

EUROPEAN TRENDS IN ADVERTISING COMPLAINTS, COPY ADVICE AND PRE-CLEARANCE











EASA

EASA – the European Advertising Standards Alliance – is the single authoritative voice on 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 businesses in Europe and beyond.

Effective advertising self-regulation helps ensure responsible advertising, meeting consumers' demand for honesty and transparency, regulators' demand for responsibility and engagement and businesses' demand for freedom to operate responsibly. EASA and its members have developed a robust and coherent system of advertising self-regulation that can respond effectively to new challenges.

EASA was set up in 1992 to represent national SROs across Europe. In 2004, it developed into a partnership between the SROs and organisations representing the advertising industry. Today, EASA is a network of 41 organisations committed to making sure advertising is legal, decent, honest and truthful. EASA's membership is made up of 27 European advertising self-regulatory organisations (SROs), and 13 advertising industry associations, including advertisers, agencies, the media and 1 digital pure-play company. EASA is a not-for-profit organisation with a Brussels-based Secretariat. For further information please visit www.easa-alliance.org.

EASA acts as a co-ordination point for best practice sharing in the implementation of self-regulation, as well as operational standards for its national SRO members. Part of EASA's role involves coordinating the cross-border complaint mechanism. EASA also collects and analyses top line statistical data on received and resolved complaints, as well as on copy advice requests and preclearance from its SRO members each year.

EASA Editorial Team

Tudor Manda

Self-Regulation Development Manager

Eloísa López Sánchez

Junior Project Officer

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EASA Contact Information

Tudor Manda

Eloísa López Sánchez

+32 (0)2 213 41 83

+32 (0)2 213 41 92

tudor.manda@easa-alliance.org

eloisa.lopez@easa-alliance.org

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1 Key findings

This report shows the main trends in complaints lodged with SROs against advertisements, the copy advice services provided, and the number of pre-cleared ads throughout 2024¹.

It is based on data collected by 27 SROs in 25 European countries.



52,715 complaints related to 32,099 advertisements were received by 26 European SROs



The UK and Germany accounted for 81% of all complaints received in Europe



Misleading advertising remained the predominant issue complained about at 66% followed by social responsibility at 13%



On average, SROs resolved 56% of received complaints within the first week, 77% in two weeks, and 89% within one month in 2024



Online advertising achieved the 54% mark of complaints, followed by television at 33%



Complaints against health and beauty services and products advertisements amounted to 23%, followed by retail at 19%, and leisure services at 16%



204 cross-border complaints were registered in 2024, increasing by 14% compared to 2023.



98,209 requests for copy advice were submitted to the SROs



77,059 ads were pre-cleared by the SROs providing this service to the industry

¹ Data was collected by SROs from 01/01/2024 – 31/12/2024 and provided to EASA during the summer of 2025.

1.1 Methodology

Every year, EASA collects statistical complaints' data from the advertising self-regulatory organisations (SROs) in its membership. A complaint is defined as an expression of concern about an advertisement by a member of the public, a competitor, or an interest group (among others), which requires a response from an SRO. A complainant can raise one or more concerns about the ad within the same complaint. The SRO may then open one case for one ad based on one complaint or several similar complaints. Multiple cases may be opened against a single ad if several complaints raise different issues. The following pages will discuss solely the number of complaints received by SROs, as an indicator of the prevalent audience attention to seemingly problematic issues in ads.

The present report covers data² from 28 SROs in 26 European countries (23 SROs from European Union Member States as well as the 5 SROs from Serbia, Switzerland, Turkey, and the United Kingdom EASA's network covers over 97% of the European Union's population and over 74% of Europe's.

The data collected by EASA identifies the issues which prompted complaints, the products and services that generated the most complaints, and the medium that carried the most complained about ads. The annual collection and analysis of complaints data are a useful tool in determining and anticipating trends as well as in identifying any problematic sectors or issues.

The main method used for data processing is the calculation of the European averages based on aggregate complaints data, available at the national level. It is a method which relies on the calculation of the sum of the total complaints resolved by each SRO per issue, product, medium, or other categories. Subsequently, the percentage has been computed in relation to the total number of complaints within a given category or section. Where appropriate, the European mean average is also presented, which rely on an average share of complaints (in percentages) in each country.

If granular data within a particular category with second level classification at national level is available, this data will be presented here. However, it is important to keep in mind that those graphs only refer to the group of markets where such granular distribution is available.

The number of complaints received by individual SROs can vary greatly (see table 1, section 2.1). The European average is thus not necessarily mirroring the share of complaints per issue, medium, service, etc. at the national level. For national complaints data or further information please contact the <u>EASA secretariat</u>.

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 $^{^{\}rm 2}$ The report covers data on complaints received and handled from 1 January to 31 December 2024.

2 Complaints in Europe in 2024

52,715 complaints about 32,099 advertisements in Europe

In 2024, EASA's network of European ad self-regulatory organisations (SROs) received and handled a total of 52,715 complaints related to 32,099 advertisements. The number of complaints increased by 5.5% since in 2023. In recent years, the peak number of complaints was reached in 2021 with 61,883, while the following year, 2022, recorded the lowest figure with 50,029.

On average across the previous five years, 54,896 complaints have been handled by SROs annually against an average of 30,295 advertisements.

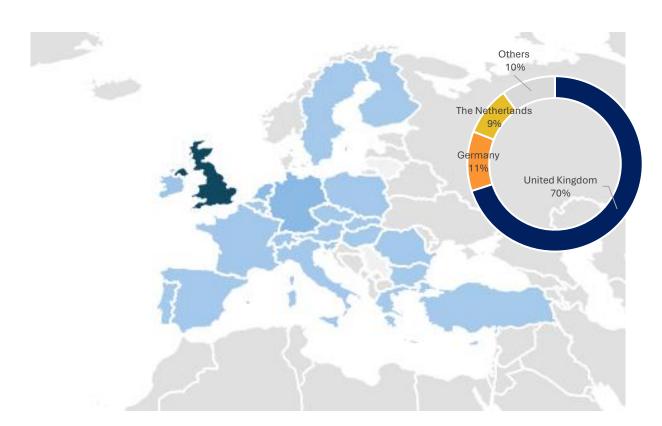
70.000 61.883 60.000 55.790 54.065 52.715 50.029 50.000 40.000 35.096 32.099 30.178 29.684 30.000 24.420 20.000 10.000 0 2021 2020 2022 2023 2024 Complaints Advertisements

Graph 1: Complaints lodged with SROs and the number of complained about ads across Europe from 2020 to 2024

2.1 Complaints by country

Consumers in the UK, Germany and The Netherlands accounted for 90% of lodged complaints

The map below in Graph 2 and Table 1 depicts a breakdown of complaints received in 2024 per country. The United Kingdom received 70% of all complaints, with Germany falling in second place registering 11% of complaints between the two SROs. The Netherlands accounted for 9% of complaints.



Graph 2. European complaints map

Number of complaints	Colour		
>1000			
101–1000			
1–100			
0			

Table 1: Complaints per country across Europe from 2020 to 2024

Country – SRO	N°	2024	2023	2022	2021	2020
UK – ASA UK	1	37,028	39,427	33,324	43,190	36,297
DE – WBZ	2	4,600	3,100	1,008	1,444	1,343
DE – DWR		1,041	355	5,000	6,000	5,600
DE – Total		5,641	6,827	6,008	7,444	6,943
NL-SRC	3	4,957	4,866	4,198	6,157	4,015
IE - ASA Ireland	4	1,469	1,399	1,187	1,422	1,614
FR – ARPP	5	587	552	567	736	714
SE – Ro.	6	523	511	617	660	688
IT – IAP	7	458	544	2,378	577	1,797
AT – ÖWR	8	368	334	503	413	411
ES – AUTOCONTROL	9	279	258	214	209	239
CH - CSL/SLK	10	262	152	122	51	110
BE – JEP	11	257	97	155	151	123
PL-RR	12	207	240	165	245	221
RO – RAC	13	174	155	93	81	102
FI – MEN & LTL	14	129	103	129	145	132
TR – RÖK	15	109	91	175	160	202
CY – CARO	16	71	28	15	24	22
SK – SRPR	17	43	108	59	73	79
BG – NCSR	18	42	6	11	13	28
EL-SEE	19	42	57	59	74	84
CZ – CRPR	20	33	22	15	Unavailable	38
HU – ÖRT	21	15	8	13	29	31
SI – SOZ	22	12	0	10	24	14
PT – ARP	23	6	5	6	4	11
LU – CLEP	24	3	0	1	1	0
RS – NAESO	25	0	0	0	0	0
LT – LRSB	25	0	N/A	N/A	N/A	N/A

The majority of complaints were lodged by consumers

In 2024, 90% of complaints received by SROs were from consumers, a share almost identical to the previous year and confirming their leading role. Complaints from interest groups represented 5%, showing a slight increase compared to 2023, while competitors accounted for 4%, moving to third place after holding second position the year before.

As in previous years, the figures show only limited variation. Consumers remain by far the main source of complaints, while submissions from public authorities and entities continue to account for less than 1%.

Graph 3: Source of complaints received across Europe in 2024 (European total average)

90% 5%

Consumers Competitors





<1%

Interest groups

4%



Authorities and Public entities



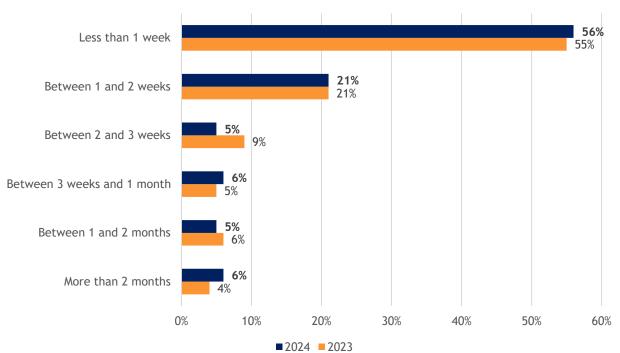
2.3 Speed of complaint resolution

Over half of all complaints were handled in less than one week, and 77% in two weeks

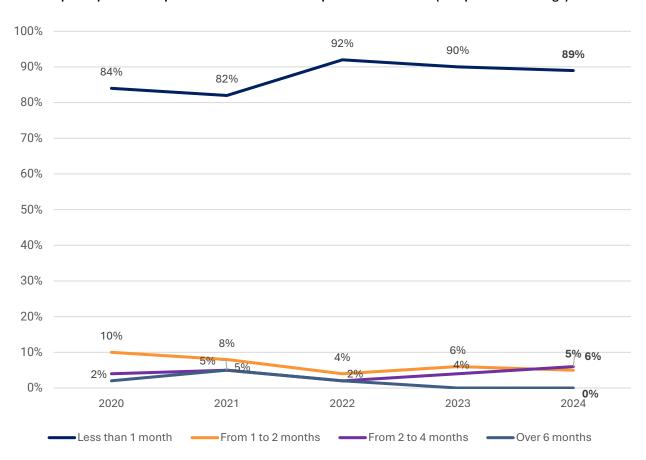
In 2024, over half of all complaints (56%) were handled in less than one week, and more than three quarters (77%) within two weeks.

The speed of complaints handling continues to depend on the complexity of the case and the ease with which SROs can reach out to the relevant parties. Straightforward cases are typically resolved within a couple of days, whereas more complex ones take longer when additional information is required. Where scientific substantiation of advertising claims is necessary, complaints may lead to extended investigations.

Graph 4: Speed of complaint resolution across Europe in 2023 and 2024 (European total average)



As illustrated in Graph 5, the European SROs' speed of complaint resolution has been consistent for the past few years. This is good news, as the faster complaints are handled, the quicker consumers will receive the due redress they are owed, a notification that their queries are being heard, treated properly, and advertisers contacted to possibly modify or withdraw an ad campaign as quickly as possible.



Graph 5: Speed of complaint resolution across Europe from 2020 to 2024 (European total average)

2.4 Outcome of complaints resolved

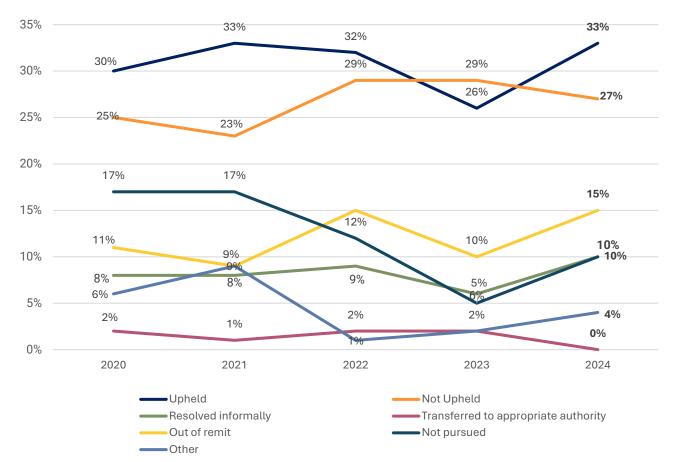
On average, 33% of complaints were upheld, 27% were not upheld, and 10% were resolved informally in 2024.

In 2024, on average, 33% of complaints were upheld by the SROs' juries. The responsible SRO's jury considered that the advertisements complained about in these cases were in breach of the relevant national advertising codes. Conversely, about 27% of complaints were not upheld by SROs.

The share of complaints that were received but were out of the SROs' remit accounted for 15%. Meanwhile, the number of complaints that were not pursued due to a lack of adequate information or unsubstantial reasons for complaining represented 10%.

Informally resolved complaints accounted for 10% in 2024, showing the relevance of mediation between the advertiser and the complainant before the SRO jury or complaints committee reaches a decision. Withdrawn complaints represented only 1%, while 4% fell into other categories.

The graph below showcases how the different outcomes of complaints evolved since 2020. Compared to 2023, upheld complaints increased from 26% to 33%, while not upheld complaints decreased from 29% to 27%. The share of complaints out of remit rose from 10% in 2023 to 15% in 2024, whereas cases not pursued for lack of information remained stable at around 10%.



Graph 6: Outcome of complaints across Europe from 2020 to 2024 (European mean average)

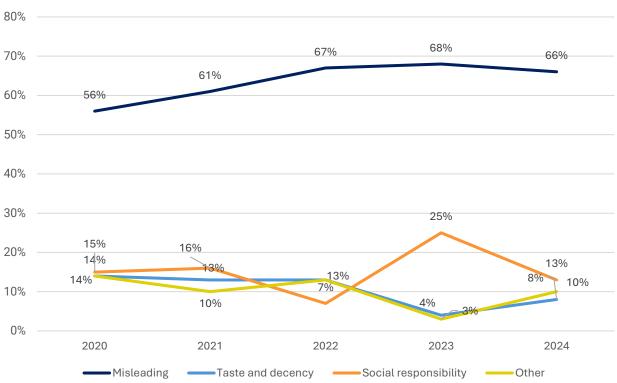
2.5 Issues complained about

In 2024, consumer concerns over misleading advertising decreased by 2 points to 66% of complaints, with social responsibility in second place at 13%

The graph below illustrates the evolution over the past 5 years of the issues complained about. Complaints against purportedly misleading advertising remain the dominant share of complaints lodged with SROs across Europe, accounting for 66% in 2024, slightly down from a high of 68% in 2023.

In 2024, social responsibility ranked second with 13%, a decrease from 25% in 2023, when it temporarily overtook other categories. Social responsibility issues encompass gender-based and non-gender-based discrimination, inappropriate content for children, exploitation of credulity, and play on fear and violent content.

Other categories reached 10% in 2024, compared to 3% in 2023. This category relates to issues such as privacy & data protection, breaches of sectoral rules, imitation, transparency of commercial intent in the ad, and breaches of rules on non-commercial ads or market rules for SROs that extend their remit to include this. Taste and decency accounted for 8% of complaints, up from 4% in 2023. Health and safety represented 2%, while denigration of competitors remained marginal at 1%.



Graph 7: Issues complained about across Europe from 2020 to 2024 (European total average)

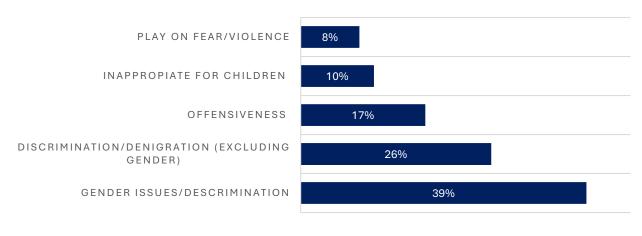
A more detailed look into both categories of social responsibility and taste & decency reveals that 39% of complaints referred to gender issues and discrimination, including gender roles, stereotypes, or the portrayal of the human body. This marks a significant increase compared to 10% in 2023.

Twenty-six percent of complaints concerned non-gender-based discrimination depictions, such as those based on religion, ethnicity, age, disability, or political beliefs, a decrease from 42% in 2023. In 2024, 17% of complaints were lodged on grounds of general offensive content, up from 4% in 2023. Such complaints often differ considerably across countries due to local sensitivities and cultural narratives. However, they all had in common the fact that consumers took issue with the creative execution of the ad and its depiction of actors in ways that offended customs, social or cultural norms, religious practices, or other decency standards.

A tenth of these complaints concerned inappropriate content for children, slightly down from 11% in 2023. Eight percent related to content that played on the audience's fears or contained violent content, a small increase compared to 5% in 2023.

It is important to note that not all SROs differentiate between these subcategories. We have combined both categories of Social Responsibility and Taste & Decency together, as what is considered to be the realm of the former or latter depends on the SROs' rules, themselves reflective of local social structures. Therefore, the figures presented in this section should be taken as a top-line general overview of the situation, noting that each country may have vastly different statistical trends in this area. If an SRO does not distinguish between distasteful, offensive, or harmful content, they will not be included in the overview graph below. Finally, it is also worth keeping in mind that each country, region, and language will have distinct definitions of what is considered distasteful, offensive, harmful, or discriminatory. As such, these figures serve here only to give an idea of the type of portrayals and depictions that some consumers may find unacceptable in their views – this is not to say that the SROs' jury or complaints committee agreed with their complaint.

Graph 8: Distribution of complaints under the categories of taste and decency and social responsibility (2024)



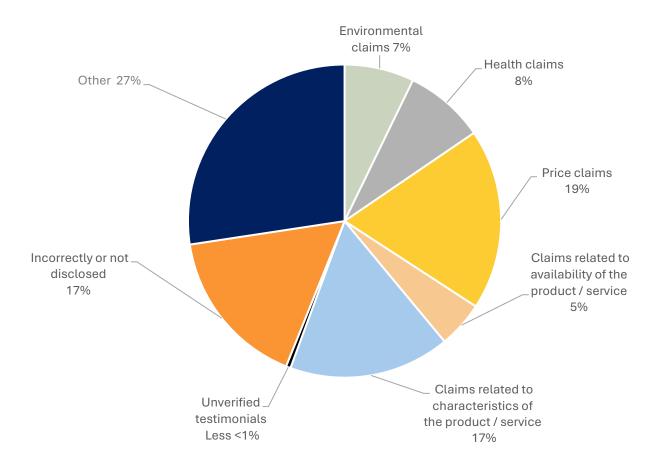
15

It is also relevant to look in more depth into the category of misleading advertising. Though the below graph outlines the major trends in the complaints lodged with SROs in the category of misleading advertising, these sub-classifications are not necessarily reflected in all SROs' complaints' handling systems, as each organisation has their own categories and handling processes.

In 2024, across Europe, the largest share of purportedly misleading claims was about price claims (19%) followed by claims about product or service characteristics (17%) and incorrect or not disclosed information (17%). Health claims accounted for 8% of complaints, while environmental claims represented 7%. Availability-related claims stood at 5%, and finally, unverified testimonials accounted for less than 1% of the total.

Other complaints (27%) concerned missing information, qualifications, invitations to purchase, blacklisted practices, comparative advertising, and aggressive advertising, among others.

Compared to 2023, the distribution of categories has shifted significantly. In 2023, the majority of misleading claims related to incorrect or not disclosed information (35%), while in 2024 this share fell sharply to 17%. Health claims and price claims, which both accounted for 18% in 2023, diverged in 2024: price claims rose slightly to 19%, while health claims declined to 8%. Availability-related claims also dropped from 16% in 2023 to 5% in 2024, and environmental claims increased modestly from 6% to 7%. Finally, unverified testimonials decreased from 4% in 2023 to less than 1% in 2024.



Graph 9: Distribution of complaints under the category of misleading advertising

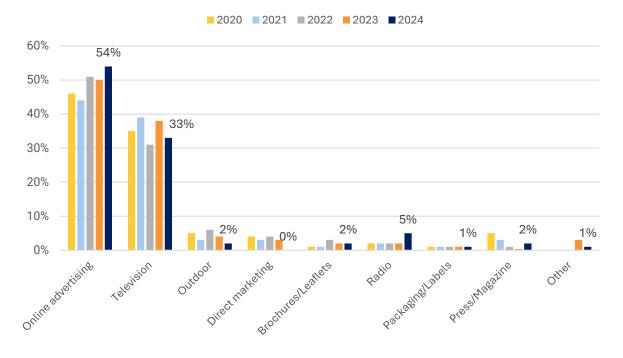
More than half of all complaints targeted online ads

Online advertising accounted for the highest share of all complaints in Europe in 2024, at 54%. This follows past years' trends, as illustrated in the graph below. Television ranked second, covering 33% of complaints.

Outdoor advertising accounted for 2% of complaints, consistent with previous years. Direct marketing, press, radio, brochures and packaging together represented around 9% of all complaints. Other media types, such as point-of-sale, cinema, and teleshopping reached less than 1% in 2024.

Online advertising remained the medium with the highest share of complaints, with television in second position. Compared to 2023, online advertising complaints rose from 50% to 54%, while television declined from 38% to 33%. Outdoor advertising remained stable at 2%, whereas radio increased slightly from 4% to 5%.

Overall, 2024 confirmed the predominance of online advertising as the most complained about medium, while television continued to decline. Traditional media such as outdoor, press and radio remained relatively stable, together representing a much smaller share of total complaints.



Graph 10: Medium of complained about ads received across Europe from 2020-2024

³ A couple of name changes occurred in the Media section in 2021. *Digital Marketing Communications (DMC)* was changed to *Online advertising*, to better reflect the category's remit of influencer marketing, banner ads, paid search, etc. Similarly, *Audio-visual media services (AVMS)* were changed to *Television*, as it only included linear and non-linear TV, and it wrongly alluded to the European Union Directive on Audio-Visual Media Services, which also includes online in its remit, unlike the statistical category here. Readers are informed as well that the sub-category "digital outdoor" that was previously located under *Digital Marketing Communications (DMC)*, and which accounted for 2% of DMC complaints, was moved in the *Outdoor* category, now making up 22% of this category's complaints. These changes were proposed and approved by EASA's Self-Regulatory Committee and its Board.

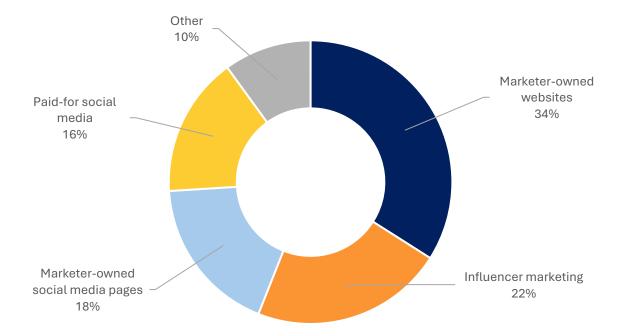
Looking closer at online advertising as a medium, for SROs that are able to provide granular data distinguishing between sub-categories of online ads, we see that marketer-owned websites (34%) saw the most complaints, followed by influencer marketing (22%). Marketers' social media pages ranked third with 18%, closely followed by paid social media ads at 16%.

Displayed ads on non-marketer-owned websites represented 8%, while paid search accounted for 2%. Smaller categories included in-app advertising (0.2%), native advertising (0.02%), and marketergenerated or endorsed viral (0.01%). Other formats, such as OBA or advert-games, were negligible in 2024.

Compared to 2023, the distribution of online advertising complaints shifted notably. Influencer marketing decreased from 26% in 2023 to 22% in 2024, while marketer-owned websites rose from 18% in 2023 to 34% in 2024, taking the lead. Marketers' social media pages fell slightly from 34% to 18%, and paid social media remained stable, moving from 15% in 2023 to 16% in 2024. Paid search increased from under 2% in 2023 to just over 2% in 2024, while other smaller categories (in-app, native, advert-games) remained negligible.

It is worth noting that self-regulatory rules enforced by SROs are applicable both to paid-for ads and to organic content disseminated via social media by marketers on their own pages.

Finally, similar to previous graphs depicting granular data within a given classification category, the below figures are only reflective of a pool of SROs that keep such detailed records. By covering a majority of the SR network, it provides a general top-line overview of the trends in this category. Within any given country or market, statistics may differ from the data shown in this report.



Graph 11: Distribution of complaints against online advertisements across Europe for 2024

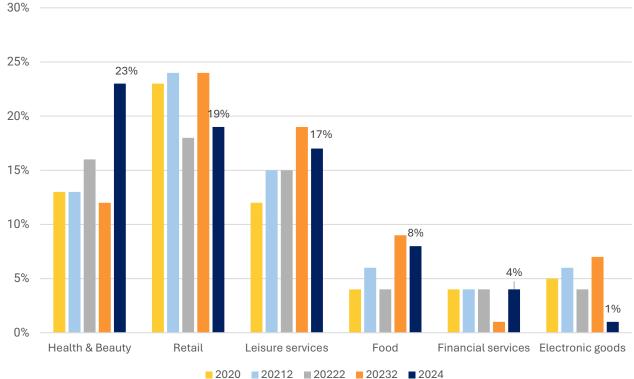
Ads for health and beauty services and products, retail, and leisure services were the most complained about sectors.

A comparison of the products and services that generated the highest number of complaints reveals that, in 2024, the largest proportion of complaints was lodged against advertisements for health and beauty products and services, accounting for 23% of all complaints. Retail follows in second place with 19%, while leisure services take third position with 16%. This represents a notable shift compared to 2023, when retail held the top spot at 23%, leisure services were second with 22%, and health and beauty accounted for 10% of all complaints.

The following graph indicates the share of the commercial categories of products and services most complained about, and on the next page is an infographic displaying the shares of all products and services in more detail.

Graph 11: Complaints for the first six commercial categories across Europe from 2020 to 2024

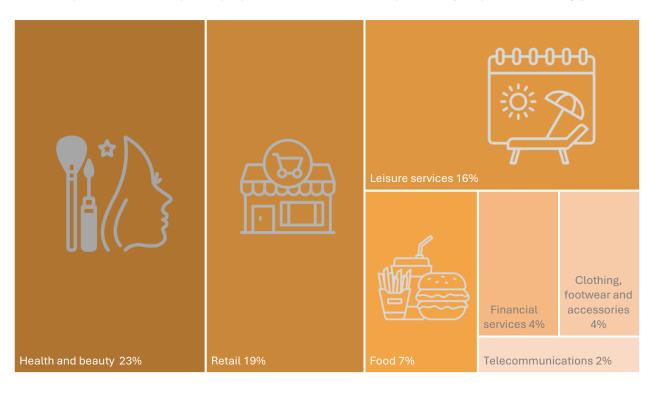
(European total average)



SROs also recorded complaints for other sectors such as alcohol beverages, books and magazines, cars, electronic goods, e-cigarettes, business directories, education services, energy and water providers, employment services, real estate, house maintenance, gambling and lotteries, transport services, and other services. These categories have not seen major variations compared to previous years' statistics.

Compared to 2023, the distribution of complaints per sector shows a significant change. Health and beauty products and services, which accounted for 10% in 2023, rose sharply to 23% in 2024, becoming the most complained about category. Retail, which held first place with 23% of all complaints in 2023, decreased slightly to 19% in 2024, moving into second place. Leisure services, which represented 22% of complaints in 2023, fell to 16% in 2024, now ranking third. Food remained stable, with 6% of complaints in both 2023 and 2024, while financial services rose modestly from 3% to 5%. By contrast, toys, which had accounted for 6% in 2023, dropped considerably to below 1% in 2024.

Graph 12: Share of complaints per product/service across Europe in 2024 (European total average)

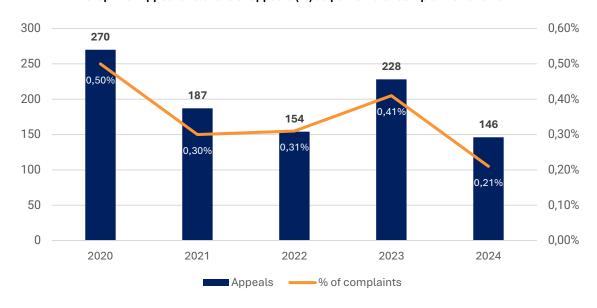


2.8

In 2024, SROs' decisions were appealed 36% less

Appeals can be filed by both complainants and advertisers requesting a review of decisions taken by the jury or complaints committee. An appeal may only be lodged with the SRO under strict rules, such as based on newly available evidence or a proven vice with the adjudication procedures in the first instance decision. They are often dealt with by a different body than the jury responsible for the original decision, though this is defined by the SROs' rules on the matter and not all organisations follow the same procedures. Nonetheless, all SROs ensure that the decisions that are appealed are reviewed by an independent, impartial, and expert jury.

In 2024, the number of appeals amounted to 146, which represents a 36% decrease compared to the 228 appeals recorded in 2023. These appeals constituted 0.21% of all complaints received. Graph 12 below shows how the number of appeals evolved over the past 5 years, and their representative share compared to the annual total number of complaints.



Graph 13: Appeal and share of appeals (%) as part of total complaints 2020-2024

In 2024, 146 appeals were filed across Europe. Of these, 54% were lodged by advertisers and 48% by complainants.

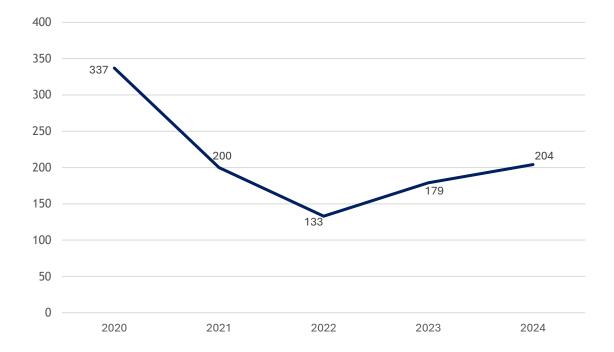
Graph 14: Share of lodged appeals per category of appellants (%)

By advertiser, 54%	By plaintiff, 48%

Cross-Border Complaints: top-line overview

In 2024 EASA's SROs transferred 204 complaints, 25 more than in 2023

Over the course of 2024, EASA was notified of a total of 204 cross-border complaints, which translates into a 14% increase in referred complaints in comparison with the preceding year.



Graph 16: Cross-border complaints received between 2020 and 2024

Source: Annual Cross-Border Complaints Report 2024 & Online Database⁴

The EASA Cross-Border Complaints system is based on the principles of the country of origin and mutual recognition, enshrined in European Union law. In practice, this means that all advertisements comply with the advertising laws and advertising self-regulatory codes of the country wherein the medium carrying the advertisement is based. However, in the case of Direct Mail and Digital Marketing Communications (DMCs), the country of origin that is responsible for the complaint is the one wherein the advertiser is based. In the case of Online Behavioural Advertising (OBA), it is the country in which the principal decision-making authority is conducted that counts as the country of origin. ⁵ The vast majority of CBCs are lodged against digital marketing

⁴ The "Online Database" refers to EASA's internal online cross-border complaints platform that member self-regulatory organisations use to register and send their complaints through to other SROs. EASA acts as a facilitator and caretaker of the platform, using the confidential data only for statistical purposes.

⁵ Switzerland requires that advertisements addressed by Swiss-based marketers to consumers in other countries comply with the rules and laws of those countries (known as the "principle of the country of destination"). Consequently, in such cases, the Self-Regulatory Organisation (SRO) in the plaintiff's country assesses the complaint based on its own national rules before passing it to the Swiss SRO, which communicates the decision to the advertiser. Some other SROs, in EU member countries, operate under different principles as well. However, SROs always share information and best practices to have a swift and definitive decision for each CBC.

communications. This entails that it is the SRO in the country of origin of the advertiser that is responsible for handling the complaint according to local rules and legislation.

From the analysis of the figures for 2024, it transpires that consumers in the UK were the source of the vast majority of complaints transferred abroad, with 86% of CBCs. The 176 CBCs predominantly targeted misleading advertising material in 89% of cases, relating to ads by leisure services with 26% or other IT products accounting for 14%.

These ads appeared in 89% of CBCs in the online space as digital marketing communications. Only 6% of complaints were upheld, versus 26% that were not and 25% that were closed as SROs were unable to pursue the cases. Less than 5% of CBCs prompted no cause for investigation on the part of SROs and 29% fell out of their remit. Finally, the remaining share of CBCs were either transferred to the appropriate body, withdrawn by the plaintiff or resolved informally.

Further details are available in the CBC report on the EASA website.

Graph 17: Cross-border complaints per country of origin of the media/advertiser in 2024

Source: EASA Annual Cross-Border Complaints Report 2024

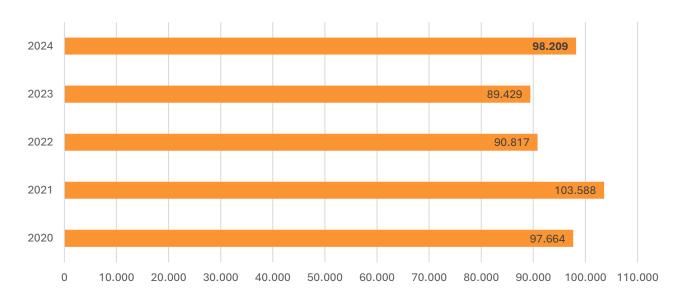
4 Copy Advice requests

SROs serviced 98,209 ads with copy advice

Copy advice is provided by an SRO as a voluntary service for companies wishing to receive feedback on a confidential basis as to whether their ads meet the required advertising standards before they go ahead with the marketing project. The feedback is non-binding and does not guarantee that the ad will not be subject to complaints later once the ad is aired or published. Companies can ask for advice at any stage of the campaign development process. In 2024, 25 out of 26 SROs offered such a service across Europe.

illustrates the numbers of copy advice requests dealt with across Europe. European SROs provided a total of 98,209 copy advice services in 2024 – an increase of 10% compared to the previous year.

Graph 18 Below illustrates the numbers of copy advice requests dealt with across Europe. European SROs provided a total of 98,209 copy advice services in 2024 – an increase of 10% compared to the previous year.



Graph 18: Copy advice requests across Europe from 2020 to 2024

75% of copy advice requests dealt with by SROs in 2024 were handled within 72 hours. Of those, 9% were dealt with in less than 24 hours, an additional 14% in less than 48 hours.

Table 3 presents a full overview of copy advice requests per country across Europe from 2019 to 2024. In 2024, most copy advice requests were received by the ARPP in France, accounting for 34% of them, followed by AUTOCONTROL in Spain with 33%, and the UK with ASA and Clearcast jointly handling 31% of requests

Table 2: Copy-Advice requests per country across Europe from 2020 to 2024

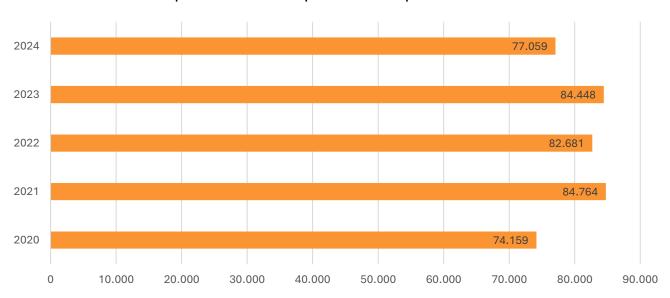
Table 2. Copy-Advice requests per country across Europe from 2020 to 2024							
Country/SRO	N°	2024	2023	2022	2021	2020	
FR – ARPP	1	33716	33620	36,187	45,281	43,866	
ES – AUTOCONTROL ⁶	2	32420	24740	25,075	28,446	28,400	
UK – Clearcast	3	26041	3347	2,947	2,310	2,485	
UK-ASA		4253	28087	28,022	30,756	30,885	
UK – Total		30294	25932	24,690	25,391	20,841	
HU – ÖRT	4	693	600	650	800	800	
DE – WBZ	5	550	23	20	32	40	
DE – DWR		26	623	670	832	840	
DE - Total		576	656	641	691	645	
IE – ASAI IE	6	103	94	88	117	115	
IT – IAP	7	103	93	106	103	95	
TR – RÖK	8	79	81	137	114	81	
PT – ARP	9	51	56	67	83	82	
BG - NCSR	10	33	34	46	89	51	
RO – RAC	11	29	33	25	31	28	
SE – Ro.	12	25	28	27	25	32	
SI – SOZ	13	25	23	19	15	30	
NL - SRC	14	25	17	16	Unavailable	17	
CY - CARO	15	18	16	34	25	27	
BE – JEP	16	14	11	2	2	2	
PL – RR	17	11	10	-	-	-	
CZ – CRPR	18	7	8	20	17	10	
SK – SRPR	19	6	0	3	1	2	
AT – ÖWR	20	3	0	1	1	2	
EL – SEE	21	3	0	0	0	2	
FI – MEN & LTL	22	0	0	8	14	7	

 $^{^6}$ AUTOCONTROL provides mandatory copy advice for companies who signed the PAOS Code (food advertising for children) and the Toys Code.

5 Pre-Clearance service

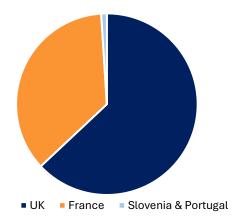
77,059 ads were pre-cleared in 2024 by the 3 SROs providing this service

In 3 European countries, namely France, Portugal, and the UK, ads appearing on TV and radio, or ads for particular sectors, such as alcohol advertisements, are subject to compulsory pre-clearance. The mandate is led by the local advertising industry, at the behest of either the advertisers or the media, and facilitated by the SRO, who check the ads' compliance with relevant legislation and SR rules. This means that advertisements in those categories must be assessed by the national advertising self-regulatory organisation for compliance with the relevant statutory or self-regulatory code before they can be broadcast or published. This year, the Slovenian SRO, SOZ, also reviewed 4 advertisements under the pre-clearance service.



Graph 19: Pre-clearance requests across Europe from 2020 to 2024





As shown in Graph 20, in 2024, a total of 77,059 were reviewed by SRs in the UK, France, Portugal and Slovenia.

The graph on the side indicates the share of ads that each of the SROs in these countries have precleared over the course of 2024: 48,562 by Clearcast; 28,272 by ARPP and 221 by ARP (<1%). Finally, 4 advertisements were pre-cleared by SOZ ((<1%).



Annexe: Definitions and key terms

General definitions

Complaint

A complaint is defined as an expression of concern about an advertisement by a member of the general public, a competitor, an interest group, etc. which requires a response. One complaint is defined as one or several different concerns about one advertisement by the same complainant.

Case

A case is defined as an advertisement subject to assessment/investigation by the SRO jury. Cases include assessments and decisions taken by all competent SRO bodies, such as the SRO council/jury, the SRO complaints committee or the SRO secretariat

Copy advice

Advice on (a) proposed advertisement(s) provided by a self-regulatory body, usually on a non-binding basis, as to whether or not it is compliant with the local advertising code.

Pre-clearance

Examination of an advertisement by a self-regulatory body or another body/institution as a compulsory precondition from publication or transmission.

Ban

A complete ban on advertising of the product/issue concerned, usually made by law.

Restriction

Codes/laws in place which significantly affect the advertising of the product/issue concerned.

Case handling duration

The time elapsed from the receipt of the complaint until the moment where the decision is made effective.

SR Code

The self-regulatory (SR) Code is a set of rules governing the content of advertising.

Own-initiative investigation (SRO)

Examination of advertisements by an SRO jury following the flagging of these ads by the SRO secretariat, e.g. through a monitoring exercise.

Appeal

Challenge to the complaints committee's decision either by the complainant or the advertiser, for example on the basis of new evidence. Appeals are normally considered by a different body than the jury which reached the original decision.

Outcomes of complaints

Upheld

Complaints that are investigated by the SRO and adjudicated by the SRO jury are upheld if the jury decides that the marketing communication does breach the advertising codes. Subsequently, the advertiser is asked to withdraw or change the advertisement to ensure it complies with the rules.

Not upheld

Complaints that are investigated by the SRO and adjudicated by the SRO jury are not upheld if the jury decides that the marketing communication does not breach the advertising codes. No further action is taken.

Not pursued/not investigated

A complaint is not pursued if the SRO considers that there is no basis for investigation (e.g. the concern of the complainant would not be shared by most people) and subsequently dismisses the complaint, or where not enough information was provided by the complainant, or the requirements of complaint submission were not met.

Resolved informally

When a minor or clear-cut breach of the self-regulatory codes has been made, the SRO may decide to resolve the complaint informally, i.e. the marketer agrees to change or withdraw its marketing communication right away.

Transferred to the appropriate authority

For example, complaints that have been transferred to the appropriate legal backstop.

Out of remit

A complaint falls out of remit if either the complaint or the marketing communication falls outside the scope of the self-regulatory code (e.g. the complaint is about the product advertised and not the advertisement as such). However, the SRO might decide to forward the complaint to another complaint-handling body for action.

Nature of the complaints

Misleading advertising

Misleading advertising refers to any claim, whether made expressly, by implication, or by omission, which is likely to lead members of the general public to suppose that the advertised goods or services, or the conditions (including price) under which they are offered, are materially different from what is, in fact, the case.

Marketing communication should not contain any statement, or audio or visual treatment which, directly or by implication, omission, ambiguity or exaggeration, is likely to mislead a member of the general public.

Social responsibility

Marketing communication should respect human dignity and should not incite or condone any form of discrimination, neither denigrate any person or group of persons, firm, organisation, industrial or

commercial activity, profession or product. Moreover, advertisements should be so framed as not to abuse the trust of people, exploit their lack of experience or knowledge and should not without justifiable reason play on fear or exploit misfortune or suffering.

Marketing communication should pay particular attention to advertising for children and should not suggest that possession or use of the promoted product will give a child or young person physical, psychological or social advantages over other children or young people, and should not undermine the authority, responsibility, judgment or tastes of parents, having regard to relevant social and cultural values. Advertising targeting children should not present prices in such a way as to lead children and young people to an unrealistic perception of the cost or value of the product, or imply that the product is immediately within the reach of every family budget.

Health and safety

Advertisements should not without reason, justifiable on educational or social grounds, contain any visual presentation or any description of dangerous practices or of situations that show a disregard for safety or health.

Taste and decency

Advertisements should not contain statements or visual presentations which offend prevailing standards of decency. Claims over taste and decency issues include complaints lodged in relation to alleged offensiveness, discrimination based on gender and inappropriate sexualisation as well as inappropriateness for children audience. This may include shocking images or claims used merely to attract attention, sexually offensive material, hostile or discriminatory content, as well as content that might cause distress to children.

Denigration of competitors

Advertisements should not make incorrect, false, unduly announcements to give bad effects to reputation, financial situation, business activities in goods and services of competitors in order to obtain a competitive edge.

European Advertising Standards Alliance

Rue des Deux Églises 26

1000 Brussels, Belgium

www.easa-alliance.org

info@easa-alliance.org

european-advertising-standards-alliance

