2017

EU PLEDGE SURVEY

EASA

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

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

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Introduction

EASA was commissioned by the EU Pledge Secretariat to review a number of food and beverage brand websites, social media profiles and mobile apps belonging to the EU Pledge [1] member companies and independently check compliance with the EU Pledge criteria as well as SR codes and national laws.

The goal of the project was to determine whether the reviewed company-owned websites, social media profiles and mobile apps were compliant with the relevant EU Pledge commitment.

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

- The website or social media profile or mobile app features marketing communications;
- If these marketing communications promote food or beverage products, as opposed to a brand in general;
- Such food and beverage products meet or do not meet the EU Pledge common nutritional criteria;
- Such marketing communications are designed to be targeted primarily at children under 12.

Please note that the apps segment is absent from this project, due to an insufficient sample of apps featuring non-compliant products required to successfully carry out the monitoring exercise and offer a comprehensive analysis.

Advertising self-regulation experts were requested to try and think from the perspective of a child younger than 12 while reviewing brand websites and social media profiles and keep in mind what a child of this age would find interesting and attractive. Special attention had to be paid to specific aspects of the websites and social media profiles that would make them appealing to under-12s.

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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' has been drawn up by the EASA Secretariat in collaboration with the EU Pledge Secretariat and Dr. Verónica Donoso, the independent reviewer of the exercises that were conducted between 2011-2016. The 2017 methodology was adapted by EASA, the EU Pledge Secretariat and Professors Liselot Hudders[2] and Dieneke Van de Sompel[3], independent reviewers of this exercise. The role of the independent reviewers is to verify that appropriate criteria have been set up in the methodology, perform quality check on SROs' reviews, testify to the correctness of the monitoring procedure, and sign off on the EASA top line report.

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[2] **Liselot Hudders** is an assistant professor at the department of communication sciences at Ghent University and a postdoctoral fellow of the FWO at the marketing department. She teaches courses on Consumer Behavior, Communicative Skills and Organizational Psychology and she serves as ad hoc reviewer for journals as Journal of Happiness Studies, Journal of Adolescence, and Journal of Brand Management and for conferences as EMAC, and ICORIA. She participated in many international conferences and published in various international journals. Her research interests include Persuasive Communication, Consumer Behavior and Advertising Literacy. Her research focus lays on how consumption affects an individual's well-being. In particular, she is conducting research on how materialism and luxury consumption, green consumption practices, and food consumption may contribute to an individual's happiness (both for children and adults). In addition, she investigates how children and youngsters cope with (new) advertising techniques. She is particularly interested in 1) how minor's advertising literacy can be improved, using advertising cues and advertising literacy training sessions and 2) how parental mediation and peer influences moderate these effects.

[3] **Dieneke Van de Sompel** is a visiting professor at the Department of Communication Sciences at Ghent University. She obtained a PhD in Applied Economic Sciences ("Insights in children's consumer related activities and reactions to advertising") in 2016 at the department of Marketing, Faculty of Economics and Business Administration of Ghent University. The dissertation explored two touch points children have with consuming, namely play activities and advertising exposure. She has worked as a research and teaching assistant at the marketing department of the Faculty of Economics and Business Administration of Ghent University and the department of Business Administration and Public Administration of University College Ghent, where she has given courses such as Marketing planning, Marketing strategy, Sales management etc. Dieneke is interested in research combining the domains of Communication sciences, Psychology and Marketing and she specifically centers her research on children's Consumer behavior and the effects of Advertising on children. Her research looks for example into how consumerism has an effect on children (for example on the development of materialistic goals, purchase intentions, ad preferences). She also works on projects that examine the effects of advertising cues (such as exposure to attractive models) on children's self-esteem and well-being.

Project Overview

Experts from 6 European self-regulatory organisations (SROs) were invited by EASA and the EU Pledge Secretariat to conduct the monitoring exercise starting mid-October until the end of November 2017, in order to assess the appeal of marketer-owned websites and social media profiles to children under 12. The 6 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
Bulgaria	NCSR
France	ARPP
Germany	DWR
Hungary	ÖRT
Spain	AUTOCONTROL
The Netherlands	SRC

Self-regulation experts from the 6 SROs reviewed a sample of 331 items, including national brand websites[4] and social media profiles of EU Pledge company members.

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

Country	Websites	Social Media profiles
Bulgaria	19[5]	36
France	40	16
Germany	45	10
Hungary	40	15
Spain	40	15
The Netherlands	40	15

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4 Where available, at least 1 website per company.
5 Due to limited availability.

Below is a list of the EU Pledge member companies.

Table 3: 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
KiMs	Lorenz Snack-World
Mars	McDonald's
Mondelēz	Nestlé
PepsiCo	Royal Friesland Campina
Unichips-San Carlo	Unilever
Zweifel Pomy-Chips	

Methodology

The EU Pledge Secretariat provided EASA with a list of all products promoted by the EU Pledge member companies in the selected markets. The list indicated whether these products met the applicable nutritional criteria set out in the EU Pledge Nutrition White Paper. From this, EASA compiled a list of websites and social media profiles that promoted products that did not meet the nutritional criteria. Based on EASA's list the self-regulatory experts selected websites and social media profiles to review. When making their selection, reviewers were requested to consider products popular amongst children in their country.

EASA carried out a thorough search of existing apps in the selected markets, but could not identify a sufficient number of apps promoting non-compliant products to ensure a meaningful analysis of compliance.

To offer unbiased, independent and accountable results, a 'consumer oriented approach' was drawn up by the EASA Secretariat in collaboration with the EU Pledge Secretariat and Dr. Verónica Donoso, the independent reviewer of the 2011-2016 exercises. The methodology was revised in 2017 by EASA, the EU Pledge Secretariat and the current independent reviewers Professors Liselot Hudders and Dieneke Van de Sompel.

The questionnaire for the **websites** asked the self-regulatory experts if the website being reviewed contained elements such as games/entertainment activities[6], animations/sound effects/videos, licensed characters[7] 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 <u>not</u> considered to be sufficient to ensure compliance if the marketing communications on the website were clearly designed to appeal primarily to children under 12.

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

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[6]A game/entertainment activity is an activity engaged for diversion or amusement. A non-exhaustive list of games/entertainment activities are: online interactive games, casual/social games, puzzles, board games, role-playing games, trivia, card games, racing, arcade, colouring sheets, activity sheets, do it yourself activities, etc.

[7] Characters acquired externally and linked for example to movies, cartoons or sports.

The questionnaire for the **social media profiles** asked the experts if the reviewed profiles allowed children under 12's access without registration[8] and if they featured licensed characters, games/entertainment activities, contests and promotional events, and to decide if the reviewed profiles were primarily designed for children under 12.

Reviewers then had to judge if these elements, in conjunction with the overall look and feel of the social media profile, were clearly intended to make the marketing communication(s) primarily appealing to under-12s.

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

The following were considered:

- ICC Framework for Responsible Food and Beverage Marketing Communications;
- Relevant advertising standards and national sectoral codes;
- Relevant advertising laws.

All reviews were performed by experts from national SROs. EASA's role in the project was to ensure that the results were reported on in a consistent manner.

Note on the Methodology

In collaboration with the EU Pledge Secretariat and independent reviewers Professors Liselot Hudders and Dieneke Van de Sompel, EASA has taken great care to ensure that the results of this project are objective and consistent. They have - as explained above - developed a detailed methodology which was applied by all self-regulatory experts when assessing brand websites and social media profiles.

However, although it may be relatively easy to determine if a website or a social media profile appeals to children in general, it is much harder to determine if a website or a social media profile is designed to **appeal primarily to children younger than 12**. As a result, the decisions of the self-regulatory experts retain an unavoidable degree of subjectivity, although it is informed by their extensive day-to-day professional experience. Readers are requested to bear this in mind.

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[8] Given the fact that children under 13 are not allowed to create a profile on Facebook, Instagram, and YouTube, the questionnaire included a question aimed at checking if the pages of this social media platforms were accessible without registration and if they included language that encouraged the interaction or active participation of children under 12.

Note from the Independent Reviewers

This note is based on a thorough analysis of a random sample of 56 company-owned websites and 28 social media sites. This analysis has been conducted by a team of independent reviewers working at Ghent University, Center for Persuasive Communication, Dept. Of Communication Sciences. The team consists of two PhD students, Hayley Pearce and Melanie Verstockt and two Professors, Dieneke Van de Sompel and Liselot Hudders. The results of this analysis are discussed in this note.

1. Research Methodology

The 2017 monitoring research attempted to determine whether the company-owned websites, social media channels and mobile applications of the signatories of the EU Pledge were compliant with the EU Pledge Commitment. As youngsters grow up in the digital era, social media like Facebook, YouTube and Instagram play a significant role in their lives. Therefore, these social network sites were also included in the monitoring project this year.

In total, a sample of 224 company-owned websites and 107 social media channels were analysed by Self-Regulatory Organizations (SROs) in 6 different countries (France, Bulgaria, Germania, Hungary, Spain and The Netherlands). A team of independent coders at Ghent University double checked the coding done by the SROs by recoding a random sample of 25% of websites and social media profiles. The team reviewed a total of 56 websites and 28 social media profiles. Extra attention has been paid to websites and social media profiles that were indicated as not compliant with the EU Pledge criteria.

2. Main conclusions analysis SROs

In what follows, we summarize the main conclusions of the analysis of the SROs concerning the company-owned websites:

- Of the 224 national brand websites reviewed, 2 websites (1% in 2017, compared to 5% in 2016 and 3% in 2015) were considered to be in breach of the EU Pledge.

- There is a decrease in websites that are using an age-screening mechanism. Only 9% use one of these in 2017 as compared to 13% in 2016 and 2015.

- The number of websites that feature licensed characters went down in 2017 (16%), compared to previous years (19% in 2016 and 18% in 2015). Only 5% of the websites featuring licensed characters were found to be primarily appealing to children under 12 (as compared to 11% in 2016, 5% in 2015). In 2017, 3% of the websites used licensed characters/tie-ins/celebrities to explicitly promote a food/beverage product to children under 12.

- 31% of the websites contained games or entertainment activities (as compared to 30% in 2016 and 28% in 2015). Most of these games were targeting older children or adults due to higher complexity and a less appealing design. Only 2% of these games or entertainment activities (compared to 9% in 2016 and 10% in 2015) were primarily designed to target children under 12.

- There is also a decrease in the number of websites displaying animations (48% in 2017, 52% in 2016, 58% in 2015). Likewise, the use of animations designed to primarily appeal to children under 12 is less common than in previous years (4% in 2017, compared to 8% in 2016). Of the websites using animations to target children, 4% explicitly promoted a food/beverage product to children under 12 (for instance, food products that were promoted in videos directed to children).

- 3% of the websites included a direct link to their social media sites and/or mobile applications which were primarily appealing to children under 12, providing children with an easy access to social media and mobile applications.

The results of the assessment of company-owned social media profiles are similar to the results of the company-owned websites. Some interesting trends are summarized below:

- Of the 107 social media profiles reviewed, the SROs flagged 2 of them as being primarily appealing to children under 12.

- 1 social media page used a language that was clearly directed at children under 12. Only 4 social media (4%) pages encouraged the active participation of children. Nevertheless, interactions with children younger than 12 were found on 10 social media pages (9%).

- Brands often use licensed characters to help promote their products. Those were found on 26 social media pages (24%), 9 (8%) of them targeted primarily at an under-12 audience. 7 (6%) of them were used to promote food and beverage products.

- When looking at the use of games on brand-owned social media pages, 27 (25%) profiles featured an entertainment activity. Only 6% of these games were elementary enough to be played by children younger than 12 years old.

- 49% of the social media profiles reviewed featured pictures and videos. 14 (27%) of the 52 pictures and videos were found to be interactive and easy for children younger than 12 to understand. However, only 2 (4%) videos/pictures videos contained appealing music, 8 (15%) featured characters from movies that youngsters typically like and 23 (23%) were considered primarily appealing to children under 12 because of the colours and cartoon-like nature.

- 20 (19%) pages included competition and promotional events. Only 1 Facebook page included a competition promoted directly to an under-12 audience. 2 promotional events appeared to be appealing for children under 12.

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

3.1 Research Methodology and Sample

Independent reviewers of Ghent University recoded a random sample of company-owned websites and social media profiles (25% has been double-coded). 56 websites and 28 social media sites were recoded according to the coding scheme developed by the EASA. 9 websites and 18 social media sites were deliberately included in the sample because of the potential breaches reported by the SROs. One reviewer at Ghent University coded the websites, the other one coded the social media profiles. After recoding, the inter-coder reliability was analysed in SPSS Statistics by calculating *Cohen's Kappa* (the closer the Cohen's Kappa is to one, the more agreement in coding between the independent coder and the SROs' coding; the closer the Cohen's Kappa is to zero, the more disagreement there is between the coders)[9]. The results were further discussed in the team and are reported in this note.

The results of the Cohen's Kappa analysis show a general reliability of .73 for the websites and .43 for the social media sites. This indicates a good agreement for the websites and a moderate agreement for the social media profiles. The reasons for the differences in evaluation could be the different timing of the review periods (a delay of one month and a half). Given the nature of online media and especially social media channels, changes in the profiles are likely, which in turn, changed thus the material that has been reviewed. Furthermore, SROs reviewed national websites and social media profiles locally giving them access to local content which was not necessarily available to the reviewers in Belgium. The local SR experts could also complete the review in the local language of the website or social media page, which was not necessarily possible for the control researchers. Finally, differences could also arise by having a different interpretation of the questions as well as a different understanding of the analysed elements. An improvement of the questionnaire and clearer definitions could lead to more agreements on the evaluation.

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[9] Cohen's Kappa is a measure used to assess inter-rater reliability in nominal data and compares to what extent the observations of two coders can be perceived as being alike. By doing so, measurement errors can be reduced. More agreement between the values of two coders (which is related to values closer to 1) indicates that there is more consensus about the question between the coders. Cohen, J. (1960). *A coefficient of agreement for nominal scales*. *Educational and psychological measurement*, 20(1), 37-46.

3.2 Inter-coder reliability analysis of company-owned websites

Our analysis confirmed the findings of the SROs for the websites that were flagged as being in breach. We double-checked the coding for these websites and would like to highlight that we found that several websites have elements that we consider not fully compliant with the EU Pledge. For several sites, the look and feel of the website seemed to be designed to target children, some websites included cartoon-like animations and pictures or contained videos and entertainment activities primarily targeting young children. Some websites contained information that tried to persuade children to buy products by offering them gifts. Based on our independent analysis on a random sub-sample of 56 websites, we also concluded that at least 7 websites additionally contained elements that appealed to young children. These websites were not considered by SROs as being in breach as a whole, but were flagged by the independent-coding team to be in breach with at least 1 element of the EU Pledge, for example because they included contests that stimulated product trial in which licensed characters or gadgets were offered as reward, or because they contained visuals (e.g. bright colours, less text, attractive animations) and animations appealing to children below 12.

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

The SROs flagged 2 company-owned social media profiles as being in breach. We do agree with the fact that 1 profile mainly targeted young children by using videos that are clearly directed to children. However, our assessment of the other 1 differed because we considered the overall profile as not primarily aimed at children under 12. In addition, 16 other social media profiles were signaled by the SROs to feature elements in breach of the EU Pledge. We double-checked the coding for these profiles and found that indeed, several profiles contained videos appealing to young children, visual layouts that were appealing (e.g., showing colorful, happy and child-targeted pictures), pictures of branded characters making the profile very appealing to young children, licensed characters or advertising for products-tie-ins that were appealing to children etc. Additionally, our analysis found 5 additional brand-owned social media pages that featured elements we considered to be attractive to children younger than 12. Some other profiles were indicated by the SROs as potentially being in breach. These profiles mainly used licensed characters and promoted games that were targeting young children and movies encouraging children younger than 12 to buy the product.

4. General Conclusions

To conclude, we aim to formulate some final notes:

- Most of the websites featuring an *age-screening mechanism* ask the visitor to enter his/her age or date of birth. Children can easily enter a false age or birth date in the blank field provided. Other websites use a pop-up asking whether the visitor is older than a certain age, which children can also easily bypass. Company-owned websites should consider more creative ways to prevent children younger than 12 from entering. Some companies request parental permission by asking parents some elaborate questions, taking the age screening more seriously than others.

- Another note that we would like to make is about the use of licensed characters and *brand equity characters*. We have ethical issues with EU Pledge's decision to exclude brand equity characters from the analyses and suggest altering the EU Pledge to include these characters. Brand equity characters are also marketing tools and even more powerful ones for children under 12, which is why we can't come to terms with the reasons provided to exclude them from the commitment.

- Despite the fact it may occur that animations, videos, etc. do not specifically appeal to young children, the general look and feel of websites using such techniques (colours, etc.) often gives the impression that the website or profile is targeting young children. For many websites and social media profiles, the presence of brand characters makes the website appealing to children under 12. However, since brand characters fall outside the scope of the EU Pledge, it can happen that no breach is officially coded. We believe that these sites are targeting young children because of this aspect and should therefore be considered to be included in the scope of the EU Pledge.

- Furthermore, it is difficult for adults to determine whether games, animations, etc., are primarily designed to target children. We therefore believe it is necessary to *include children as coders* in order to objectively decide if the website is primarily designed for children younger than 12 years old.

- We also would like to add that children are also being targeted by advertising channels and advertising techniques that are currently not included in this exercise, such as influencer marketing, sponsoring of vloggers, pre-roll ads etc. It seems essential to also include these in the scope of future EU Pledge monitoring exercise.

Executive Summary

Brand-Owned Websites:

- A total of 224 national brand websites were reviewed;

- Out of the 224 websites, 2 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 224 reviewed websites, 11 contained items that were in breach of advertising codes or relevant advertising laws. In total, 17 problematic items were flagged.

Brand-Owned Social Media Profiles:

- A total of 107 social media profiles were reviewed;

- Out of 107 reviewed social media profiles, 2 were considered in breach as they were deemed appealing primarily to children under 12 as they contained elements, such as videos/photos, entertainment activities/games, contests/competitions/promotional events, licensed characters as well as language addressed to children under 12 and encouraging their active participation;

- Out of the 107 reviewed social media profiles, 10 contained items that were in breach of advertising codes or relevant advertising laws. In total, 17 problematic items were flagged.

1. Brand-Owned Websites

1.1 Sample of Brand-Owned Websites

A total of 224 websites were reviewed by the experts. The table below provides an overview of the number of websites that were reviewed per country.

Table 4: Number of websites reviewed per country (N=224)

Country	Number of Websites Reviewed
Bulgaria	19
France	40
Germany	45
Hungary	40
Spain	40
The Netherlands	40
TOTAL	224

1.2 Product Promotion

The reviewers identified product promotion on all 224 websites reviewed. All reviewed websites featured at least 1 product that did not meet the common nutritional criteria.

1.3 Age screening/Parental Consent

20 out of 224 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=224)
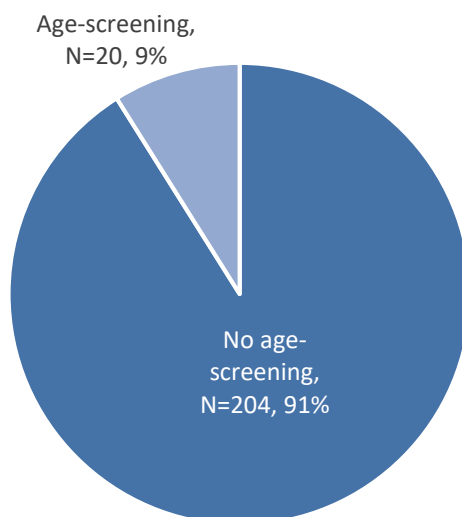
Below is an overview of the age screening's methods.

*Figure 2: Types of age screening (N= 20)*
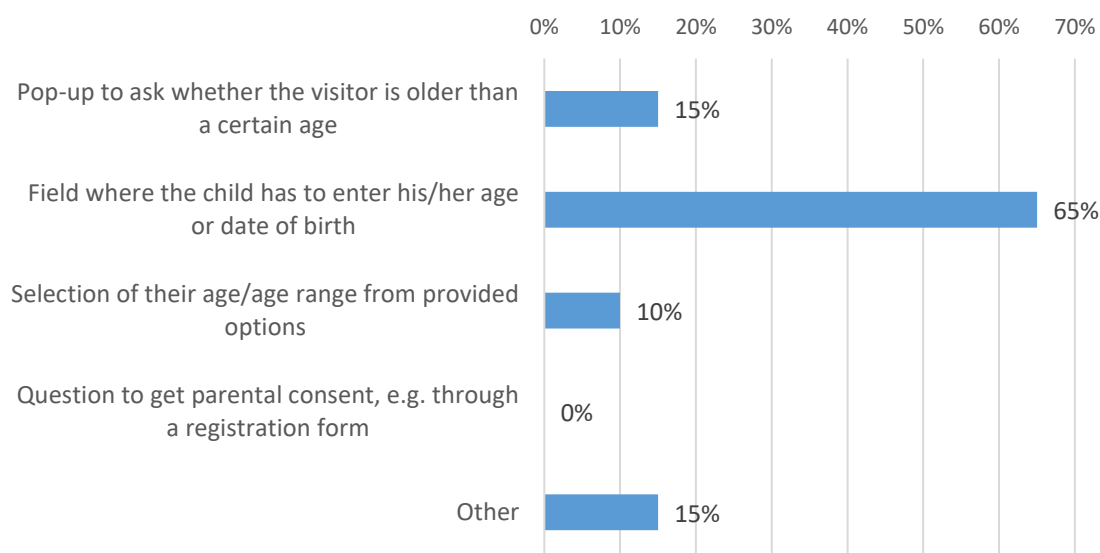
1.4   Licensed Characters/Tie-ins/Celebrities

The reviewers checked if the websites or the children's section(s) of the website featured licensed characters or movie tie-ins as means to promote food or beverage products. 35 out of 224 websites featured licensed characters/tie-ins. In 11 instances, the reviewers considered these characters/tie-ins as designed to target primarily under-12. In addition, 7 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=224)
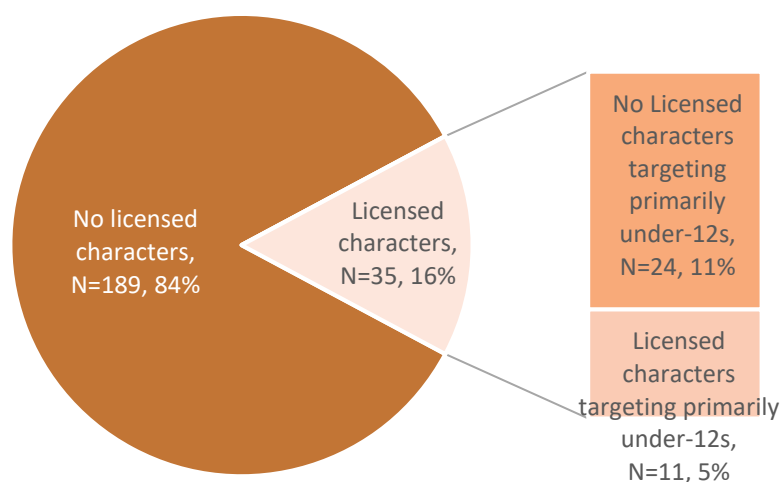
Reasons as to why the reviewers considered the licensed characters/tie-ins to be appealing primarily to under-12s are featured in the following chart (Figure 4). The combination of several of these criteria is a strong indicator that the licensed character is primarily appealing to young children.
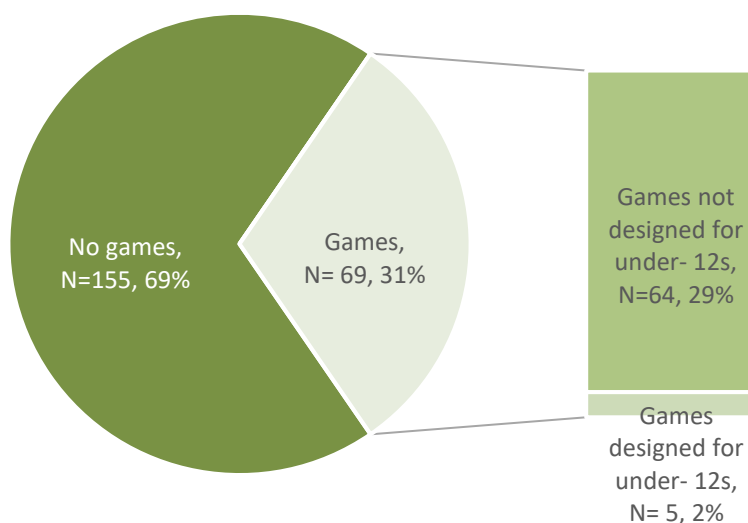
Figure 4: Main indicators for licensed characters/tie-ins considered primarily appealing to under-12s (N=11)
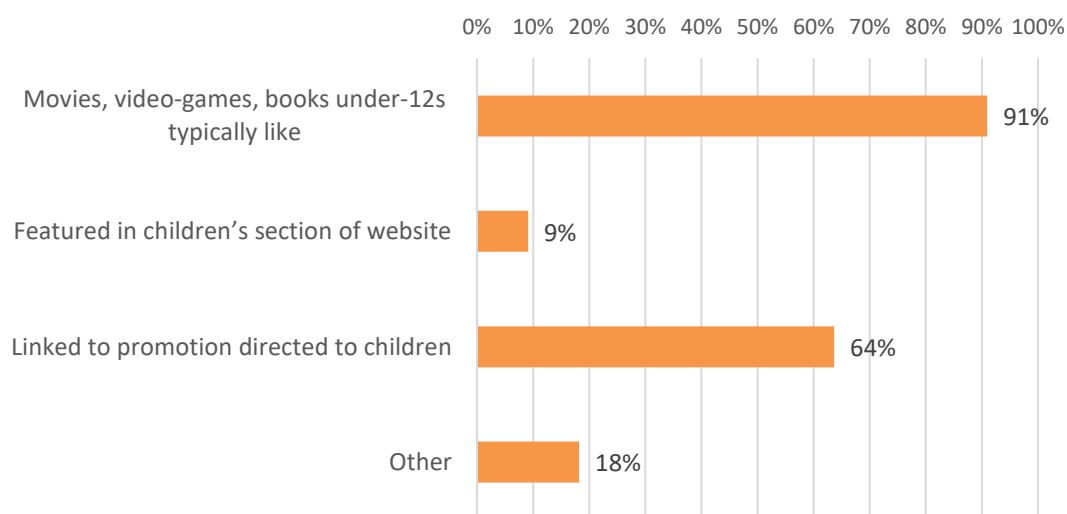
1.5   Games/Entertainment Activities

The reviewers identified entertainment activities/games on 69 reviewed websites. In 5 instances, the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s. In addition, 4 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=224)

Reasons as to why the reviewers considered the entertainment activities/games to be appealing primarily to under-12s are featured in the following chart (Figure 6). 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=5)
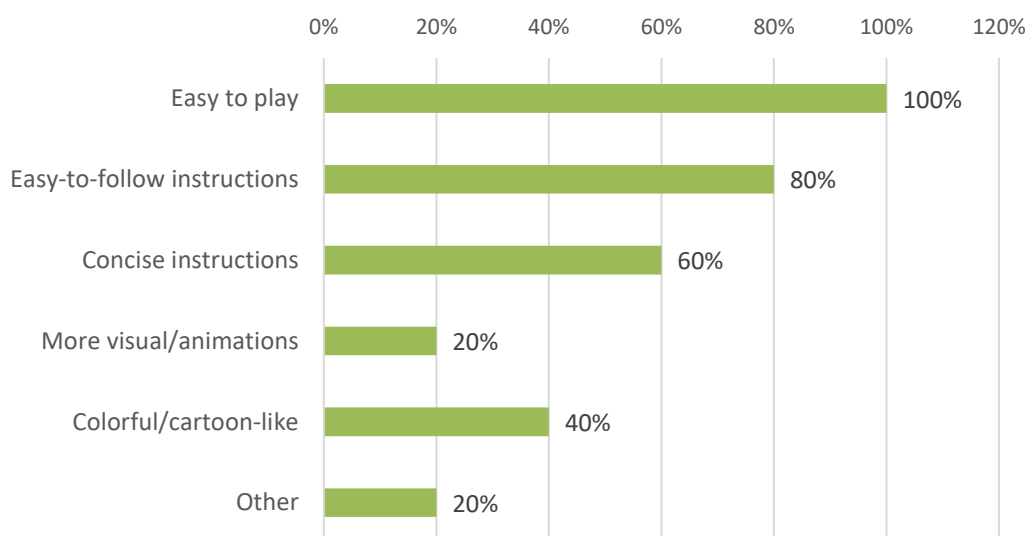
## 1.6   Animation/Sound Effects/Videos

107 of the 224 reviewed websites featured animations such as cartoons, animations depicting fantasy situations, sound effects or videos. According to the reviewers, 9 of these websites featured animations, sound effects or videos which were designed to appeal primarily to under-12s. In addition, 8 of these websites used these animations, sounds effects or videos to promote food or beverage products to children.

Figure 7: Number of websites featuring animation, sound effects or videos (N=224)
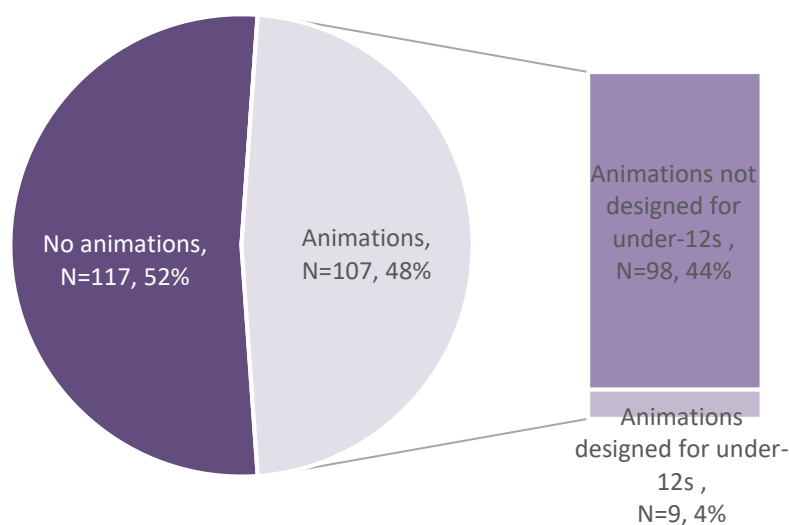
Reasons as to why the reviewers considered the animations, sound effects or videos to be appealing primarily to under-12s are featured in the following chart (Figure 8). The combination of several of these criteria is a strong indicator that the animations are primarily appealing to young children.

Figure 8: Main indicators for animation/sound effects/ videos considered primarily appealing to under-12s (N= 9)
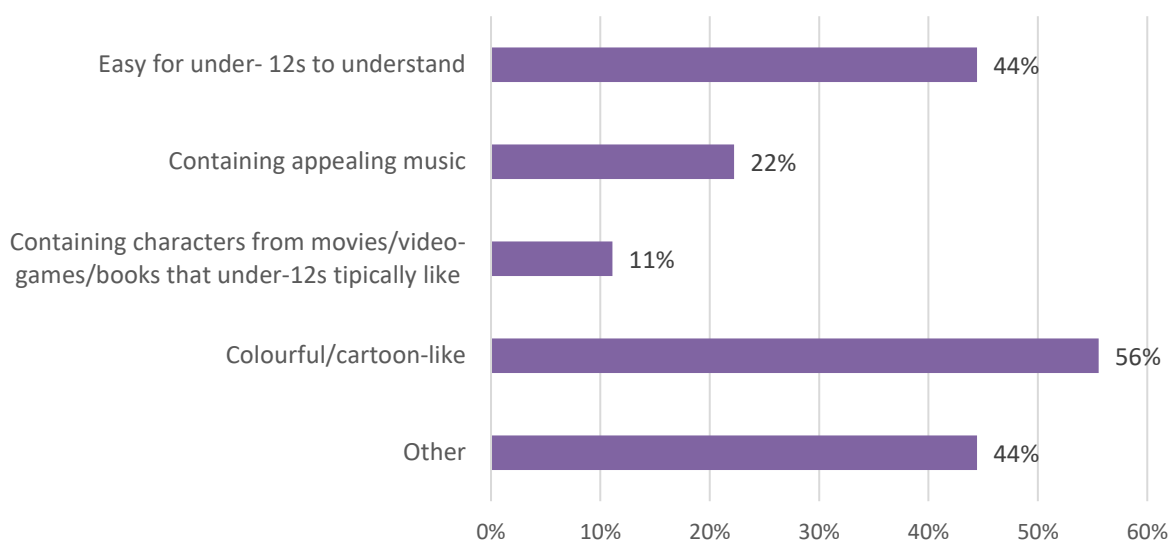
1.7   Contest/Competitions

The reviewers identified 34 websites that featured contests/competitions to promote food or non-alcoholic beverage products. In 2 of the 34 cases the contests/competitions were considered to be designed to appeal primarily to children under 12.

Figure 9: Number of websites featuring contests/competitions (N=224)

No contest, N=184, 84%

Contest, N=34, 16%

Contest not appealing primarily to under-12s, N=32, 15%

Contest appealing primarily to under-12s, N=2, 1%
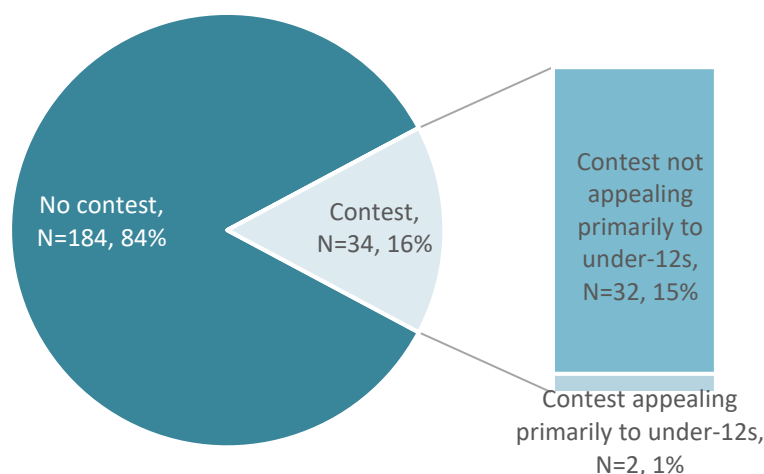
1.8   Toys Used as Premiums/Prizes

The reviewers identified 4 websites that used toys as 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 all 4 cases, the toys were considered to be designed to appeal primarily to under-12, and promoting food or beverage products to children.

Figure 10: Number of websites featuring toys used as premiums (N=224)

No toys, N=220, 98%

Toys, N=4, 2%

Toys appealing primarily to under-12s, N=4, 2%
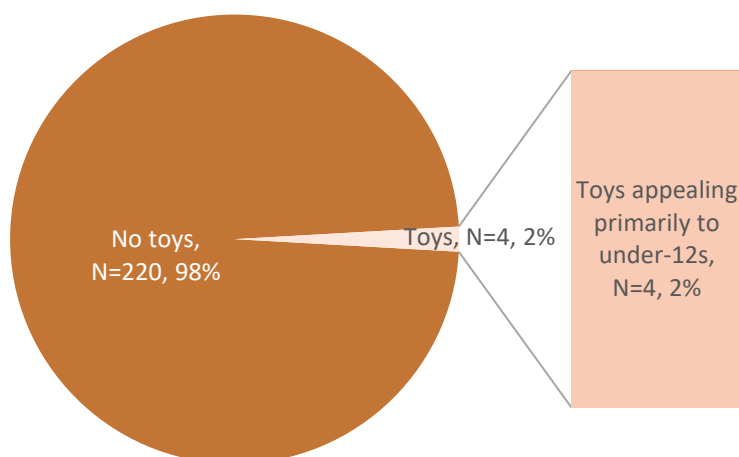
1.9   Compliance with the EU Pledge Criteria

In order to determine whether a website was designed to target primarily under-12s, and subsequently to assess if the marketing communications were intended to appeal primarily to under-12s, all previously identified elements had to be considered. This included the use of animations/sound effects/videos, entertainment activities/games, toys or licensed characters/tie-ins/celebrities as well as the creative execution of the website, i.e. the overall impression of the website design (use of colours, typeface, font size, language, etc.).

Decisive factors in judging the appeal of a website to young children were the usability of the websites (i.e. ease of navigation), simplicity of language, font size, colour schemes and the level of entertainment offered on the websites.

After careful review, the experts concluded that 222 out of 224 reviewed websites were found to be compliant with the EU Pledge commitment.

Figure 11: Compliance with the EU Pledge criteria (N=224)

Non-compliant with EU Pledge criteria, N=2, 1%

Compliant , N=222, 99%
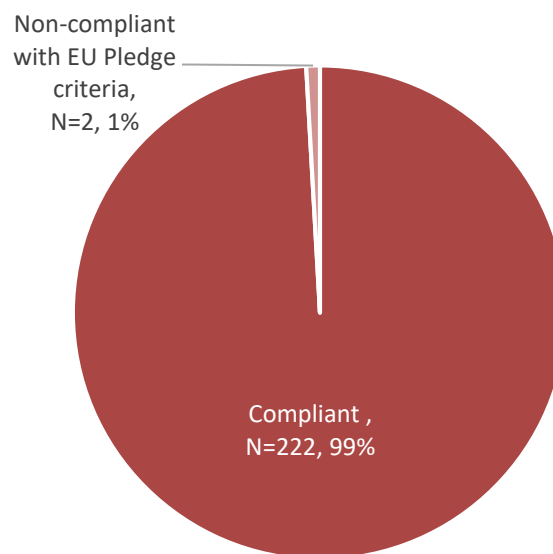
1.10 Compliance with Advertising Codes/Laws

On 11 out of 224 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=224)
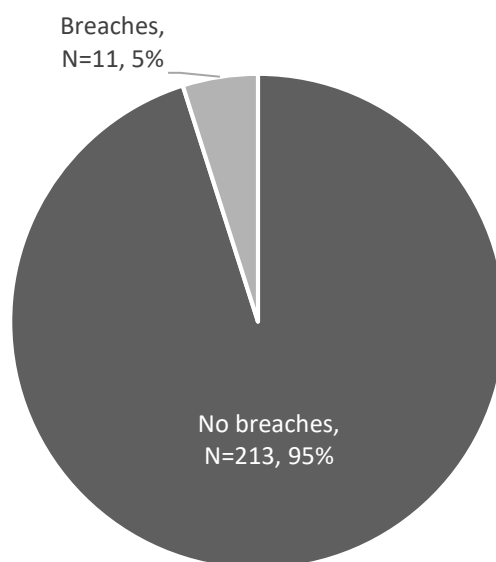
On these 11 websites, a total of 17 problematic items were found.

Figure 13: Potential breaches of advertising codes/laws (N=224)
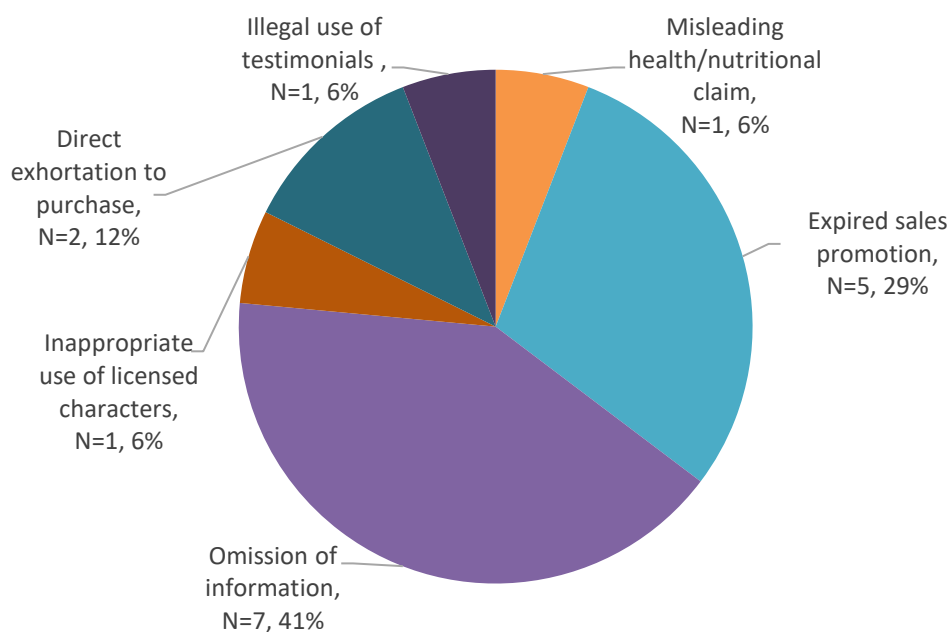
In 5 cases, the reviewers found on the websites sales promotions that had already expired at the time of the review.

Furthermore, the reviewers flagged 7 cases of omission of information, such as lack of size reference of the toys or information on conditions and expiration dates of the advertised promotions.

1 website contained problematic nutritional claims, while 1 other website featured the real or presumed scientific testimony of a healthcare professional/nutritionist endorsing the product.

Finally, 1 website was flagged for using inappropriate licensed characters which enjoy a high degree of popularity among child audiences, and 2 websites included a direct invitation to buy the advertised products.

1.11 Links to social media profiles and/or mobile apps

6 of the 224 reviewed websites include links to social media profiles and/or mobile apps that were considered to be primarily appealing to children under 12.

Figure 14: Potential breaches of advertising codes/laws (N=224)

Links, N=6, 3%

No links, N=218, 97%
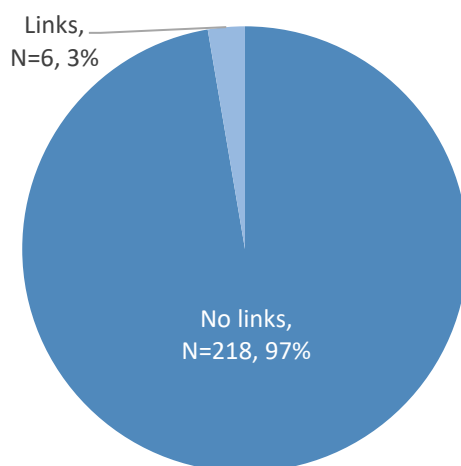
2. Brand-Owned Social Media Profiles

2.1   Sample of Brand-Owned Social Media Profiles

A total of 107 social media profiles were reviewed by experts. 49 out of the 107 reviewed profiles were brand-owned Facebook pages, while 34 were brand-owned YouTube channels and 24 were brand-owned Instagram profiles. The table below provides an overview of the number of social media profiles that were reviewed per country.

Table 5: Number of social media profiles reviewed per country (N=107)

Country	Number of Social Media Profiles Reviewed
Bulgaria	36
France	16
Germany	10
Hungary	15
Spain	15
The Netherlands	15
TOTAL	**107**

2.2   Product Promotion

The reviewers identified product promotion on all the 107 reviewed social media profiles. All the reviewed profiles featured at least 1 product that did not meet the common nutritional criteria.

2.3 Accessibility

102 out of the 107 reviewed social media profiles had their content accessible without registration or logging in.
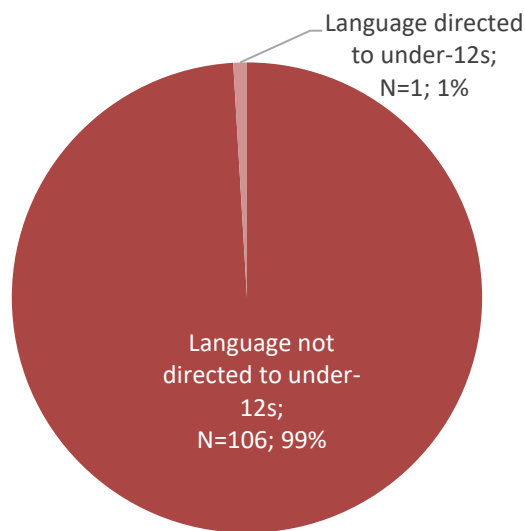
Figure 15: Number of social media profiles accessible without registration/logging in (N=107)
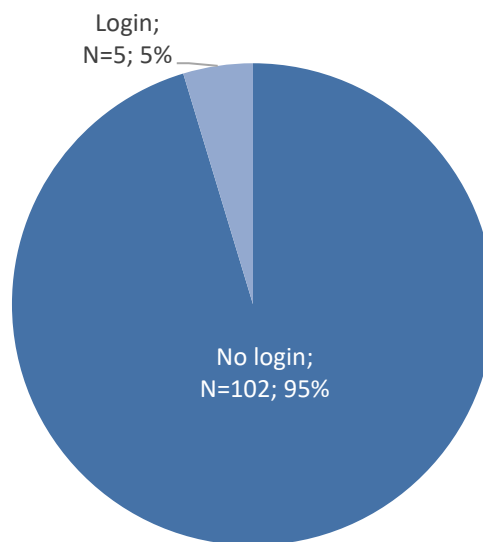
2.4   Language/Interaction

1 of the 107 reviewed social media profiles used language that was deemed as directed at children under 12, as it was considered plain and easy to understand by under-12s.

Figure 16: Number of social media profiles using language directed at children under 12 (N=107)

In 10 other social media profiles, the reviewers identified posts and comments which were likely to have been made by children younger than 12.

Figure 17: Number of social media profiles including any posts/comments/interactions from children under 12 (N=107)
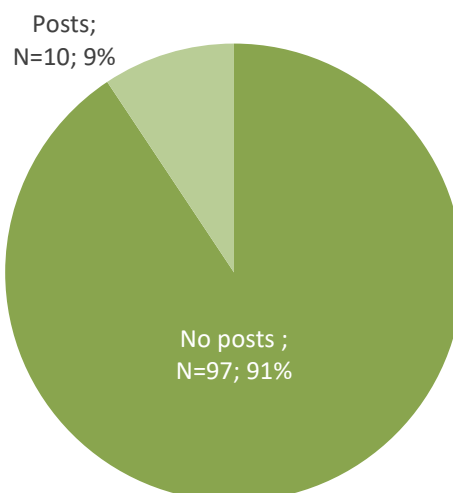
According to the reviewers, 4 out of 107 reviewed social media profiles seemed to encourage the interaction and active participation of children under 12.

Figure 18: Number of social media profiles encouraging interaction and/or active participation of children under 12 (N=107)

Interaction;
N=4; 4%

No interaction;
N=103; 96%
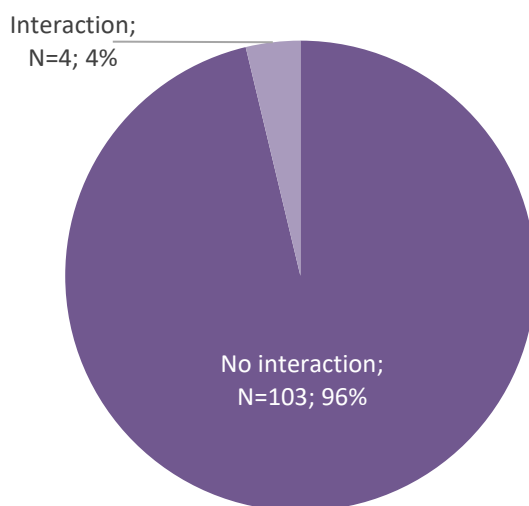
Reasons as to why the reviewers considered that the social media profiles seemed to encourage interaction and active participation of children under 12 are featured in the following chart.

Figure 19: Main indicators for encouraging interaction and/or active participation of children under-12 (N=4)

Downloading of apps	11%
Participation in contests	33%
Playing games	33%
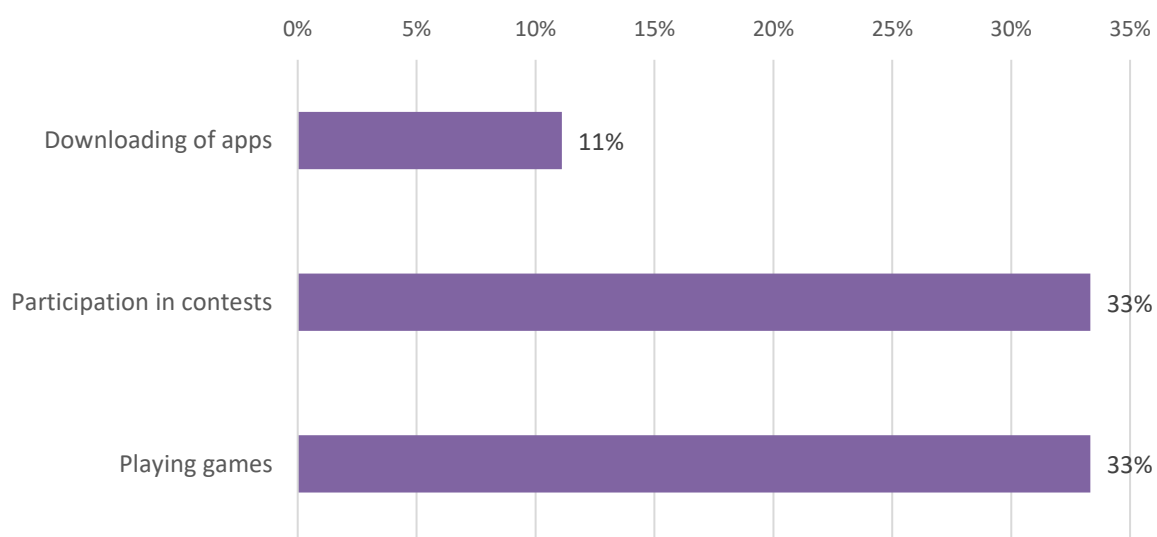
2.5   Licensed Characters/Tie-ins/Celebrities

26 out of the 107 reviewed social media profiles featured "licensed characters". In 9 instances, these characters/tie-ins were considered to be designed to target primarily children under 12. In addition, 7 of these social media profiles used the licensed characters/tie-ins to promote food or beverage products.

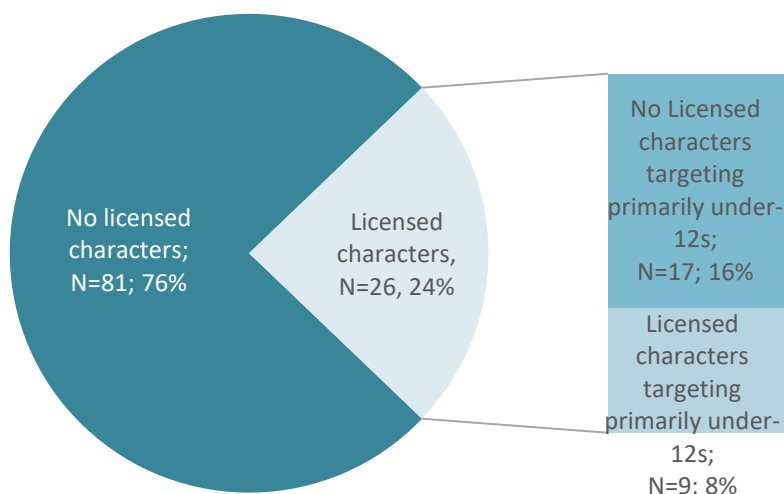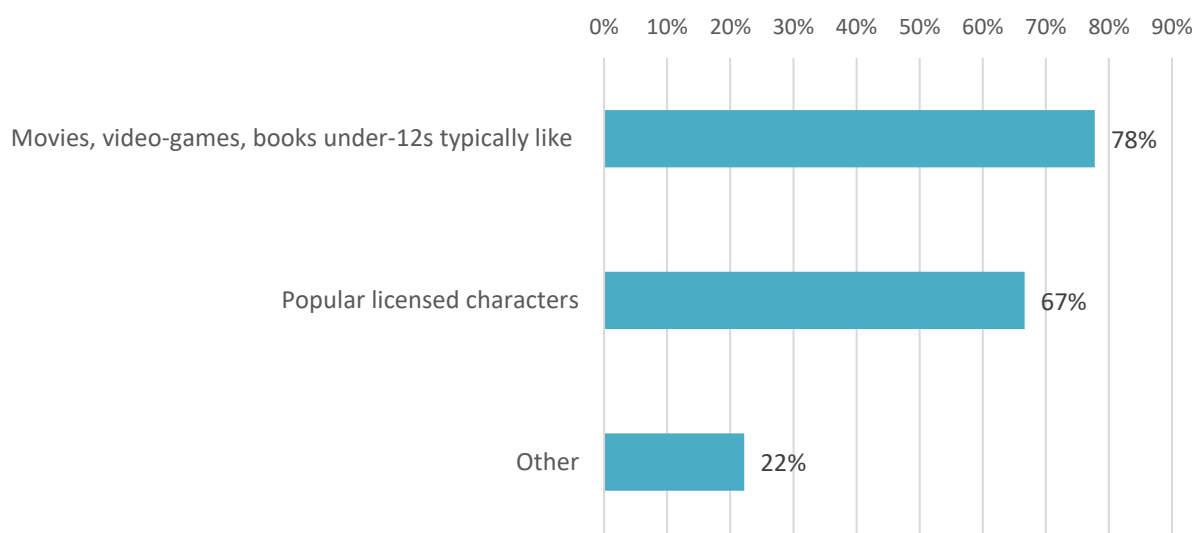*Figure 20: Number of social media profiles featuring licensed characters, tie-ins or celebrities (N=107)*

Figure 21: Types of licensed characters, tie-ins or celebrities featured in the social media profiles (N=26)

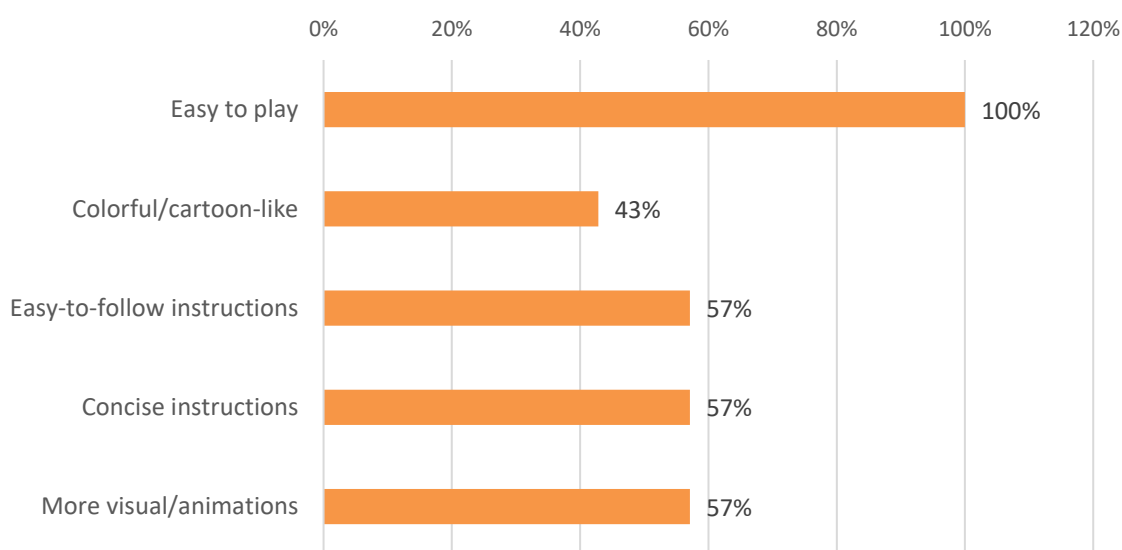## 2.6   Games/Entertainment Activities

The reviewers identified entertainment activities/games on 27 of the 107 reviewed social media profiles. In 7 instances, the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s. In addition, 7 of these profiles used the entertainment activities/games to promote food or beverage products to children.

*Figure 22: Number of social media profiles featuring entertainment activities/games (N=107)*
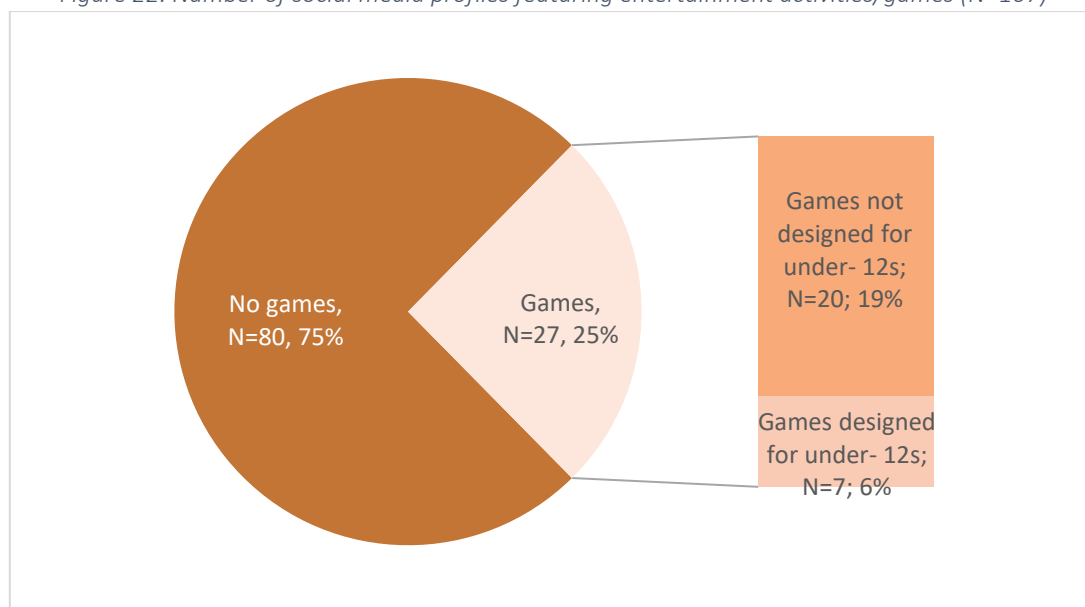
Reasons as to why the reviewers considered that the entertainment activities/games were primarily appealing to children under 12 are featured in the following chart (Figure 23).

Figure 23: Main indicators for entertainment activities/games considered primarily appealing to under-12s (N=7)

Reasons as to why the reviewers considered that the entertainment activities/games were used to promote the advertised product to children under 12 are featured in the following chart (Figure 24).

Figure 24: Main indicators for entertainment activities/games used to promote product to under-12s (N=7)
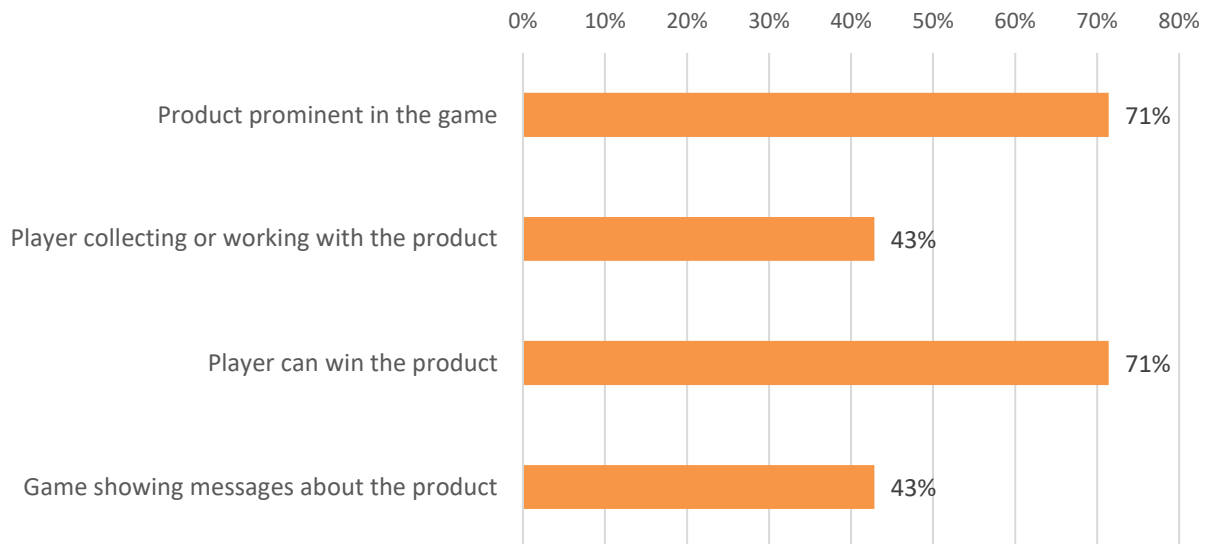
2.7 Videos/Photos

52 of the 107 reviewed social media profiles featured videos and/or photos. According to the reviewers, all these 52 profiles included videos and/or photos that were designed to appeal primarily to under-12s. 14 of these profiles used videos and/or photos to promote food or beverage products to children.

Figure 25: Number of social media profiles featuring videos/photos (N=107)
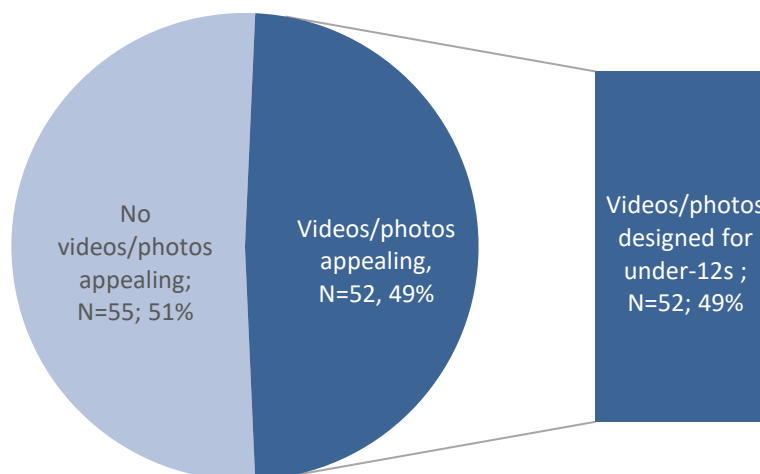
Reasons as to why the reviewers considered the videos and/or photos as primarily appealing to children under 12 are featured in the following chart.

Figure 26: Main indicators for videos/photos considered primarily appealing to under-12s (N=52)
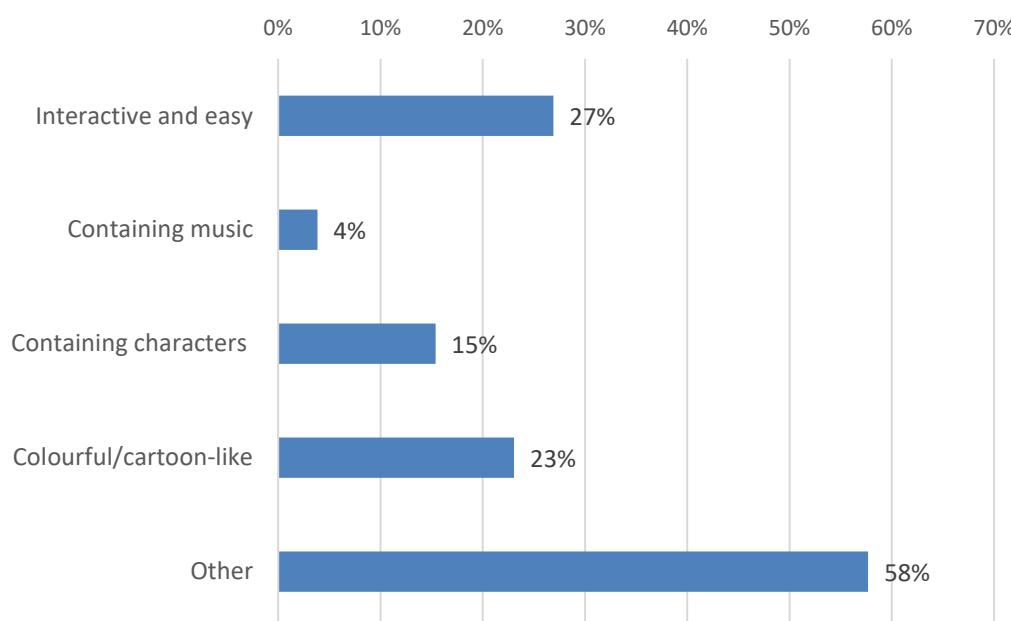
2.8   Contests/Competitions

20 out of the 107 reviewed social media profiles included contests or competitions. In 1 case, the reviewers considered that these contests and competitions were appealing primarily to children under 12.
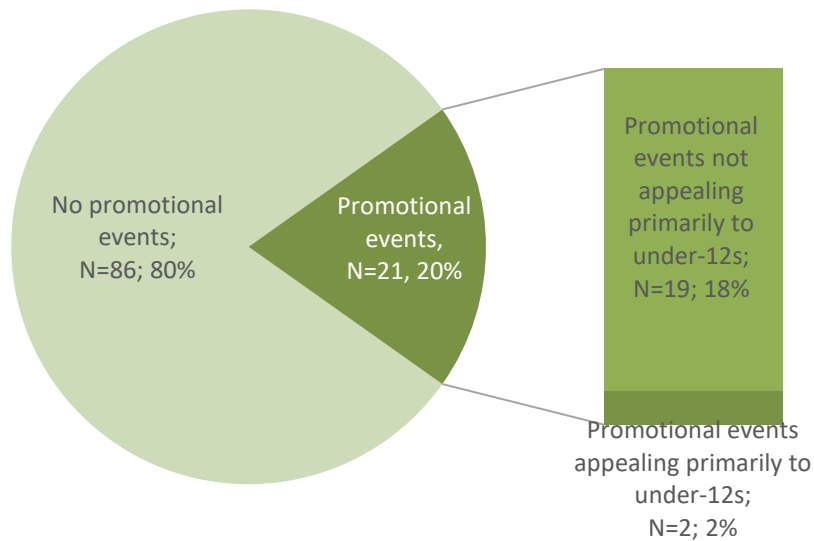
Figure 27: Number of social media profiles featuring contests/competitions (N=107)
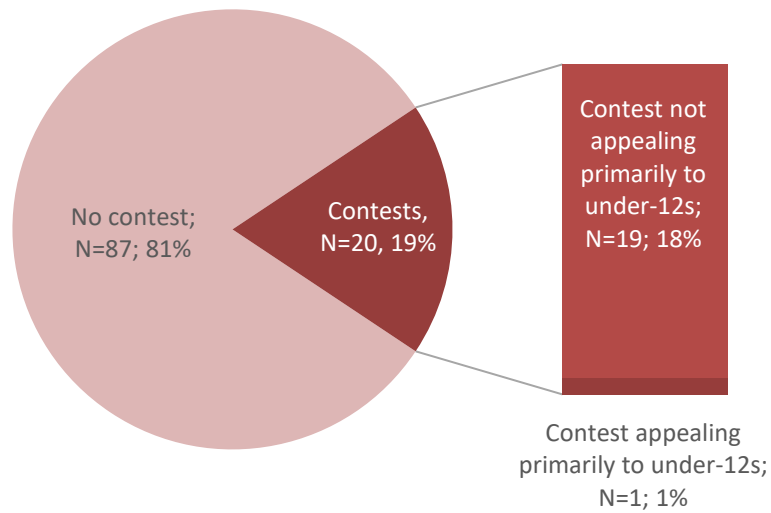
2.9   Promotional events

21 out of the 107 reviewed social media profiles included promotional events. In 2 instances, the reviewers considered that the promotional events were appealing primarily to children under 12.

Figure 28: Number of social media profiles featuring promotional events (N=107)

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

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

After careful assessment, the reviewers decided that 2 out of the 107 reviewed social media profiles were primarily appealing to children under 12.

Figure 29: Number of social media profiles primarily appealing to under-12s (N=107)

Non-compliant with EU Pledge criteria; N=2; 2%

Compliant ; N=105; 98%
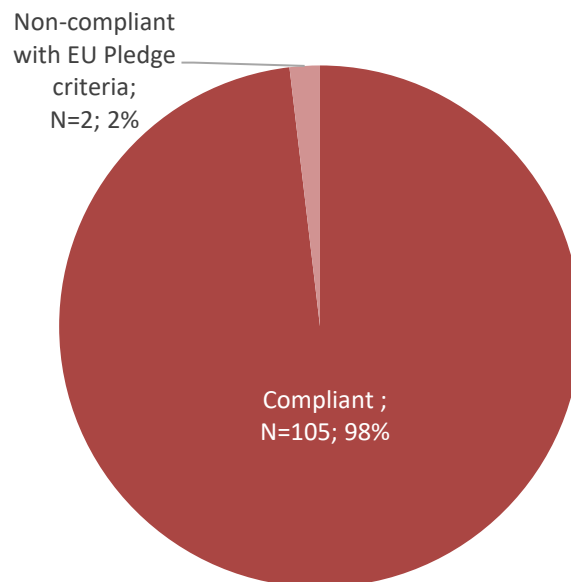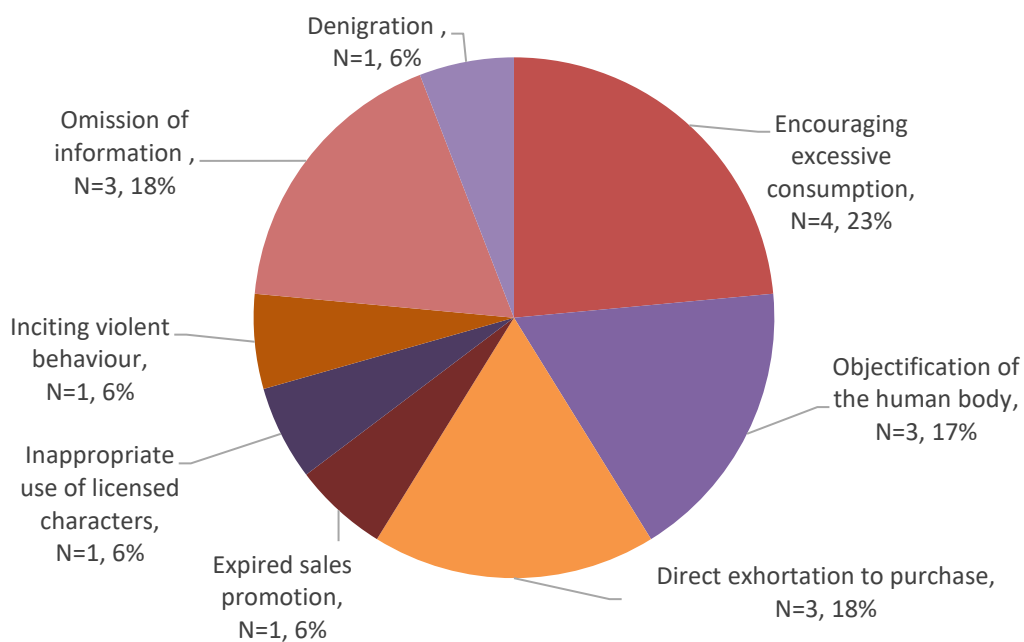
2.11 Compliance with Advertising Codes/Laws

10 out of the 107 reviewed social media profiles featured items that were considered to be potentially in breach of advertising codes or relevant national advertising laws.

Figure 30: Compliance with advertising codes/laws (N=107)

Breaches;
N=10; 9%
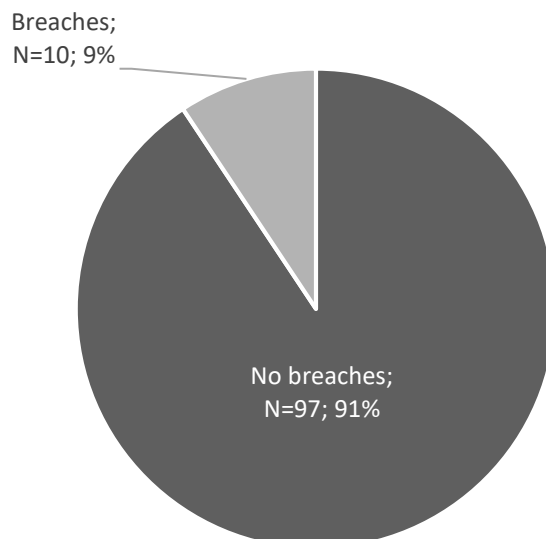
No breaches;
N=97; 91%

On these 10 social media profiles, a total of 17 problematic items were found.

Figure 31: Potential breaches with advertising codes/laws (N=10)

Denigration ,
N=1, 6%

Omission of
information ,
N=3, 18%

Inciting violent
behaviour,
N=1, 6%

Inappropriate
use of licensed
characters,
N=1, 6%

Expired sales
promotion,
N=1, 6%

Encouraging
excessive
consumption,
N=4, 23%

Objectification of
the human body,
N=3, 17%

Direct exhortation to purchase,
N=3, 18%

4 social media profiles promoted and encouraged excessive consumption, whereas 3 social media profiles included direct exhortation to purchase the advertised products.

In 1 case, the reviewers found on the social media profile sales promotions that had already expired at the time of the review.

Furthermore, the reviewers flagged 3 cases of omission of information, such as lack of size reference of the toys and products, or information on conditions and expiration dates of the advertised promotions.
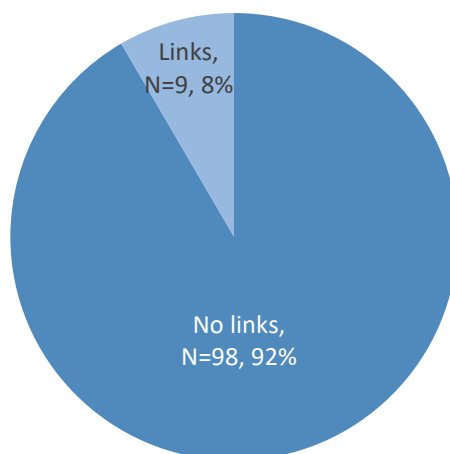
3 social media profiles contained problematic images objectivising the female body, while 1 social media profile featured messages denigrating another product.

Finally, 1 social media profile was flagged for using inappropriate licensed characters which enjoy a high degree of popularity among child audiences, and 1 social media profile included a video encouraging a violent behavior.

2.12 Links to other social media profiles and/or mobile apps

9 of the 107 reviewed social media profiles included links to other social media profiles and/or mobile apps that were considered to be primarily appealing to children under 12.

Figure 32: Links to other social media profiles and/or mobile apps (N=107)

Links, N=9, 8%

No links, N=98, 92%

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