

2019



EU PLEDGE MONITORING TOP LINE REPORT

EASA

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

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

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Contents

Introduction	3
Project Overview	4
Methodology	6
Note on the Methodology	8
Executive Summary	9
1. Brand-Owned Websites	11
1.1 Sample of Brand-Owned Websites	11
1.2 Compliance with the EU Pledge Criteria	12
1.3 Flagged websites.....	14
1.4 Age screening & Parental Consent	15
1.5 Licensed Characters, Tie-ins & Celebrities	16
1.6 Games & Entertainment Activities.....	17
1.7 Animation: Sound Effects & Videos	18
1.8 Toys Used as Premiums & Prizes	20
1.9 Compliance with Advertising Codes & Laws	21
1.10 Links to social media profiles	23
2. Brand-Owned Social Media Profiles.....	24
2.1 Sample of Brand-Owned Social Media Profiles.....	24
2.2 EU Pledge compliance rate for social media profiles.....	25
2.3 Flagged Social Media Profiles	27
2.4 Age Screening & Parental Consent	28
2.5 Licensed Characters, Tie-ins & Celebrities	29
2.6 Games & Entertainment Activities.....	30
2.7 Contests, Competitions & Promotional events.....	32
2.8 Animations: Sound effects & Videos.....	33
2.9 Language & Interaction.....	34
2.10 Compliance with Advertising Codes/Laws	37
2.11 Links to other social media profiles	39
3. Pilot on Influencer Marketing	40
4. Note from the Independent Reviewers	43

Introduction

EASA was commissioned by the EU Pledge Secretariat to review several food and beverage brand websites and social media profiles belonging to the EU Pledge¹ member companies and independently check compliance with the EU Pledge criteria as well as SR codes and national laws.

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

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

- The website or social media profile features marketing communications;
- These marketing communications promote food or beverage products, as opposed to a brand in general;
- Such food and beverage products 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 **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 12-year-olds.

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 2019 methodology was adapted by EASA, the EU Pledge Secretariat and Professor Liselot Hudders², the independent reviewer of this exercise. The role of the independent reviewers is to verify that appropriate criteria have been set up in the

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.

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 Behaviour, 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 Behaviour 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.

methodology, perform quality check on SROs' reviews, testify to the correctness of the monitoring procedure, and sign off on the EASA top line report.

Project Overview

Experts from 8 European self-regulatory organisations (SROs) were invited by EASA and the EU Pledge Secretariat to conduct the monitoring exercise and assess the appeal of marketer-owned websites and social media profiles to children under the age of 12. The eight chosen SROs represent different systems in terms of size (big vs. small SROs), location (geographical coverage) and maturity (new vs. old systems).

List of the participating countries

SRO - Country
CRPR - Czechia
ARPP - France
DWR - Germany
SEE - Greece
IAP - Italy
SRC - Netherlands
AUTOCONTROL - Spain
Ro. - Sweden

Below is a list of the EU Pledge member companies.

List of the EU Pledge member companies

EU Pledge member companies	
Amica Chips	Lorenz Snack-World
Arla Foods	Mars
Bel Group	McDonald's
Burger King	MOM
Coca-Cola	Mondelēz
Danone	Nestlé
Ferrero	PepsiCo
General Mills	Royal Friesland Campina
Intersnack	Unichips-San Carlo
Kellogg's	Unilever
KIMs	Zweifel Pomy-Chips

Self-regulation experts from the 8 SROs reviewed a sample of 254 items, including national brand websites³ and social media profiles of EU Pledge company members. The independent reviewers analysed 154 social media profiles, one profile more than the SR experts. A YouTube account was left out of the monitoring's scope as it contained videos and content dating back to 2013. Ghent University considered it to be within their analysis' remit, since children are still able to visit it and visualise the videos. This explains the slight discrepancy in reviewed profiles' numbers between the SROs and the Independent Reviewers.

Number of websites and social media profiles reviewed per country

Country	Websites	Facebook	Instagram	YouTube	Social Media	Total
CRPR – Czechia	14	5	6	6	17	31
ARPP – France	11	7	8	5	20	31
DWR – Germany	11	7	8	6	21	32
SEE – Greece	12	6	8	6	20	32
IAP – Italy	12	6	8	6	20	32
SRC – Netherlands	12	5	9	6	20	32
AUTOCONTROL – Spain	14	4	6	8	18	32
Ro. – Sweden	15	7	4	6	17	32
Total	101	47	57	49	153	254

Experts were also asked to review, as part of a separate pilot monitoring, 5 influencer profiles per country. These influencers were provided to EASA by the EU Pledge member companies, thus ensuring that the influencers and companies engaged in a commercial relationship.⁴ The table below indicates how many influencers each country monitored with regards to the three different platforms analysed in the exercise. In total, **40 influencer profiles were monitored**. However, in order to maximise the number of posts reviewed, SROs were asked to find profiles that worked with more than one company, and thus monitor several posts from one influencer profile. This increased the number of posts reviewed to 76, of which 8 posts were found to promote products that are compliant with EU Pledge nutrition criteria and were consequently left out of the monitoring exercise. Overall, **a total of 68 influencer profiles' posts were reviewed and analysed**. The analysis of this part can be found on [page 40](#).

Some of the influencers' posts were left out of the monitoring's scope as they were only advertising products that were compliant with the EU Pledge nutrition criteria.

³ Where available, at least 1 website per company.

⁴ Not all EU Pledge member companies provided influencer profiles.

Number of influencer profiles and posts reviewed per country versus the different social media platforms

Country	Facebook	Instagram	YouTube	Total profiles	Total posts	Reviewed posts
CRPR – Czechia	0	4	1	5	12	11
ARPP – France	0	5	0	5	6	5
DWR – Germany	0	4	1	5	9	9
SEE – Greece	0	4	1	5	11	11
IAP – Italy	1	3	1	5	11	10
SRC – Netherlands	0	4	1	5	12	9
AUTOCONTROL – Spain	0	5	0	5	10	10
Ro. – Sweden	0	4	1	5	5	3
Total	1	33	6	40	76	68

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.

For the **influencer pilot monitoring**, the EU Pledge secretariat provided EASA with a list of influencers each member company worked with during 2019. EASA then asked the self-regulatory organisations to select profiles that promoted non-compliant products with the applicable nutritional criteria, and to especially choose the ones that may be most appealing and popular with children under the age of 12.

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 EU reviewer of the 2011-2016 exercises. The methodology was revised in 2019 by EASA, the EU Pledge Secretariat, and the current independent reviewer Professor Liselot Hudders.

The questionnaire for the **websites** asked the self-regulatory experts if the website being reviewed contained elements such as games/entertainment activities⁵, animations/sound effects/videos, licensed characters⁶ and toys, and to decide if these were in their view primarily

⁵ 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.

⁶ Characters acquired externally and linked for example to movies, cartoons or sports.

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.

Several websites contained features to screen the age of the visitor and the reviewers were asked to note if a website contained such features. However, this element was not considered to be sufficient to ensure compliance if the marketing communications on the website were clearly designed to appeal primarily to children under 12.

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

The questionnaire for the **social media profiles** asked the experts if the reviewed profiles allowed children under 12 access without registration⁷ and if they featured licensed characters, games/entertainment activities, animations/sound effects/videos, 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.

The questionnaire for the **influencer profiles** asked the SROs what type of posts the influencer was publishing and how often they were posting about food and beverage products. They were then asked to select at least one post per profile that showcases a product from the EU Pledge companies and to analyse whether the post included techniques that may render it appealing to children under 12. Such factors included language, humour and writing style, the visuals, film tie-ins, and animations displayed on the post, and whether there were any games, promotional actions, or toys attached.

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.

⁷ Regardless of the fact that children under 13 are in theory not allowed to create a profile on Facebook, Instagram, and YouTube, the questionnaire still 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. However, the age-gating factor was purely informative, and it did not carry weight in the final compliance assessment.

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 reviewer Professor Liselot Hudders, EASA has taken great care to ensure that the results of this project are objective and consistent. They have – as explained above – developed a detailed methodology which was applied by all self-regulatory experts when assessing brand websites and social media profiles.

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

Executive Summary

Brand-Owned Websites:

- A total of 101 national brand websites were reviewed;
- **97% of the brand-owned websites were compliant with the EU Pledge commitment** – 3 websites were flagged as being primarily appealing to children under 12 due to a combination of several factors, such as entertainment activities and games, toys and prizes used as premiums, as well as constant display of animations, sound effects, videos and photos, making them particularly appealing to young children;
- 98% of the brand-owned websites were compliant with the relevant local advertising codes and laws – 2 websites were identified as breaching local self-regulatory advertising codes or relevant national advertising legislation;
- 2 more websites were flagged as potentially problematic with regards to the EU Pledge commitment due to several factors but were not tagged as primarily appealing to young children;
- 1 website was highlighted as potentially problematic, come July 2020, due to new Dutch SR rules on the inclusion of licensed characters aimed at children on food products.

Brand-Owned Social Media Profiles:

- A total of 153 social media profiles were reviewed;
- **96.1% of brand-managed social media profiles were compliant with the EU Pledge commitment** – 6 social media profiles were flagged as being primarily appealing to children under the age of 12 due to a combination of several factors, such as entertainment activities and games, contests, competitions, promotional actions, presence of licensed characters, as well as the language style that directly addresses children under 12 directly and encourage them to interact on the social media profile;
- 96.1% of social media profiles were found to be compliant with the relevant local advertising codes and laws – 6 social media profiles were thus flagged as breaching local self-regulatory advertising codes or relevant national advertising legislation;
- 1 social media profile in particular was also highlighted as potentially in breach of the EU Pledge commitment due to the presence of influencers popular with both children and teenagers on the profile.

- 1 other social media profile was also found in breach, but its contents were outdated, and the profile was thus left out of the monitoring. Such social media pages and accounts that contain outdated marketing campaigns and that are primarily appealing to children must be taken down.

Pilot Influencer Marketing:

- A total of 40 influencer profiles were monitored spread on three social media platforms, Facebook, YouTube, and Instagram;
- SROs analysed 76 posts from the 40 profiles selected, 8 of which contained products compliant with the EU Pledge nutrition criteria. These were subsequently left out of the monitoring;
- **All influencer posts were compliant with the EU Pledge commitment;**
- 4 posts were flagged breaching relevant local advertising codes or rules, or the ICC Code.

1. Brand-Owned Websites

1.1 Sample of Brand-Owned Websites

A total of 101 websites were reviewed by the experts. The table below provides an overview of the number of websites that were reviewed per country.

Number of websites reviewed per country

Country	Websites
CRPR - Czechia	14
ARPP - France	11
DWR - Germany	11
SEE - Greece	12
IAP - Italy	12
SRC - Netherlands	12
AUTOCONTROL - Spain	14
Ro. - Sweden	15
Total	101

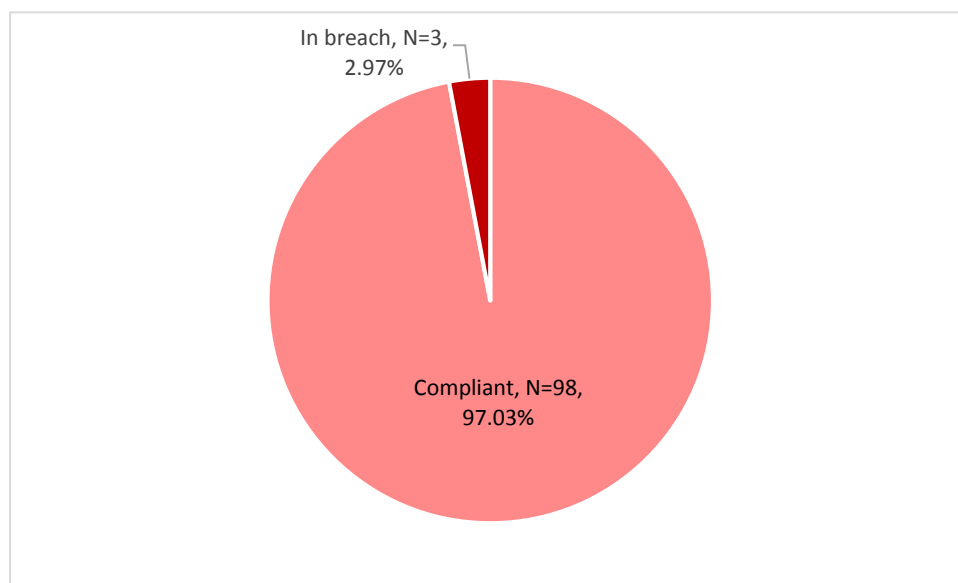
1.2 Compliance with the EU Pledge Criteria

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 the following identified elements had to be considered. These included the use of animations, sound effects and videos, entertainment activities and games, toys, or licensed characters, tie-ins and 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.

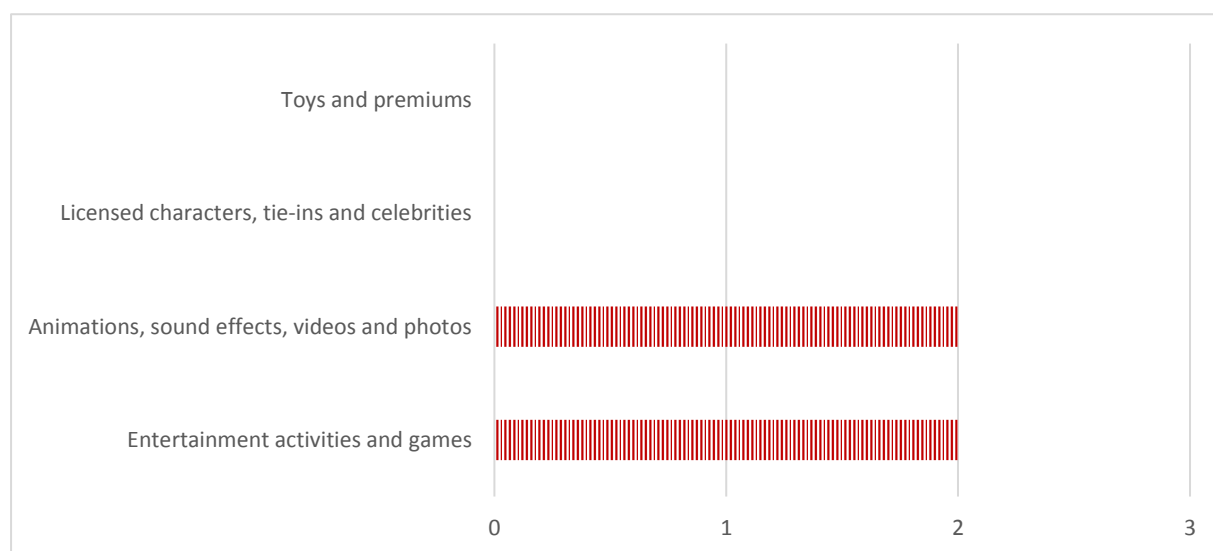
After careful review, **the experts concluded that 98 out of 101 reviewed websites were found to be compliant with the EU Pledge commitment.**

Compliance with the EU Pledge commitment (N=101)



2 of the 3 websites that were flagged in breach of the EU Pledge commitment contained games and entertainment activities that were deemed to be particularly appealing to young children. 2 of the 3 websites also contained animations, sound effects and videos that were also judged appealing to children younger than 12 years old. However, none of the 3 websites displayed an age-gating mechanism, licensed characters or celebrities, or toys as premiums.

Main indicators decisive on the websites' compliance (N=3)

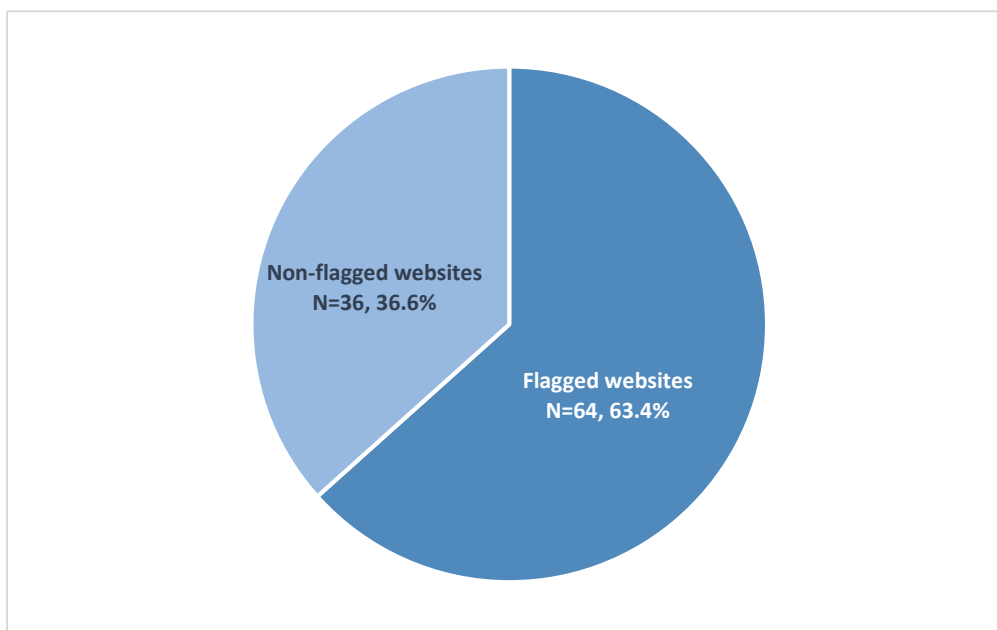


Two SROs have also highlighted **one profile each of the same company for being borderline compliant**. They deemed the websites particularly appealing to children younger than 12 but have decided that they were not breaching the EU Pledge commitment. Reviewers found considerable factors and content that would appeal primarily to children, such as games, games' descriptions, entertainment activities, animations, videos and photos, and licensed characters and tie-ins. In order to avoid such cases and confusion, companies must be careful not to walk a thin line between compliance standards.

1.3 Flagged websites

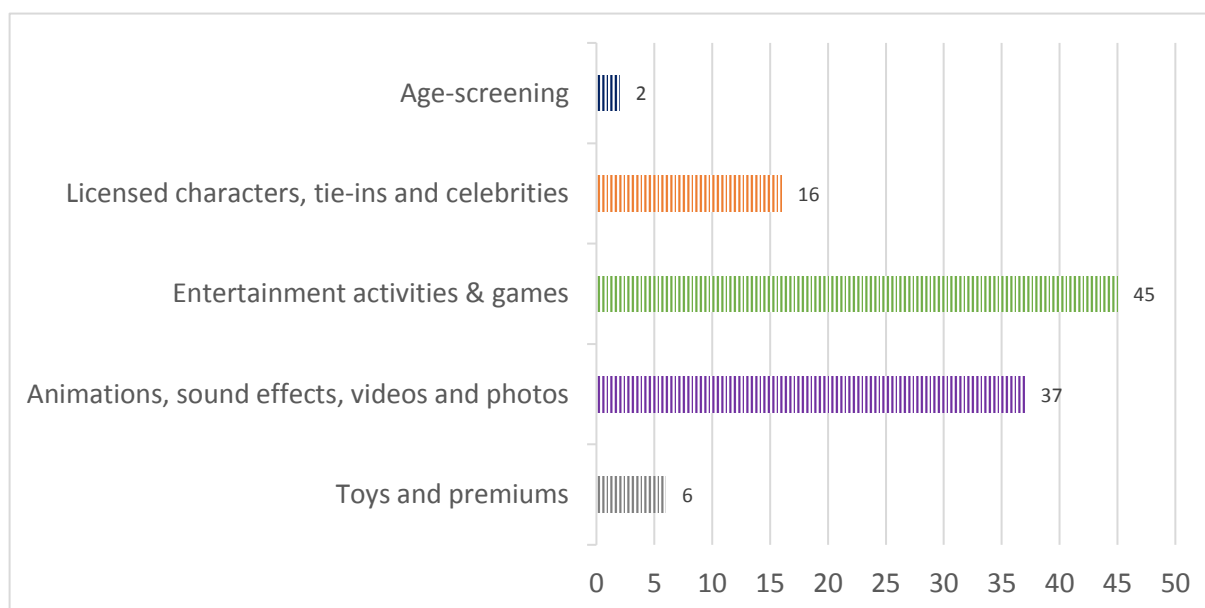
SROs have flagged nearly two thirds (63.4%) of the company-owned websites for at least one of the factors in the checklist. In order to identify and assess whether any of these 64 websites were primarily appealing to young children, the experts had to weigh the factors together and see whether, within the local cultural and linguistic context, it would appeal primarily to children under 12.

Number of websites flagged for at least one of the factors in the checklist (N=101)



Below are the number of websites that were flagged for each of the category.

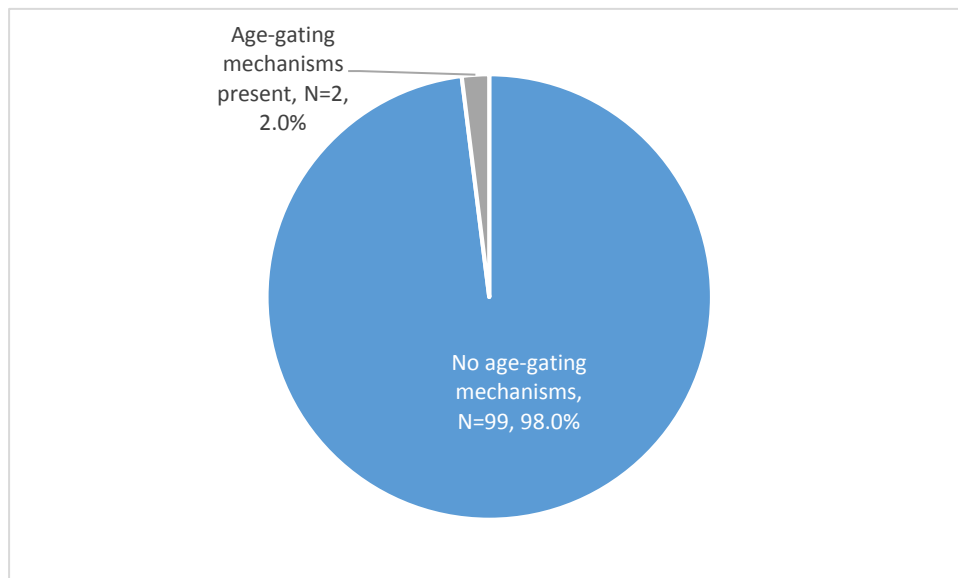
Number of websites flagged for each category (N=101)



1.4 Age screening & Parental Consent

2 of the 101 reviewed websites contained mechanisms to screen the age of the user. 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. This factor was not crucial to the final compliance assessment of the websites.

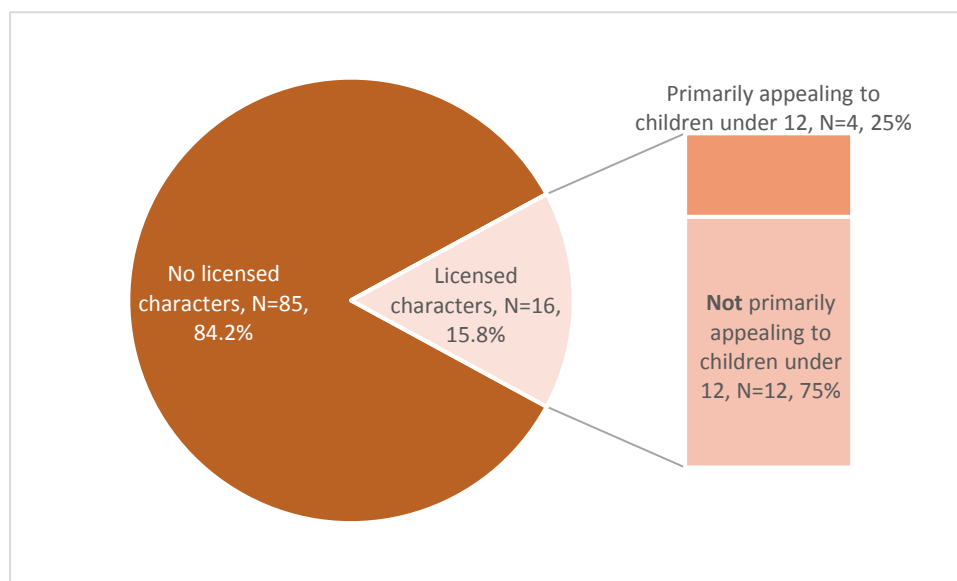
Number of websites featuring age screening (N=101)



1.5 Licensed Characters, Tie-ins & Celebrities

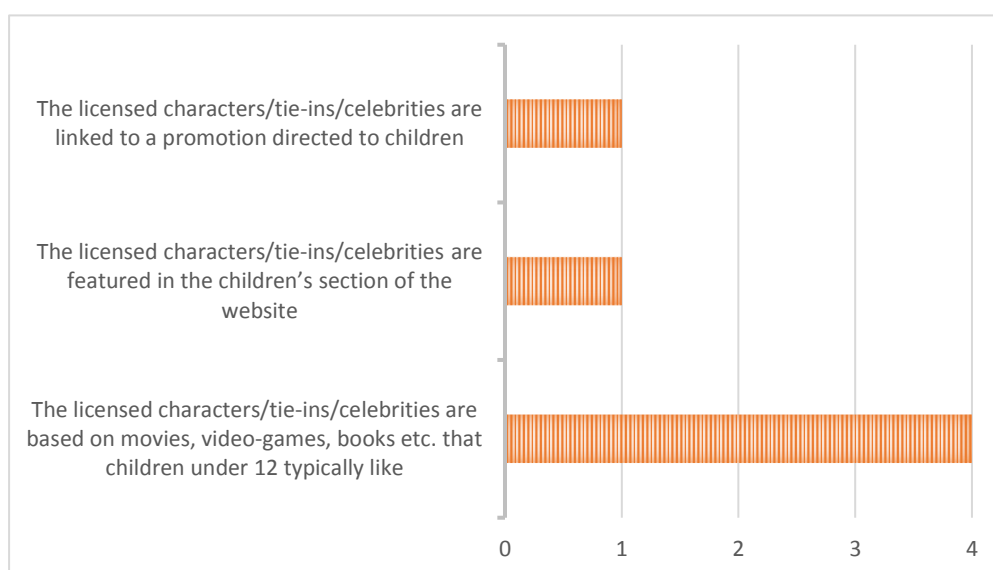
The reviewers checked if the websites, or the children's section(s) of the websites, featured licensed characters or movie tie-ins as a means to promote food or beverage products. 16 out of 101 websites featured licensed characters/tie-ins. In 4 instances, the reviewers considered these characters/tie-ins as designed to target primarily under-12s. In addition, 2 of these websites used the licensed characters/tie-ins to promote food or beverage products.

Number of websites featuring licensed characters/tie-ins (N=101)



The tied-in licensed characters were flagged as directly targeting children under 12 due to several reasons disclosed in the chart below.

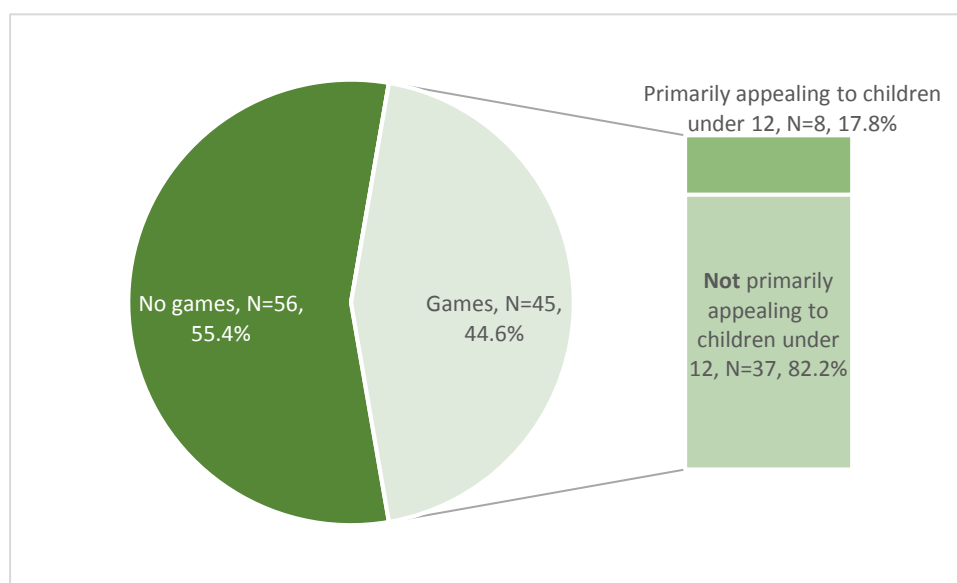
Main indicators for licensed characters/tie-ins considered primarily appealing to under-12s (N=4)



1.6 Games & Entertainment Activities

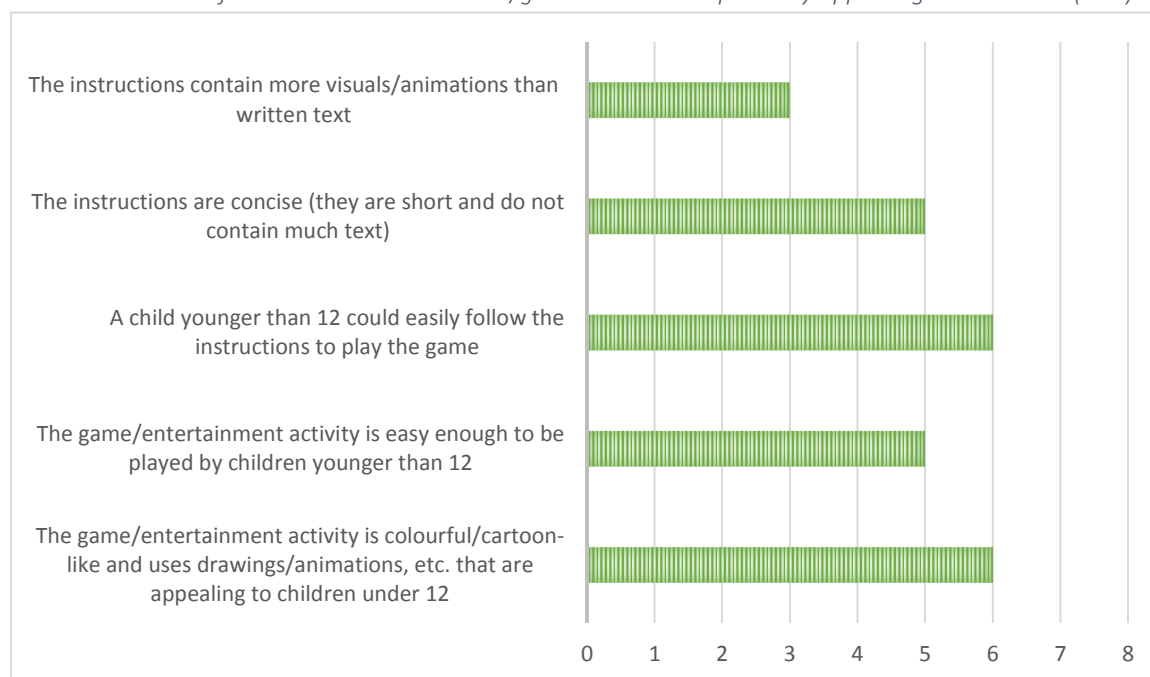
The reviewers identified entertainment activities and games on 45 reviewed websites. In 8 instances, the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s. On 5 of these websites, the games and activities were used to promote the product.

Number of websites featuring entertainment activities/games (N=101)



The 8 profiles contained games that were flagged as directly targeting children under 12 because of the following factors:

Main indicators for entertainment activities/games considered primarily appealing to under-12s (N=8)



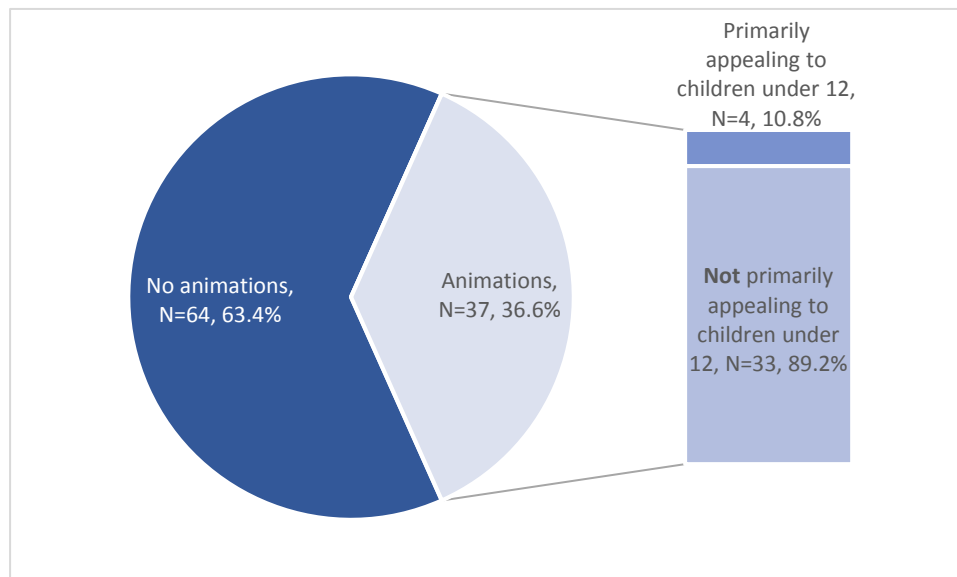
2 websites of the 8 that displayed games and activities deemed to be primarily targeting children were also using the entertainment activities to promote food and beverage products. Websites used techniques such as:

- The advertised product is prominent in the game;
- The player is either collecting or working with the product itself;
- The game is constantly showing messages about the product.

1.7 Animation: Sound Effects & Videos

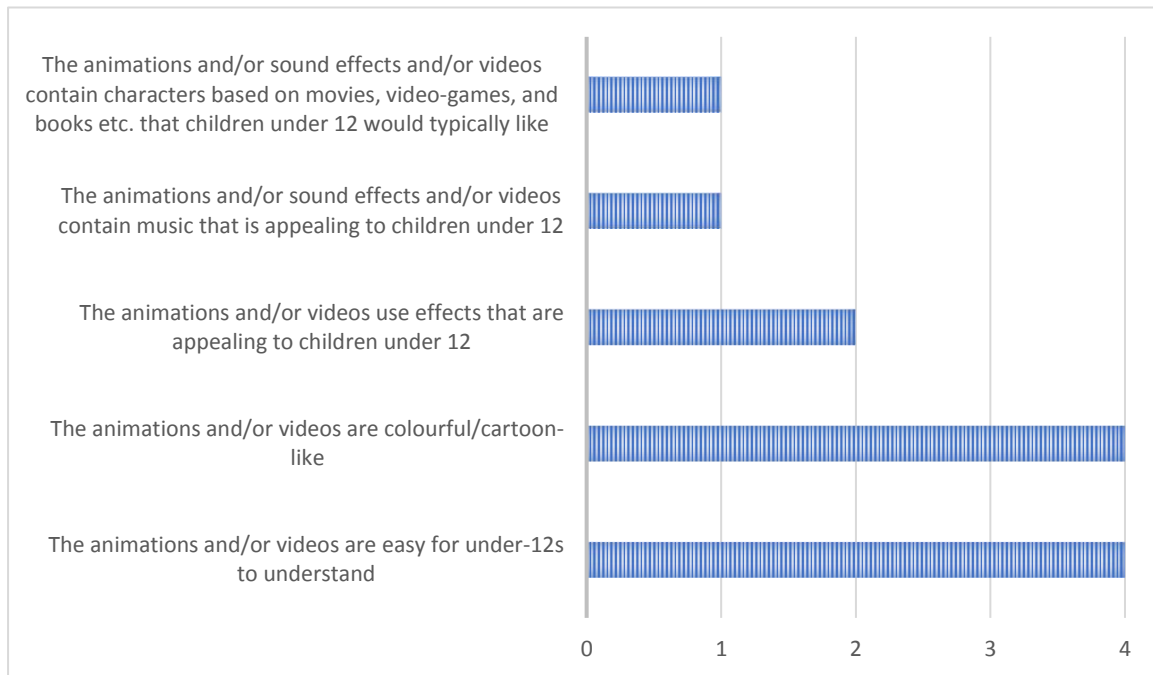
37 of the 101 reviewed websites featured animations such as cartoons, animations depicting fantasy situations, sound effects or videos. According to the reviewers, 4 of these websites featured animations, sound effects or videos which were designed to appeal primarily to under-12s. In addition, 3 of these websites used these animations, sound effects or videos to promote food or beverage products to children.

Number of websites featuring animation, sound effects or videos (N=101)



Reasons as to why the reviewers considered the animations, sound effects and 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.

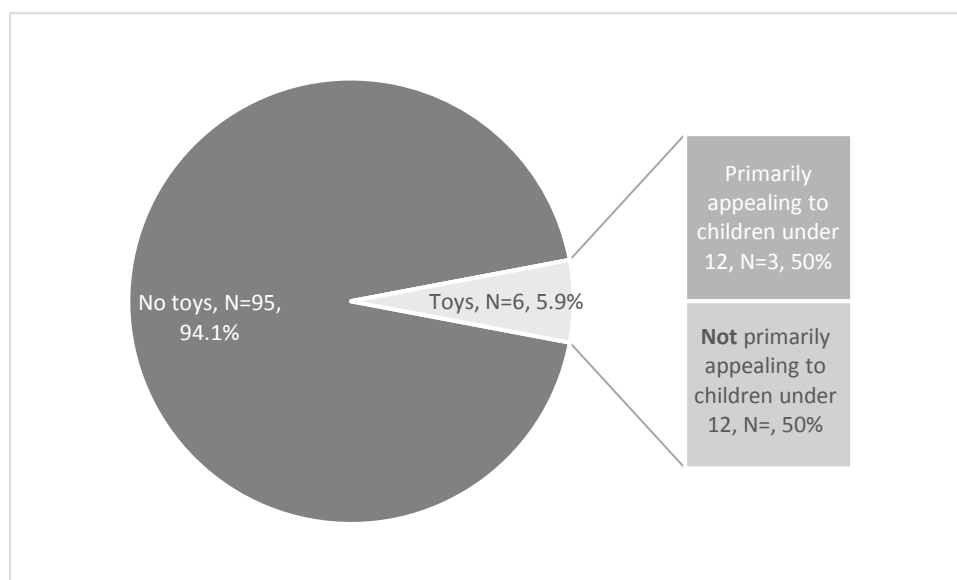
Main indicators for animation/sound effects/videos considered primarily appealing to under-12s (N=4)



1.8 Toys Used as Premiums & Prizes

The reviewers identified 6 websites that used toys as premiums to promote a food or non-alcoholic beverage product. In half of the cases, the toys were considered to be designed to appeal primarily to under-12s.

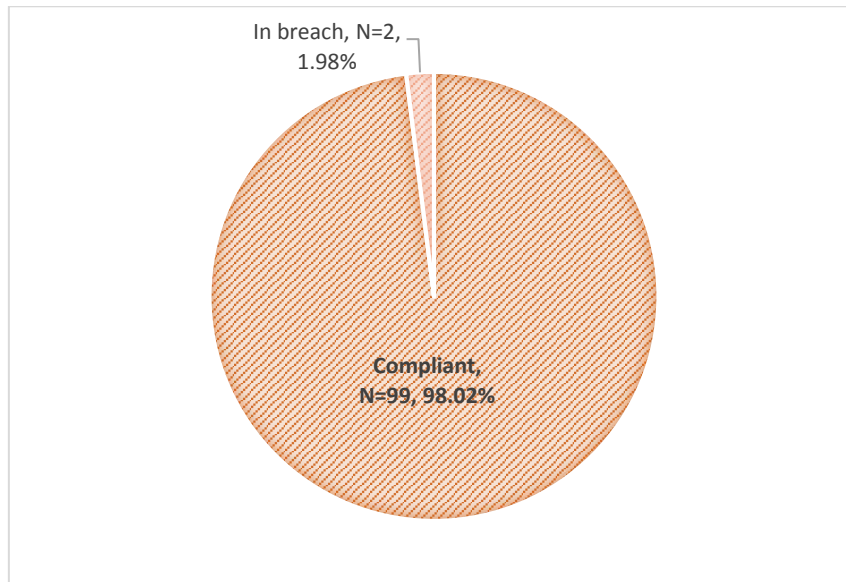
Number of websites featuring toys used as premiums (N=101)



1.9 Compliance with Advertising Codes & Laws

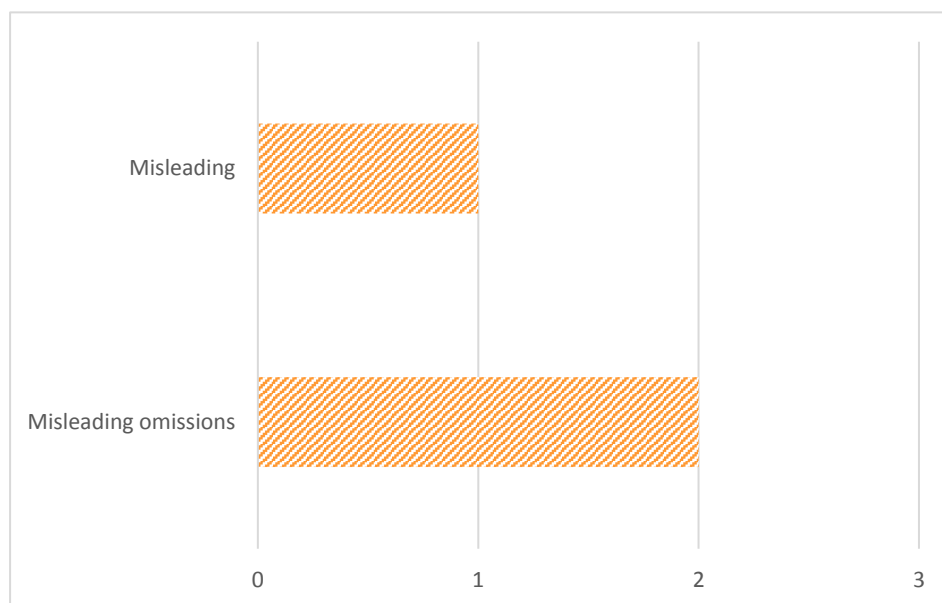
2 of the 101 websites, the reviewers identified items that were considered as potentially in breach of advertising codes and/or relevant advertising laws. These three websites differ from the three that breached the Pledge commitment.

Compliance with the ICC & local SR advertising codes & laws (N=101)



On these 2 websites, a total of 2 breaches were found.

Potential breaches of advertising codes & laws (N=2)



Misleading refers to advertisements that contain promotional calls with slogans too vague or too broad and could mislead the consumer of the actual promotion. Such advertising can be in breach of the ICC Code or the Spanish Code of Advertising Practice.

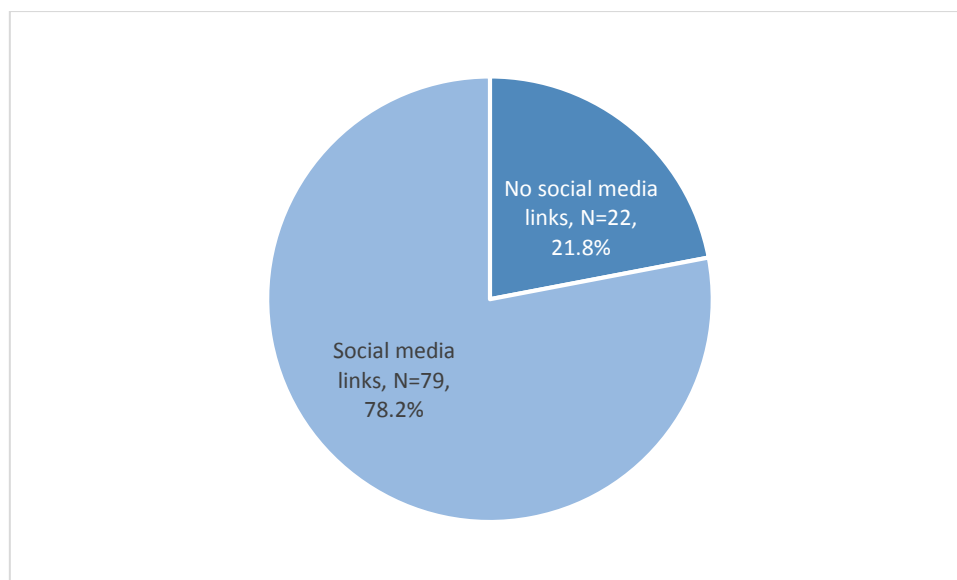
Misleading omission refers to a lack of information that is crucial to the complete understanding of the promotional action or product. Such cases include not inserting the total stock of promotional coupons, lack of the end date of promotional actions, or other omission that can mislead the consumer. These omissions can be in breach of Article 3, §e of the Spanish General Advertising Law (*“Ley 34/1988, de 11 de noviembre, General de Publicidad”*), and Article 7 of the Spanish Unfair Competition Law (*“Ley 3/1991, de 10 de enero de Competencia Desleal”*). One website didn’t display any scale on the advertisement to inform the user of the actual size of the product or toy that is attached to the product. SROs often advise that, in such cases for children’s advertising, a child’s hand should be included so that the minor has a direct reference of the size of the items. Such omission can be in breach of Article 3, §e of the Spanish General Advertising Law (*“Ley 34/1988, de 11 de noviembre, General de Publicidad”*).

A new section of the Dutch Advertising Code for Food Products will prohibit the inclusion and tie-ins of licensed characters that are popular with children on the product itself. This applies equally for products that are compliant with the applicable nutritional criteria if the character is aimed at children under the age of 7. The new rule came into force in February 2019 with a transition period until July 2020 or “till existing media year contracts have expired”, meaning that after then, the respective SRO will judge products displaying such licensed characters in breach of Article 8 of Dutch Advertising Code for Food Products.

1.10 Links to social media profiles

78 of the 101 reviewed websites included links to social media sites – either brand-owned or influencer profiles (Facebook, YouTube, Instagram, Twitter, etc).

Number of social media links in websites (N=101)



2. Brand-Owned Social Media Profiles

2.1 Sample of Brand-Owned Social Media Profiles

A total of 153 social media profiles were reviewed by experts. 47 out of the 153 reviewed profiles were brand-owned Facebook pages, 57 were brand-owned Instagram profiles, and 49 were brand-owned YouTube channels. The table below provides an overview of the number of social media profiles that were reviewed per country.

Number of social media profiles reviewed per country (N=153)

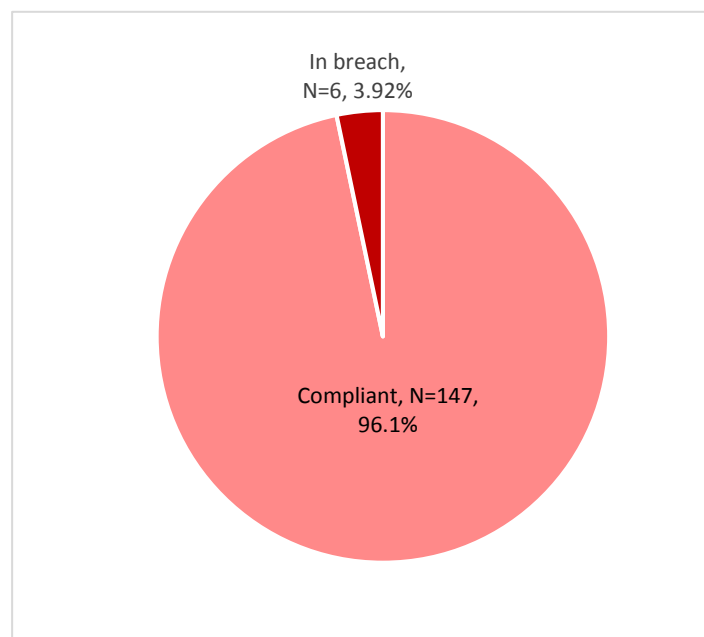
Country	Facebook	Instagram	YouTube	Social Media
CRPR - Czechia	5	6	6	17
ARPP - France	7	8	5	20
DWR - Germany	7	8	6	21
SEE - Greece	6	8	6	20
IAP - Italy	6	8	6	20
SRC - Netherlands	5	9	6	20
AUTOCONTROL - Spain	4	6	8	18
Ro. - Sweden	7	4	6	17
Total	47	57	49	153

2.2 EU Pledge compliance rate for social media profiles

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 children under 12, the following elements had to be considered: the presence of animations, sound effects, videos and photos, entertainment activities and games, contests, competitions and promotional events, or licensed characters and celebrities, as well as the language and/or level of interaction of the page.

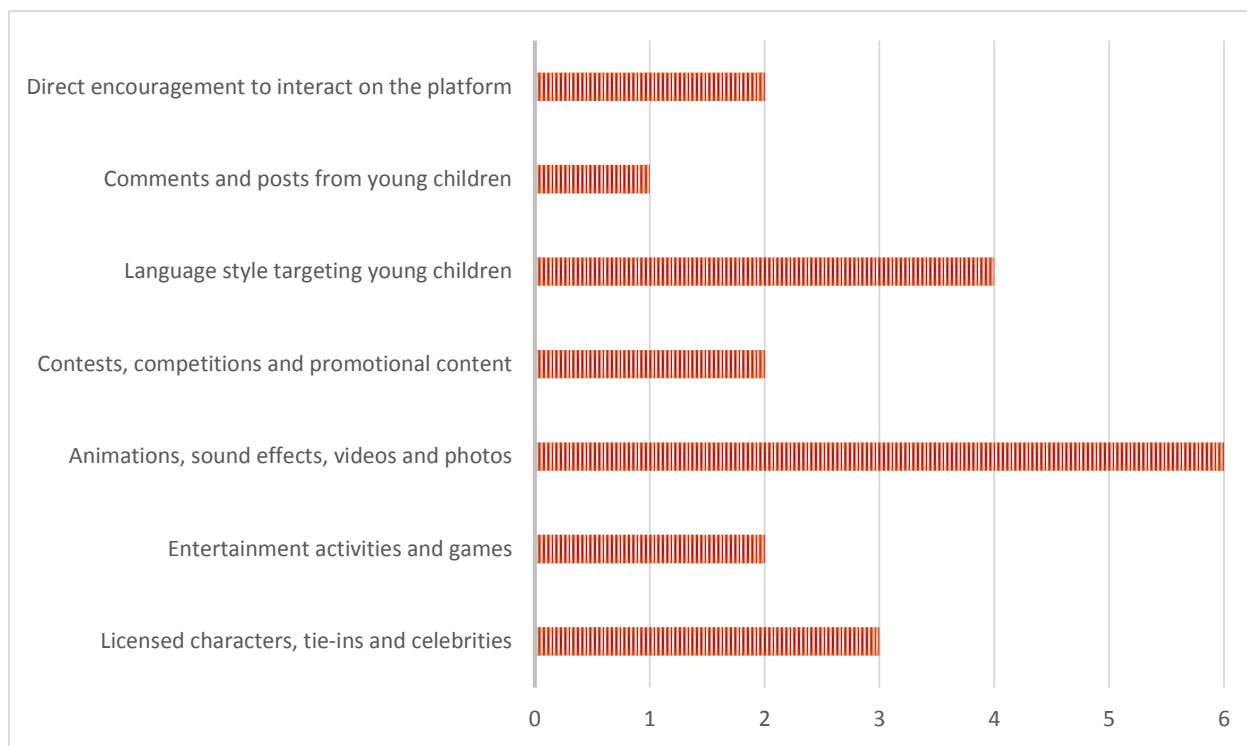
After careful assessment, **the reviewers decided that 6 out of the 153 reviewed social media profiles were primarily appealing to children under 12.**

Number of social media profiles primarily appealing to under-12s (N=153)



Reviewers have flagged those 6 profiles due to a combination of several factors that were assessed to be primarily appealing to children. These factors are disclosed in the chart below:

Main indicators decisive on the social media profiles' compliance (N=6)

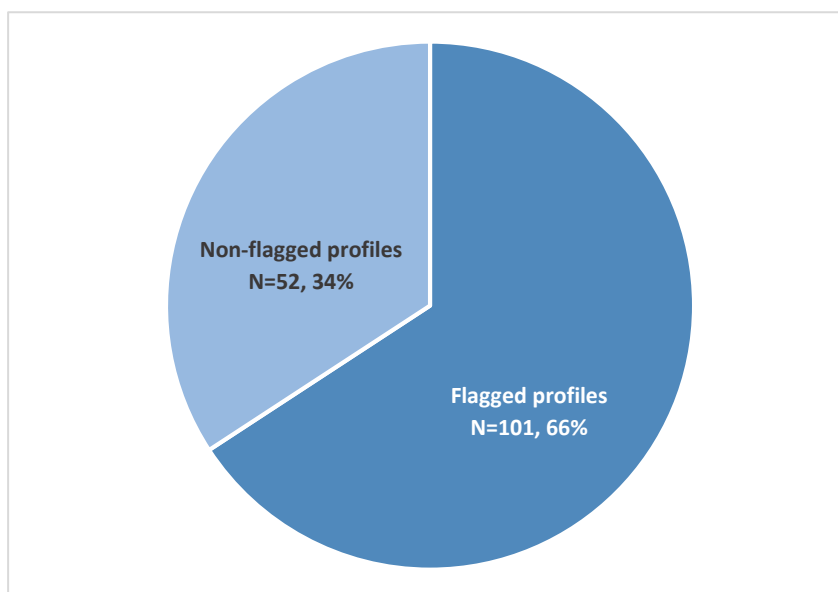


One SRO flagged a social media profile for breaching the EU Pledge commitment, but its contents were outdated by several years. The profile was thus left out of the monitoring's scope as the purpose is to review marketing campaigns of 2019. Nonetheless, both the SRO reviewers and independent reviewers have highlighted that such accounts and pages must be taken down. The social media page is still primarily appealing to young children and many will be attracted to its visual animations, stories, and entertainments activities. The experts are thus advising to shut down such old accounts.

2.3 Flagged Social Media Profiles

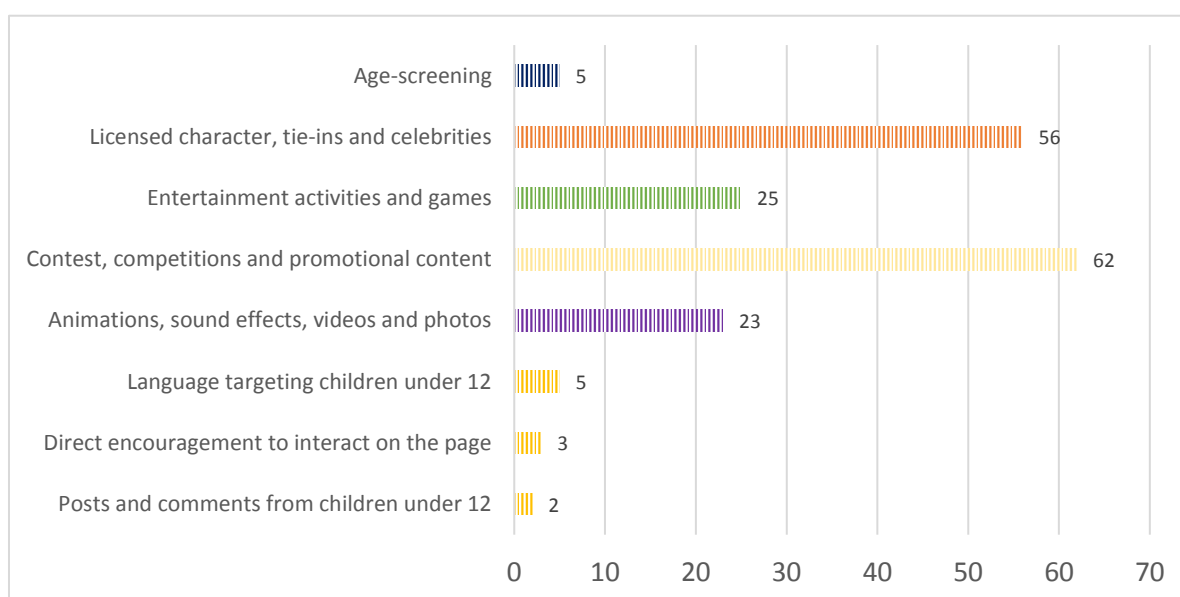
SROs have flagged about two thirds (66%) of the company-managed social media profiles for at least one of the factors in the checklist. In order to identify and assess whether any of these 101 social media pages were primarily appealing to young children, the experts had to weigh the factors together and see whether, within the local cultural and linguistic context, it would appeal primarily to children under 12.

Number of social media profiles flagged for at least one factor of the checklist (N=153)



Below are the number of social media profiles that were flagged for each of the category.

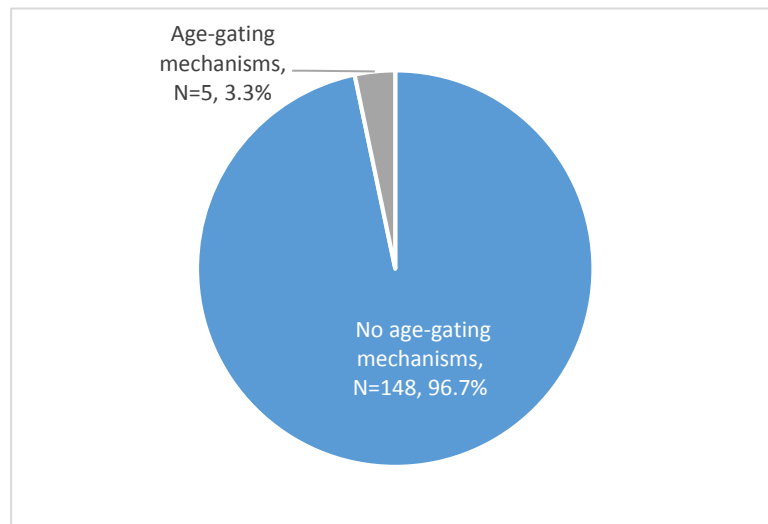
Number of social media profiles flagged for each category (N=153)



2.4 Age Screening & Parental Consent

5 out of the 153 reviewed social media profiles contained mechanisms to screen the age of the user. Such systems would prompt the user to disclose their date of birth for access to the online content. This factor was not crucial to the final compliance assessment of the social media profile.

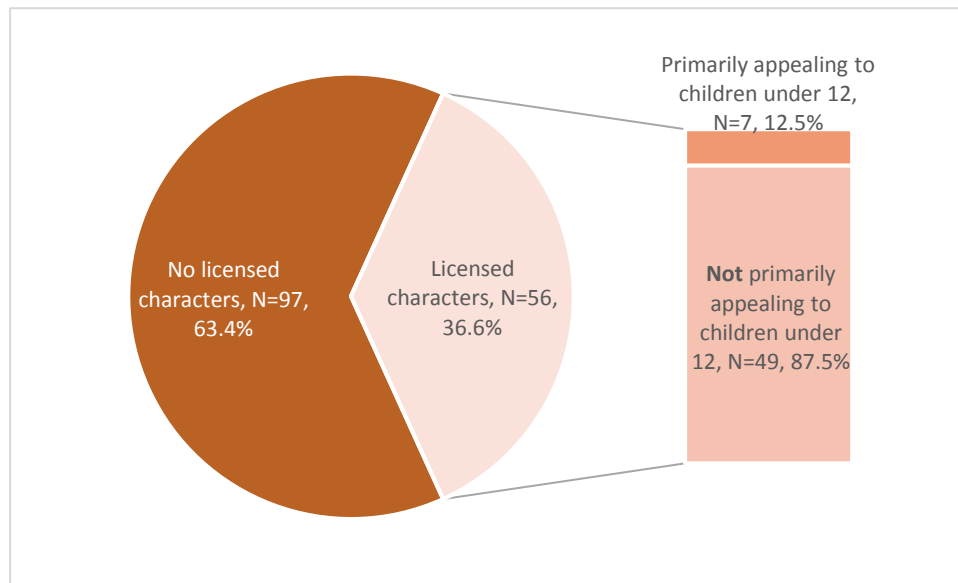
Number of social media profiles reviewed per country (N=153)



2.5 Licensed Characters, Tie-ins & Celebrities

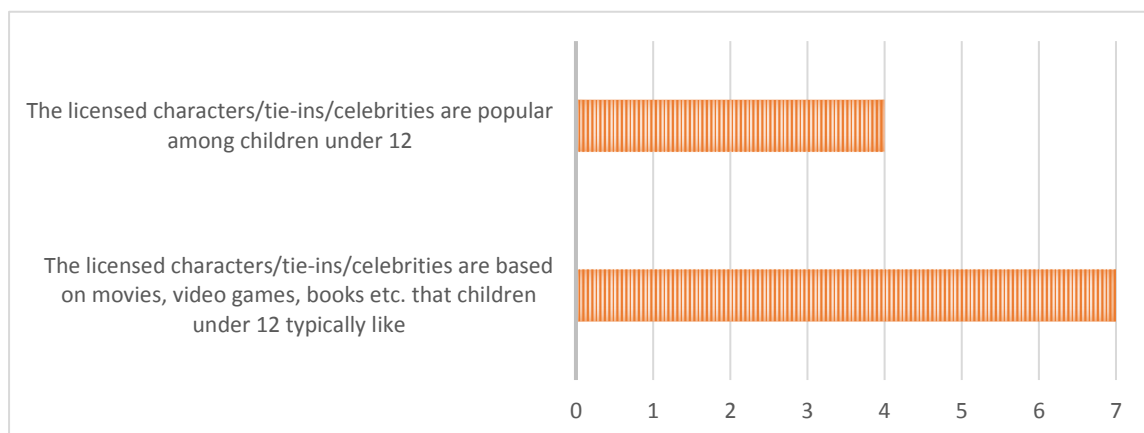
56 out of the 153 reviewed social media profiles featured “licensed characters”. In 6 instances, these characters and/or tie-ins were considered to be designed to target primarily children under 12. In addition, 4 of these social media profiles used the licensed characters/tie-ins to promote food or beverage products.

Number of social media profiles featuring licensed characters, tie-ins or celebrities (N=153)



The tied-in licensed characters were flagged with content that was deemed primarily appealing to young children due to a number of factors, disclosed in the chart below.

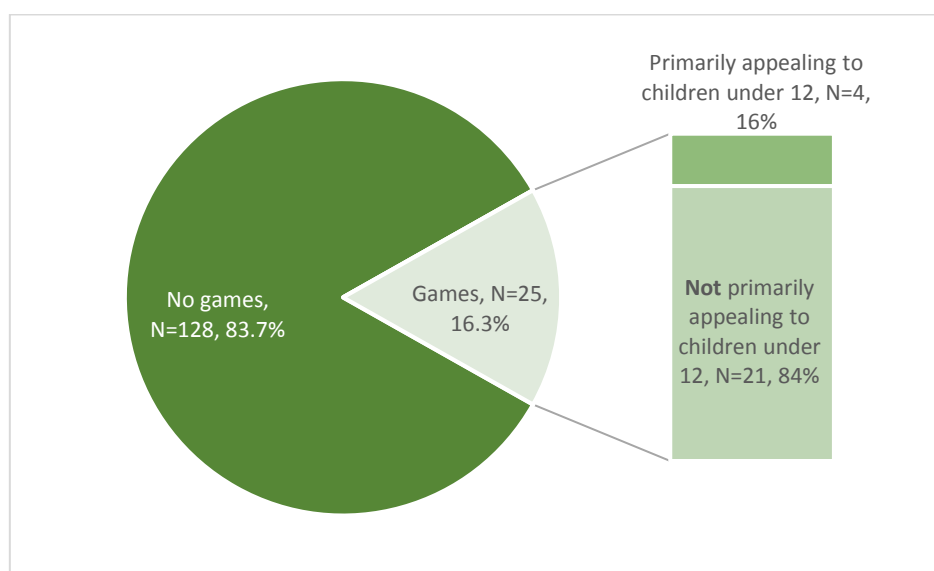
Types of licensed characters, tie-ins or celebrities featured in the social media profiles (N=7)



2.6 Games & Entertainment Activities

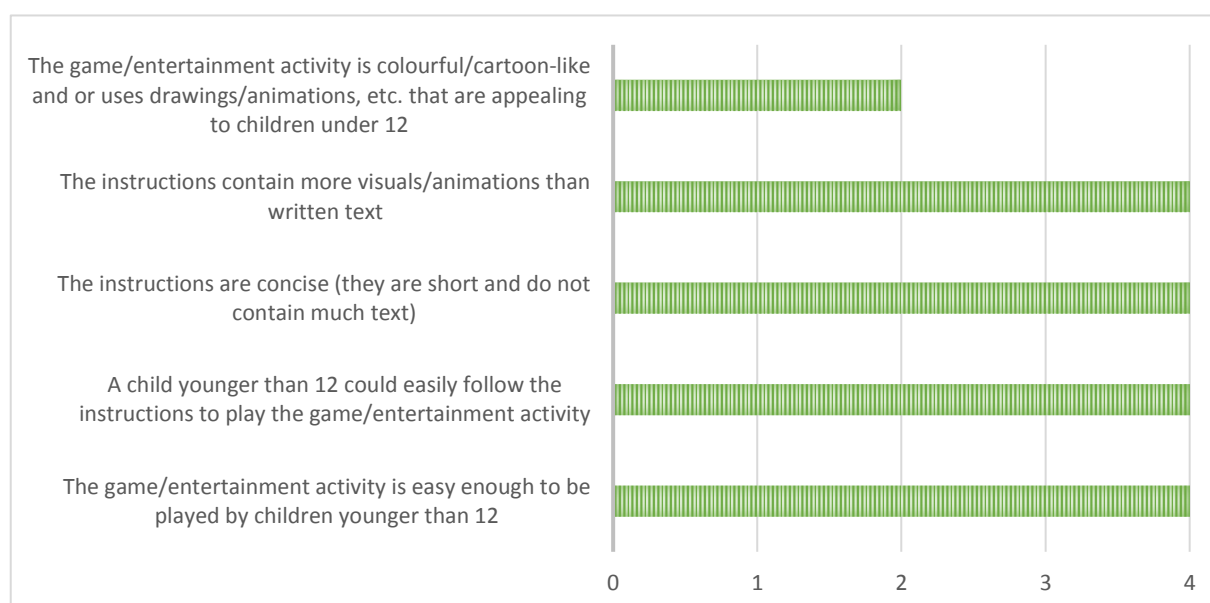
The reviewers identified entertainment activities and/or games on 25 of the 153 reviewed social media profiles. In 4 instances, the reviewers considered that the entertainment activities/games were designed to appeal primarily to under-12s. These 4 profiles also used the entertainment activities/games to promote food or beverage products to children.

Number of social media profiles featuring entertainment activities/games (N=153)



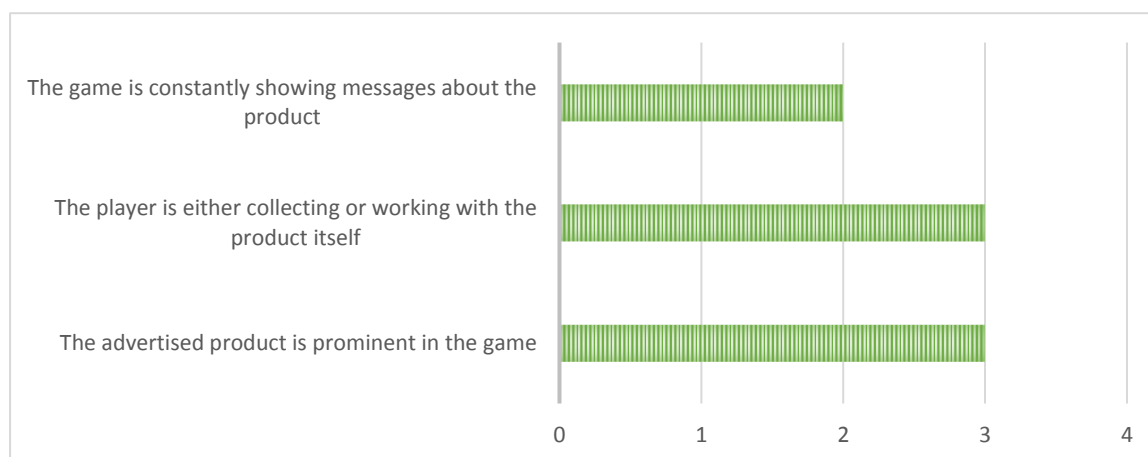
The following chart discloses the experts' reasons as to why they considered the entertainment activities and/or games to be primarily appealing to children under 12.

Main indicators for entertainment activities/games considered primarily appealing to under-12s (N=4)



The three social media profiles were also flagged as using the entertainment activities as a means to promote the food and beverage products. Below are disclosed the reasons why the reviewers judged it so.

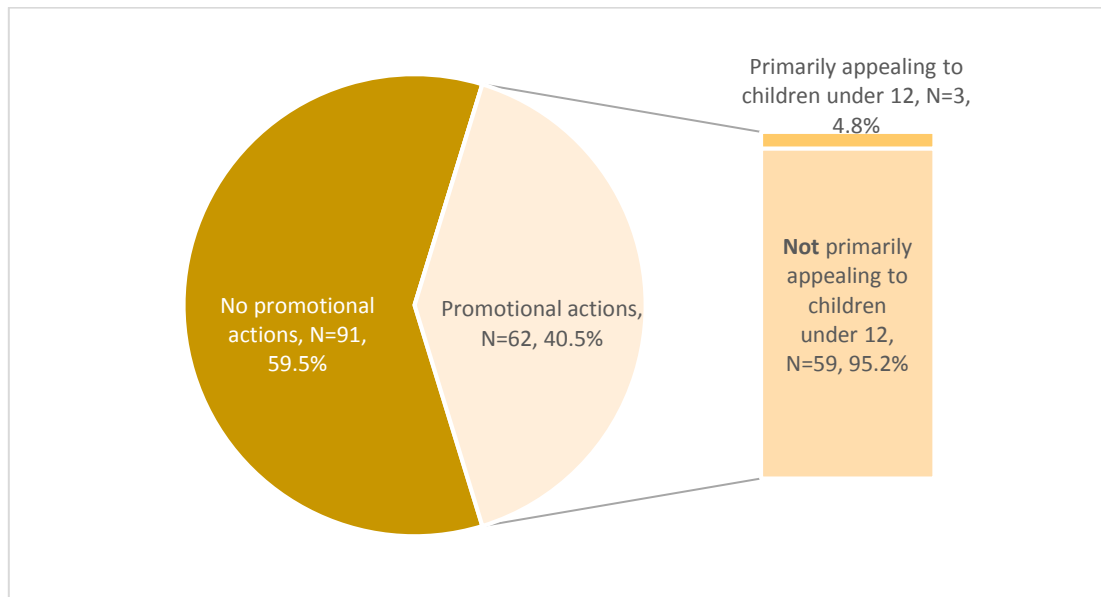
Main indicators for entertainment activities/games used to promote product to under-12s (N=4)



2.7 Contests, Competitions & Promotional events

62 out of the 153 reviewed social media profiles included contests, competitions or promotional events. In 3 cases, the reviewers considered that these contests, competitions and promotional events were appealing primarily to children under 12. In 2 of these cases, the contests, competitions, and promotional events were used as a means to promote a food and beverage product to children under 12.

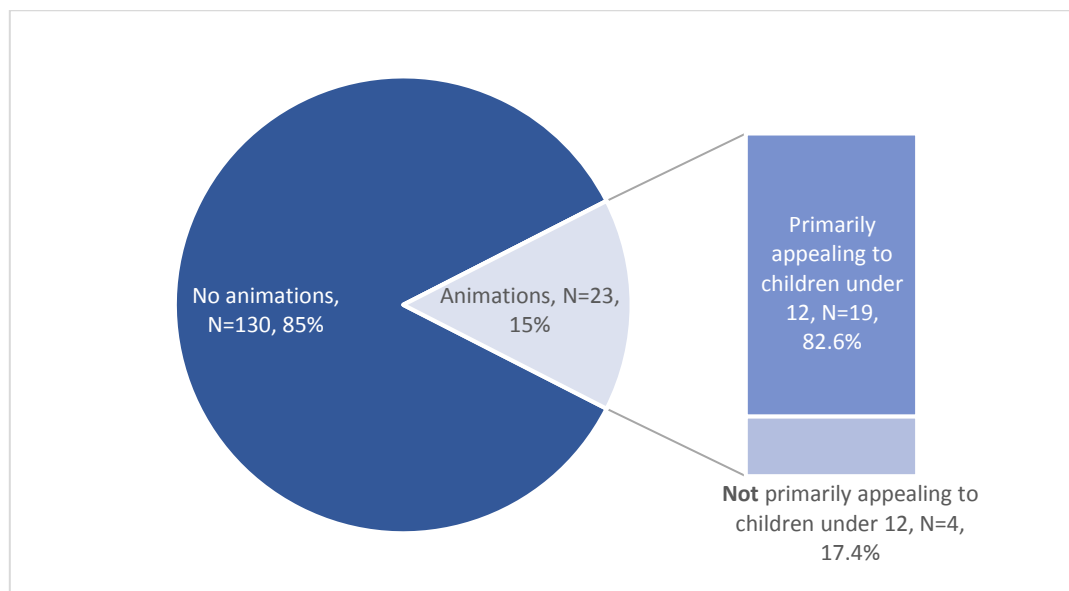
Number of social media profiles featuring contests/competitions (N=153)



2.8 Animations: Sound effects & Videos

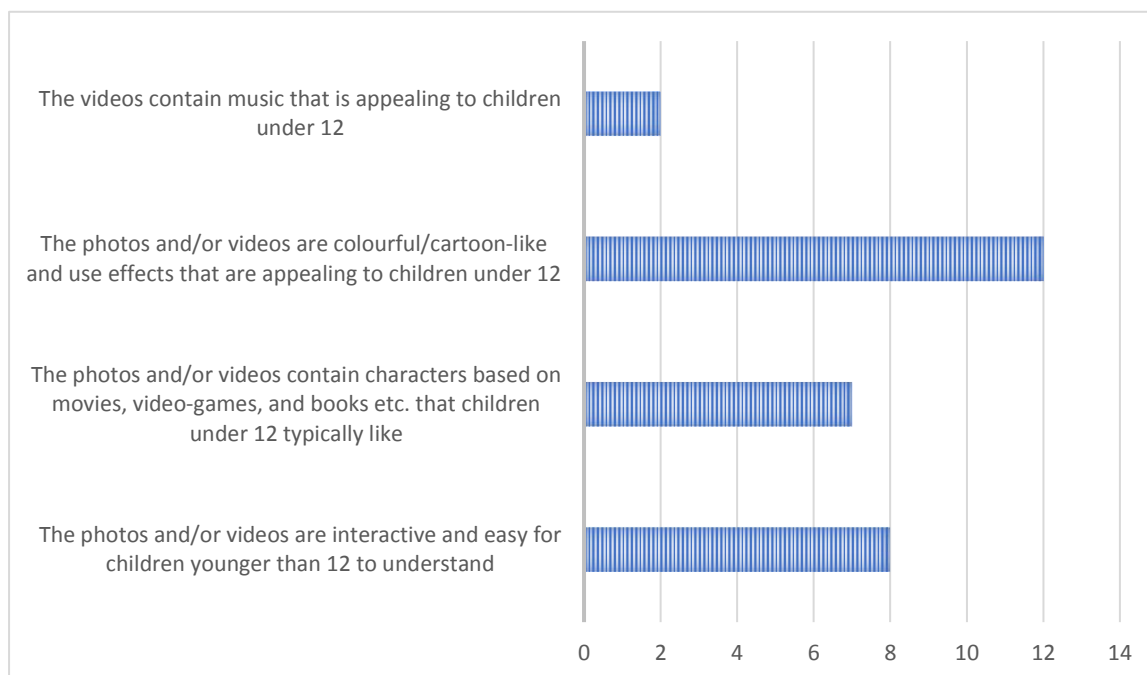
23 of the 153 reviewed social media profiles featured animations, photos and/or videos. 19 of these profiles were considered to be primarily appealing to under-12s, with 14 of these 19 profiles using videos and/or photos to promote food or beverage products to children.

Number of social media profiles featuring videos/photos (N=153)



The animations, videos and photos were flagged by reviewers as primarily targeting children under 12 due to the following factors:

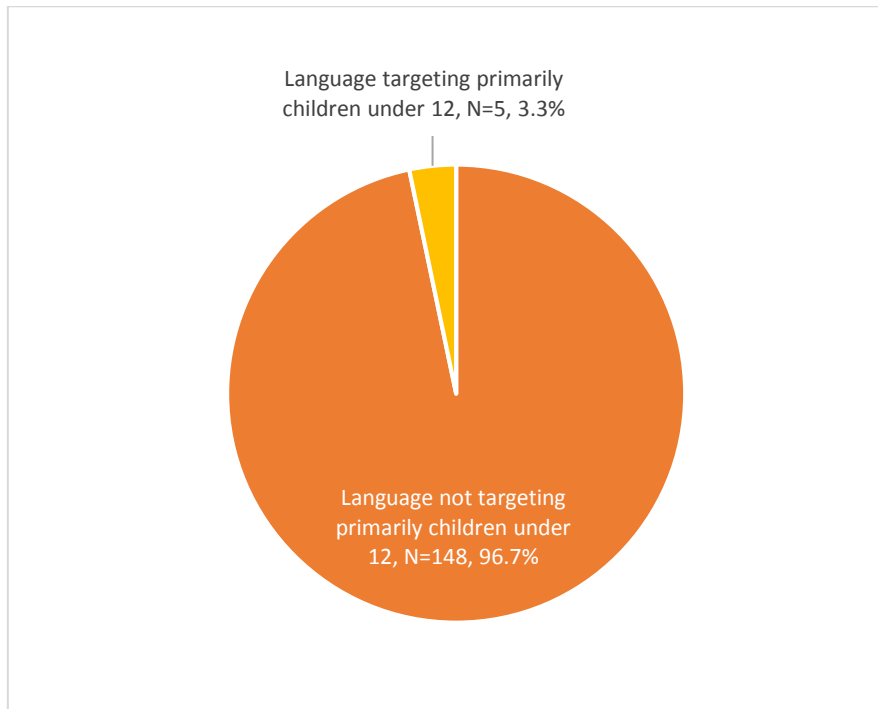
Main indicators for videos/photos considered primarily appealing to under-12s (N=19)



2.9 Language & Interaction

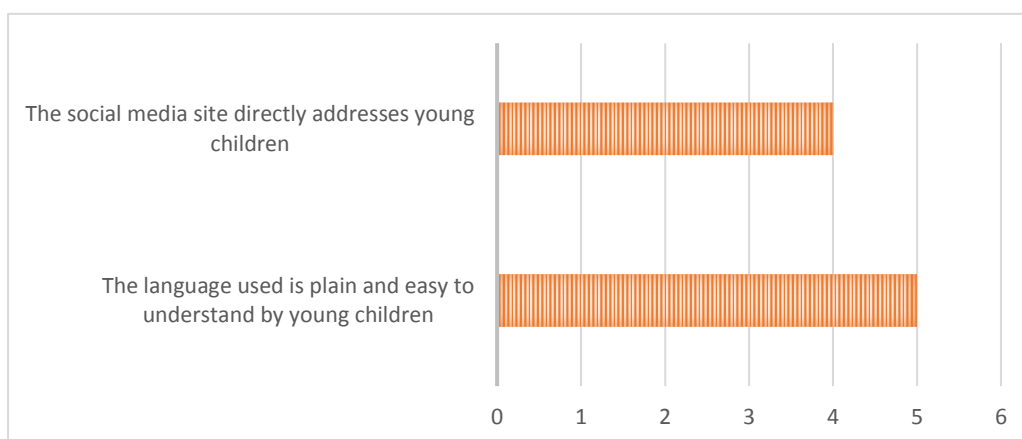
5 of the 153 reviewed social media profiles used language that was deemed to be directed at children under 12, as it was considered plain and easy to understand by under-12s, as well as directly addressing under-12s.

Number of social media profiles using language directed at children under 12 (N=153)



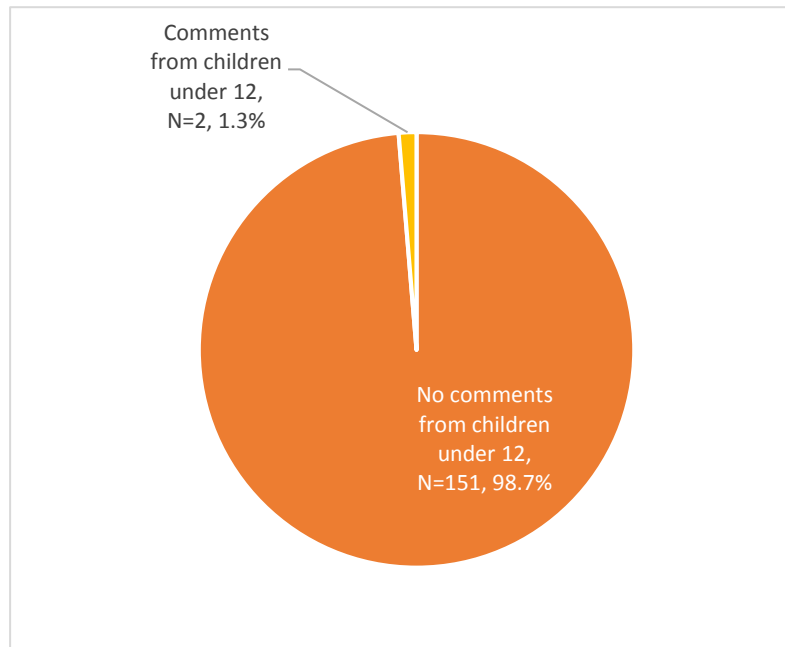
The 5 profiles were flagged in this category due to the following reasons:

Main indicators for the language style directly targeting young children (N=5)



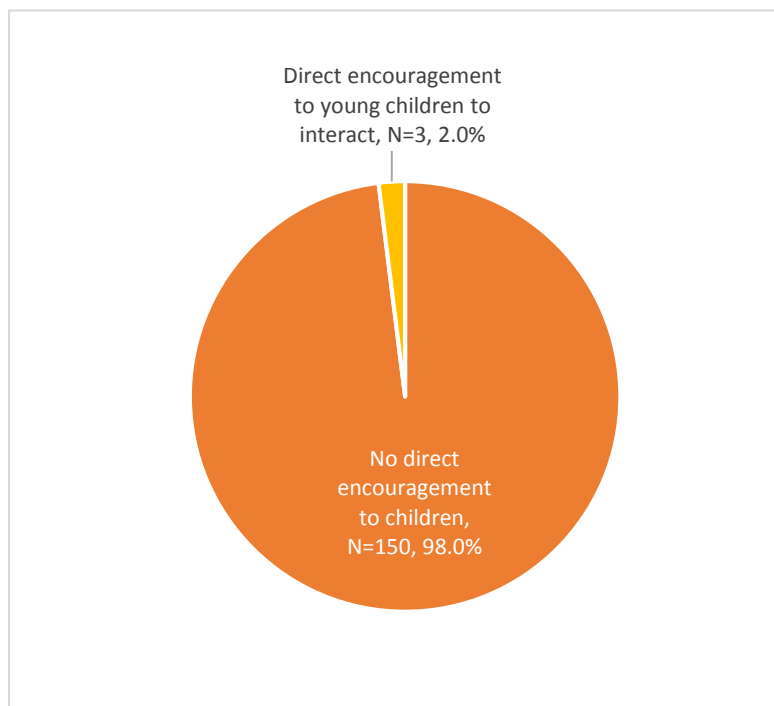
In 2 social media profiles, one of which was also flagged for the above category, the reviewers identified posts and comments which were likely to have been made by children younger than 12.

Number of social media profiles including any posts/comments/interactions from children under 12 (N=153)



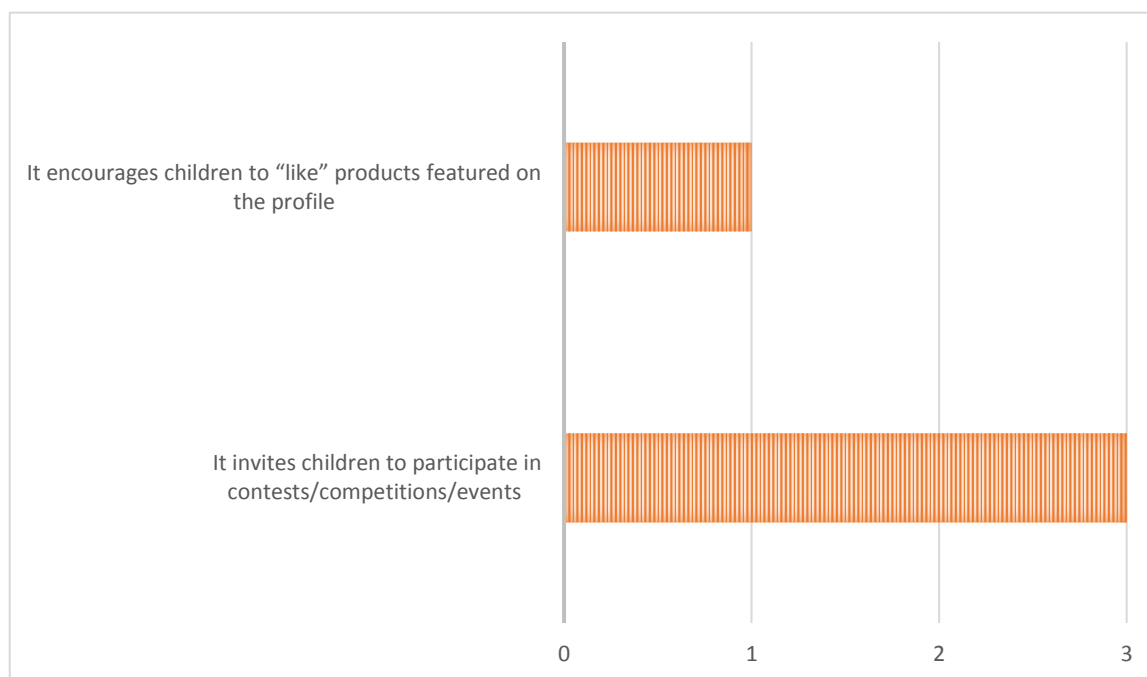
According to the reviewers, 3 reviewed social media profiles seemed to encourage the interaction and active participation of children under 12. 2 of these profiles were also flagged for the first category above on language style.

Number of social media profiles encouraging interaction and/or active participation of children under 12 (N=153)



The reviewers considered the 3 social media profiles as actively inciting to interact on the social media platform for the following reasons:

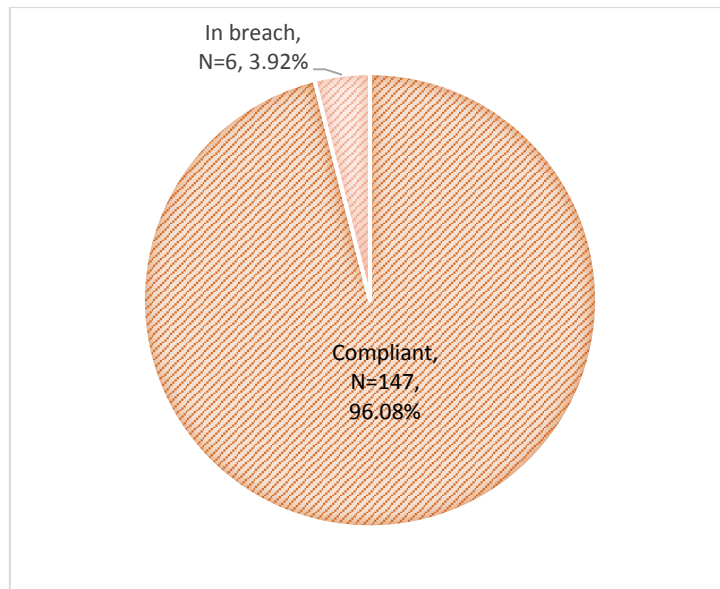
Main indicators for encouraging interaction and/or active participation of children under 12 (N=3)



2.10 Compliance with Advertising Codes/Laws

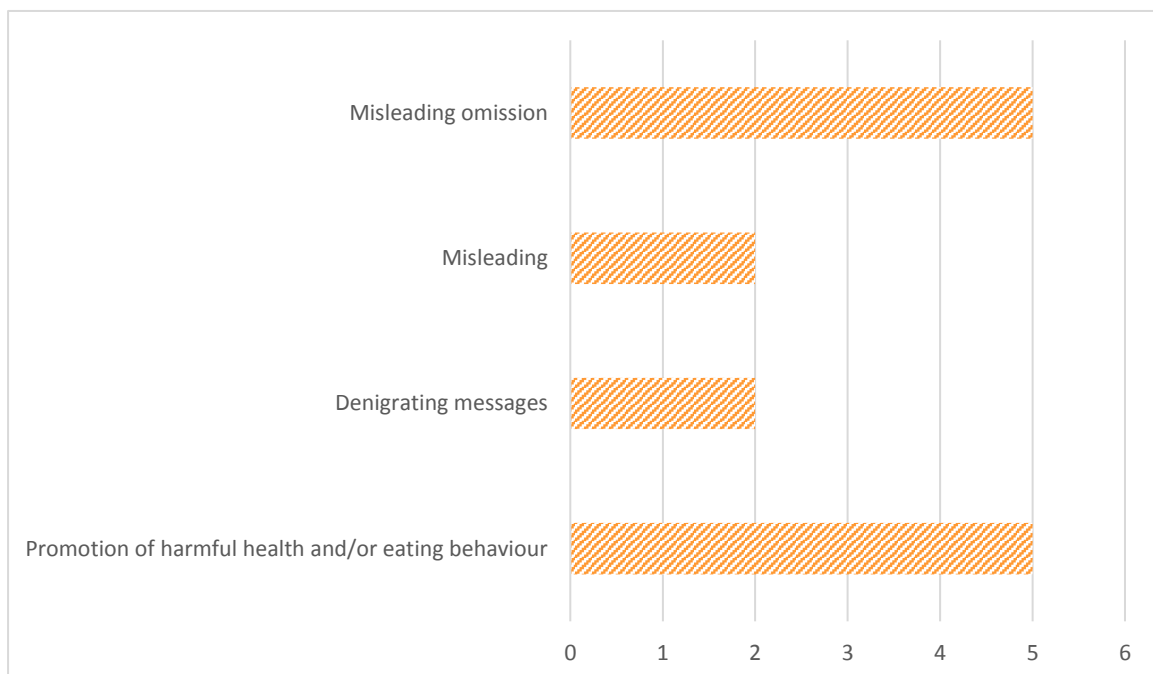
6 out of the 153 reviewed social media profiles featured items that were considered to be potentially in breach of advertising codes or relevant national advertising laws.

Compliance with advertising codes/laws (N=153)



On these 6 social media profiles, a total of 4 breaches were found.

Potential breaches with advertising codes/laws (N=6)



Misleading omission refers to a lack of information that is crucial to the complete understanding of the promotional action or product. Such cases include not specifying which establishments adhere to the respective promotions, a lack of information on the total stock of promotional coupons, or the end date of the promotion. These omissions can be in breach of Article 3, §e of the Spanish General Advertising Law (*“Ley 34/1988, de 11 de noviembre, General de Publicidad”*), and Article 7 of the Spanish Unfair Competition Law (*“Ley 3/1991, de 10 de enero de Competencia Desleal”*).

Misleading refers to advertisements that contain promotional calls but do not specify that it's only valid if used on the brand-owned mobile app. Included in this category are the lack of size references implying a toy attached to the product is bigger than it actually is. Such advertising can be in breach of Article 1 of the ICC Code.

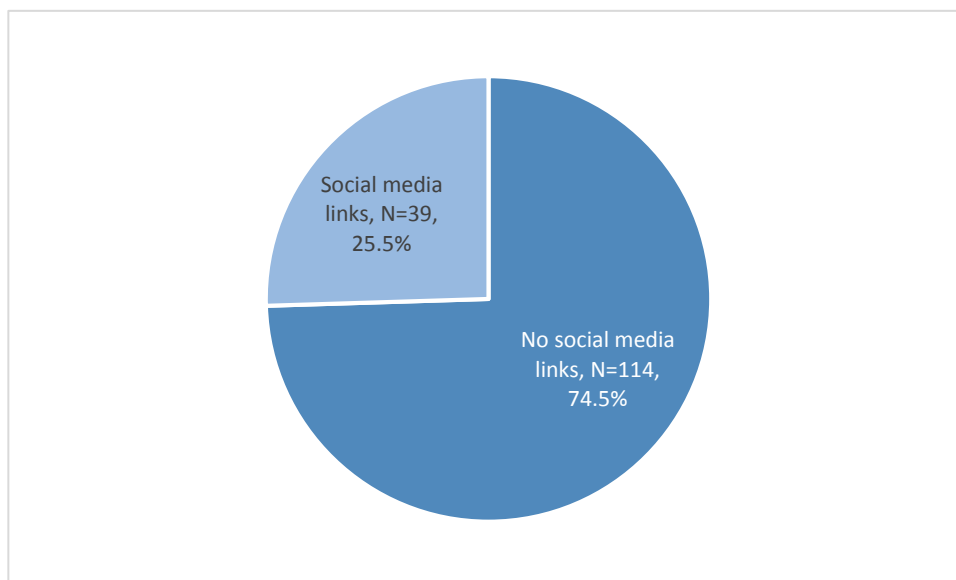
Denigrating messages refer to animations and videos that belittle otherwise healthy produce, such as tea, carrots, and soups, in favour of other (sometimes less-healthy) food products. Other denigrating messages include disparagement of competitors. This can be in breach of Article 12 of the ICC Code.

The promotion of harmful health and/or eating behaviour refers to animations and videos where an unhealthy product is suggested as a substitute to vegetables and fruits. Included in this category is the promotion of excessive consumption of food or beverage products. This can be in breach of Rule 29 of the Spanish Advertising Self-Regulatory Code, the French Advertising Code, and the Greek Advertising Code (Food Annex).

2.11 Links to other social media profiles

39 of the 153 reviewed social media profiles included links to other social media sites – either brand-owned or influencer profiles (Facebook, YouTube, Instagram, Twitter, etc).

Links to other social media profiles (N=153)



3. Pilot on Influencer Marketing

The 2019 monitoring exercise also included a **pilot monitoring** on influencer marketing.

The purpose of the pilot was to provide an overview on the use of influencers by EU Pledge companies in order to identify if the promotion done by the influencers could potentially be problematic and be found in breach of the EU Pledge commitment in the future. For the scope of this pilot exercise, the self-regulatory organisations monitored if:

- the influencers were officially endorsed by the EU Pledge companies and were promoting non-compliant products;
- the post of the influencers appeared to be primarily targeting children under 12 and/or
- the post was intended to target children under 12.

Due to the nature of this exercise, the judgement of the influencers' posts was from a **subjective point of view**. This led to a difficult overall analysis of the results.

Experts from the SROs reviewed a sample of 40 influencer profiles that were officially endorsed by the EU Pledge companies.⁸ SROs only analysed profiles that promoted non-compliant products with the applicable nutritional criteria. Out of these 40 profiles, 76 posts were analysed by the experts, of which 68 were promoting products that were non-compliant with the Pledge nutrition criteria.

In order to minimise the subjectivity, a specific **checklist** had been developed to help SROs understand what was primarily appealing to under 12s when reviewing the influencers' profiles. The reviewers were thus asked which of the following techniques were used by the influencer to appeal to children under 12:

- **Language/Writing style** - the influencer uses words and/or expressions clearly directed at children, i.e. plain and easy language that an under-12-year-old can easily understand, language belonging to children's talk/slang;
- **Visuals** - i.e. there are animations, cartoons and/or colourful illustrations in the influencer's post;
- **Games** - the influencer's post contains games to play that a child under 12 would like, i.e. playing video games, crafting, cooking, etc;
- **Promotional actions** - the influencer's post contains challenges and/or contest to win prizes/toys that a child under 12 would like;
- **Humour** - i.e. jokes that children under 12 would find funny;
- **Toys** - the influencer's post discusses toys, and/or the influencer is unboxing and/or playing with and/or reviewing the toys;
- **Films/TV shows/apps** - the influencer is reviewing the latest kids' movies, TV shows, web series and apps.

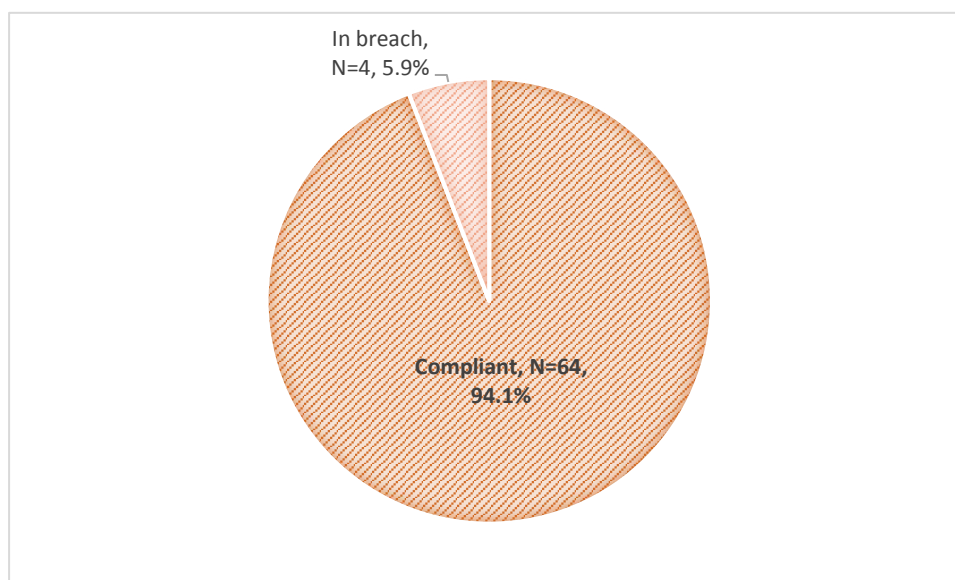
⁸ Not all EU Pledge member companies provided a list of officially endorsed influencers.

Reviewers analysed all 68 posts and after careful assessment to take all the above factors into account, they concluded that **all 68 posts were compliant with the EU Pledge commitment and none were primarily appealing to children under the age of 12**. The other 8 posts that included products compliant with the nutritional criteria were equally compliant with the Pledge commitment.

The reviewers did flag 3 posts that contained factors from the checklist above. SROs found that two influencers made use of humour and comic situational scenes to attract the attention of viewers. One other influencer used a language style that was deemed to be clearly directed at young children. These cases were, however, not flagged as being primarily appealing to children.

SROs have also analysed the posts against the relevant local SR rule, and have flagged 4 posts that breached various national advertising codes or laws, or the ICC Code.

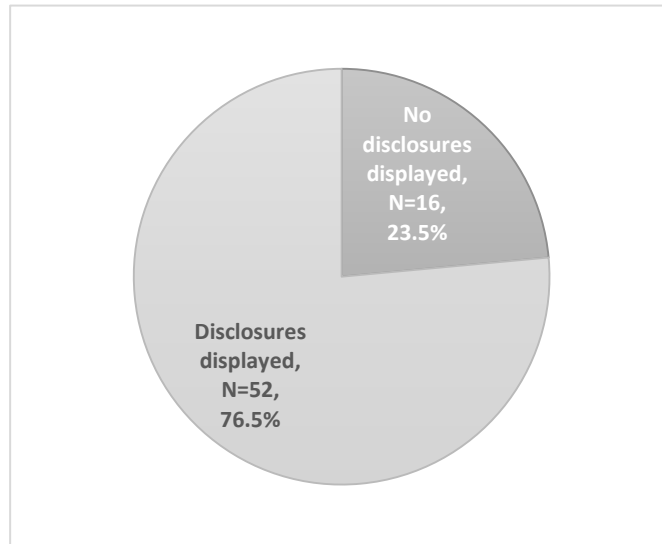
Compliance rates for influencer profiles' posts against national SR & ICC Codes (N=68)



The breaches included 3 posts advertising promotional sales and promotional actions that did not include the end date of the special action, and one post with a misleading claim as to the composition of the advertised product.

Moreover, experts found 52 posts displaying disclosures that were clear, immediate, and in line with self-regulatory standards. These are vital for influencers' posts as they inform the viewer of the advertising nature of the post. SROs have highlighted that simply stating the brand's name after a hashtag does not count as a disclosure as the brand may not be aware of the marketing communication conducted on their behalf.

Rate of disclosure display on the influencers' posts (N=68)



4. Note from the Independent Reviewers

1. Critical Notes on the SRO reviews based on an Analysis of Inter-Coder Reliability

1.1 Research Methodology and Sample

A total of 101 websites, 154 social media pages (57 Instagram, 50 YouTube and 47 Facebook), and 40 profile pages of influencers (Instagram, YouTube and Facebook) from different countries were reviewed by SROs based on a standardized coding scheme. An independent team of reviewers at Ghent University double coded 25% of these pages and profiles (based on a random selection, N = 73) to check the quality and reliability of the coding. This eventually resulted in a total of 25 websites, 38 company owned social media pages (14 Instagram, 16 YouTube and 8 Facebook) and 10 influencer profile pages (Instagram and YouTube) that have been coded by the Ghent University team.

The independent reviewers used the same coding scheme as the SROs and all data were entered in SPSS. Subsequently, the inter-coder reliability between the coding of Ghent University and the SROs was analysed in SPSS Statistics by calculating *Cohen's Kappa*. The closer the Cohen's Kappa is to one, the more agreement in coding between the independent coder and the SROs' coding; the closer the Cohen's Kappa is to zero, the more disagreement there is between the coders⁹. The results were further discussed within 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, .68 for the social media profiles and .45 for the influencer profiles. This indicates a good agreement for the websites, a good agreement for the social media profiles and a fair agreement for the influencer profiles. Below, the reasons are outlined that may explain the (minor) disagreement in coding:

- Firstly, some disagreement can be explained due to the ***difference in timing*** between the reviews of the independent coders and the SROs (a delay of one month and a half). In that period, there may have been some changes to the websites/ social media. For example, competitions, videos, etc., could have been added or removed. The independent reviewers for example found one social media site (YouTube) where new content was added in the past couple of weeks. This content was in breach, so the brand was flagged by the independent reviewers but not by the SRO (since it was not online at the time of their evaluation).
- A second point is the ***difference in language***. The different languages form a barrier when it comes to evaluating the language used on the websites and social media profiles. All content has been translated by the coders, however, small nuances might have been missed which could have led to a different evaluation. Also, each SRO coded cases for his/her own country, which might also generate differences in coding across

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.

SROs. The independent coding team coded cases across countries and was able to compare these different cases and evaluate them accordingly.

- A third reason for divergence in coding is the way in which sponsoring is **disclosed** on social media. Where some SROs considered a reference to the brand (@brandX) in a post as a disclosure, independent reviewers disagreed this was sufficient, in line with EASA.
- Finally, the questionnaire specifically instructs coders to indicate which posts are **primarily appealing** to children under 12. The independent coders also flagged specific elements of posts/websites that could be appealing to young children, next to evaluating the posts/websites as a whole. In future monitoring exercises, an orange code could be implemented to mark that one or more elements of a social media post or website appeal to children. In addition, it should be clearer when a final breach should be indicated (i.e., when multiple elements of the post or site are in breach).

1.2 Inter-coder reliability analysis of company-owned websites

The results of the inter-coder reliability for the websites are reported in **table 1**. Twenty-five websites were coded by the independent reviewers. The results of the inter-coder reliability between the work of the SROs and of the independent coders show a good agreement except for the questions about the presence of animations and toys on the website. On these questions, the independent reviewers and SROs had only a fair to moderate agreement.

The randomly selected websites that were coded by the independent reviewers contained no websites that were finally flagged by the SROs. Our analysis however identified **one site** that can be considered to be in breach (due to the presence of videos, apps and licensed characters that are appealing to young children). In addition, **nine sites** were flagged with an orange code because they contained multiple elements that were in breach with EU Pledge criteria. For example, some websites contained contests with prizes targeted at adults which may also be appealing to children under 12. The independent reviewers also found websites that used cartoon-like animations and included information that tried to persuade children directly to buy products by offering them gifts.

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

Table 2 provides an overview of the Cohen's Kappa of the coding of the social media sites. In total, 38 social media sites were double coded by the independent reviewers. When examining the questions separately, Cohen's Kappa ranges from fair to substantial agreement.

First, both the SROs and the independent reviewers signalled **3 social media sites** (one Facebook page and two YouTube channels) that are in breach with the EU Pledge criteria. These social media sites contained pictures, videos, visual lay-outs, contests and games endorsed by licensed characters that are appealing to young children (e.g., showing colourful, happy and child-targeted pictures).

The independent reviewers additionally flagged **7 social media pages** that they believed to be appealing to young children (three Facebook pages; one Instagram page and three YouTube videos). This mainly because of colourful, fun images or videos that encourage children to nag for the product (e.g., one social media page included pictures of a child eating the product and an easy to play riddle/contest). Moreover, some Facebook-pages flagged by the independent

reviewers targeted children through contests or games. However, it should be noted that several of these contests date from before 2019, so perhaps SROs did not take this into account for the exercise of this year, which explains the difference in flagging. Also, one example concerns a series of videos uploaded on YouTube after the time of the evaluation of the SROs (they could therefore not have seen it).

The independent reviewers also want to point attention to several social media pages that mainly target parents of young children. Because they do not directly appeal to children when strictly following the Pledge, they were not finally flagged. However, the content on these pages is easy enough to be understood by children, the fun-looking images might stimulate pester power and some of the posts are clearly directed at children, for instance showing craft activities using the product packaging.

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

Table 3 provides an overview of the Cohen's Kappa of the coding of the influencer profiles. The SROs provided a list of 39 influencer profiles cooperating with different brands. The independent reviewers selected a random sample of 10 influencer profiles, after which they checked which brands cooperated with the influencers. First, 20 posts that were evaluated by the SROs were checked and double coded. Hereafter, the independent reviewers scrolled through the influencers' entire profile to look for other sponsored posts that display products from brands that are members of the pledge. As such, 10 additional posts were evaluated by the independent reviewers.

In line with the SROs, the independent reviewers argued that **none** of the 20 influencer posts and videos that were double coded were primarily appealing to children under twelve. However, **one influencer was clearly targeting parents of young children** while promoting one of the brands committed to the EU-Pledge. She posted a video on YouTube of her toddler interacting with the products. The SROs also considered this influencer's listed YouTube video as an example in which parents are targeted. When exploring this influencer's Instagram profile (which was only done by the independent reviewers, not by the SROs), the same strategy was used to promote the brand in question. Moreover, the independent reviewers noticed she was also promoting a brand that is a member of the pledge but that did not include a potential partnership with this influencer in the list provided to the reviewers. According to the independent reviewers, one Instagram post featuring this brand in particular, is in breach. In this particular post, the influencer claims that visiting a particular fast food restaurant with her family was something that made her very happy as a child and argues that she is happy she can now share this experience with her child. This post insinuates that in order to make your child happy, you should visit the restaurant. She also reports the whole visit in one of her vlogs on YouTube.

According to the independent reviewers, 13 out of the 20 double-coded influencer posts did not use any form of advertising disclosure. Some SROs considered a reference to the brand (@BrandX) in these influencers' posts as a disclosure, which explains the low Cohen's kappa for this question. However, the independent reviewers argued that this disclosure is not sufficient as indicated in the recent EASA guideline. Seven out of twenty double-coded influencer posts and videos did use a form of disclosure according to the independent reviewers. Two Instagram posts used a hashtag at the end of the caption, such as #werbung and #partenariat. Two

YouTube videos used a written disclosure and one YouTube video used an audio disclosure, each of them in the influencer's language. To conclude, two Instagram posts used Instagram's paid partnership feature. While this is certainly a good manner to create more transparency, it depends on national guidance regarding influencer marketing whether this meets requirements for clear disclosure.

2. General Conclusions

Based on the analysis of the independent reviewers, some general concerns and conclusions are generated:

- **Overall assessment**

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

- **Children as primary target group**

While reviewers and SROs agreed that most coded sites were not primarily designed to appeal to children under 12, the independent reviewers want to bring under the attention the subjectivity of the phrasing "primarily appealing to children under twelve" and also the nature of this final question as a general evaluation tool. The question used to make this evaluation is put at the end of the questionnaire as a final evaluation method of the websites, but can be interpreted in a subjective manner and possibly even dilutes specific breaches that were flagged, but not seen as critical to flag the whole website. For example, despite the fact that it may occur that the general look and feel of the websites or social media pages does not specifically appeal to young children, some elements (e.g., pictures, videos, games, recipes) have been found that do give the impression that the brands target young children. Both the SROs and the independent reviewers thus reported several elements which can be found attractive by young children.

Websites often do not use language that is clearly directed at children, but they contain contests or craft ideas specifically designed to target children. Some sites are clearly directed at older children (teenagers), but children around the age of 10-11 might be visiting these sites and find them appealing. For example, contests with an age limit (+18) are easy to circumvent by inserting a fake age. The independent reviewers therefore propose a more nuanced output mechanism, where the final evaluation of breaches is reported as being critical overall (red flag) or critical in some specific aspects (orange flag).

- **Impossible to retrieve (targeted) social media ads and Instagram stories**

Currently, some advertising tactics are not yet included in the monitoring exercise or are difficult to retrieve. In particular, YouTube pre- and mid-rolls, banners or sponsored social media posts cannot be retrieved on the brands' social media pages and thus cannot be checked by the SROs through the current approach. Moreover, due to the large amount of personal information consumers (including minors) share on social media and the use of cookies,

advertisements can be specifically targeted and adapted to a certain audience. Another attention point that remains critical for this evaluation is the use of social media “stories”. These stories are in essence short, temporary messages that disappear from the influencers’ profile, usually after a day. Since the evaluation of the SROs and the independent reviewers happens at one point in time, the independent reviewers only checked the stories of that review period.

Hence, it is currently impossible to see and check these advertisements, even though young children and parents daily encounter them when browsing the internet and social media. These materials should be included in the monitoring.

- **Influencer marketing should be disclosed correctly**

Most influencers included in the sample did not primarily target children under 12. However, teenagers are also a vulnerable target group and should not be misled. Many influencers did not disclose their sponsored posts properly which makes it very difficult for children and teenagers to critically process the post.

- **Persuasiveness of brand characters**

In many of the websites and profiles, branded characters stimulate the child-like character of the site (animal or human-like characters). Because of this, no breach is officially coded in the coding system (as branded characters are not included in the Pledge). However, the independent reviewers believe that including these characters in the site makes the site particularly appealing to young children. Accordingly, they again suggest that brands should try to adjust these characters so that they appeal to older consumers instead of the young ones (as several brands already do). These brand characters are often portrayed in a funny situation or are designed to be liked by children. Brand equity characters are also marketing tools and even more powerful ones for children under 12. For example, a study by McGale, Halford, Harrold and Boyland (2016) showed that using a brand equity character on food packaging evokes unhealthy food choices in children¹⁰.

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

Some brands mainly use their websites and social media to convince parents of the suitability of the product for their children. They often portray those parents together with their young children. In this way, brands try to persuade the parents that their children would like the products by adding textual and/or visual elements to the website and social media. Although this is in agreement with the commitments of the EU Pledge, the independent reviewers make a plea for a cautious use of such tactics. For instance, claims need to be put in such a way that they are clear to parents and provide correct information that is fully comprehensible to them and not misleading (e.g. ‘Product X will delight the little ones and satisfy the older ones’ or ‘Play and learn together’). Additionally, adding recipes and pictures of children to websites or social media pages, may make those pages also appealing to young children (even when the general tone of voice and textual elements are mainly targeting parents). The independent reviewers detected one influencer that used pictures of her child to promote products and brands

¹⁰ McGale, L. S., Halford, J. C. G., Harrold, J. A., & Boyland, E. J. (2016). The influence of brand equity characters on children’s food preferences and choices. *The Journal of Pediatrics*, 177, 33-38. doi: 10.1016/j.jpeds.2016.06.025

included in the Pledge. The posts in se are not specifically appealing to children, but the pictures do clearly target parents of little children and make references to the joy the products bring to children.

- **Older posts/materials in breach still available**

The independent reviewers found some websites and social media pages that contained posts from before 2019 or older that were in breach. This content should be deleted, as children can still access them. In addition, for some sites it was not possible to assess the recent content and it remains unclear if they are still operational. When the independent reviewers checked the global account, they noticed that these were frequently used and up to date. Accordingly, they question the inclusion of the local social media pages in the monitoring exercise when no longer used or updated.

Table 1. Inter-coder reliability websites (Cohen's Kappa)

Main questions of the website survey	Cohen's Kappa	% of agreement
<i>Do the website or sections of the website, have an age-screening/parental consent mechanism aimed at verifying the age of visitors before allowing the access</i>	Full agreement	100%
<i>Does the website feature licensed characters/tie-ins/celebrities (i.e. celebrities or fictional characters which are not owned by the company)</i>	.91	96%
<i>If yes, are the licensed characters/tie-ins/celebrities targeted primarily at an under-12 audience</i>	.83	92%
<i>If yes, are the licensed characters/tie-ins/celebrities used as means to promote a food/beverage product to children under 12</i>	.78	92%
<i>Does the website feature any type of games and/or other entertainment activities such as puzzles, card games, racing, recipes, colouring or activity sheets, "Do it yourself" type of activities? etc.-</i>	.92	96%
<i>If yes, are the games/entertainment activities designed for children younger than 12</i>	.73	84%
<i>Does the website feature animations (i.e. cartoons, animations depicting fantasy situations) and/or music/sound effects and/or videos</i>	.37	68%
<i>If yes, are the animations and/or sound effects and/or video used designed to appeal primarily to under-12s</i>	.33	60%
<i>Does the website feature toys used as premiums/prizes to promote a food/beverage product- Please don't include cases where toys are an inherent part of the food product?</i>	.52	84%
<i>Are they designed to appeal primarily to children younger than 12</i>	.43	80%
<i>Taking into account your answers to all the previous questions and all the aspects of a website's design like language/text/navigation, do you think that the website is clearly intended to be primarily appealing to children under 12</i>	*	96%

* Could not be calculated because one of the variables was constant.

Table 2. Inter-coder reliability social media profiles (Cohen's Kappa)

Main question of the Social Media Survey	Cohen's Kappa	% of agreement
<i>Is the content of the social media site accessible without registration/logging in?</i>	*	92%
<i>Is the language used on the social media platform clearly directed at children under 12?</i>	.21	84%
<i>Do you think the social media profile encourages the interaction and/or the active participation of children under 12?</i>	.89	90%
<i>Does the social media platform feature licensed characters/ movie tie-ins/ celebrities (i.e. celebrities or fictional characters which are not owned by the company, e.g. sports athletes, actors, celebrities, or fictional characters linked to movies/entertainment, e.g. Shrek, Harry Potter?</i>	.78	90%
<i>Are the licensed characters/tie-ins/celebrities targeted primarily at an under-12 audience?</i>	.63	82%
<i>Does the social media profile feature any type of games and/or other entertainment activities such as puzzles, card games, racing, recipes, colouring or activity sheets, "Do it yourself" type of activities, apps, etc.?</i>	.21	79%
<i>Are the games/entertainment activities designed for children younger than 12 (i.e. are they easy enough to be played/performed by children younger than 12)?</i>	.24	82%
<i>Does the social media profile feature videos/photos?</i>	.29	76%
<i>Is the product featured in the videos/photos, i.e. are the videos/photos used as means to promote a food/beverage product to children under 12?</i>	.32	68%
<i>Does the social media profile feature contests/competitions?</i>	.55	79%
<i>Are the contests/competitions used to appeal primarily to under-12s?</i>	.46	74%
<i>Taking into account your answers to all the previous questions and all the aspects of a social media profile, do you think that the profile is clearly intended to be primarily appealing to children under 12?</i>	.39	82%

* Could not be calculated because one of the variables was constant.

Table 3. Inter-coder reliability influencer profiles (Cohen's Kappa)

<i>Main question of the Influencer Survey</i>	<i>Cohen's Kappa</i>	<i>% of agreement</i>
<i>Is the food/beverage product non-compliant?</i>	Full agreement	100%
<i>If the product is non-compliant, do you think the way it is advertised by the influencer could be considered primarily appealing to children under 12?</i>	*	90%
<i>Are there any disclosures in the post/video (i.e. paid partnership with, hashtags used by the influencer #ad, #sponsored, etc)?</i>	.196	55%
<i>Does the influencer use any of the following techniques that appeal to children under 12?</i>	-.071	85%
<i>Do you think the influencer is targeting children under 12 in his/her post/video?</i>	Full agreement	100%
<i>Do you think the influencer is targeting parents of children under 12 in his/her posts/videos (indirectly addressing parents to buy unhealthy products their children)?</i>	Full agreement	100%

* Could not be calculated because one of the variables was constant.

