

A faint, light blue map of Europe is visible in the background of the top half of the page.

2025

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



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 45 organisations committed to making sure advertising is legal, decent, honest and truthful. EASA's membership is made up of 28 European advertising self-regulatory organisations (SROs), and 14 advertising industry associations, including advertisers, agencies, the media and 3 digital pure-play companies. 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 pre-clearance from its SRO members each year.

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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 2025¹.

It is based on data collected by 28 SROs in 26 European countries.



55,737 complaints related to 34,683 advertisements were handled by 27 European SROs



The UK, the Netherlands and Germany accounted for 91% of all complaints received in Europe.



Misleading advertising remained the predominant issue complained about at 46% followed by taste and decency at 28%



On average, SROs resolved 57% of received complaints within the first week, 77% in two weeks, and 90% within one month in 2025



Online advertising accounted for 49% of complaints, closely followed by television at 40%



Complaints against health and beauty services and products advertisements amounted to 30%, followed by retail at 18%, and leisure services at 11%



178 cross-border complaints were registered in 2025, decreasing by 13% compared to 2024



126,735 requests for copy advice were submitted to the SROs



49,478 ads were pre-cleared by the SROs providing this service to the industry

¹ Data was collected by SROs from 01/01/2025 – 31/12/2025 and provided to EASA during the summer of 2026.

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 4 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 relies 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 [EASA secretariat](#).

² The report covers data on complaints received and handled from 1 January to 31 December 2025.

2 Complaints in Europe in 2025

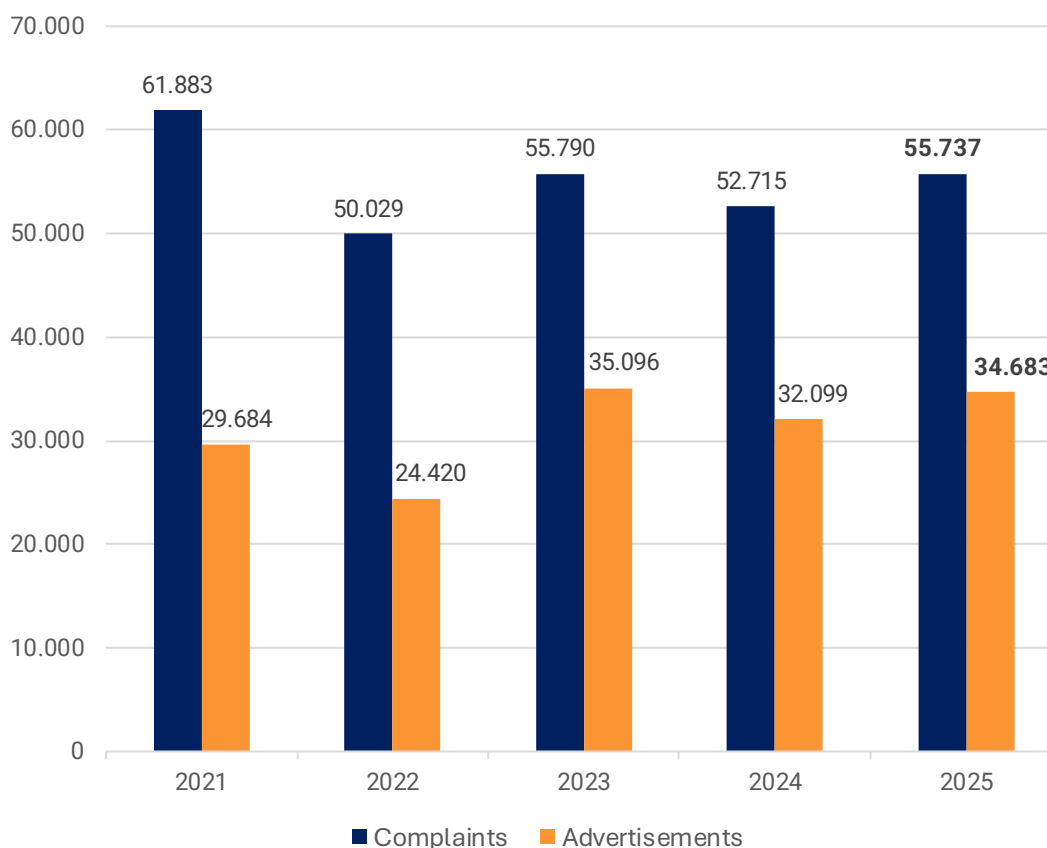
55,737 complaints about 34,683 advertisements in Europe

In 2025, EASA's network of European ad self-regulatory organisations (SROs) received and handled a total of 55,737 complaints related to 34,683 advertisements. The number of complaints increased by 5.7% compared to the previous year, from 52,715 complaints in 2024.

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, 55,231 complaints have been handled by SROs annually against an average of 31,196 advertisements.

Graph 1: Complaints lodged with SROs and the number of complained about ads across Europe from 2021 to 2025



2.1 Complaints by country

Consumers in the UK, The Netherlands, and Germany accounted for 91% of lodged complaints

The map below in Graph 2 and the Table 1 show a breakdown of complaints received in 2025 per country. The UK remained by far the country with the highest number of complaints, accounting for 72% of all complaints received across Europe. The Netherlands ranked second with 12%, followed by Germany with 8%.

Together, the UK, the Netherlands, and Germany accounted for approximately 91% of

all complaints lodged in Europe in 2025. Compared to 2024, the share of complaints received in the UK increased slightly, while the Netherlands strengthened its position as the second-largest source of complaints. Germany, by contrast, recorded a lower share than in the previous year.

The rest of the detailed breakdown can be found in the table on the following page.

Graph 2. European complaints map

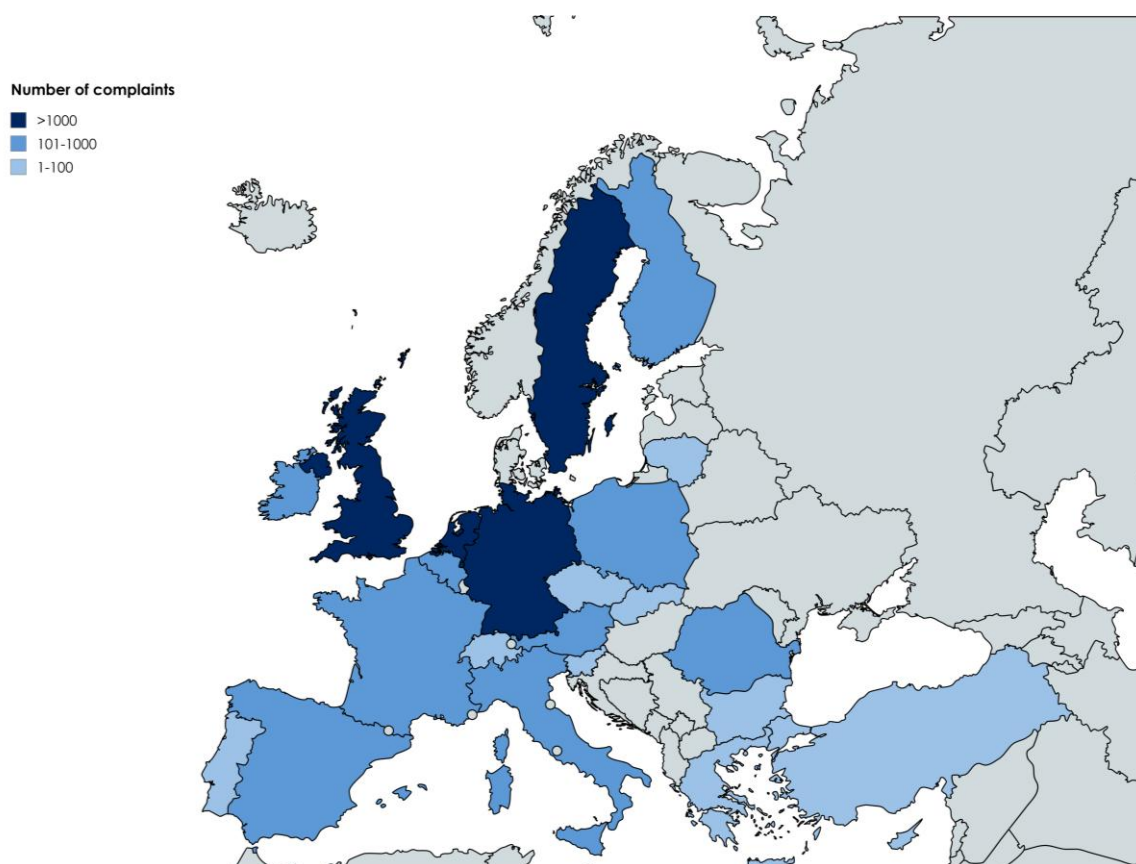


Table 1: Complaints per country across Europe from 2021 to 2025

Country – SRO	N°	2025	2024	2023	2022	2021
UK – ASA UK	1	40,152	37,028	39,427	33,324	43,190
NL – SRC	2	6,611	4,957	4,866	4,198	6,157
<i>DE – WBZ</i>	3	3,100	4,600	3,100	1,008	1,444
<i>DE – DWR</i>		1,110	1,041	355	5,000	6,000
DE – Total		4,210	5,641	6,827	6,008	7,444
SE – Ro.	4	1,051	523	511	617	660
IE – ASA Ireland	5	913	1,469	1,399	1,187	1,422
FR – ARPP	6	685	587	552	567	736
AT – ÖWR	7	438	368	334	503	413
ES – AUTOCONTROL	8	387	279	258	214	209
PL – RR	9	314	207	240	165	245
FI – MEN & LTL	10	162	129	103	129	145
BE – JEP	11	139	257	97	155	151
IT – IAP	12	138	458	544	2,378	577
RO – RAC	13	122	174	155	93	81
TR – RÖK	14	98	109	91	175	160
CH – CSL/SLK	15	82	262	152	122	51
SK – SRPR	16	53	43	108	59	73
EL – SEE	17	48	42	57	59	74
CZ – CRPR	18	44	33	22	15	Unavailable
BG – NCSR	19	27	42	6	11	13
CY – CARO	20	17	71	28	15	24
HU – ÖRT	21	15	15	8	13	29
SI – SOZ	21	15	12	0	10	24
LT – LRSB	22	12	0	N/A	N/A	N/A
PT – ARP	23	4	6	5	6	4
LU – CLEP	24	0	3	0	1	1
RS – NAESO	24	0	0	0	0	0

2.2 Source of complaints received

The vast majority of complaints were lodged by consumers

In 2025, 90% of complaints for which source information was available were lodged by consumers, confirming their predominant role as the main source of complaints across Europe. Interest groups accounted for 5%, while competitors represented 4% of complaints.

As in previous years, the figures show only limited variation. Consumers remain by far the

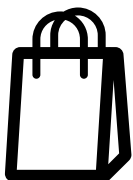
main source of complaints, while submissions from public authorities and entities continue to account for less than 1%.

Overall, the distribution remained broadly stable compared to 2024, with consumers continuing to account for the overwhelming majority of complaints received by SROs.

Graph 3: Source of complaints received across Europe in 2025 (European total average)

90%

Consumers



5%

Interest groups



4%

Competitors



<1%

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

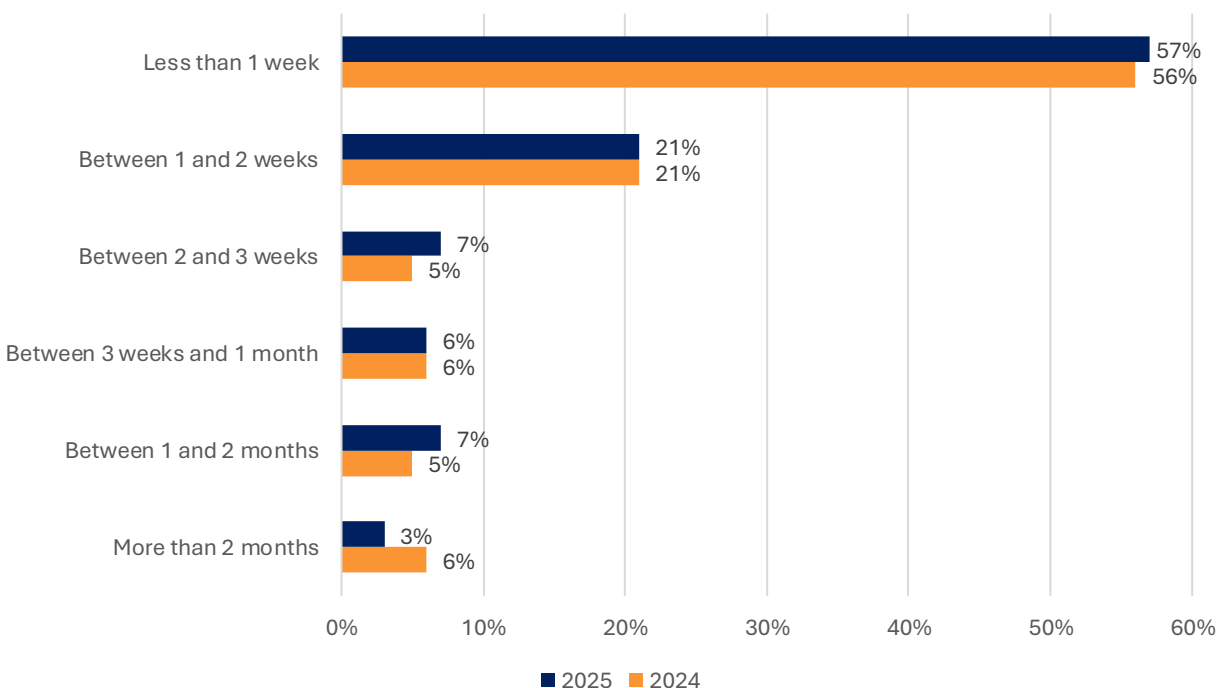
The speed of complaint handling varies depending on the complexity of the case and the ease with which SROs can reach out to the relevant parties. Straightforward cases are typically resolved within a few days, whereas more complex cases may take longer when additional information is required. Where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

In 2025, 57% of complaints were handled in less than one week, while a total of 77% were resolved within the first two weeks. Overall, 90% of complaints were handled within one month.

Compared to the previous year, complaint handling times showed a slight improvement. In 2024, 89% of complaints were resolved within one month, compared with 90% in 2025. The share of complaints taking between one and two months increased from 5% to 7%, while the proportion requiring more than two months decreased from 6% to 3%.

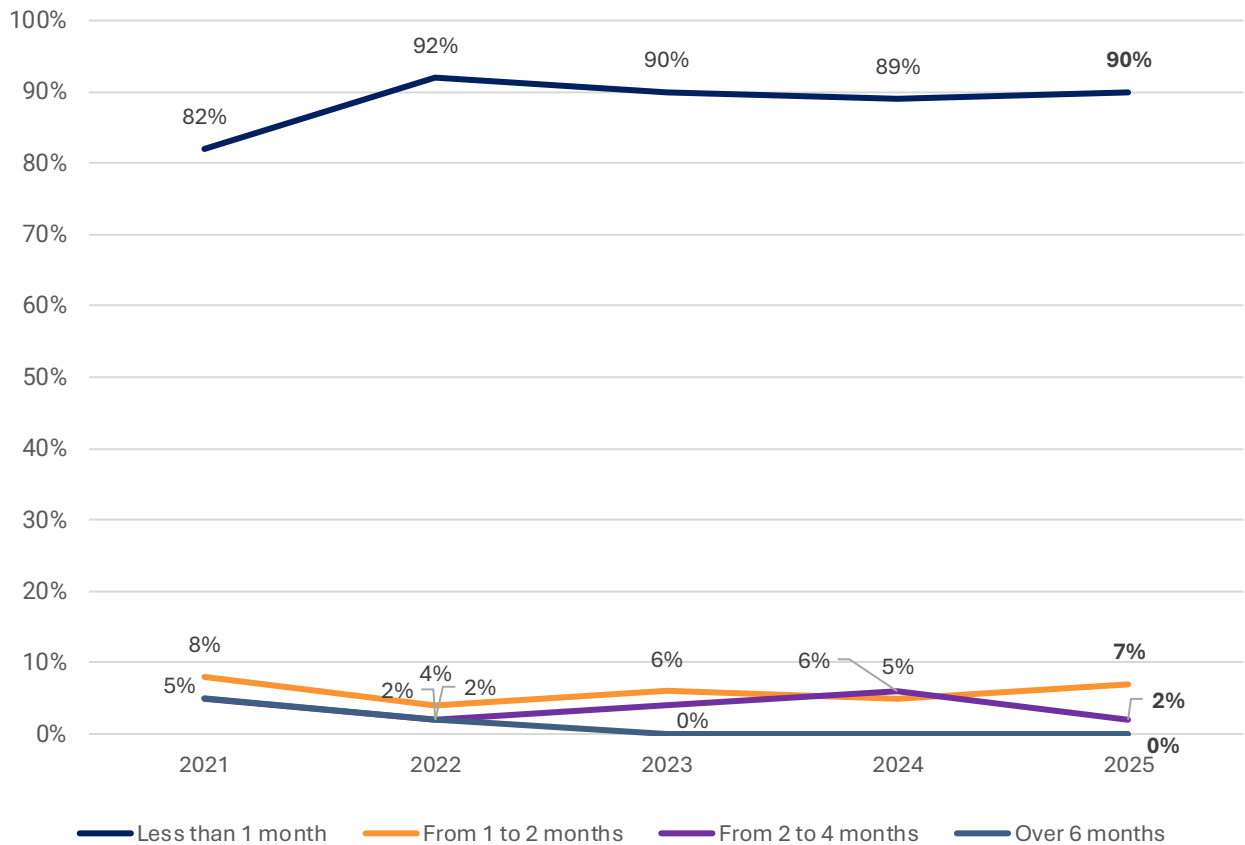
Overall, the figures show that European SROs continued to resolve the vast majority of complaints within relatively short timeframes, with nine out of ten complaints handled within the first month.

Graph 4: Speed of complaint resolution across Europe in 2024 and 2025 (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 2021 to 2025 (European total average)



2.4 Outcome of complaints resolved

On average, 31% of complaints were upheld, while 28% were not upheld in 2025

In 2025, on average, 31% of complaints were upheld by SROs' juries, meaning that the advertisements complained about were considered to be in breach of the relevant national advertising codes. Conversely, 28% of complaints were not upheld, as the SROs found that the advertisements did not breach the applicable rules. Complaints that were out of the SROs' remit accounted for 12%, while a further 12% were not pursued because the requirements for complaint submission were not met. Ten percent of complaints were resolved informally, for instance where the advertiser agreed to amend or withdraw the

advertising before a formal decision by the SRO's jury or complaints committee.

The remaining outcomes represented a relatively small share of complaints: 5% fell under the "Other" category, while complaints transferred to the appropriate authority and withdrawn cases each accounted for less than 1%. Overall, upheld complaints represented the largest individual outcome category in 2025, although the share was only slightly higher than that of complaints that were not upheld.

Table 2: Outcome of complaints across Europe from 2021 to 2025 (European mean average)

Outcome	2025	2024	2023	2022	2021
Upheld	31%	33%	26%	32%	33%
Not upheld	28%	27%	29%	29%	23%
Out of remit	12%	15%	10%	15%	9%
Not pursued	12%	10%	5%	12%	17%
Resolved informally	10%	10%	6%	9%	8%
Other	5%	4%	2%	1%	9%
Transferred to appropriate authority	1%	0%	2%	2%	1%

2.5 Issues complained about

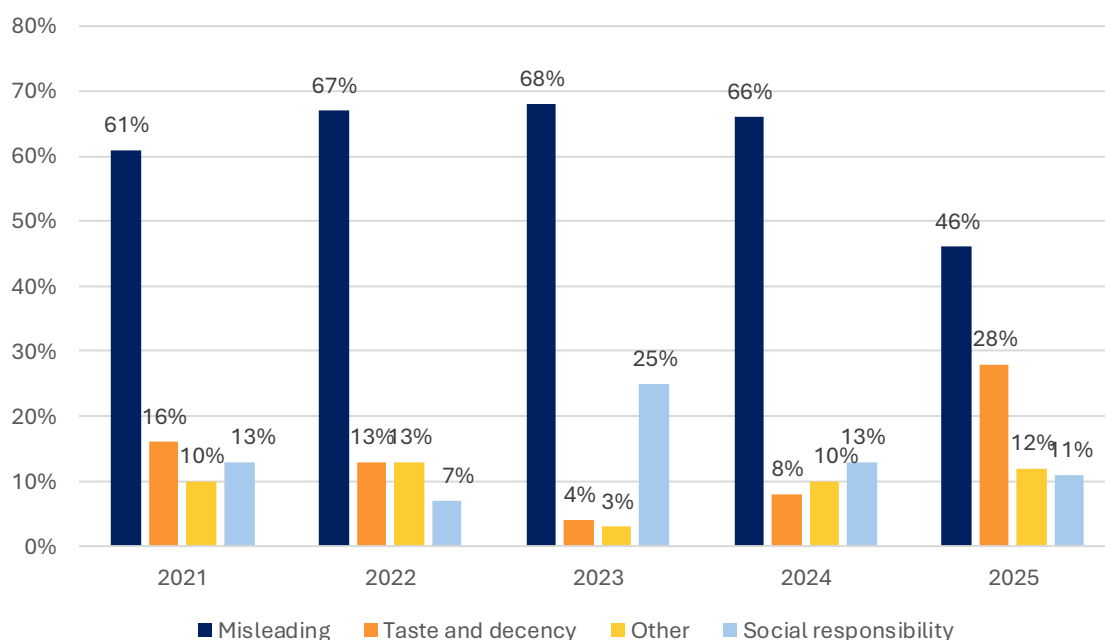
In 2025, consumer concerns over misleading advertising decreased by 20 points to 46% of complaints, with taste and decency in second place at 28%

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 46% in 2025, down from 66% in 2024.

In 2025, taste and decency ranked second with 28%, a significant increase from 8% in 2024. Social responsibility accounted for 11% of complaints, slightly down from 13% in the previous year.

Other categories reached 12% in 2025, compared to 10% in 2024. 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. Health and safety represented 3%, while denigration of competitors remained marginal at 1%.

Graph 6: Issues complained about across Europe from 2021 to 2025 (European total average)



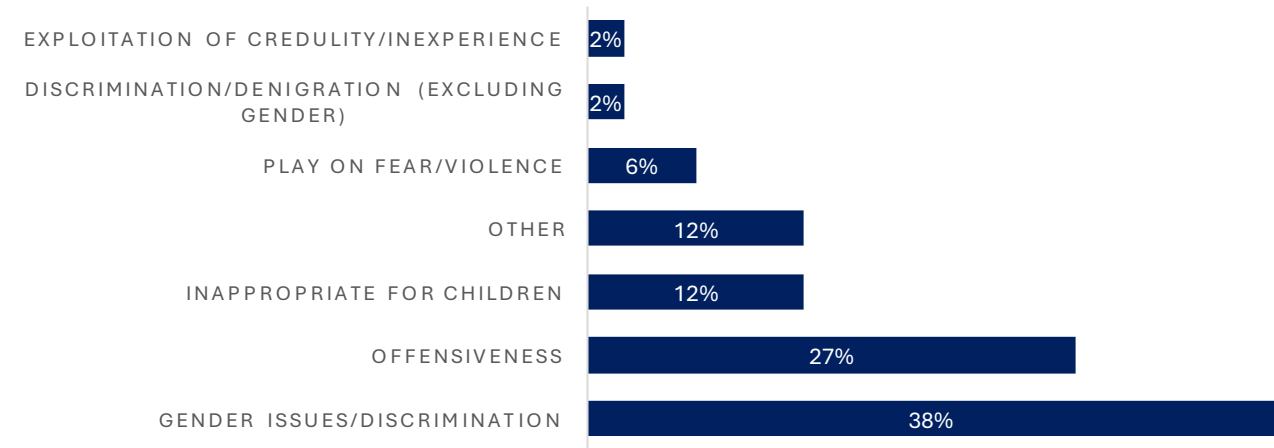
A more detailed look into the categories of social responsibility and taste & decency reveals that 38% of complaints referred to gender issues and gender-related discrimination, including gender roles, stereotypes, objectification, the portrayal of the human body, and discrimination on the basis of sexual orientation and/or gender identity.

Offensiveness accounted for 27% of complaints, making it the second-largest category. Such complaints often differ considerably across countries due to local sensitivities and cultural narratives. However, they have in common the fact that consumers took issue with the creative execution of an advertisement or with depictions considered offensive to prevailing social, cultural or decency standards.

Twelve percent of complaints concerned content considered inappropriate for children, while another 12% fell under the “Other” category. Six percent related to content that played on the audience’s fears or contained violent content, while 2% concerned exploitation of credulity or inexperience. Complaints concerning non-gender-based discrimination, including discrimination on the basis of age, social status, disability, race, ethnicity or nationality, political beliefs or religious beliefs, accounted for approximately 2%.

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 fall within either category 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, it 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 only to give an indication of the type of portrayals and depictions that some consumers may find unacceptable – this is not to say that the SROs’ jury or complaints committee agreed with their complaint.

Graph 7: Distribution of complaints under the categories of taste and decency and social responsibility (2025)



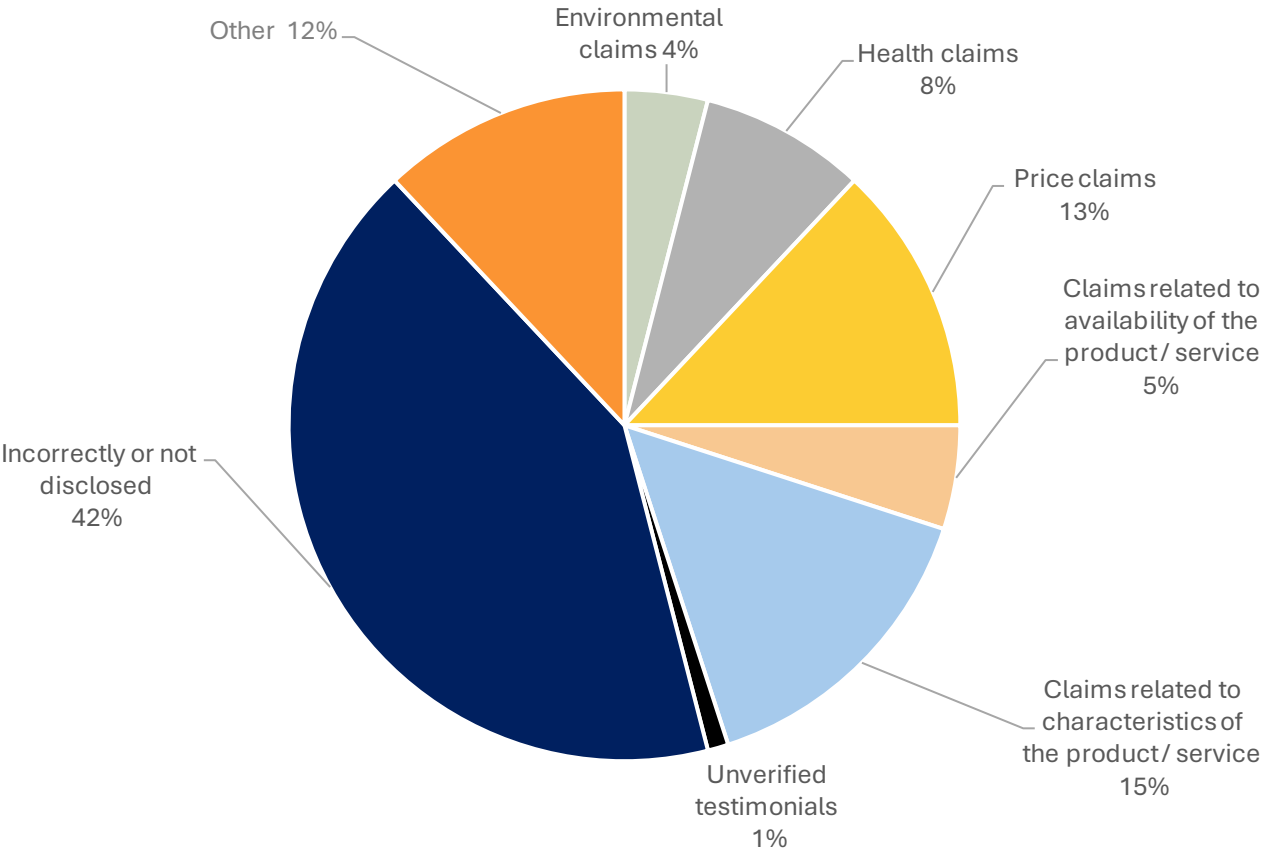
It is also relevant to look in more depth into the category of misleading advertising. Though the graph below outlines the major trends in the complaints lodged with SROs in the category of misleading advertising, these sub-classifications are not necessarily reflected in all SROs' complaints-handling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

In 2025, across Europe, the largest share of purportedly misleading claims related to incorrectly or not disclosed information (42%), followed by claims related to the characteristics of the product or service (15%). Price claims accounted for 13%, while the "Other" category represented 12%. Health claims accounted for 8%, claims related to

availability for 5%, environmental claims for 4%, and unverified testimonials for 1%.

Compared to 2024, the distribution of categories shifted considerably. Complaints concerning incorrectly or not disclosed information increased sharply from 17% to 42%, becoming the largest category in 2025. By contrast, the "Other" category decreased from 27% to 12%, while price claims fell from 19% to 13%. Claims related to the characteristics of the product or service decreased slightly from 17% to 15%, while environmental claims fell from 7% to 4%. Health claims remained stable at 8%, as did availability-related claims at 5%, while unverified testimonials accounted for 1%.

Graph 8: Distribution of complaints under the category of misleading advertising



Online advertising remained the most complained-about medium, closely followed by television

Online advertising accounted for the highest share of complaints in Europe in 2025, at 49%. Television ranked second, accounting for 40% of complaints.

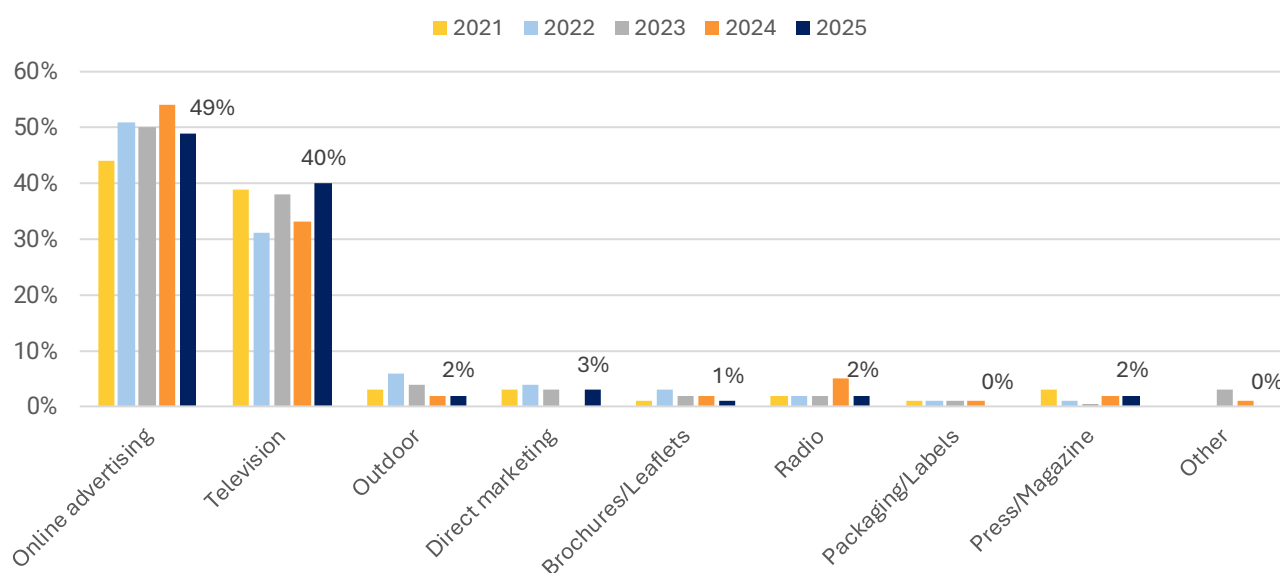
Compared to 2024, the gap between the two leading media categories narrowed considerably. The share of complaints concerning online advertising decreased from 54% in 2024 to 49% in 2025, while television increased from 33% to 40%. These are general relative proportions, however.

The increase in complaints concerning television was particularly influenced by figures from the UK, where the ASA recorded

17,155 complaints relating to television and video-on-demand TV advertising. According to the ASA, several campaigns generated particularly high volumes of complaints in 2025, with thousands of complaints received in relation to individual campaigns.

Direct marketing accounted for approximately 3% of complaints. Radio and outdoor advertising each represented around 2%, while brochures and leaflets and press and magazines each accounted for approximately 1.5%. Cinema represented 0.5%, packaging and labels around 0.3%, while teleshopping remained negligible.

Graph 9: Medium of complained about ads received across Europe from 2021-2025



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.

Overall, online advertising and television together accounted for approximately 90% of complaints for which media information was available in 2025, confirming the continued predominance of these two media categories.

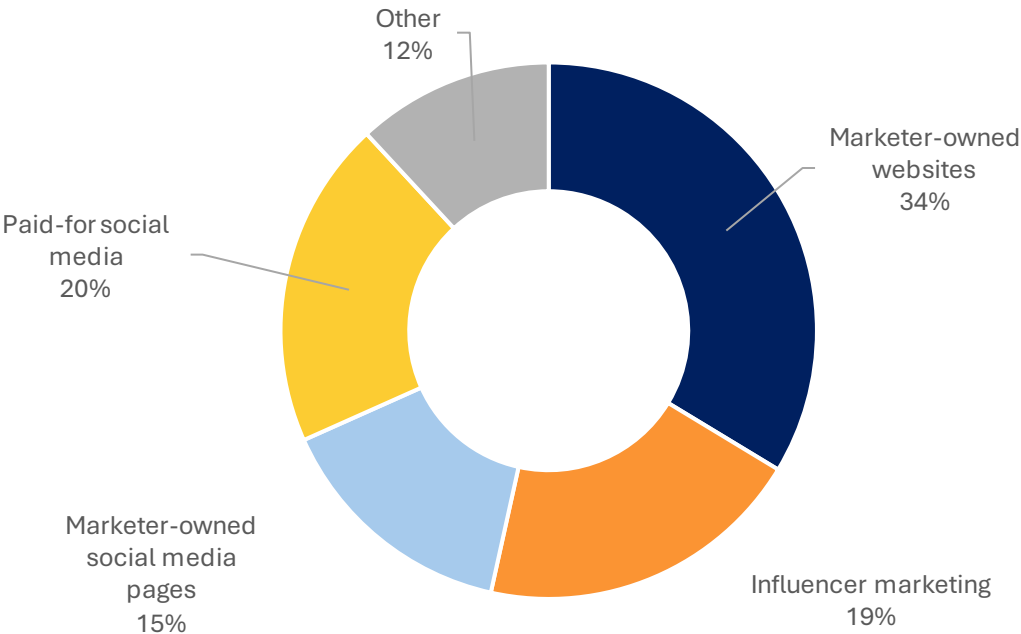
Looking more closely at online advertising, for SROs that are able to provide granular data distinguishing between different types of online ads, marketer-owned websites remained the largest category in 2025, accounting for 34% of complaints.

Paid-for social media advertising and influencer marketing each accounted for approximately 19%, followed by marketers’ social media pages at 15%. In-app advertising and display advertising on non-marketer-owned websites each represented approximately 4%, while paid search accounted for 3% and advert-games for 2%. Native advertising and online behavioural advertising represented less than 1%, while no complaints were recorded under advertising in AI chatbots.

Compared to 2024, marketer-owned websites remained stable at 34%. The share of influencer marketing decreased from 22% to 19%, while paid-for social media advertising increased from 16% to 20%. Complaints concerning marketers’ social media pages decreased from 18% to 15%, while display advertising fell from 8% to 4%. By contrast, in-app advertising increased from less than 1% in 2024 to 4% in 2025. It is worth reminding here that self-regulatory rules enforced by SROs are applicable both to paid-for advertisements and to organic content disseminated via social media by marketers on their own pages.

Finally, as with previous graphs depicting granular data within a given classification category, the figures below reflect only those SROs that keep such detailed records. They therefore provide a general top-line overview of trends within online advertising, while national statistics may differ.

Graph 10 Distribution of complaints against online advertisements across Europe for 2025



2.7 Complaints about advertising for products and services

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 2025, the largest proportion of complaints concerned health and beauty products and services, accounting for 30% of the total. Retail ranked second at 18%, followed by leisure services at 11%.

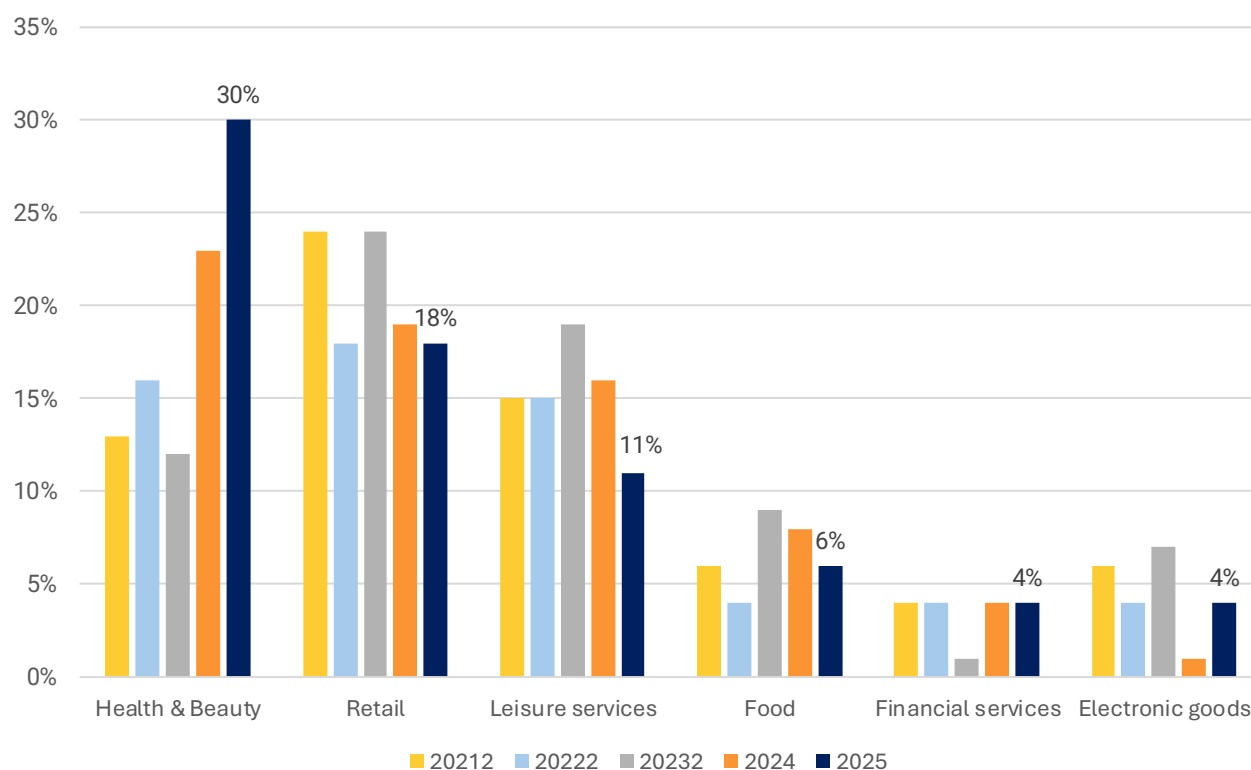
Food advertising represented 6% of complaints, while business directories accounted for 5%. Non-commercial advertising, financial services and electronic goods each represented approximately 4%,

followed by clothing, footwear and accessories at 3%.

Compared to 2024, health and beauty products and services increased from 23% to 30%. Retail decreased slightly from 19% to 18%, while leisure services fell from 16% to 11%.

The following graph indicates the share of the commercial categories of products and services most complained about, while the infographic on the following page provides a more detailed breakdown of all product and service categories.

Graph 11: Complaints for the first six commercial categories across Europe from 2021 to 2025
(European total average)



SROs also recorded complaints concerning a wide range of other sectors, including financial services, electronic goods, clothing, furnishing and household goods, telecommunications, alcohol beverages, cars and motorised vehicles, non-alcoholic beverages, books and magazines, real estate,

For those SROs able to provide a more granular breakdown of complaints within the leisure services category, entertainment, sports and leisure activities represented 65%

transport services, education services, toys, e-cigarettes, energy and water providers, gambling and lotteries, employment services and house maintenance services. These categories individually represented relatively small shares of the overall number of complaints in 2025.

of leisure services complaints, followed by restaurants and bars at 11%, hotels and holiday accommodation at 9%, and travel services at 8%. Other leisure activities represented 4%, erotic services 3%, and dating services 1%.

2.8 Appeals

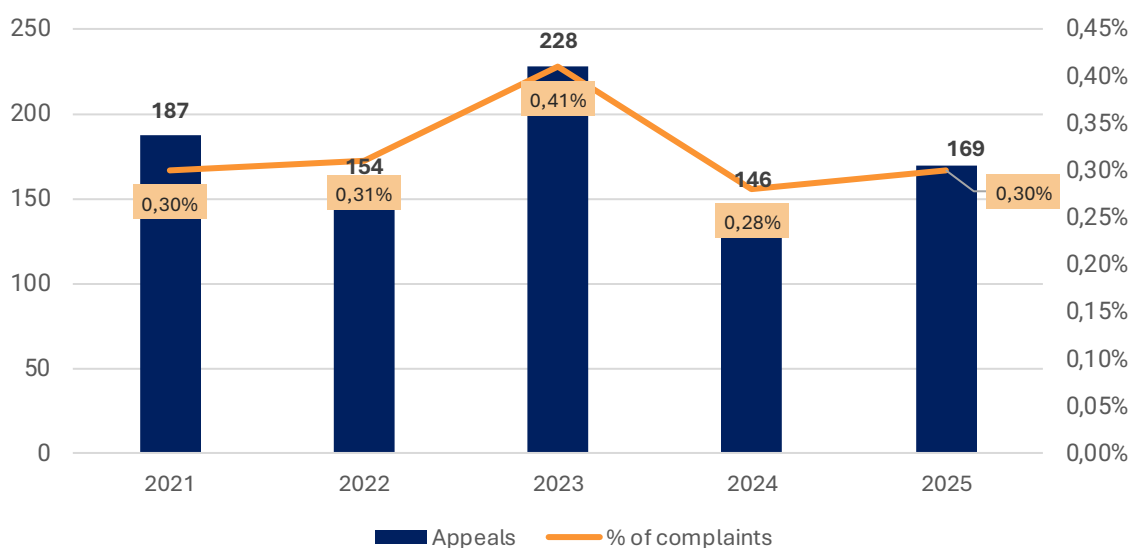
In 2025, the number of appeals increased by 16%

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 2025, 169 appeals were reported by European SROs, compared to 146 in 2024, representing an increase of approximately 16%. Appeals represented approximately 0.3% of all complaints received in 2025.

Graph 12: Appeal and share of appeals (%) as part of total complaints 2021-2025



In 2025, 169 appeals were filed across Europe. Of these, 54% were lodged by advertisers and 46% by complainants.

Graph 13: Share of lodged appeals per category of appellants (%)

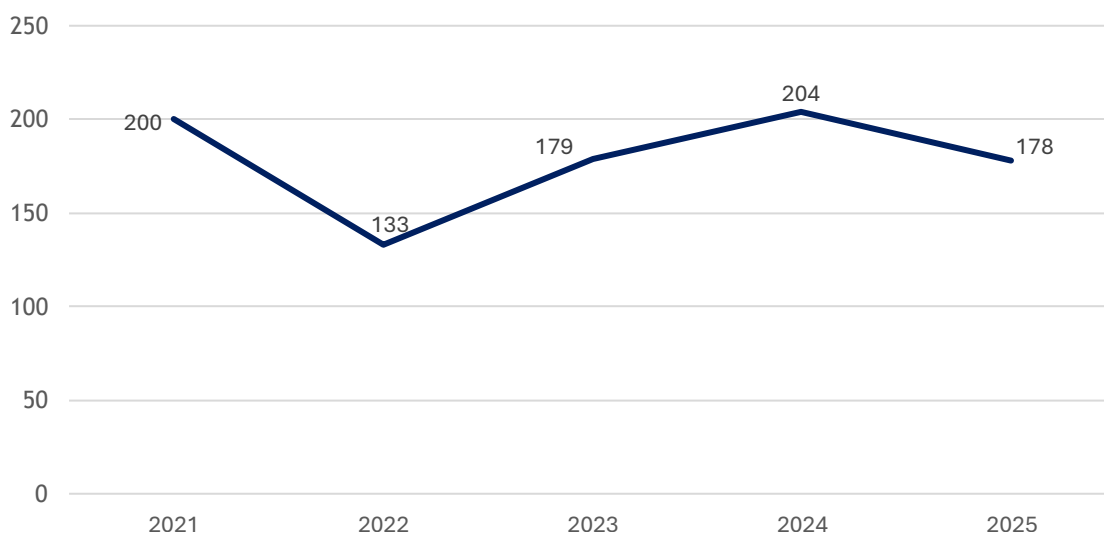


3 Cross-Border Complaints: top-line overview

In 2025 EASA's SROs transferred 178 complaints, 26 fewer than in 2024

Over the course of 2025, EASA was notified of a total of 178 cross-border complaints, which translates into a 13% decrease in referred complaints compared with the preceding year. Over the past five years, from 2021 to 2025, EASA's network handled an average of around 179 cross-border complaints annually.

Graph 14: Cross-border complaints received between 2021 and 2025



Source: Annual Cross-Border Complaints Report 2025 & 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 advertisements must comply with the advertising laws and advertising self-regulatory codes of the country in which the medium carrying the advertisement is based.

However, in the case of Direct Marketing and Online Advertising, the country of origin responsible for handling the complaint is generally the one in which the advertiser is based. In the case of Online Behavioural Advertising (OBA), the country in which the principal decision-making authority is located is considered the country of origin.⁵

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.

From the analysis of the figures for 2025, it transpires that UK consumers remained the source of the vast majority of complaints transferred abroad, accounting for 82% of CBCs, with 147 complaints lodged by UK plaintiffs. Ireland followed with 13 complaints, while France recorded 8.

The 178 CBCs predominantly concerned misleading advertising, which accounted for 86% of complaints. Misleading advertising therefore remained by far the main issue raised by complainants, followed by social responsibility and taste and decency, both at 6%.

In terms of products and services, leisure services remained the most complained-about sector, accounting for 26% of CBCs, followed by clothing, footwear and accessories at 10%, electronic goods at 8%, health and beauty services and transport services at 7% each, and software and IT products at 6%.

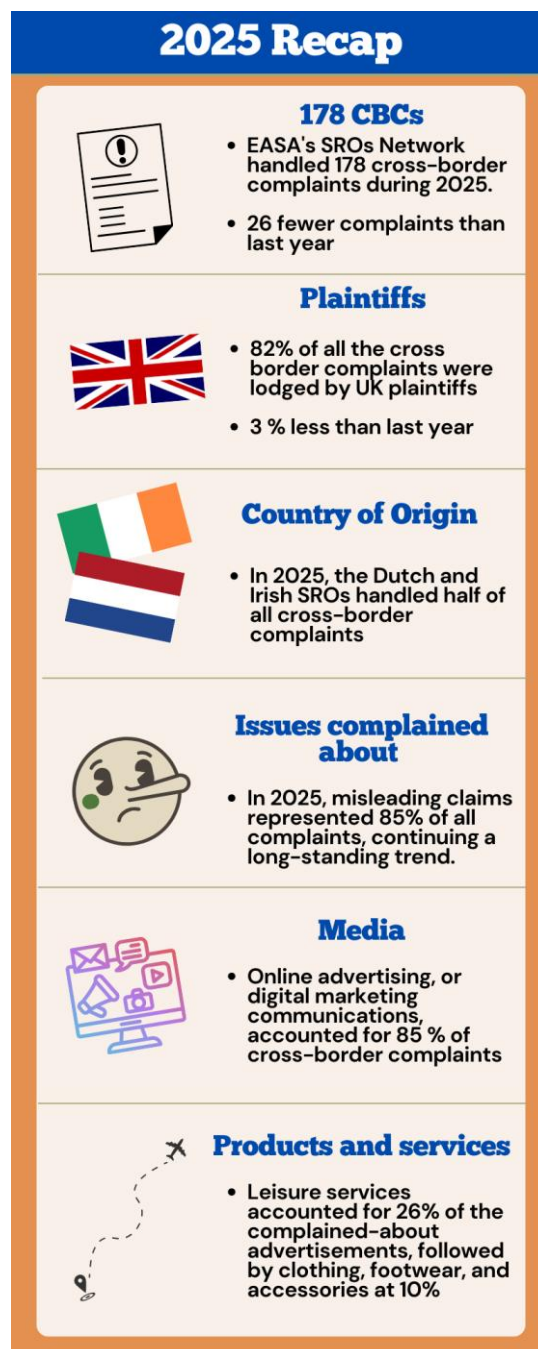
Online advertising continued to dominate, accounting for 85% of cross-border complaints, although its share decreased from 89% in 2024. Direct marketing increased to 9%, while audiovisual media services accounted for around 3–4% of CBCs and other media remained marginal.

As regards the country of origin of the advertiser or media, the Netherlands accounted for the largest share at 31%, with 56 complaints, followed by Ireland at 20% with 35 complaints and Germany at 11% with 20. France accounted for 8% and Spain for 4%.

As of mid-February 2026, 36% of the complaints submitted in 2025 remained open. Among the cases already processed, 2 complaints were upheld, 18 were not upheld,

28 were unable to be pursued, 18 fell outside the relevant SRO's remit, 4 were resolved informally and 4 resulted in no cause for investigation.

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

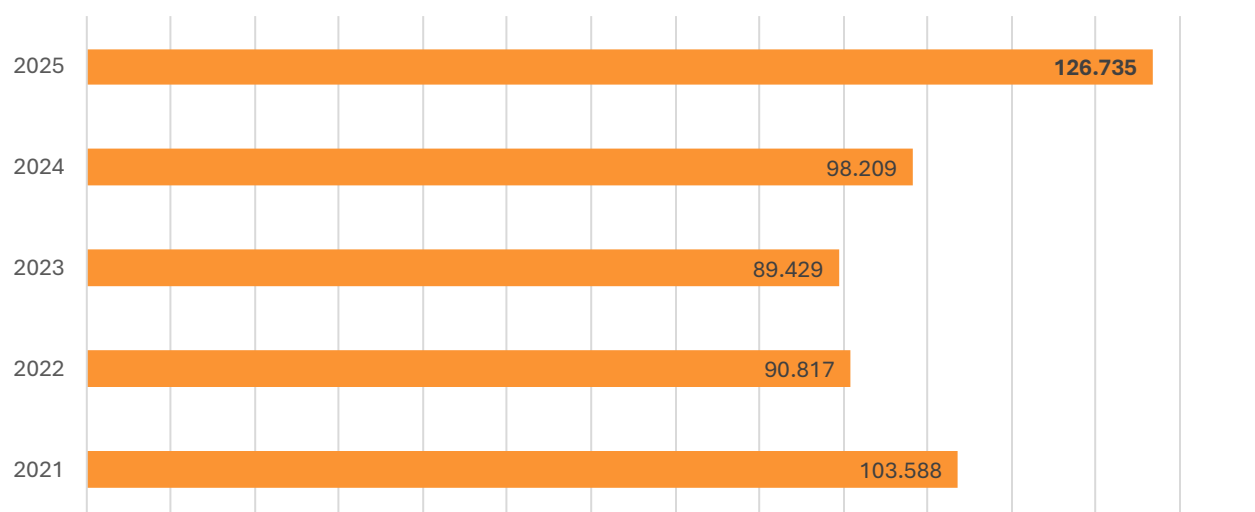


4 Copy Advice requests

SROs serviced 126,735 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.

Graph 15 Copy advice requests across Europe from 2021 to 2025



Approximately 96% of copy advice requests dealt with by SROs in 2025 were handled within 72 hours. Of all requests, 5% were dealt with in less than 24 hours, 50% in less than 48 hours, and 40% in less than 72 hours. Around 2% were handled within one week, while a further 2% took more than one week.

The increase in copy advice activity, alongside the reduction in pre-clearance (see next section), appears to be largely driven by advertisers and agencies using technology and AI to create initial copy drafts, rather than seeking guidance earlier in the creative development process. As a result, Clearcast in particular are seeing more video concepts

and claims coming through for review at the copy advice stage.

The two services remain complementary rather than direct substitutes, so changes in volume can also reflect the mix of campaigns and the types of advertising being submitted during a particular period.

Table 3 presents a full overview of copy advice requests per country across Europe from 2021 to 2025. In 2025, most copy advice requests were received in the UK, with ASA and Clearcast jointly accounting for 48% of all requests, followed by AUTOCONTROL in Spain with 26%, and ARPP in France with 25%.

Table 3: Copy-Advice requests per country across Europe from 2021 to 2025

Country/SRO	N°	2025	2024	2023	2022	2021
UK – Clearcast	1	56,300	26,041	28,087	2,947	2,310
UK – ASA		4,340	4,253	3,347	28,022	30,756
UK – Total		60,640	30,294	25,932	24,690	25,391
FR – ARPP	2	32,153	33,716	33,620	36,187	45,281
ES – AUTOCONTROL⁶	3	32,003	32,420	24,740	25,075	28,446
HU – ÖRT	4	629	693	656	641	691
DE – WBZ	5	400	550	600	650	800
DE – DWR		10	26	23	20	32
DE – Total		410	576	623	670	832
TR – RÖK	6	95	79	81	137	114
IT – IAP	7	93	103	93	106	103
IE – ASAI IE	8	75	103	94	88	117
PT – ARP	9	42	51	56	67	83
BG – NCSR	10	29	33	34	46	89
CY – CARO	11	28	18	16	34	25
NL – SRC	12	25	25	17	16	Unavailable
RO – RAC	13	25	29	33	25	31
BE – JEP	14	23	14	11	2	2
SE – Ro.	15	14	25	28	27	25
CZ – CRPR	16	12	7	8	20	17
PL – RR	17	7	11	10	-	-
SK – SRPR	18	6	6	0	3	1
SI – SOZ	19	4	25	23	19	15
EL – SEE	20	2	3	0	0	0
FI – MEN & LTL	21	2	0	0	8	14
AT – ÖWR	22	1	3	0	1	1

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

5 Pre-Clearance service

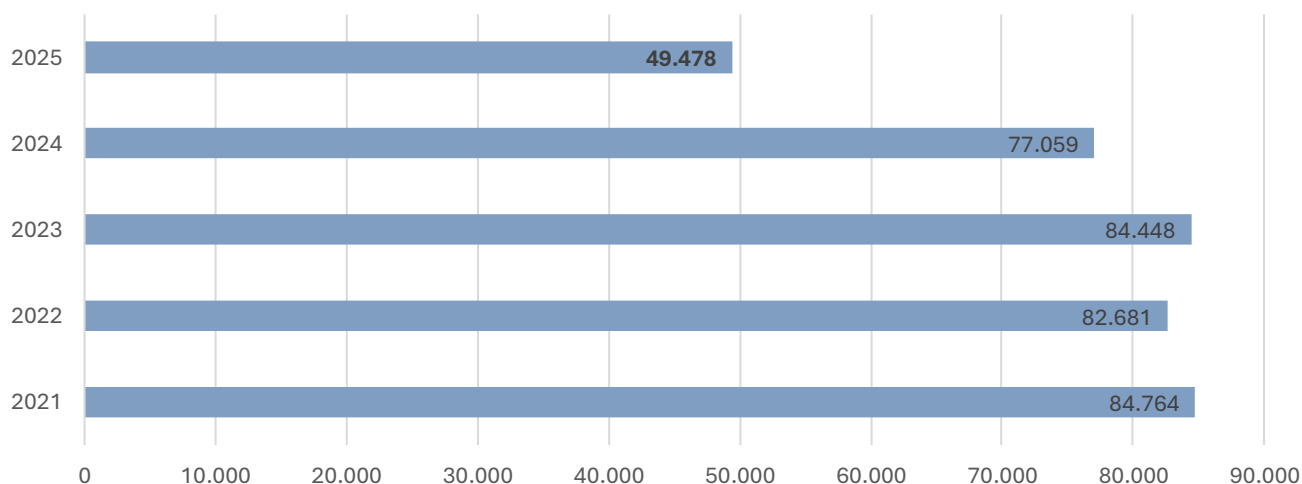
49,478 ads were pre-cleared in 2025 by the 3 SROs providing this service

In three 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, which checks the ads' compliance with relevant legislation and SR rules. This means that advertisements in those categories must be assessed by the

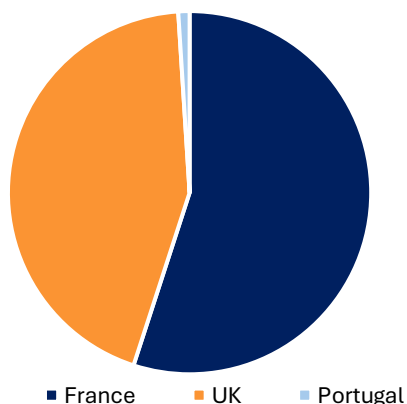
national advertising self-regulatory organisation for compliance with the relevant statutory or self-regulatory code before they can be broadcast or published.

In 2025, a total of 49,478 advertisements were pre-cleared by European SROs, representing a decrease of approximately 36% compared to the 77,059 advertisements pre-cleared in 2024.

Graph 16 Pre-clearance requests across Europe from 2021 to 2025



Graph 17 Share of pre-cleared ads per country in 2025



As shown in Graph 17, in 2025, a total of 49,478 advertisements were reviewed by SROs in France, the UK and Portugal.

The graph on the side indicates the share of ads that each of the SROs in these countries have pre-cleared over the course of 2025: 27,295 by ARPP in France (55%), 21,890 by Clearcast in the UK (44%), and 293 by ARP in Portugal (<1%).

Annex: 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.

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