

Minors & Advertising

Connecting the dots between research, policy and regulation and implementation

Thematic session

12 May 2022

Background document – revised version of 12 July 2022 including a summary of the discussion
EPRA Secretariat

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1. Empowering & protecting minors: a key theme for EPRA in 2022

One key focus of [EPRA's Work Programme for 2022](#) is on **empowering and protecting minors**. This is a recurring subject in EPRA meetings, reflecting the importance of the topic as a key regulatory concern across all jurisdictions and the difficulty to strike a balance between protecting a vulnerable audience and taking into account children's rights. A novelty in the EPRA Work Programme 2022 is the combination of dedicated online work groups and taskforces and in-person meetings. Through this new mode of operation, we are able to cover various complementary angles within the wide theme of empowering and protecting minors, and to adopt a transversal approach incorporating three current topics of interest for media regulators: the regulation of video-sharing platforms, media and information literacy and artificial intelligence. First outputs include:

- 16 March 2022: an online workshop on [age assurance and age classification on VSPs](#)
- 8 April 2022: a roundtable discussion on the use of [AI-tools based on facial age estimation](#)
- 22 April 2022: [a dedicated EMIL meeting](#) on empowering children and youth online

For the first in-person EPRA meeting after two years, the thematic session in the afternoon of 12 May 2022 will focus on **children and advertising**.

Minors and advertising in past EPRA sessions

The protection of minors in the online world was the focus of two fruitful plenary sessions in 2019, on research and evidence of harm (in spring in Sarajevo) and the interplay between protection of minors and data protection (in autumn in Athens)¹.

¹ Two substantial background documents were produced on that occasion:

In 2017, a plenary session in Vienna discussed “*minors' advertising literacy in the digital age*”, based on the findings of the 4-year multi-stakeholder *Ad Lit Project*², which investigated how to empower children and youth to cope with advertising, and the discussion of various approaches and initiatives undertaken by EPRA members. Some of the key conclusions of the plenary session still resonate strongly today and may provide useful orientations for the present discussion:

- New online techniques have hybrid characteristics: integration, personalisation, entertainment and interaction; the fear is that children may not recognise and understand their persuasive intent.
- The revised AVMSD will raise new challenges for the enforcement of provisions on audiovisual commercial communications on video-sharing platforms.
- Different frameworks are enforced by different regulators; Enhanced coordination between regulatory bodies, incl. self-regulatory bodies, media regulators, data protection authorities and consumer protection bodies and ombudsmen is paramount to ensure efficient enforcement.
- Regulation must be adapted to the new environment: there are benefits in adopting a risk-based, evidence-based and a step approach, keeping in mind the objectives of regulation.
- It is important to talk to children to understand their perceptions and concerns, and involve them in co-designing appropriate solutions.

2. Objectives of the session

During the consultation with EPRA members prior to the adoption of the Work Programme for 2022, two specific issues of concern emerged from the responses of media regulators:

- **Minors and the (online) marketing of “unhealthy”**, i.e. high energy-dense, highly processed **foods and beverages** that are high in saturated fats, trans fats, free sugars and/or salt
- **Minors and “influencer marketing”**, i.e. the marketing by user-generated audiovisual content creators (or “vloggers” or “uploaders”) on video-sharing platforms targeting children

While the regulation of advertising in the broadcast field is a well-known task for media regulators, the regulation - or rather co-regulation - of audiovisual commercial communications on video-sharing platforms is quite a novel development for EPRA members and there is still a lot to learn.

As media regulation does not operate in a vacuum and such complex issues involve many stakeholders other than media regulators, the general aim of this session will be to **connect the dots between research, policy and regulation and implementation**.

In line with past EPRA sessions pointing out the importance of adopting an **evidence-based approach**, the present session relies strongly on the input of renowned academics and the presentation of recent research findings to inform policy orientations and the implementation in practice.

EPRA Sarajevo 2019: "Protection of minors in the online world: focus on evidence of harm"

<https://www.epra.org/attachments/sarajevo-plenary-1-protection-of-minors-in-the-online-world-introductory-document>

EPRA Athens 2019: Protection of minors in the digital world: common challenges for NRAs and DPAs

<https://www.epra.org/attachments/athens-plenary-1-protection-of-minors-in-the-digital-world-what-common-challenges-for-nras-and-dpas-background-paper>

² The presentation by Eva Lievens is available at this link:

<https://www.epra.org/attachments/vienna-plenary-2-minors-advertising-literacy-in-the-digital-age-presentation-by-eva-lievens-ghent-universit>

In-person EPRA meetings are also an opportunity to **learn more about the media landscape and players of the host country**, the second part of this session will be an opportunity to highlight several initiatives and research projects emanating from Belgium and in particular from the Flemish-speaking Community.

3. Structure of the session

The plenary session, steered by EPRA Vice-Chairperson *Mari Velsand*, is structured in two separate parts.

1) PART I: on **“Minors and the (online) marketing of “unhealthy” foods and beverages”**

- The first part of the session will open with a keynote of *Kremlin Wickramasinghe*, Acting Head of the [WHO European Office](#) for the Prevention and Control of Noncommunicable Diseases. This will be an opportunity for a refresher on the implementation of the WHO set of recommendations on the marketing of foods and non-alcoholic beverages as well as on relevant guidelines and tools, and the latest WHO findings relating to marketing on online media.
- As an excursion into the applicable legal framework of the EU, *Sophie Valais*, senior legal analyst at the [European Audiovisual Observatory](#), will present a short update on the status of the transposition of Article 28b(2) of the Audiovisual Media Services Directive (AVMSD) into national law. This provision, which is applicable to video-sharing platform services, inter alia states that:

*“Member States shall encourage the use of co-regulation and the fostering of self-regulation through **codes of conduct** as provided for in Article 4a(1) aiming at **effectively reducing the exposure of children to audiovisual commercial communications for foods and beverages containing nutrients and substances with a nutritional or physiological effect, in particular fat, trans-fatty acids, salt or sodium and sugars, of which excessive intakes in the overall diet are not recommended.** Those codes shall aim to provide that such audiovisual commercial communications do not emphasise the positive quality of the nutritional aspects of such foods and beverages”.*

- As an input from academia, *Jörg Matthes*, Professor of Communication Science at the [Department of Communication of the University of Vienna](#), will share with the audience the latest research findings on the exposure of minors to marketing of unhealthy products and its effects and the possible implications for policy-makers and media regulators.
- The last part of the session will be an opportunity for EPRA members to ask questions to the speakers and share experiences.

2) **PART II. Issues of concern in relation to influencer marketing and minors on video and content-sharing platforms – key insights from the Flemish-speaking Community of Belgium**

- The second part will open with the presentation of the latest research findings on **regulating branded content creators, and blurred lines between videosharing, videogaming and gambling** by *Professor Dr. Eva Lievens* and *Nadia Feci*, from Ghent University and the KU Leuven.
- As the media landscape is growing increasingly complex, traditional regulation, in order to remain relevant and effective, will need to be complemented and informed by new approaches, such as **developing media and information literacy**. Children and young people need to be empowered so that they can grow up to be critical, informed consumers who make their own

conscious choices in today's new media environment. *Andy Demeulenaere*, coordinator of Mediawijs, the Flemish Knowledge Centre for Digital and Media Literacy and active member of EMIL, EPRA's media literacy taskforce, will briefly report on projects relating to influencer marketing and children.

- As we know, media regulators are *not the only competent bodies* to deal with influencer marketing and the AVMSD is not the only applicable framework in Europe, other legal standards applies such as the Directive concerning misleading and comparative advertising. *Melissa Kekenbosch*, inspector and legal expert at the Belgian Federal Public Service of Economy will provide a glimpse into **recent investigations and best practices** with regard to influencer marketing and children.
- The last part of the session will **include sharing brief case studies** related to influencer marketing and children from some of the EPRA members, and the possibility of asking questions to the speakers.

4. Summary of the session

Minors & the marketing of unhealthy foods in the online media

- ❖ **Keynote by Kremlin Wickramasinghe, Acting Head, WHO European Office for the Prevention and Control of noncommunicable Diseases**
- While all noncommunicable diseases are decreasing, obesity is still on the rise throughout the world. The risks caused by obesity have been highlighted by the COVID crisis: chances to end up in the ICU are far higher for a person suffering from obesity; obesity also causes cancer.
- Over the years, the WHO has drafted several guidelines and recommendations to improve children health (see annex for details). Evidence reviews indicate that marketing heavily influences children's health. The WHO has determined that self-regulation by the industry is ineffective and that, in consequence, a more robust legal framework was needed.
- In order to act, the starting point was to set a precise scientific profile for HFSS (High in Fat, Sugar and Salt). WHO has developed such [a nutrient profile model](#), with which national public health institutions agree. For that to translate into a better regulation of HFSS advertising, there must however be **stronger links between the WHO** (and national public health institutions) **and media regulators**, with whom the WHO is eager to work.
- Health Ministries tend not to understand the changing media landscape and often seem to believe that they can have no grasp on content from abroad, especially from influencers. A stronger involvement by media regulators would change that perspective.
- The current focus of WHO's activity is on **digital marketing**: the situation is worsening, with children entering at an increasingly early age an online world with very light or non-existent regulations on the digital marketing of unhealthy products targeting children, in which big players receive large income from advertising. **Influencers** also raise new challenges.
- An ongoing WHO investigation, based on work with a panel of 47 Norwegian children and studying their exposure to digital food and drink advertising [revealed that one in ten ads](#)

[watched were promoting food and drinks](#). More worrying still, eight in those ten ads were not permitted to be marketed for children according to WHO's guidelines.

- Developing monitoring technologies to measure exposure and the persuasiveness of marketing will also be key in designing effective policies and ensuring industry compliance.

The WHO aims to reduce deaths by non-communicable diseases by 33% by 2030 and media regulators can help with that through the regulation of marketing of unhealthy food. **To reach that objective, the WHO is willing to work with media regulators and would welcome their knowledge with regard to data collection and new technologies. The development of a common tool, for instance, could be an important step in the right direction.**

- + [Minors and Advertising - Presentation by Kremlin Wickramasinghe \(WHO\)](#)
- + wickramasinghek@who.int

❖ **Update on Art. 28b (2) AVMSD transposition by Sophie Valais, European Audiovisual Observatory**

- Art. 28b (2) of the AVMSD indicates that “*Member states shall encourage the use of co- and self-regulation through codes of conduct on ‘unhealthy’ foods*” to reduce the exposure of children to HFSS on video-sharing platforms. However, a third of the children in Europe are obese and children in general are exposed to significant amounts of advertising daily, which shape their preferences and influence what they eat.
- Most EU members have transposed Art. 28 almost verbatim. The advertising of HFSS products on VSPs is treated differently than tobacco and alcohol (self-regulation in one case, strict obligations in the other). A few countries have chosen a stricter approach (e.g. VSPs' terms and conditions must refer to the presence of HFSS ads; VSPs must provide content producers with the ability to label such commercial communications). In some cases, as in Belgium or Austria, a specific role is granted to the media regulator.
- What are next steps to take for a better regulation? HFSS is not homogenous, it encompasses several categories of foods and beverages (alcohol, sweets, etc). There must be work on categorising HFSS advertising. There is also a need for actions at industry level, though given children's exposure, relying on self-regulation will certainly not be enough.

- + [Minors and Advertising - Presentation by Sophie Valais \(EAO\)](#)
- + Sophie.VALAIS@coe.int

❖ **Advertising effects & effectiveness by Prof. Jörg Matthes, University of Vienna**

- One in every three children in Europe is obese. But how do unhealthy foods exert their power?
- The ideal food pyramid (for a healthy organism) has HFSS products at its tops, indicating that they should be consumed in smaller quantities (if at all, in some cases) than healthier foods. However, this ratio does not translate on screen. A food pyramid determined by volume of appearances in commercial and editorial content would have HFSS products at its base, being the most represented category of foods and beverage to appear on screen.
- HFSS products are showcased more in the media but, more importantly, in situations where they are more likely to be evaluated positively. A series of experiments was conducted in order to evaluate the influence that such advertising has on children.

Exp. 1: Children are shown a movie in which a product is being consumed or interacted with. If watched without a parent, consumption of the same product will rise.

Exp. 2: Based on the conclusions of the first experiment, researchers sought to verify the results by assessing if the same phenomenon would happen with healthy food. A video was edited to create two versions: a healthy one (showing some fruit) and an unhealthy one (showing sweets). Whatever video is shown, children tend to go towards the unhealthy option.

- The results of both experiments tend to indicate that unhealthy foods are more attractive to children. But what is the reason behind it? An eye-tracking experiment revealed that children give more attention to unhealthy foods even subconsciously. Pairs composed of a healthy and unhealthy option were created and shown separately to children, integrated in the cartoon used for the second experiment. In all cases, options were chosen in order to be as similar as possible in terms of visual complexity (similar presentation, size and colours). Eye-tracking revealed a noticeable rise in attention when the unhealthy products were on screen, compared to the healthy products.
 - Figures also tend to show that there is a link between media consumption and obesity. Obesity is connected to a heightened intake of food high in salt, fat and sugar and a decline in physical activity, both of which are encouraged by watching media. Household rules may prevail when the parents are with the children, but not when they are not.
- ➔ **Policy implications:** Policy must take into account the fact that HFSS foods and beverages have an **advantage over healthy food** (regardless of age). **Implementing marketing restrictions** over such products or simply placing ads for healthy food instead may not be enough, **pervasive strategies are key**. With stricter marketing restrictions, children would become less exposed which would lead to a decrease in preferences for unhealthy options and a reduced consumption. **Proper education on healthy foods** can also help to create a healthy food environment.

- + [Minors and Advertising - Presentation by Jörg Matthes \(University of Vienna\)](#)
- + joerg.matthes@univie.ac.at

❖ Q&A with speakers

❓ *Are parents well-equipped to react? Are they better armed than children? Any advice to parents?*

- ➔ **Answer by Jörg Matthes:** It is easier for children to resist with parents explaining while they see the advertising. Children left alone will not be able to resist. A big part of the problem now is that children are constantly exposed to advertising because they tend to have their own devices. It is even more important than before for parents to take the time and explain to their children how to react to advertising and to build awareness to mindfully use your smartphone.

❖ Sharing updates on implementation by EPRA members

- Mònica Duran Ruiz (CAC-ES)

[A 2021 report by the CAC](#) (under Art. 28b AVMSD) analysed the presence of HFSS foods and beverages in a selection of 50 influencer videos and whether it was properly identified as advertising.

The report concluded that video content that included HFSS products always targeted - either partially or totally - minors, with a potential number of viewers reaching 100m. New forms of advertising, such as branded hashtag challenges have the potential of reaching even more viewers (600m in one case). The CAC found that social media is the ideal medium to advertise HFSS products: the nutritional message is easily missed and content-creators create a sense of trust with their viewers.

- **Tine de Baere, VRM (BE)**

Two main provisions of the Flemish Media Decree are of relevance: Art. 69 mandates that a toothbrush logo be used when advertising for sweets and Art. 77 prohibits encouraging or trivializing the excessive intake of certain food and beverages. The wording is however not strict and many marketing techniques fall outside of the legal scope.

A [content creator protocol](#) published by the VRM requires the use of labels to make commercial communication recognisable as such.

At Belgium level, there is a division of competence between communities with the Federal State in charge for health. In general the focus is on self-regulation. The effectiveness of the [Belgium pledge](#) has been criticised.

Issues of concern in relation to influencer marketing and minors on video and content-sharing platforms

- ❖ **Regulating branded content creators and blurred lines between video-sharing, videogaming and gambling by Prof. Dr. Eva Lievens (Ghent University) and Nadia Feci (Ghent University & KU Leuven)**

Regulating branded content creators: a necessity but a challenge

- Regulation is too often limited to one type of content: many regulatory challenges come down to a need for convergence. Content-sharing platforms now offer a wide variety of content (including tutorials, gaming, reactions, unboxing or ASMR) from a wide variety of influencers (also described as vloggers or branded content creators with slightly different connotations)
- Content regulation is necessary because the formats influencers use are engaging and interactive, and their authors appear relatable, which allows them to influence their public's consumption behaviour. Controversial content also tends to generate more views and revenue, leading to a tendency to glamourise gambling, drug use, smoking or drinking alcohol. There's also a lack of level playing field with some influencers making large amounts of money from brands, platforms, peers etc.
- The pandemic confirmed the important place of influencers in society, while they remain less strictly regulated than traditional television. But it is sometimes difficult to assess who is a professional and who is just a hobbyist. One could base an analysis on various indicators; like earnings, number of viewers or publications frequency.
- Influencer marketing has become one of the most effective forms of advertising, through trust and the way their content blends in the commercial communication, making it hard for minors to critically tell the difference.
- Disclosure is necessary; its effectiveness should be assessed; children should be involved to test.
- The convergence of different types of media activities complexifies regulation. A popular trend at the crossroads of videogaming, audiovisual media and gambling is the live streaming by gamers of themselves opening lootboxes.

Compliance & enforcement

- At this point, there is are still few cases perhaps due to lack of legal certainty and awareness.

- We see mostly soft law and self-regulatory initiatives at national level.
- Many regulatory bodies could potentially be competent to regulate influencers, although the cross-border nature of user-generated content is an additional challenge for regulation and another **argument for stronger cooperation between media regulators and other regulators.**

Key take-aways:

- The time has come for action and additional research
- Reinforced cooperation is paramount: not only between media NRAs but other bodies such as DPAs, consumer and gambling authorities
- The dialogues with all stakeholders should include the participation of children
- There is a need for balancing the creativity of influencers and protecting consumers
- Existing legal instruments were not designed with modern-day actors in mind: difficulties for enforcement

- + [Minors and Advertising - Presentation by Prof. Dr. Eva Lievens \(Ghent University\) and Nadia Feci \(Ghent University & KU Leuven\)](#)
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❖ **Media and Information Literacy initiatives by Andy Demeulenaere (Mediawijs)**

There is more to media and information literacy than spotting fake news.

Data on social networks use by youth shows widespread use of all major social networking applications, with variations depending on age categories.

- 87% of 16-25 year olds follow influencers (10 on average), 32% saying they bought something within 3 months of seeing it with an influencer
- 42,4% of +25 year olds follow influencers (2 on average), with 36% buying something within 3 months of seeing it with an influencer

The Belgian Government defines media literacy as *“the whole of knowledge, skills and attitudes that allows citizens to deal with the complex, changing and mediated world in a conscious and critical way. It is the ability to use media in an active and creative way, aimed at societal participation.”*

All users can however not be expected to have the same level of proficiency, but certain levels of knowledge should be expected from certain age groups. For instance, it is not possible to teach kids of all ages to spot fake news. Additionally, problematising news may teach them to avoid news altogether rather than just spot the fake news.

As with media regulation, media and information literacy teaching materials must evolve to remain relevant and efficient. Mediawijs continuously works on their own materials; with a yearly campaign week in March targeting 10-12 year olds, extra lessons available all year and workbooks for younger kids.

[Eryica](#), the European Youth Information and Counselling Agency, is **eager to work with media regulators on the topic of media and information literacy**; as are all non-regulatory actors involved in media and information literacy (Insafe network, Better Internet for Kids, etc).

[Media Smart](#) US/UK have the most recent educational material on influencers.

- + [Minors and Advertising - Presentation by Andy Demeulenaere \(Mediawijs\)](#)
- + andy.demeulenaere@mediawijs.be

❖ A glimpse into recent investigations & best practices with regard to influencer marketing and children by Melissa Kekenbosch (Belgian Federal Public Service of Economy)

The [Belgian Federal Public Service of Economy](#) is also conducting investigations and studying best practices regarding influencer marketing. The Code of Economic Law states that commercial intent must be clear and that it is illegal to directly exhort children to buy products or exhort their parents to do so. It also applies to social media, where users – both children and adults – tend to be more easily influenced.

Anonymised case study: The focus of the case study is a famous influencers couple, very popular in Belgium and followed by millions of children and teenagers. They regularly advertise on their social media without being transparent about the commercial intent, through challenges targeting their followers, organising weekly contests, picking winners and giving them prizes and taking pictures with them. They often show branded content without ever disclosing that they were paid by the brands.

What to call advertising?

The Belgian Federal Public Service of Economy has defined cumulative conditions for content to be qualified as advertising:

1. A product/service is promoted/endorsed
2. The influencer receives an advantage

How to disclose commercial intent?

1. Label the message unambiguously (“publicity” or “advertisement”)
2. Mention/Tag the brand being advertised
3. If available, use platform-specific labels (“Paid Partnership” on Instagram, “Includes paid promotion” on YouTube)

❖ Media regulators’ short case studies

• Peter Eijssvoegel (CvdM-NL)

[As of 1 July 2022](#), influencers on YouTube, Instagram and TikTok fall under the supervision of the CvdM and must comply with the Dutch Media Act. They must be aware of their obligations regarding the protection of minors, particularly with regard to commercial messages.

The CvdM will begin monitoring compliance by influencers with more than 500 000 followers having posted at least 25 videos in the last two years (between 200 and 300 people in the Netherlands). They are given two months to register with the Chamber of Commerce. Over time, the CvdM will lower the threshold to monitor all influencers.

• Mònica Duran Ruiz (CAC-ES)

In 2020, the CAC analysed [advertising and video content on TikTok](#), focusing on 8 profiles with a high number of teenage followers. The promoted products ranked as follows: 25%: food and beverages, 18%: fashion, 18%: beauty products, 12,5%: influencer’s own merchandising, 6,5%: videogames.

How products are promoted varies (discount, incentive to buy, praising virtues) depending on the TikToker. The most common ways are to show use of the product or through “hashtag challenges”. The study concluded that 93,8% of the videos analysed had no warnings to distinguish them from non-commercial videos or that the disclaimers used were not easily visible.

- **Alexandra Mielle (Arcom-FR)**

Arcom has seen a rise in gambling ads targeting 18-25 years old. The French gambling regulator ANJ decided to remind actors of their obligation to explicitly mention the need to be at least 18 to gamble.

[Joint guidelines](#) agreed in consultation with Arcom stipulate notably that:

- Influencers promoting gambling cannot be heavily followed by minors (less than 16% audience of 13-17)
- Influencers promoting gambling cannot be minors or appear to be less than 18 years old

The decision was taken to rely on soft law with a simple objective: to influence the influencers.

- **Mari Velsand (EPRA Vice-Chair, NMA-NO)**

Following an assignment from the Norwegian Minister of children and equality in 2018, the Norwegian Media Authority and the Norwegian Consumer Agency [produced ethical guidelines to fight body pressure in social media, targeting influencers, networks and advertisers](#).

4 years later, does it work?

Watch Haavard Kvernaas Bakken (Head of the FIM Secretariat and Senior Adviser at the Norwegian Advertisers Association) answer in [video](#).

5. Annex: A brief overview of key reference documents, reports and research

Legal framework:

United Nations:

- UN Convention on the Rights of the Child (UNCRC): Convention on the Rights of the Child, Adopted and opened for signature, ratification and accession by General Assembly, Resolution 44/25 of 20 November 1989:
https://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf

European Union:

- Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) (codified version) <https://eur-lex.europa.eu/eli/dir/2010/13/2018-12-18>

Council of Europe:

- Recommendation CM/Rec(2018)7 of the Committee of Ministers to member States on Guidelines to respect, protect and fulfil the rights of the child in the digital environment (Adopted by the Committee of Ministers on 4 July 2018 at the 1321st meeting of the Ministers' Deputies) <https://rm.coe.int/guidelines-to-respect-protect-and-fulfil-the-rights-of-the-child-in-th/16808d881a>

WHO documents:

- Set of recommendations on the marketing of foods and non-alcoholic beverages to children (2010): <https://www.who.int/publications/i/item/9789241500210>
- Evaluating implementation of the WHO set of recommendations on the marketing of foods and non-alcoholic beverages to children (2018): https://www.euro.who.int/_data/assets/pdf_file/0003/384015/food-marketing-kids-eng.pdf
- Monitoring and restricting digital marketing of unhealthy products to children and adolescents (2019): https://www.euro.who.int/_data/assets/pdf_file/0008/396764/Online-version_Digital-Mktg_March2019.pdf
- Future steps to tackle obesity: digital innovations into policy and actions (WHO and Portuguese Ministry of Health, conference report 29/06/2021): <https://apps.who.int/iris/bitstream/handle/10665/351471/WHO-EURO-2022-4764-44527-63040-eng.pdf?sequence=1&isAllowed=y>
- Monitoring food and beverage marketing to children via television and the Internet (proposed tool, 2017): https://www.euro.who.int/_data/assets/pdf_file/0011/333956/food-children-TV-internet-en.pdf
- Tackling food marketing to children in a digital world: trans-disciplinary perspectives (2016): https://www.euro.who.int/_data/assets/pdf_file/0017/322226/Tackling-food-marketing-children-digital-world-trans-disciplinary-perspectives-en.pdf

- Ending inappropriate marketing of breast-milk substitutes and foods for infants and young children in the WHO European Region (2022):
<https://apps.who.int/iris/bitstream/handle/10665/352003/WHO-EURO-2022-4885-44648-63367-eng.pdf?sequence=1&isAllowed=y>
- WHO Regional Office for Europe nutrient profile model (2015):
https://www.euro.who.int/_data/assets/pdf_file/0005/270716/Nutrient-children_web-new.pdf

Monitoring toolkits:

- Monitoring of Marketing of Unhealthy Products to Children and Adolescents – Protocols and Templates:
<https://www.who.int/europe/tools-and-toolkits/monitoring-of-marketing-of-unhealthy-products-to-children-and-adolescents---protocols-and-templates>
- WHO Regional Office for Europe: YouTube social media influencer marketing protocol V2 2020:
<https://euro.sharefile.com/share/view/s80bdabee2284c92b/fobd28fb-2815-41a1-ae78-f30f65bc9a21>

Research and studies on exposure of children to marketing of HFSS:

- European Commission, Directorate-General for Health and Food Safety, Study on the exposure of children to linear, non-linear and online marketing of foods high in fat, salt or sugar: final report, Publications Office, 2021, <https://data.europa.eu/doi/10.2875/928620>
- Binder, A., Naderer, B., & Matthes, J. (2021). Shaping healthy eating habits in children with persuasive strategies: Toward a typology. *Frontiers in Public Health*, 9, 676127. doi: [10.3389/fpubh.2021.676127](https://doi.org/10.3389/fpubh.2021.676127)
- Heiss, R., Naderer, B., & Matthes, J. (2021). Healthwashing in high-sugar food advertising: The effect of prior information on healthwashing perceptions in Austria. *Health Promotion International*, 36(4), 1029-1038. doi: [10.1093/heapro/daaa086](https://doi.org/10.1093/heapro/daaa086)
- Naderer, B., Binder, A., Matthes, J., & Mayrhofer, M. (2020). Healthy, sweet, brightly colored, and full of vitamins: Cognitive and affective persuasive cues of food placements and children's healthy eating behavior. *International Journal of Advertising*, 39(7), 1012-1030. doi: [10.1080/02650487.2020.1735140](https://doi.org/10.1080/02650487.2020.1735140)
- Spielvogel, I., Naderer, B., & Matthes, J. (2020). Again and again: Exploring the influence of disclosure repetition on children's cognitive processing of product placement. *International Journal of Advertising*, 39(5), 611-630. doi: [10.1080/02650487.2019.1648984](https://doi.org/10.1080/02650487.2019.1648984)
- Steinnes, Kamilla Knutsen; Haugrønning, Vilde (2020). Mapping the landscape of digital food marketing: Investigating exposure of digital food and drink advertisements to Norwegian children and adolescents: <https://oda.oslomet.no/oda-xmlui/handle/20.500.12199/6510>

Research papers on influencers:

- Feci, Nadia, Influencers and the legal implications of conflict as a genre of audiovisual content online

- Verdoodt, Valerie, et al. "Child Labour and Online Protection in a World of Influencers." The Regulation of Social Media Influencers, edited by Catalina Goanta and Sofia Ranchordas, Edward Elgar, 2020, pp. 98–124, [doi:10.4337/9781788978286.00013](https://doi.org/10.4337/9781788978286.00013)
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EPRA papers and resources:

- EPRA Athens 2019: Background paper on the protection of minors in the digital world: common challenges for NRAs and DPAs:
<https://www.epra.org/attachments/athens-plenary-1-protection-of-minors-in-the-digital-world-what-common-challenges-for-nras-and-dpas-background-paper>
- EPRA Athens 2019: Background paper on the protection of minors in the digital world: common challenges for NRAs and DPAs:
<https://www.epra.org/attachments/athens-plenary-1-protection-of-minors-in-the-digital-world-what-common-challenges-for-nras-and-dpas-background-paper>
- EPRA Vienna 2017: Presentations on minors' advertising literacy in the digital age:
<https://www.epra.org/attachments/vienna-plenary-2-minors-advertising-literacy-in-the-digital-age-presentation-by-mari-velsand-nma-no>
<https://www.epra.org/attachments/vienna-plenary-2-minors-advertising-literacy-in-the-digital-age-presentation-by-eva-lievens-ghent-university>
- EMIL, EPRA's media literacy taskforce - resources:
<https://www.epra.org/attachments?category=mil-taskforce>
- EPRA online workshop on [age assurance and age classification on VSPs](#) 16 March 2022:
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ERGA reports:

- ERGA Report 2021: [Analysis and recommendations concerning the regulation of vloggers](#)
- Activity Report on the ERGA Workshop 2020 [“Regulation of Vloggers on Video-Sharing Platforms”](#)