

IAB Europe interim report on activities related to the EU Code of Practice on Disinformation – September 2020

This document contains an overview of IAB Europe's engagement in the context of the EU Code of Practice (CoP) on Disinformation, and additionally, it provides for observations on the impact of the Covid-19 on the digital advertising industry.

Introduction

IAB Europe (Transparency Register: 43167137250-27) represents 25 European national organisations who in turn associate over 5,000 companies from across the digital advertising and marketing ecosystem, from advertisers and advertising agencies on the buy side, news publishers and other ad-funded sites and online services on the sell side, and technology providers facilitating the delivery of ads. We have over 90 companies in direct membership, including agencies, technology companies, publishers and eCommerce companies.

Tackling disinformation as a priority for the digital advertising ecosystem

IAB Europe is committed to reducing the incidence of online disinformation. The association and a number of member companies are signatories to the CoP. In its role as a trade association, IAB Europe did not enter into any specific obligations stemming from the Code on behalf of its members. Instead, IAB Europe committed to make its members fully aware of the Code, and to encourage them to join it or respect its principles, as appropriate.

We recognise that legitimate online infrastructure can be misused by bad actors to deceive and confuse citizens, making it more difficult for them to make fact-based judgments, and ultimately undermining our democracies. Though all manifestations of online disinformation do not leverage, or relate to, advertising, digital advertising may facilitate the creation and propagation of disinformation, for example, by inadvertently enabling the placing of legitimate advertising on websites enabling disinformation. Investment in brand safety tools can significantly contribute to reducing such ad misplacement. The digital advertising industry is deeply invested in brand safety, as proven by our strong support for the European Commission's "follow-the-money" approach, embodied in the EU Memorandum of Understanding (MoU) on misplacement of ads on websites that infringe intellectual property rights¹. In a recently published report on the functioning of the MoU²,

¹ The Memorandum of Understanding (MoU) on Online Advertising and IPR is a voluntary agreement facilitated by the European Commission to limit advertising on websites and mobile applications that infringe copyright or disseminate counterfeit goods. In addition to the MoU efforts, IAB Europe has been supportive of the initiative embracing a similar approach spearheaded by the World Intellectual Property Organisation (WIPO), WIPO ALERT. WIPO ALERT is a secure, online platform to which authorized bodies in WIPO member states can upload details of websites or apps which have been determined to infringe copyright according to national rules. Access to the platform is given to any genuine digital advertising industry player which is willing to undertake to use the information solely for preventing the appearance of advertising on pirate websites.

² https://ec.europa.eu/docsroom/documents/42702.



the Commission acknowledged that industry cooperation has led to progress in tackling online piracy.

We believe it is in our shared interest to ensure that the digital ecosystem continues to provide accurate information and views, and on terms that are accessible and affordable for all citizens. In this context, IAB Europe continues to engage with its members to combat stakeholder quality and transparency concerns and address the challenges that the industry is facing in order to fuel consumer trust and brand investment in the digital advertising and marketing ecosystem. This includes market-wide programmes driven by European National IABs³ that are designed to increase transparency and trust in how digital advertising is bought and sold; addressing the need for harmonised pan-European brand safety and brand suitability approaches⁴; as well as collaborating with other partners, for instance, in the framework of the Global Alliance for Responsible Media (GARM)⁵ that aims to proactively and collectively address harmful and misleading media environments. Over the period of 2020, we have witnessed advancement in all of the aforementioned work strands, detailed in footnote references to this document.

Mindful of the fact that both the Digital Services Act (DSA) and the European Democracy Action Plan (EDAP) aim to address disinformation, we encourage readers to consult IAB Europe's responses to the public consultation on the DSA⁶ and the EDAP⁷ respectively.

Digital advertising industry amidst Covid-19

Amidst Covid-19, IAB Europe has focused on providing the industry players with relevant economic insights in the framework of its 'Economic Trends Forum'⁸, to allow them to understand the situation at hand and take informed decisions. While the situation is fluid, the economic downturn is a reality. Previous recessions are not a reliable model to quantify the impact of the Covid-19 pandemic on the market. But macroeconomic indicators, paired with industry data, are the best modelling ingredients that one has. Continual review and reforecasting are critical, in particular, given the fact that rising unemployment and squeezed personal expenditure can turn the ad downturn into a crisis of consumer demand, where advertisers and brands are withdrawing their ad investment. Current

³ In July 2020, IAB Europe <u>updated</u> its <u>IAB Europe Navigator</u>: <u>Quality Initiatives</u>. The paper demonstrates the vast amount of work being undertaken in Europe and beyond to build and ensure a sustainable future for digital advertising and marketing. There are both similarities and differences across all of these initiatives. It includes a summary of the work being undertaken in national markets such as quality certification schemes, guidelines and best practice guides.

⁴ In July 2020, IAB Europe <u>published</u> its Guide to Brand Safety and Suitability, to share background context on brand safety in Europe, pan-European definitions for brand safety and brand suitability with accompanying key considerations, best practices and case studies to help educate all stakeholders on ensuring brand safe environments. The guide was developed by experts from IAB Europe's Quality & Transparency Taskforce (a part of the Brand Advertising Committee). Formed in January 2020, the taskforce's aim is to combat stakeholder quality and transparency concerns and address the challenges that the industry is facing in order to fuel consumer trust and brand investment in the digital advertising and marketing ecosystem. Following on from IAB Europe's industry poll brand safety which demonstrated the need for more education and guidance, the taskforce agreed that their first priority was to address the need for harmonised pan-European brand safety and brand suitability definitions.

⁵ www.wfanet.org/garm.

⁶ https://iabeurope.eu/wp-content/uploads/2020/09/20200908_IAB-Europe_DSA_comments.pdf.

⁷ https://iabeurope.eu/wp-content/uploads/2020/09/20200915_IAB-Europe_EDAP_comments.pdf.

https://iabeurope.eu/knowledge-hub/event-recording-economic-trends-forum-10th-september-2020.



market forecasts for 2020 show that digital advertising could effectively decline by -3,8%, whereas all other media are expected to experience -21,6% decline in 2020.

Digital advertising industry amidst Covid-19 - disinformation-related considerations

The Covid-19 crisis has further demonstrated the need for quality news media, which at its core is a critical contributing factor to tackling disinformation. People have been looking for trusted, quality journalism, often financed primarily via ad revenues.

This spur in heightened traffic should be delivering the financial results to reward trusted journalism. However, the market has seen buyers of ads extending the use of their avoidance technologies to prevent some or all Covid-19 ad adjacencies. The inclusion of the exact match words such as 'crisis', 'coronavirus' or 'Covid-19' in avoidance technologies has had the unintended consequence of blocking all advertising from appearing next to Covid-19-related content, thus limiting the availability of monetisable inventory to the publisher, and surely having an impact on technology providers working on their behalf.

IAB Europe therefore recommended⁹ that during the Covid-19 a blanket brand safety approach of blocking all 'Coronavirus' or 'Covid-19' content is not applied. Brands should instead work closely with their media agencies, verification companies, and trusted news partners to make an informed decision by looking at the facts about the value of news environment and implementing smart solutions to ensure that their advertising continues to reach the correct audiences during Covid-19.

In recent years, one can witness a rapid progression of the number of independent providers and additional services from independent providers. Technology companies continue to rely on proprietary and client's brand safety mechanisms for this purpose. These services are dedicated to ad placement verification through high-end semantic technology, and these include third-party services specialised in identifying properties that carry disinformation. In this context, the aforementioned development, which prevented news media publishers from monetising the Covid-19-related reporting, underscores the importance of ensuring a flexible approach to risk management and brand protection. Ultimately, in terms of ad buying, the level of brand safety must be at the discretion of the advertiser, or a buyer for that matter. Certain products or services may fare better from an advertising perspective in specific content environments, or when viewed by a particular audience. Same environments or audience could be however deemed inappropriate by another advertiser, which highlights the fact that brand safety is context specific, and there are no one-size-fits-all approaches. Conversely, suitable solutions must be discussed on a case-by-case basis.

⁹ https://iabeurope.eu/blog/iab-europe-backs-dont-block-quality-european-journalism.