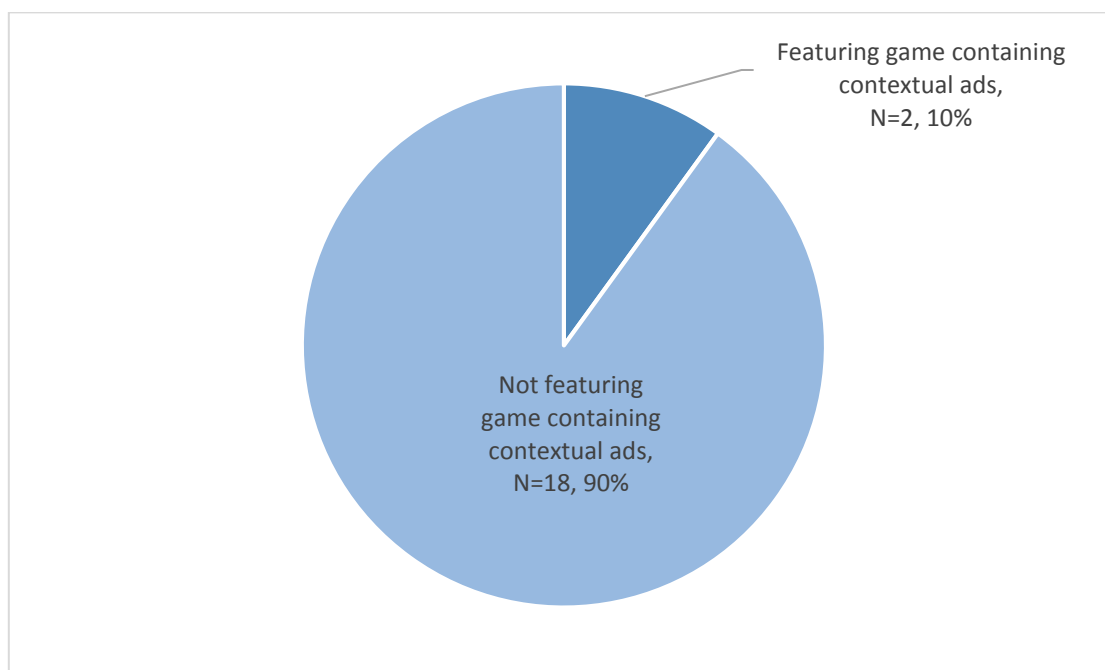
2.12 Games containing embedded ads

8 out of the 20 mobile applications reviewed featured games containing embedded advertisements.
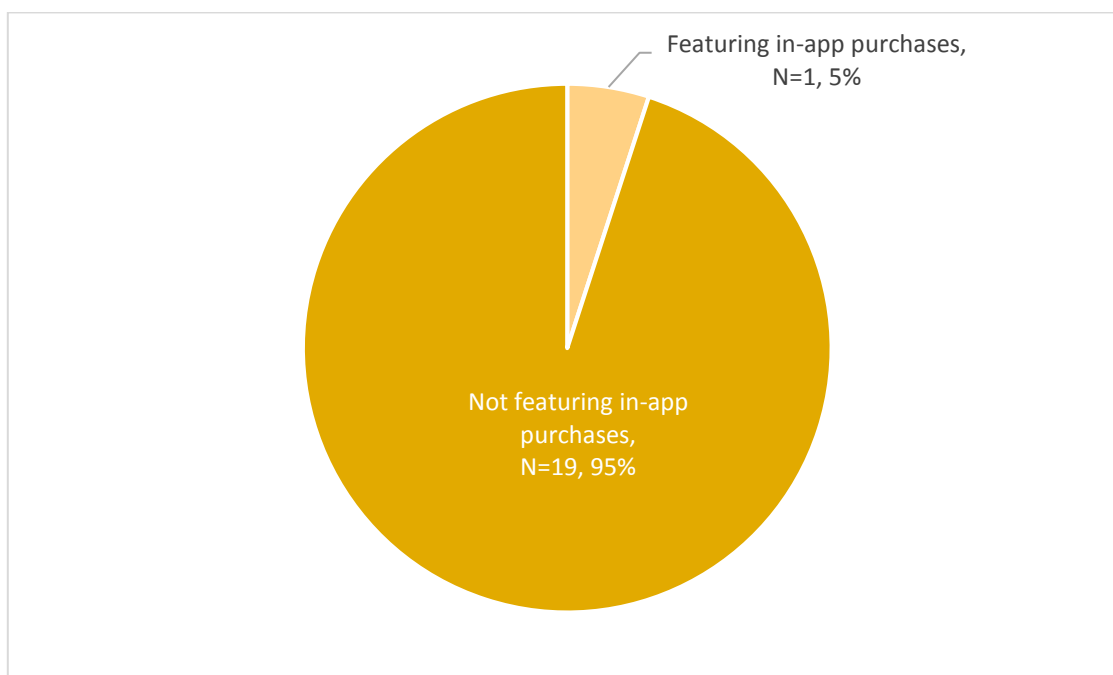
Figure 26: Number of mobile applications featuring games containing embedded ads (N=20)

2.13 In-app purchases

1 out of the 20 mobile applications reviewed featured games containing in-app purchases.

Figure 27: Number of mobile applications featuring games containing in-app purchases (N=20)
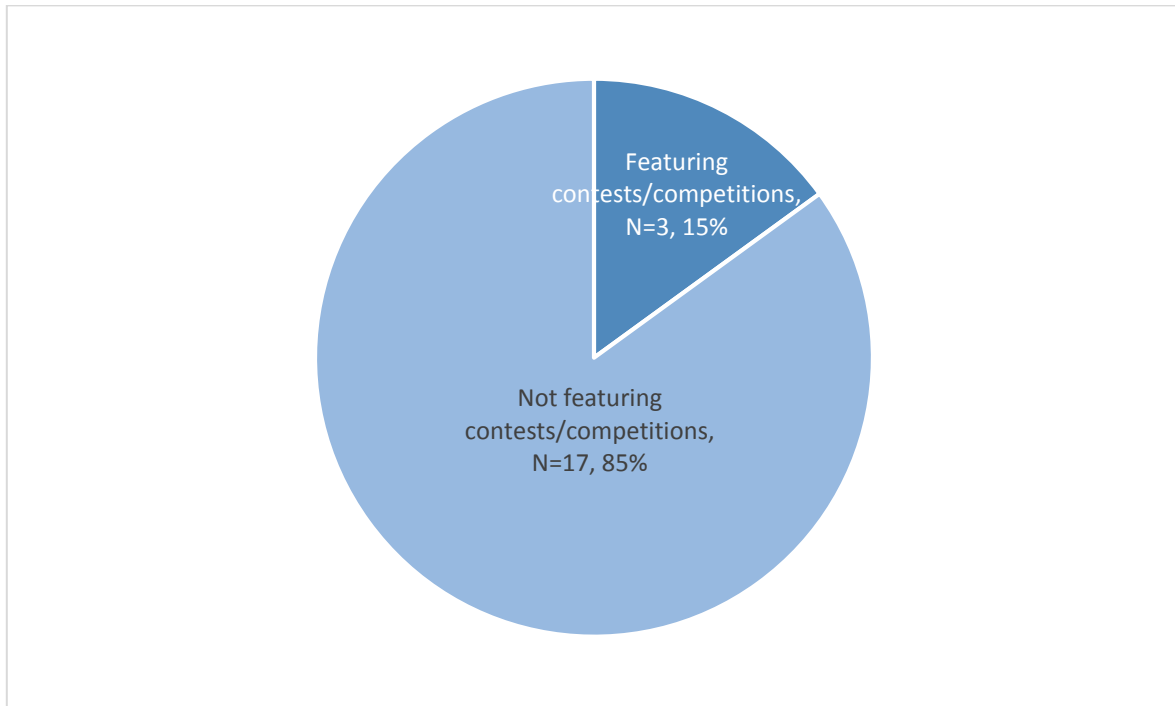
2.14 Contests/Competitions

3 out of the 20 mobile applications reviewed included contests or competitions.

The reviewers considered that these contests or competitions were not appealing primarily to children under 12.

Figure 28: Number of mobile applications featuring contests/competitions (N=20)

2.15 Events/Promotional events

1 out of the 20 mobile applications reviewed included events or promotional events, which were considered to be appealing primarily to children under 12.

Figure 29: Number of mobile applications featuring events/promotional events (N=20)

Featuring events/promotional events appealing to <12s, N=1, 5%

Not featuring events/promotional events appealing to <12s, N=19, 95%
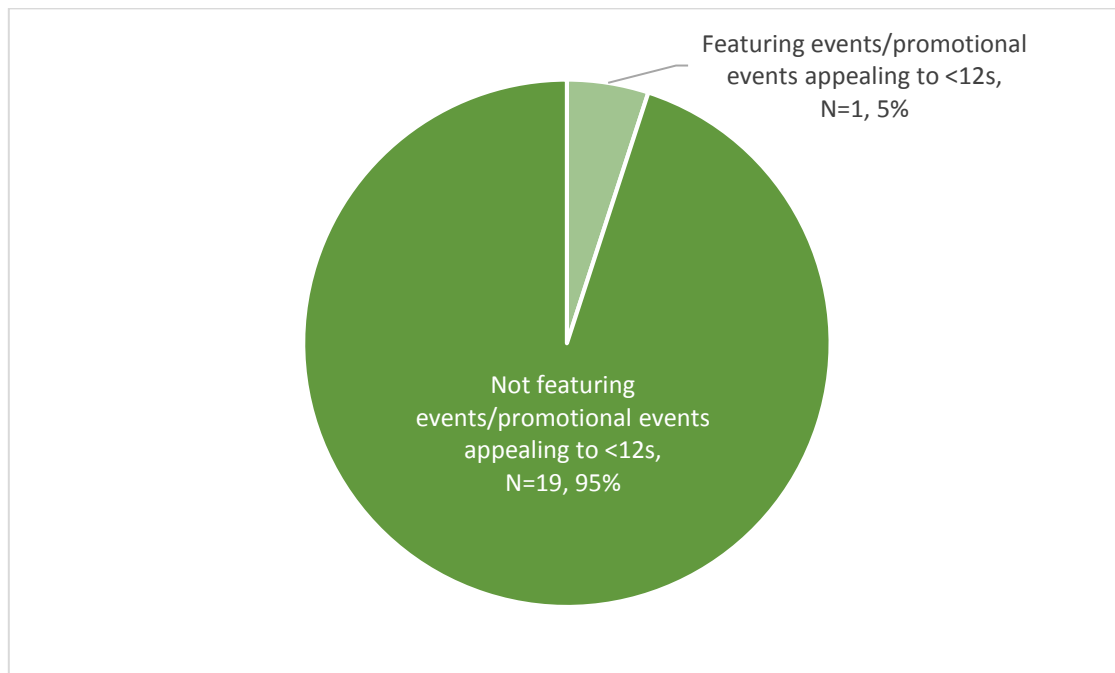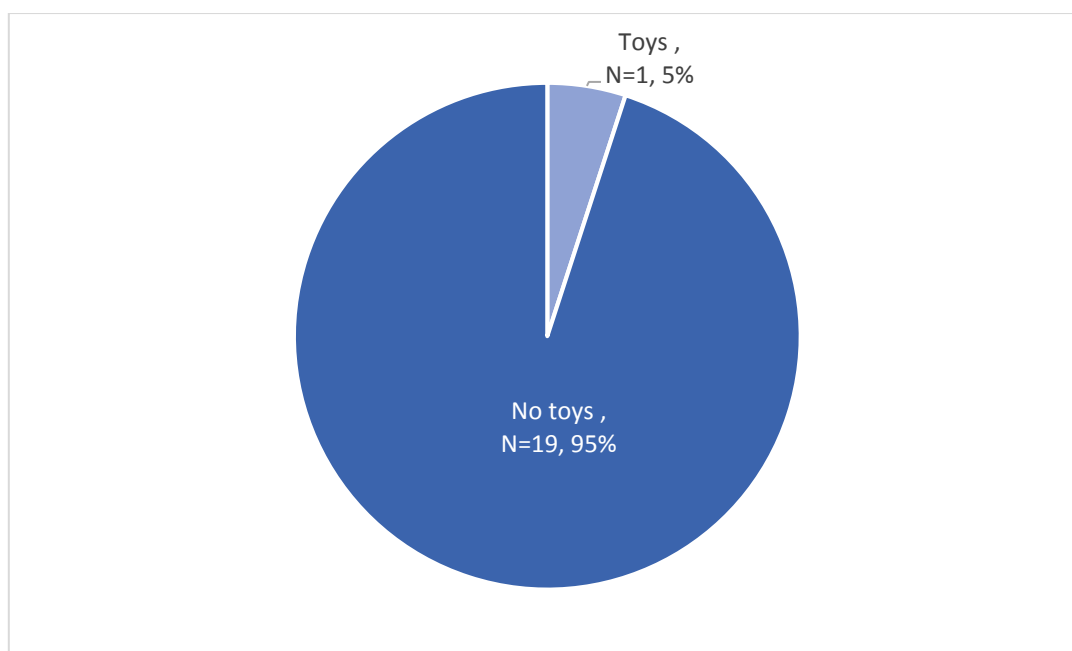
2.16 Toys used as premiums

The reviewers identified 1 mobile application that used toys or other premiums to promote a food or non-alcoholic beverage product.

In this case the toys were not considered to be designed to appeal primarily to children under 12.

Figure 30: Number of websites featuring toys used as premiums (N=20)

2.17 Primary Appeal of Brand mobile applications to under-12s

8 out of the 20 mobile applications reviewed were considered as primarily appealing to children under 12.

1 out of 8 mobile applications featured non-compliant product promotions, and was, therefore, considered as potentially in breach of the EU Pledge.

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

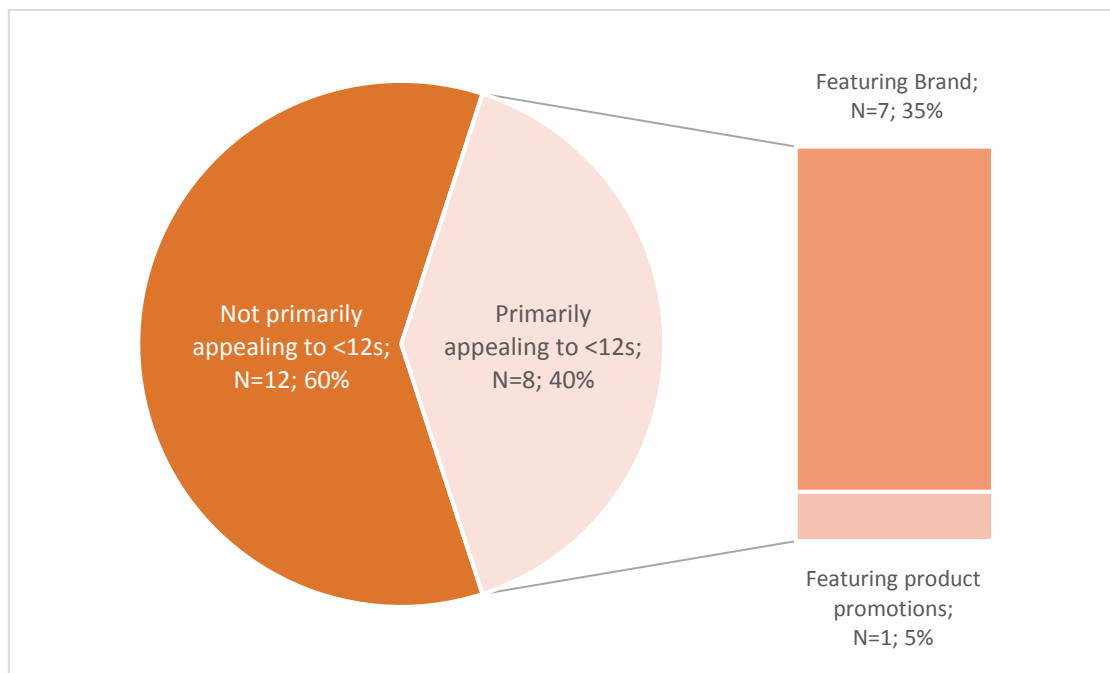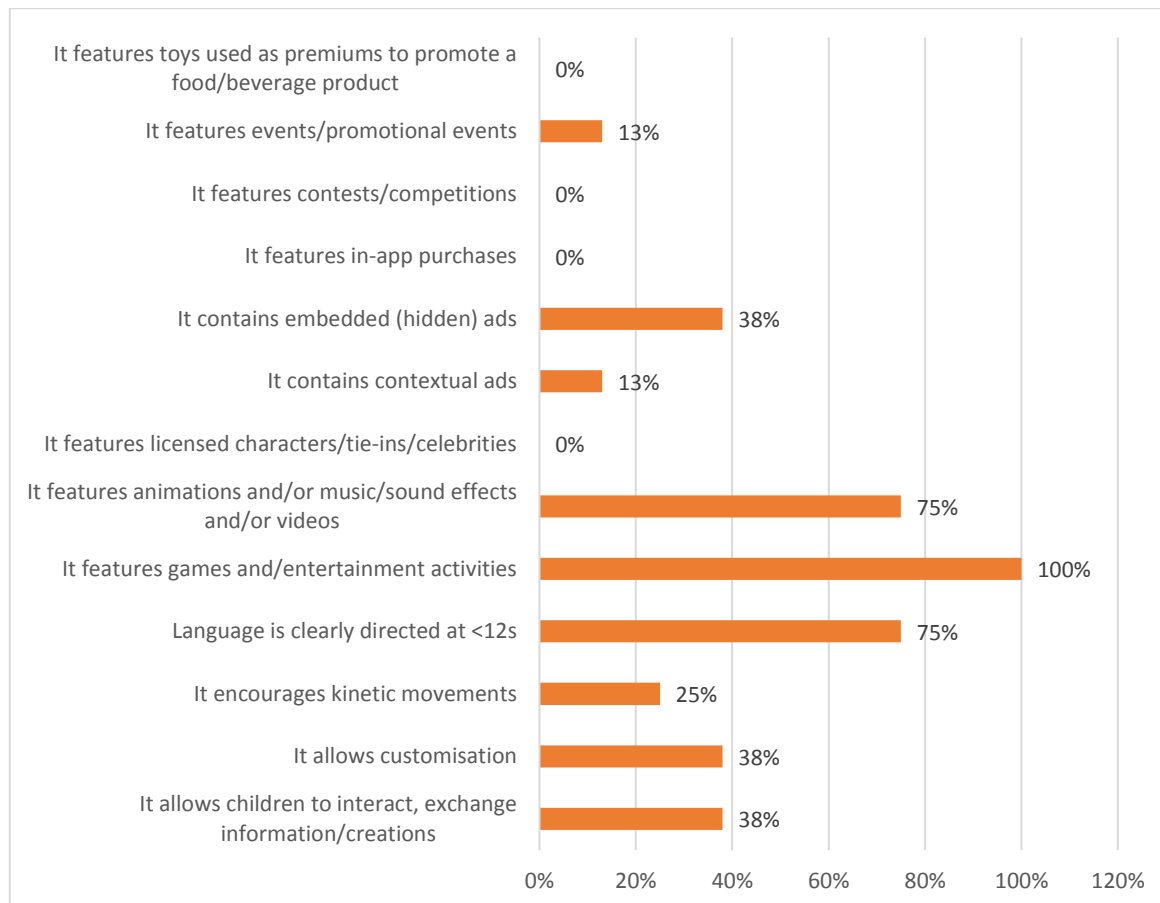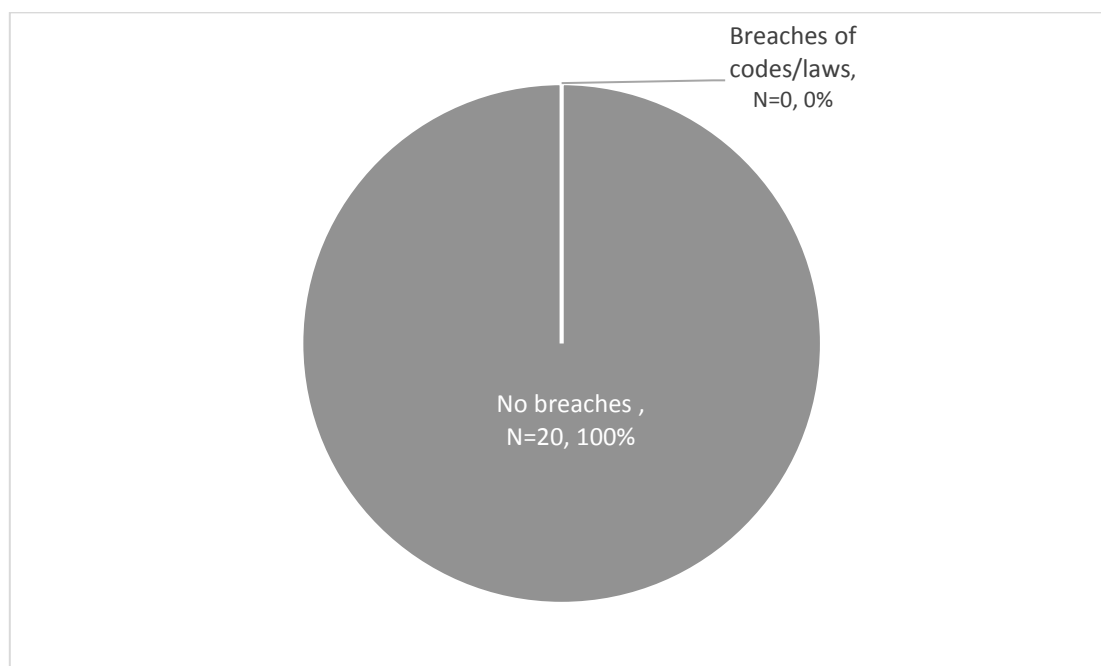*Figure 31: Number of mobile applications primarily appealing to under-12s (N=20)*

Figure 32: Elements of mobile applications primarily appealing to under-12s (N=8)

2.18 Compliance with Advertising Codes/Laws

All 20 mobile applications reviewed featured were considered to compliant with advertising codes or relevant national advertising laws.

Figure 33: Compliance with advertising codes/laws (N=20)

Breaches of codes/laws, N=0, 0%

No breaches , N=20, 100%

EUROPEAN ADVERTISING STANDARDS

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