WFA position on European Commission Communication - "Tackling Online Disinformation: a European Approach"

> **The World Federation of Advertisers (WFA) is the voice of marketers worldwide, representing 90% of global marketing communications spend – over €800 billion per year – through a unique, global network of the world's biggest markets and biggest marketers. WFA champions responsible and effective marketing communications worldwide. More information at www.wfanet.org.**
>
> **We represent 92 global brands and 60 national advertiser associations worldwide. This includes national advertiser associations in 20 EU Member States, and around 50% of the companies we represent are European.**

WFA welcomes the Commission's recent Communication "Tackling online disinformation: a European approach". As advertisers, we recognise the role that advertising can play in funding some of the types of disinformation described in the Communication and the subsequent potential impact on society.

Advertisers are committed to avoiding the funding of purveyors of disinformation intent on damaging business, society and politics at large. However, the way that online advertising is bought and placed is complex and can involve many different intermediaries. This means that advertisers don't always have full transparency and visibility on every piece of content their ads appear next to. Concerns around the context in which ads are placed is a top priority for the majority of WFA members.

A significant amount of work has already been done by WFA members to work with the wider online advertising ecosystem to address this issue, including:

- WFA members are working with the biggest online advertising platforms to review the procedures and tools in place to control what content ads appear next to online.
- Most WFA members are working with independent third-party verification companies to monitor the environment ads appear in, and they limit investment in networks which do not allow the use of third-party verification.
- 88% of WFA members have suspended investment in ad networks where it's felt that there is an unnecessary risk of ads appearing next to content which does not meet the values of the brand.
- Nearly all WFA members use some form of whitelists and/or blacklists to determine what types of content their ads should not appear next to.
- Most WFA members include specific stipulations in media contracts with their agencies related to limiting the exposure of their ads next to certain types of content.

However, WFA believes that all parties involved in the buying and selling of online advertising and the provision of advertising-related services need to continue to work together to significantly improve transparency across the online advertising ecosystem in order to effectively scrutinise, control and limit the placement of advertising on accounts, channels, websites and apps belonging to purveyors of disinformation.

WFA believes that it is the responsibility of all stakeholders in the advertising ecosystem to employ comprehensive and rigorous safeguards to prevent advertising revenues from funding actors intent on causing public harm through the dissemination of false, inaccurate or misleading information, including strict limits placed on which accounts and channels can host paid advertising.

WFA members have already set out a number of key principles by which advertisers seek to operate with their online advertising ecosystem partners in this context. These principles include requiring platforms and publishers to be meticulous with regard to how advertising is placed alongside content on their sites. This is particularly important in the context of content which falls within the Commission's definition of 'disinformation'[1].

---

[1] "Disinformation is understood as verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm", *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – Tackling online disinformation: a European approach, COM(2018) 236, 26/04/18*

166 Avenue Louise
1050 Brussels, Belgium
info@wfanet.org
www.wfanet.org   1/2

WFA supports the Commission's objective of exploring ways in which all relevant stakeholders, including online platforms, the advertising industry, major advertisers, media and civil society representatives, could collectively develop industry-led solutions to tackle the spread of disinformation. The suggestion of an industry 'Code of Practice' is a good starting point, although we believe that it is essential that this forum is given sufficient time and resources to develop something meaningful that can eventually be turned into concrete, effective action.

WFA also supports the Commission's focus on education and media literacy in tackling disinformation. WFA strongly believes in the importance of empowering users to navigate the digital environment and the effectiveness such initiatives can have when they are well designed. Based on our extensive experience in devising and supporting media literacy programmes and campaigns at EU and global level, we would also be open to contributing to the Commission's work in this area.

WFA would also like to note that measures to reform political campaign advertising and political sponsored content should be separate from measures which relate to advertising and marketing for commercial goods and services.

For more information, please contact Catherine Armitage, Head of Digital Policy, WFA (c.armitage@wfanet.org, 0032470367677)

WFA's corporate members

WFA's national advertiser association members

166 Avenue Louise
1050 Brussels, Belgium
info@wfanet.org
www.wfanet.org

2/2