

# **MONITORING OF ADVERTISING DIRECTED TO CHILDREN UNDER 15 YEARS OF AGE IN THE INTERNET: Detailed methodology proposal**

## **Introduction**

The Co-Regulation Code of Advertising for Food Products and Beverages Directed to Children, Prevention of Obesity and Health (PAOS Code), which was adopted on December 26, and came into force on January 2013, recognizes the special characteristics of the Internet, which prevent the existence of a regulated mandatory prior control system and establishes that a specific Monitoring system will be developed for advertising broadcasted on the Internet directed to children under 15 years of age, that will allow for a periodical, flexible and effective follow up and assessment.

In Chapter B (Standards of Application), Section II (Control of Compliance), point 5 (Monitoring of Advertising) of the PAOS Code, it is pointed out that the **FIAB will put forward a detailed proposal of the methodology to be used for the Monitoring system of the Advertising for Food Products and Beverages Directed to Children under 15 years of age broadcasted on the Internet.**

Television is the main media used to advertise food products and beverages. It has the largest child audience (devoting 2 hours and 40 minutes to this media; even though the average audience and average daily minutes are much lower [-37%] than the data registered for other targets such as housewives or individuals older than 18 years of age). As for the Internet, it is a secondary media to which, as an average, children devote 40 minutes per day (36% minutes less than the rest of the population) and where investments presently represent around 1%.

After an analysis of the media that children use (TV, Internet), advertisers' investments, trademarks in the Internet and the main web-sites/formats more akin to this group, we propose the following:

## **Methodology for the control of advertising for food products and beverages directed to children under 15 years of age on the Internet**

I. The FIAB recognises **AUTOCONTROL as the entity that is in charge of managing the self-regulatory advertising system in Spain** through the resolution of the claims raised due to supposedly illicit advertising, as well as the system of prior control to the broadcasting of advertising. On the other hand, AUTOCONTROL fulfills the requisites established by the Unfair Competition Act for self-regulatory systems and it has been notified by the Government to the European authorities for its inclusion in the EEJ Network.

II. In accordance with the aforementioned, **in order to perform the Monitoring of advertising for food products and beverages directed to children under 15 years of age in the Internet, AUTOCONTROL is appointed as the external and independent organization for the above purposes.**

## **III. PROPOSAL FOR THE MONITORING METHODOLOGY**

• **EXAMINATION OF COMPATIBILITY WITH THE PAOS CODE RULES.** AUTOCONTROL shall examine:

1.- The **product web site most relevant with content aimed at children under 15 years of age of each member company**, according to the information that to that effect the member companies provide to AUTOCONTROL. **Where the Company does not have product web-sites directed to children under 15 years of age** (according to the criteria established for this purpose by the PAOS Code), **the advertising contents of the corporate web site directed to this target would be examined** following the aforementioned criteria.

2.- The **most relevant campaigns/adverts directed to children under 15 years of age broadcasted on the Internet** by member companies that are subject to the PAOS Code.

Their relevance would be determined for being the **most broadcasted campaigns/adverts on the web-sites/formats with contents and audiences most akin to children under 15 years of age.**

☐ **LOCATION OF THE ADVERTISING PIECES SUBJECT TO MONITORING.** The following tools and procedure are proposed:

- **Tools:**

AUTOCONTROL will use the **information provided by tools and independent companies that measure, analyse and follow-up advertising in the Internet, provided by the Infoadex and Comscore institutes.** Both entities are the ones that provide these services to the market, being their technical capacity and Independence recognised. **Infoadex** has a wide experience in this area. **Comscore** also has a serious reputation and has been designed to officially measure on-line audiences. Among its tools there are two of them that are particularly interesting for this examination: the web-sites/formats ranking with affinity to children aged between 4 to 14 years, and the one known as ADMETRIX, the only tool that can provide this kind of information about on-line campaigns (formats, prints, creativity); even though ADMETRIX still is in BETA phase, since it was implemented in 2013. A descriptive file of the functionalities of ADMETRIX is enclosed

The ADMETRIX tool is presently in the running-in phase and thus a period of 6 to 12 months has been established to guarantee its reliability.

– **Procedure.** The following steps will be taken

1.- Firstly, **products with the highest advertising investment by each Company member in the web-sites/formats akin to children between 4 to 14 years of age and, eventually relevant to the PAOS code**, will be determined **according to the INFOADEx ranking.**

2.- Secondly, the most relevant **web-sites/formats will be determined (according to the propinquity to the target and audience), according to the information provided by Comscore**, will be determined.

3.- Thirdly, **AUTOCONTROL will cross-check such information between products and web-sites/formats using a license to access the ADMETRIX data base to look for the most relevant campaigns/adverts** for this target according to the PAOS Code. In particular, products are the ones, established in point 1 of the section referred to the methodology proposal, **that would have been most widely broadcasted in the most closely related web-sites/formats over a three month period** (point 2 of the methodology proposal section).

**All PAOS Company members must be represented.** For this purpose, **up to 3 trademarks from each member company** – relevant to the public under 15 years of age, according to the PAOS Code – will be selected **from the INFOADDEX Ranking. If it were not to have any “children” trademarks, contents directed to this target by the corporate trademark (product or service) will be chosen.** Out of each one of these, the campaign with the most broadcasting/impacts/prints on the publishing format of the COMSCORE’s ADMETRIX report will be selected.

A registry of contents relevant to monitor the web-sites or the advertising pieces selected at the time of their analysis will be created through the “screen prints” mechanism amounting to the campaign impacts.

4.- Fourthly, **AUTOCONTROL will examine the resulting advertising pieces and will carry out its legal analysis to verify if they are compatible with the PAOS Code.** AUTOCONTROL would also analyze the Companies’ web-sites according to the aforementioned.

This study would be performed **once a year**, and in order to facilitate **the assessment of the sites and selected advertising pieces, some guidelines will be followed**, with the following basic structure:

- a) Is the promoted product aimed at or is it attractive to children under 15 years of age?
- b) Is the web page design aimed at or is it attractive to children under 15 years of age?
- c) Does the web page include animation or sound effects?
- d) Are licensed characters used?
- e) Are on-line games included?
- f) Does the web page show any toy or present that could be attractive to children under 15 years of age?
- g) Does the web page collect any personal data?
- h) Checking of the fulfillment of the applicable PAOS rules and detection of eventual infractions.

IV. If AUTOCONTROL detects any **eventual infractions of the PAOS Code**, it will issue a communication informing about it to the Company concerned, demanding for the

presentation of the corresponding allegations, or an undertaking to cease and/or immediately rectify.

V. With all the information generated in this process, AUTOCONTROL will present the corresponding **report to the PAOS Code FOLLOW UP COMISSION** which, once analysed, will adopt whatever agreements it will deem necessary.

VI. In the cases where eventual infringements were appreciated, and where the company has not accepted AUTOCONTROL's first request, the FOLLOW UP COMMISSION will be able to agree, amongst other options, and according to the rules regarding the control of the Code's fulfillment, to forward the issue to **AUTOCONTROL's Jury**, for the Jury to adopt the corresponding resolution (imposing the sanctions that might eventually correspond).

Madrid, May 16, 2013