YOUNG AND EXPOSED TO UNHEALTHY MARKETING

Digital food marketing using influencers

February 2019

FORBRUKERRÅDET

Preface

The Norwegian Consumer Council has for many years been working to reduce pressure on children and young people from the marketing of unhealthy food and drink. The Consumer Council along with a number of other organisations voiced their support when in 2012 the Norwegian health authorities proposed a ban on the marketing of products high in fat, sugar and salt to children under the age of 18.

However, the authorities chose to enter into an agreement with the food industry to establish a stricter self-regulation regime, the Food and Drink Industry Professional Practices Committee (MFU). The Consumer Council has been critical of the scheme as we believe its code of conduct fails to provide children and young people with the necessary protections against the marketing of products that increase the risk of obesity and of adopting eating habits that do not promote well-being and healthy development.

Since the launch of the MFU in 2014 the Consumer Council has seen it as an important task to produce evidence that the current legislation does not sufficiently protect children and young people against the marketing of unhealthy food and drink, and that the lack of protection for children and adolescents over the age of 13 makes this group especially vulnerable to marketing in social media.

The Consumer Council has filed complaints about a number of marketing campaigns with the MFU, and has carried out surveys, including of teenagers, on marketing in social media.

This report provides evidence of how children and young people are being subjected to subtle marketing content in social media and how the food industry uses Norwegian YouTubers to promote their products in highly sophisticated ways. We will also demonstrate how Norway is beginning to fall behind other countries in terms of regulating marketing. The report can therefore be seen as a message to the authorities, which have the ultimate responsibility for giving children and young people adequate protection against the marketing of unhealthy food and drink.

Oslo, February 2019

> *We have to fully recognize marketing and advertising of foods high in fat, sugar and salt as a risk for childhood obesity and identify restriction of marketing of these foods as a policy priority.*
>
> *World Obesity, 2018*

Contents

1 Introduction 4

2 Online marketing exploits teenagers' vulnerabilities 6

2.1 Adolescents are easily influenced 7

2.2 The effects of marketing on young people 8

2.3 New studies confirm existing knowledge 8

3 Young people targeted in social media 12

3.1 Young YouTubers are advertising unhealthy foods 12

3.2 Strategies for reaching young people on Facebook 19

3.3 Competitions are popular – "like, share and comment" less so 19

3.4 Using young people and youth culture to reach teenagers 24

3.5 The results are an indication of the overall advertising pressure 26

4 Policy: Current status and the road ahead 27

4.1 International obligations 27

4.2 The children's rights perspective according to the UNCRC 28

4.3 The diligence clause offers no additional protection of teenagers 30

4.4 Regulations to protect teenagers 32

5 Conclusion: Stronger protections for teenagers are needed 37

References 38

Appendices: Methodologies used in the Consumer Council's survey 41

1 Introduction

It is vital that children and young people adopt a healthy and varied diet. Children and teenagers undergo rapid growth and physiological, cognitive and social development. Giving them the best possible chance of adopting eating habits that provide sufficient nutrition and a balanced energy intake is therefore paramount. Amongst other things, this means limiting their intake of food and drink high in fat, salt and sugar. A high intake of such foods increases the risk of obesity and a number of other diet-related diseases that children and young people must be protected against to prevent serious health issues later in life.

It is therefore worrying that children and young people on average consume more sugar and saturated fat and less fruit and vegetables than the rest of the population (1). According to the Norwegian Institute of Public Health, one in six children in Norway is overweight or obese. For adolescents the figure is one in four (2).

The marketing of food and drink high in fat, sugar and salt has in the last decade been established as an important contributor to children and young people's food choices. There is compelling evidence that the marketing of unhealthy products has an impact on attitudes and taste preferences in children and young people, and that it contributes to increased consumption of such products and subsequently increasing levels of obesity (3, 4).

WHAT IS MARKETING?

> The term marketing refers to any form of commercial communication or message that is designed to, or has the effect of, increasing the recognition, appeal and/or consumption of particular products and services. It comprises anything that acts to advertise or otherwise promote a product or service.

Source: WHO, 2010: http://apps.who.int/iris/bitstream/handle/10665/44416/9789241500210_eng.pdf;jsessionid=9E6BBC8E4AA26CCB741499C576A680F8?sequence=1

Being able to make informed decisions is a fundamental consumer right. Children and young people are vulnerable because, unlike adults, their decisions and behaviours are less driven by rationality and cognitive judgement. When children and young people are exposed to marketing, they make different decisions than they otherwise would have done. It is ethically and legally problematic when the decisions they make come to have a negative impact on their health and development.

Minors are defined as a vulnerable consumer group. Although Norway has granted them particular protections against marketing[1], the legislation does not specifically cover unhealthy food and drink. Norway has operated a self-regulation regime since 2014. The Food and Drink Industry Professional Practices Committee (MFU) is tasked with ensuring that unhealthy food and drink marketing does not target children (5). The MFU was established after the Norwegian authorities, in seeking to honour its international obligations, in 2012 proposed a set of regulations to ban the marketing of unhealthy foods to children under the age of 18. The MFU code of conduct, on the other hand, is only designed to protect against marketing aimed especially at children under the age of 13 (6). In terms of marketing aimed at teenagers, the self-regulation regime requires the food and drink industry to exercise *caution and consideration in respect of their age and development*.

The weak protections offered to teenagers (aged 13–17) in Norway mirrors the situation in many other countries, although some nations have recently introduced legislation that protects teenagers up to the age of 15. Most regulations and self-regulation schemes set the age limit for marketing aimed at children at around 12. In light of new marketing techniques and channels that young people are particularly vulnerable to, including digital marketing strategies, many actors including the World Health Organization (WHO) now consider that teenagers need stronger protections (7, 8).

In 2017 the Consumer Council asked young people about their perceptions and experiences of marketing in social media in a focus group study of 13 and 15-year-olds (9). The findings show that the teenagers felt they were being exposed to extensive advertising in social media. Adverts for unhealthy foods accounted for a considerable proportion of the marketing, and the youngsters themselves felt that they were being exposed to large amounts of advertising for unhealthy foods. The interviews also found that the teenagers were less conscious and critical of marketing that did not use traditional advertising formats such as promotional offers and campaigns. Marketing in the form of entertainment or content advertising promoted by influencers they followed tended to go under their radar.

The overall objective of this report is to further highlight how children, and especially teenagers, are exposed to digital marketing of unhealthy food and drink, focusing in particular on the following topics:

- New knowledge about the effects of marketing of unhealthy foods to teenagers online and in social media
- A survey of unhealthy food and drink marketing in selected social media popular with Norwegian children and teenagers
- Regulations on the marketing of unhealthy food and drink in Norway and worldwide, political obligations and reflections on where we go from here

[1] Cf. the Marketing Control Act and the Broadcasting Act.

2 Online marketing exploits teenagers' vulnerabilities

Children and young people's media use has changed markedly over the past decade. Most children aged between 8 and 18 had already turned to the internet rather than TV for entertainment as far back as 2008 (10), but their media use has changed considerably since then due to technological advances. Both equipment and platforms continue to evolve.

The Norwegian Media Authority's Children and Media report from 2018 found that practically all Norwegian children aged 13 and over have a mobile phone and that more than half of them spend more than two hours on it every day. Social media have become established platforms where Norwegian teenagers spend a great deal of their time. By the age of 13 virtually every teenager is a user of one or more social media platforms (11). There they find entertainment and information and can socialise with friends. Half of all girls aged between 13 and 16 say they spend two hours or more on social media every day. Amongst boys it is almost one in three. By the age of 15 between 80 and 90 per cent are users of Facebook, Snapchat and Instagram (11).

Norwegian children and young people spend considerably more time on YouTube than watching TV channels. Almost eight out of ten children aged between 9 and 18 use YouTube on a daily basis. One third of boys aged 13 to 16 spend more than two hours a day on YouTube, while the figure for girls is somewhat lower at 15 per cent (11).

The techniques used to market food and drink to young people have undergone a revolution in step with technological advances. Although TV advertising remains important, much of the marketing has shifted to digital platforms, and the food industry was quick to establish itself on the internet and in social media, where they deploy effective methods to reach young people.

The Consumer Council's 2017 report on young people and social media describes marketing techniques used in social media, including one known as *advertainment*. The technique appeals to the audience's emotions and engagement and often involves entertainment, competitions and fun puzzles, something which makes it difficult to recognise as advertising (9).

These actors, be they public or commercial organisations, gain considerable reach and influence by working with individuals who appeal to and are trusted by teenagers.[2] The target audience contributes to the marketing – often without realising it – by posting their own content and tagging and forwarding advertising on social media. The marketing thus becomes integrated into social networks, it becomes engaging and engrossing and is perceived to be genuine.

[2] Look at this marketing blog for an example: https://blogg.markedspartner.no/hvorfor-benytte-influencer-marketing-som-en-del-av-din-strategi

Online marketing is also based on extensive harvesting of personal data, which is then used to tailor and target marketing at individual users. All these methods make the marketing more interesting and relevant to the target group, but it also looks less like advertising.

2.1 Adolescents are easily influenced

Efforts to restrict the marketing of unhealthy food and drink to children impose an age limit that define which children should be protected. Many self-regulation regimes set the age limit at 12. This age limit is based on research which shows that when children reach the age of 12 they will have developed cognitive skills that enable them to understand the commercial purposes behind the marketing. It has been assumed that this awareness means that children can and will mobilise a cognitive defence against the effects of marketing. This research is now seen as dated and inadequate, partly because of the radical changes that have taken place in relation to technology and marketing, something which is described exhaustively by the WHO (7, 8).

The methods applied in modern, digital advertainment marketing are not processed cognitively but through unconscious, emotional and social mechanisms that can impact attitudes and behaviours. The cognitive defence is therefore not activated. Young people are in many instances incapable of recognising marketing at all. Withstanding the effects of marketing requires not only cognitive skill but also motivation (7). There are many aspects of youth that suggest adolescents can find it difficult to mobilise the necessary motivation:

They are at a stage in their lives when they are hormonally, socially and developmentally highly sensitive to social acceptance and rewards. This means that they are vulnerable to social pressures from their peers, while the teenage brain is not sufficiently developed to be able to make rational decisions based on long-term as opposed to short-term reward (12).

Young people are impulsive, and their ability to regulate their behaviour is challenged when their decisions are being influenced by emotion or social pressure. Seeking risk and testing boundaries are also part of the identity-building process when growing up (7).

Although teenagers are cognitively more mature than children, they are at a stage of their neurological and social development which makes them especially vulnerable to the marketing of unhealthy food and drink (7, 8). These vulnerabilities arise as teenagers increasingly take control of their own finances, spend more time outside the home and buy their own food. Teenage eating habits are on average less healthy than those of the rest of the population. For example, dietary surveys have found that 55 per cent of schoolchildren in Years 4 and 8 consume more added sugar than recommended. The figure amongst adults is 23 per cent (1).

2.2 The effects of marketing on young people

There is solid evidence from the last 40 years which shows how food marketing influences preferences, demand and consumption (4) amongst children and young people and consequently also their eating habits.

Most of the attention has been directed at children rather than teenagers when looking at the effects of marketing (13). The bulk of research to date has investigated the effects of TV, but in recent years we have started to see research literature on the effects of marketing on digital platforms. Much of this research has focused on the effects of *advergames* (online games incorporating food industry commercial products or mascots – a combination of advertising and gaming) on children. The results of this research show that children are influenced by such marketing and that the effects are possibly even greater than for TV advertising (8).

There is reason to believe that digital marketing that uses sophisticated methods and is tailored to the individual user has at least as much, if not more, of an effect on children and young people as traditional marketing.

The media industry also reports that such marketing reinforces the impact of campaigns in traditional media, extends the reach of the advertising and increases public recognition of and association with adverts and brands (7).

2.3 New studies confirm existing knowledge

Rapid developments mean that there is still little research on the effects of digital marketing on young people, but the first studies on the topic are now being published. We have identified five articles describing various studies on the effects of digital marketing on adolescents and young adults.

The studies look primarily at teenagers, but younger children and young adults are also included. On the whole, they indicate that children and adolescents but also young adults are influenced by marketing they encounter online and in social media. The results also suggest that the marketing can have an impact on attitudes, intentions and actual consumption of food and drink. Not surprisingly, many of the studies suggest that marketing in social media is more impactful than other forms of advertising. This is consistent with what we already know about the methods used in digital marketing. When the marketing is individually tailored, entertaining and maybe part of a social network, its effects on individuals can be greater than traditional marketing aiming at much wider audiences.

The findings from these new studies also underpin the findings from the Consumer Council's focus group interviews which show that young people let themselves be entertained by, yet find it difficult to identify, marketing in social media. Young adults, too, are influenced by marketing they are exposed to, despite being cognitively more mature.

SEARCH STRATEGY

We performed a literature search in the Medline (Pubmed), Cinahl and Web of Science databases restricted to title, abstract and keywords, using the following search terms: Food OR beverage OR soda OR junk food AND marketing OR promotion OR advertising AND Internet OR web OR social media OR Facebook OR Instagram OR YouTube OR social network AND Children OR youth OR adolescents OR teenagers OR teens. The search was restricted to scientific articles published between 1 January 2016 and the end of 2018. Articles only relating to children were excluded.

These new studies support and underpin the aggregated evidence that already exists on the effects of the marketing of unhealthy foods on children and young people.

- A systematic review by Buchanan et al. in 2018 looked at the link between digital marketing of unhealthy commodities (unhealthy foods, alcohol and tobacco) and young people's (12–30 years) attitudes and behaviours (14). Twenty-eight studies were examined, most of them cross-sectional. The systematic review looked at how exposure to the marketing of unhealthy products on *websites*, *social media*, by *email* and in *online games* was associated with attitudes towards, intended use and current use of the unhealthy products. The authors found that all of the studies made at least one significant association whereby exposure to marketing was linked to increased consumption of unhealthy products (described as the "detrimental effect"). Effects on attitudes were found in seven studies, effects on intended consumption were found in seven of the nine studies that included intended consumption as an outcome measure, and detrimental effects on current use were found in 11 out of 17 studies. The results indicate that there is a link between exposure to the marketing of unhealthy products and attitudes and consumption of these products amongst teenagers and young adults. The authors also point out that marketing that had been shared by other users in social media appeared to have a stronger effect than advertising where there was a clearly identified, commercial sender.

- Buchanan et al. conducted an experimental study in 2017 to explore the effects of online marketing on young adults' (18–24 years) consumer behaviours, using energy drinks as a case example (15). The 60 participants were allocated at random to either an experimental group which was exposed to the websites and social media sites of two energy drink brands (Red Bull and V Energy) or to a control group which was exposed to the websites and social media sites of two nut bar brands. Attitudes and intended purchases of the products were surveyed before and after exposure. Qualitative interviews were also conducted with the participants. The results show that attitudes

towards the energy drink brands and energy drinks in general had become significantly more positive amongst the experimental group than had the control group's attitudes towards nut bars. Intentions to purchase were also significantly higher in the experimental group after the experiment than in the control group. The qualitative interviews also found that the participants appreciated various aspects of the marketing, such as the brands demonstrating corporate social responsibility or using humour. They also reported that seeing other users engage (comments, likes etc.) increased their trust in the product. The authors conclude that young adults are vulnerable to marketing and that they fail to spot the techniques used to promote unhealthy habits.

- In an Australian study from 2018 Baldwin et al. looked at whether the use of social media and online-related behaviour were associated with unhealthy food and drink consumption amongst children aged 10 to 16 (16). Data from 417 children was collected through an online questionnaire. The study focused on the use of social media, especially YouTube and Facebook, as well as interactions with brand content (e.g. liking, commenting on or sharing content published by brands on Facebook). The outcome measure was consumption of unhealthy food and drink whereby consumption was given a score reflecting the degree of unhealthy consumption. The results show that children who had been exposed to online marketing of unhealthy food and drink in general and to brand content on YouTube in particular scored higher on unhealthy food and drink consumption than children who were not exposed to such advertising, including when adjusting for demographic factors. No link between Facebook activity and unhealthy consumption was found. The authors suggest that this could be because YouTube videos are more engaging or because a smaller proportion of respondents interacted with brands on Facebook.

- In Sweden Holmberg et al. carried out a survey in 2016 on how teenagers communicate around food on Instagram (17). 1,001 open profiles belonging to teenagers who had used the hashtag #14år (*aged 14*) were scanned for food-related photos, and the first photo to be identified was analysed. 85 per cent of the profiles had depictions of food. Most of the food being depicted could be classed as unhealthy (approx. 68 per cent). Almost half of the photos showed products clearly displaying the name or logo of the brand, and the four most frequently depicted brands were Coca-Cola, Ben & Jerry's, Starbucks and McDonald's. Many of the pictures were clearly inspired by campaigns that encourage users to post pictures and thus become part of the marketing campaign. For instance, almost half of the photos that included Coca-Cola products were manifestly inspired by the "Share a Coke" campaign which invited users to take pictures of bottles with personalised labels. Although the study did not measure exposure and effect, the results indicate that teenagers are influenced by marketing

for unhealthy brands and that many of them contribute by disseminating and producing advertising as part of their own identity-building.

- The last study in our literature search does not specifically address food marketing, but does tell something about how strategies commonly used to expand the reach of advertising in social media have an impact on young people. In an American study from 2016 Sherman et al. applied functional MRI (fMRI) to investigate how young people (13–18 years) responded to peer pressure in social media (18). fMRI uses magnetic resonance technology to measure brain activity. The participants were exposed to a sequence of pictures presented in an Instagram-style format where each picture had been given a number of *likes* manipulated to be either low or high. The participants were then told that 50 other young people had seen the pictures before them and were asked to respond to the pictures by either *liking* them or ignoring them. Their behaviours were measured by recording the number of likes or ignored images. fMRI was also used to measure the response in the brain's reward centre. When the adolescents were shown pictures that already had a large number of likes, they were significantly more inclined to like the pictures themselves compared with pictures with fewer likes. The fMRI scans showed that the participants developed a response in a larger area of the brain when they looked at pictures with a high number of likes compared with those with few likes. The response was especially intense when the participants saw that their own pictures had received a large number of likes, particularly in the parts of the brain associated with social skills, reward and motivation. The authors interpret the findings to mean that young people's behaviours can be affected by peer pressure, including on social media. Digital peer pressure can therefore have an impact on adolescents' socialisation, and can reinforce behaviours.

This is a rapidly evolving area of research, and the methods used to investigate the effects of digital marketing are likely to become increasingly robust and sophisticated in the coming years. Also underway are experimental studies looking at how content advertising for food endorsed by influencers and YouTubers impact food consumption. [3] These studies will further strengthen the evidence around digital marketing aimed at children and young people. When assessing the effects of marketing on children and young people one in any case has to consider the overall picture in terms of the existing evidence, including experimental studies measuring the effect of acute exposure to advertising in the short term, and cross-sectional studies looking at the link between exposure to marketing and various outcomes that are relevant to eating habits in terms of attitudes, preferences and actual behaviours.

[3] For example this recently published study: Coates AE, Hardman CA, Halford JCG, Christiansen P, Boyland EJ. Social Media Influencer Marketing and Children's Food Intake: A Randomized Trial. Pediatrics. 2019, e20182554; DOI: 10.1542/peds.2018-2554

3 Young people targeted in social media

Only a few Norwegian studies have sought to map the extent of marketing of unhealthy foods to children and teenagers, and those that have been carried out have barely touched upon marketing in social media. The Consumer Council therefore conducted its own study on the marketing of unhealthy foods to children and young people in social media. We focused on identifying content marketing on popular YouTube channels and in posts on the food industry's own Facebook pages. These channels were chosen because of their popularity with young people and because the marketing is not individually tailored and can therefore be quantified.[4] Appendix 1 provides a detailed account of the methodologies that were used and of how the survey was carried out.

The results presented in this chapter show that social media is used actively to market unhealthy foods in channels and with methods that target Norwegian teenagers.

WHAT IS CONTENT MARKETING?

Content marketing is a strategic marketing approach focused on creating and distributing valuable, relevant, and consistent content to attract and retain a clearly defined audience — and, ultimately, to drive profitable customer action.

Source:
https://contentmarketinginstitute.com/what-is-content-marketing/

3.1 Young YouTubers are advertising unhealthy foods

Our survey was based on videos published during 2018 on 16 of the most popular YouTube channels in Norway according to the chart lists of two influencer marketing agencies and other sources. Eleven of the 16 YouTubers we studied had produced content marketing for the Norwegian food and drink industry in 2018. A large majority of these partnerships promote what can be described as unhealthy foods according to the MFU's nutritient profiling. While ten of the channels had created content marketing for brands or products covered by the MFU's product list (Table 1), only four channels had created content marketing for healthy foods.[5] Three of the channels promoted both healthy and unhealthy foods through partnerships with various brands. Coca-

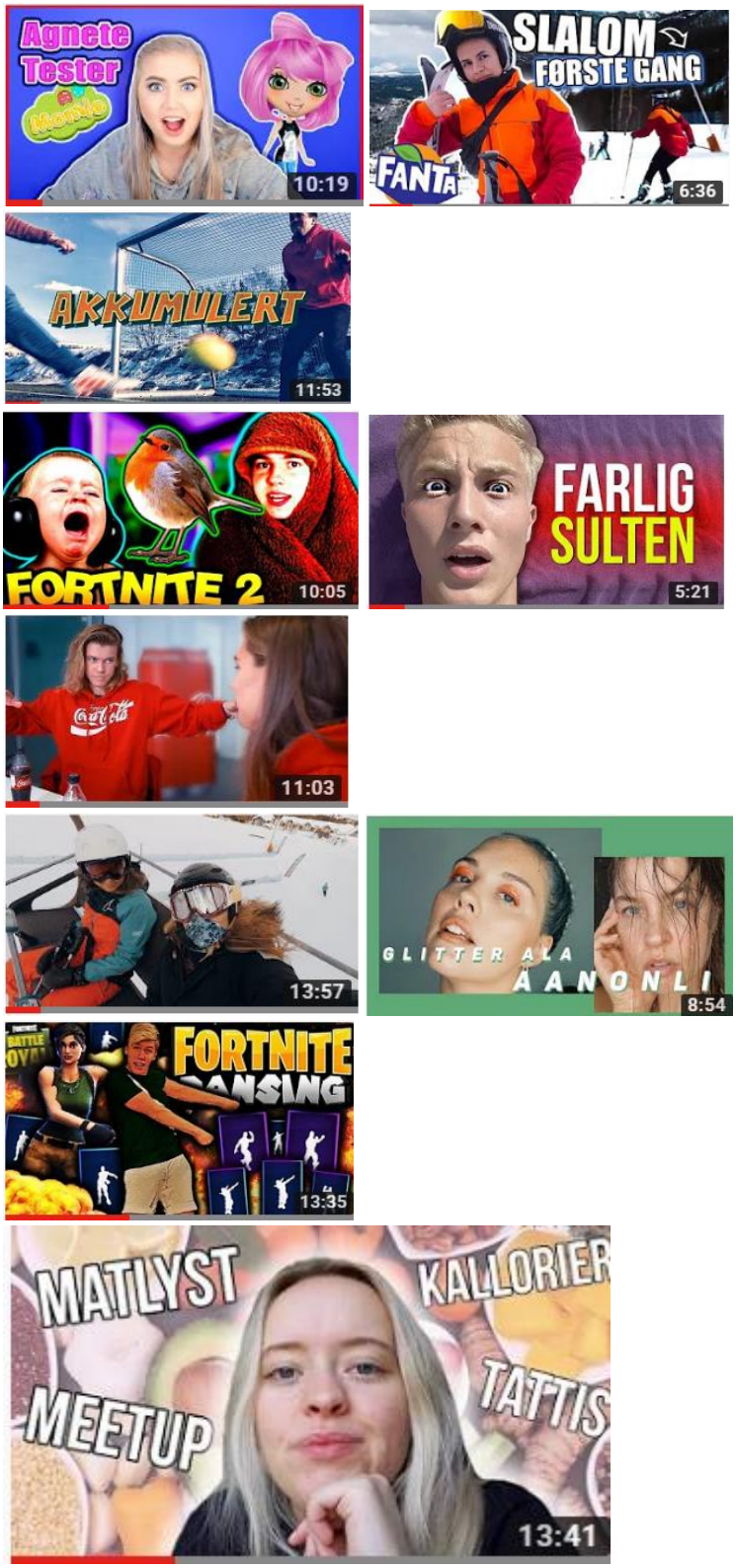
[4] Paid adverts on Facebook and YouTube are therefore not included in the survey.
[5] Content advertising for healthy foods included partnerships with Bama and REMA 1000, a healthy fast food concept and "NM i lunsj": a collaboration between the Norwegian Directorate of Health and the public information offices for agricultural produce.

Cola stands out amongst the brands using YouTubers as a marketing channel for promoting unhealthy food and drink. The company had worked with around half of the channels we studied. We found a total of 31 videos promoting food. Advertising videos for Coca-Cola brands (CokeTV Norge and Fanta) accounted for no fewer than 20 of those videos.

Table 1. Content marketing of products/brands covered by the MFU's product list on the YouTube channels studied by the Consumer Council.

YouTube channel	Markets unhealthy foods?	Food and drink brand	Number of videos recorded
Sunny	✓	Migros (Swiss brand)	1
Jarl Andersen	✓	Coca-Cola (CokeTV Norge)	3
Emma Ellingsen			
Amalie Olsen			
Randulle	✓	Coca-Cola (CokeTV Norge)	3
Herman Dahl	✓	TINE (Go'morgen yoghurt)	1
Murdrocks	✓	TINE (Go'morgen yoghurt)	1
Dennis Vareide	✓	Popcornshop.no (product placement) Coca-Cola (CokeTV Norge)	1 3
Hanna-Martine			
Sara Høydahl	✓	Coca-Cola (CokeTV Norge)	1
Agnetesh	✓	Coca-Cola (CokeTV Norge)	7
Nellie Krokstad			
BeasVerden	✓	Coca-Cola (Fanta)	1
Stina Talling			
Kristine Bremnes	✓	BURN	1
Malin Nesvoll	✓	Hennig-Olsen ice-cream Coca-Cola (CokeTV Norge)	1 2

The channels advertising unhealthy foods are without exception aimed at younger viewers. We can draw this conclusion on the basis of the content and effects used by the channels such as editing and visual effects (fonts, colours, emojis etc.) representing a typical youthful style and the fact that they use music popular with young people. They also adopt a simple and jokey language with a considerable amount of slang and youth jargon that comes naturally to this age group and which increases the channels' appeal.



Screen grabs from YouTube channels and videos used by the Norwegian food industry to promote unhealthy foods. From top, left to right: the channels Agnetesh, BeasVerden, Dennis Vareide, Murdrocks, Herman Dahl, Jarl Andersen, Kristine Bremnes, Malin Nesvoll, Randulle. Bottom: Sara Høydahl.

Like most of the videos on these channels, the clips containing content marketing are usually entertaining, and the product being promoted is subsidiary to the main content in the videos. Humour is frequently used: when Markus Sannes, aka Murdrocks, creates content marketing for TINE and its Go'morgen yoghurt[6], he does so donning the same purple condom suit worn by the rotund Go'morgen mascot in a video where he plays Fortnite online and annoys the other players by munching on crisps, amongst other things.[7] Sander Austad Dale, aka Randulle, who is known as a Fortnite and FIFA gamer, advertises CokeTV in a video in which he plays Fortnite and dances the popular floss dance.[8]

Other videos invite the audience to look in on the YouTubers' lives. Sara Høydahl, who promotes CokeTV, shares her experience of trying to go vegetarian[9], while Beatriz Neves (BeasVerden) takes her viewers on a trip to Hemsedal in a collaboration where she and other bloggers act as "ambassadors" for various Fanta products.[10] A similar video sees Kristine Bremnes travel to Trysil as part of a collaboration with the energy drink BURN. In the video she relaxes in her hotel room, goes to a concert and parties.[11]

These examples show how content marketing on YouTube packages the advertising in an entertainment format tailored especially to the target audience. The marketing is entertaining and subtle, and the methods are miles away from traditional advertising campaigns and "buy now" appeals. Instead the food industry relies on the personalities of the YouTubers and the trust they enjoy amongst their followers to position themselves to the target audience.

Coca-Cola achieves a particularly strong effect from its marketing in social media by linking YouTubers with its own YouTube channel CokeTV Norge. Young, popular YouTubers are invited onto its CokeTV programmes as guests, and the guests – many of whom have far more followers than CokeTV itself – then produce videos where they edit in short snippets from the programmes they have participated in.

Although the YouTubers have labelled these short video clips as "advertising" or "sponsored content", they come across as advertising for an entertainment programme rather than product promotion.

---

[6] According to the MFU product list, it is not permitted to promote yoghurt containing more than 11 g of sugar and/or 3.3 g of fat per 100 g of product. The Go'morgen range includes seven original yoghurt products all exceeding the threshold values for either sugar or fat or both. There are also five variants with no added sugar (Go'morgen UTEN). Only three of these five variants can legally be marketed to children. In other words, of the 12 products in the Go'morgen range, only three are not on the MFU product list. We therefore consider the entire range to fall under the MFU's code of conduct.

[7] https://www.youtube.com/watch?v=D_31oXQvQzs

[8] https://www.youtube.com/watch?v=hkg45fHV8DA

[9] https://www.youtube.com/watch?v=0FMGB587_pI

[10] https://www.youtube.com/watch?v=Z5cvgeQ8Wtc&t=31s

[11] https://www.youtube.com/watch?v=ex4ernvmbqE&t=550s

MFU RULES AGAINST COCA-COLA

In autumn 2018 the Consumer Council made a complaint to the MFU about the YouTube channel CokeTV Norge.

In Norway, Coca-Cola has been running the dedicated YouTube channel since 2017. According to Coca-Cola, the channel was set up to reach young adults in a medium they themselves use through a "relevant and engaging" approach. The channel shows straight-forward entertainment videos with regular hosts and guests, often popular YouTubers or other young celebrities. The videos are not specifically about Coca-Cola, but the brand is still being promoted through product placements and in the form of prizes, and the entire channel must be considered a branding exercise for Coca-Cola.

The complaint was based on the fact that the channel advertises products covered by the MFU scheme and that it is aimed at children and young people in that it picks celebrities and content that appeal to children and teenagers. The Consumer Council therefore argued that the marketing channel failed to exercise caution when dealing with young people and that it was in breach of the 13-year age limit.

In January 2019 the MFU published its ruling (no. 4 2018), which partly upheld the complaint. The MFU found that some of the videos listed in the complaint were in breach of the 13-year age limit, but the channel was not found to have acted negligently against young people. In its ruling the committee stated that it is permissible for advertisers to target young people and that the methods that had been applied did not exploit young people's vulnerabilities.

Sources:

https://www.ntbinfo.no/pressemelding/coca-cola-norge-felt-av-mfu?publisherId=2966260&releaseId=17858679
https://www.youtube.com/channel/UCB9hXCnjQvhph94mjgGxYhw/featured

In 2017 the MFU ruled against several food manufacturers for promoting unhealthy foods through content marketing on the YouTube channel *Prebz og Dennis*. At the time the industry declared that it took the ruling very seriously, and some of the companies said they would stop using YouTube as an advertising channel because it was difficult to determine the age of the viewers.[12] Our survey found that there are still actors in the food industry who continue to take a chance by promoting unhealthy products on YouTube channels that appeal to teenagers. This is problematic both because they ignore

[12] https://www.nrk.no/kultur/brukte-prebz-_-dennis-og-brot-reklameforbudet-1.13592899

the fact that teenagers are vulnerable consumers and because they risk the advertising being picked up by younger viewers.

We believe there is plenty to suggest that the channels which have been used to promote unhealthy foods also reach children under the age limit. For example, *Herman Dahl* and *Randulle* are both amongst the most watched YouTube channels in the 9–14 age group, according to the Norwegian Media Authority's 2018 report (Figure 1) (11). We would also assume that Dennis Vareide, who has been a role model for children for a number of years as one half of the YouTube duo *Prebz og Dennis*, continues to appeal to younger children. A video from a "meet-up" with Murdrocks in Bodø shows that he has fans as young as seven, a fact that he himself describes as slightly problematic as his channel is intended for older children.[13] Spot checks of the comment sections in the videos we examined also suggest that many of the YouTube channels have followers much younger than 13.

This begs the question: what steps is the food industry taking to verify the ages of the YouTubers' audiences when they enter into collaborations to promote unhealthy products? Our findings suggest they have not done enough to ensure that they do not reach the youngest audiences under the age of 13. In fact, it would appear that these particular YouTubers have been chosen exactly in order to reach a young audience.

Businesses defending themselves against complaints made to the MFU concerning YouTube advertising have on several occasions produced statistics purportedly showing the demographic make-up of the audiences of the YouTube channels in question.[14] The statistics do not include viewers under the age of 13, and there is no information about those viewing YouTube without being logged in, which one can easily expect a child to do. At the same time the statistics show that a large proportion of the audience is aged between 13 and 17. This uncertainty as to whom the advertisers actually reach through social media should oblige them to be extra diligent when using YouTube as a channel and promoting videos and specific channels. This is also the view of the MFU.

[13] https://bodonu.no/murdrocks/15.09-08:53

[14] MFU rulings 7-2017 and 4-2018: http://mfu.as/44514-Vedtak

Tabell 6: Topp 5-kanaler/brukere barna følger på YouTube. Brutt ned på kjønn og alder.

Gutter 9–11 år	n=530	Gutter 12–14 år	n=709	Gutter 15–16 år	n=360	Gutter 17–18 år	n=284
Randulle	13 %	Randulle	13 %	Logan Paul	9 %	Pewdiepie	10 %
Noobwork	12 %	Logan Paul	12 %	PewDiePie	9 %	iDubbbzTV	6 %
Jake Paul	11 %	W2S	8 %	Ricegum	8 %	Ricegum	4 %
Prebz og Dennis	10 %	Jake Paul	8 %	KSI	6 %	KSI	4 %
Logan Paul	8 %	Jacksepticeye	7 %	H3H3	5 %	H3H3	3 %
Jenter 9–11 år	**n=459**	**Jenter 12–14 år**	**n=637**	**Jenter 15–16 år**	**n=405**	**Jenter 17–18 år**	**n=329**
Amalie Olsen	20 %	Amalie Olsen	33 %	Amalie Olsen	11 %	Amalie Olsen	14 %
Stina Talling	8 %	Hanna-Martine	11 %	Liza Koshy	10 %	Hanna-Martine	9 %
Herman Dahl	6 %	Stina Talling	11 %	Hanna-Martine	9 %	Zoella	7 %
Slime-Te	5 %	Nellie Krokstad	6 %	Shane Dawson	9 %	Shane Dawson	7 %
SaraBeautyCorner	4 %	Herman Dahl	6 %	PewDiePie	6 %	Celina Karine	6 %

Figure 1. List from the Norwegian Media Authority's Children and Media report from 2018 of the most popular YouTube channels amongst children (11)

HIGH MARKETING PRESSURE ON YOUTUBE CHANNELS

All of the 16 YouTube channels we investigated had created content marketing for brands, products and organisations during 2018, and on average one in three videos contained some form of paid promotion. The proportion of content marketing in each channel ranged from 15 per cent to as much as 64 per cent.

There were significant variations in how many different commercial partnerships the YouTubers were involved in. The average was just over seven, but they ranged from one to 13. The partners represented a number of different sectors, including fashion, travel, home furnishings, cosmetics and beauty, food supplements, media (TV, cinema and computer games) and food and drink. The public and voluntary sectors had also teamed up with the YouTubers. Some of the content marketing is self-promotion in that the YouTubers promote their own products such as fashion lines or books.

Fashion retailer Junkyard was by a long way the company with the highest number of YouTube collaborations.

Food marketing accounted for around one fifth of the content marketing we observed.

3.2 Strategies for reaching young people on Facebook

In the second part of the survey we chose to look at the Facebook pages of various food brands. We examined posts from 2018 on the following industry pages: Freia Melkesjokolade, Haribo, Nidar (confectionary producers), Coca-Cola, Solo, Sunniva IsTe and Litago (beverage producers), Maarud Potetgull, Sørlandschips (savoury snack producers), McDonald's and Burger King.

Posts published on the brands' Facebook pages can appear in the news feeds of their followers but also in the news feeds of non-followers. This happens either when the business pays to "boost" a post so that it is displayed as an advert to a defined target audience or when Facebook friends "like" or otherwise engage with the post. This is described by Facebook as paid and organic reach respectively.[15]

The Consumer Council's focus group interviews with young people in 2017 revealed that teenagers liked and engaged with the industry's own posts on Facebook when they found them entertaining, e.g. when posting competitions or simple puzzles. In some instances the teenagers struggled to recognise these methods as marketing. As mentioned previously, using popular role models or other personalities who appeal to young people is another device that teenagers find it difficult to identify as marketing (9).

The survey therefore focused on Facebook posts that used such methods, including competitions, puzzles, role models and youth culture. This means that not all posts on the 11 Facebook pages were registered. Posts concerning taste tests, product launches and corporate social responsibilities were among the posts that were disregarded.

The Freia Melkesjokolade page was the only one of the Facebook pages not to deploy the methods described above. In other instances, one post might deploy multiple methods at the same time, such as combining a competition with a role model.

3.3 Competitions are popular – "like, share and comment" less so

The survey found that Facebook competitions are popular. Only three of the brands (Freia, Coca-Cola and Sørlandschips) did *not* post competitions on their Facebook pages. There is considerable variation in how actively the brands use competitions. Most of the posts on Haribo's Facebook page are about competitions, while Nidar has only organised one.

Most of the competitions invite the audience to comment on a post in order to enter a prize draw. The prizes, and their value, vary. They are often relatively inexpensive such as a goody bag from Litago, sweets from Haribo and gift cards

[15] https://www.facebook.com/help/285625061456389?helpref=uf_permalink

from Burger King and McDonald's. Some competitions offer merchandise as prizes, something which can be attractive to teenagers. Examples of merchandise include various fashion items and accessories from Solo, Maarud and Burger King. Other prizes are more valuable. For example, Nidar organised a competition where the prize was tickets to a Norway v. Brazil football match, while Sunniva IsTe offered an entire BIK BOK collection designed by Eirin Kristiansen.

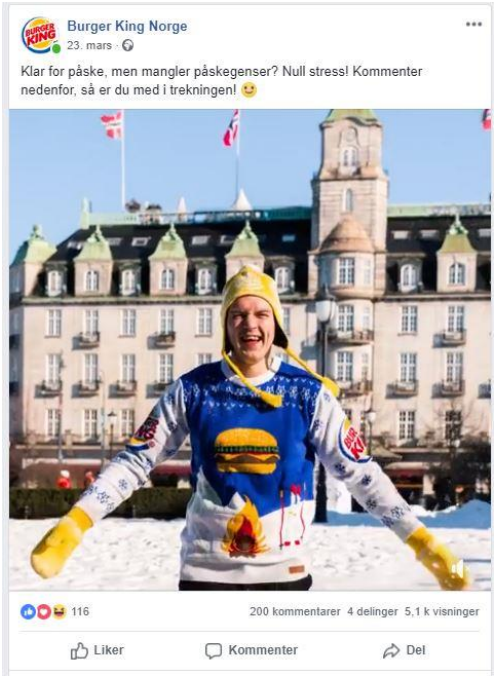
Another type of competition involves prizes that can only be won by purchasing a product. Maarud has organised two competitions where the entrants had to look for winning cards inside crisp packets to win an Xbox One or a pair of Monster headphones. This can be seen as an indirect encouragement to make a purchase. Although the posts were not expressly aimed at teenagers, the prizes would be attractive to this age group.

Sunniva IsTe and Maarud were the only brands to apply an age limit to their competitions. Maarud, which ran a Halloween competition with a chance to win a jumper, made a separate post setting out the competition rules and stating that entrants had to be 15 or over and that those under the age of 18 needed parental consent to participate. Sunniva IsTe states on its page that entrants must be 16 years of age to enter its competitions. All the other competitions were open to anyone with a Facebook profile.

The imposition of age limits in competitions could signal that a business does not wish to market its brand or products to the youngest teenagers or to children who have created Facebook accounts by faking their age. However, it does not prevent children and young people from seeing the competitions and thus be exposed to the marketing.

Encouraging viewers to act by responding to Facebook posts (like, share, comment) has been a frequently used strategy for increasing organic reach. Such encouragement can be given by posting items asking the viewers to solve tasks or by posing questions that they can engage with in other ways such as describing how they feel, tagging a friend etc.

The Consumer Council's 2017 survey of young people found that the threshold for reading such posts, or tagging friends, was low as long as the teenagers liked the product and found the post entertaining. It made the marketing an integral part of the teenagers' online social life (9).



Of the Facebook pages studied in the survey, three had published posts involving puzzles: Burger King, Sunniva IsTe and Haribo.

A typical puzzle was found on the Sunniva IsTe Facebook page. The task requires the viewer to find all the letters in an animation where the letters emerge and disappear and then combine them to form a word. Sunniva IsTe has around 52,000 followers on Facebook, but the post has generated 103,000

views despite only 43 people having commented on the puzzle. Other puzzles identified in the survey have attracted hundreds of comments.

While only a few of the Facebook pages had posted puzzles, some had created posts that encouraged people to engage in other ways. Seven of the 11 Facebook pages had published posts asking people to respond. For example, Coca-Cola is asking “Who would you share an ice-cold Coca-Cola with?”, while Sørlandschips posted a poll of different “Christmas crisps” flavours asking people to vote by choosing between two emojis. Some of these posts are clearly aimed at a younger audience. This includes the Sunniva IsTe post, which is a bingo board viewers can use while watching the TV reality show Ex on the Beach.

Examples of puzzles on food industry

Facebook pages. Screen grab from Facebook.

Screen grab from Litago's Facebook page calling on readers to respond.

In 2018 Facebook made a change to its algorithm to limit the reach of posts in which businesses and others encourage users to engage (typically like, share and comment). The change came about because Facebook had found that many users felt such posts, known as "engagement bait", were a form of spam. Posts identified by Facebook as engagement bait are therefore punished with a lower organic reach and are consequently less likely to turn up in the news feeds of non-followers to the advantage of content from family and friends.[16] It can also be assumed that Facebook wants more businesses to pay for the content they publish instead of benefiting from free marketing through organic reach.

The change could be one reason why the Facebook pages we studied contain relatively few posts encouraging action. Facebook encourages businesses to create content that is "meaningful and informative"[17], and businesses on Facebook can therefore be expected to have to change the way they communicate on the platform. It could also lead to content from Facebook pages increasingly being published as adverts rather than organic posts.

[16] https://sail.no/innsikt/facebook-tar-grep-om-engagement-bait/
[17] https://www.facebook.com/help/publisher/newsfeedguidelines

3.4 Using young people and youth culture to reach teenagers

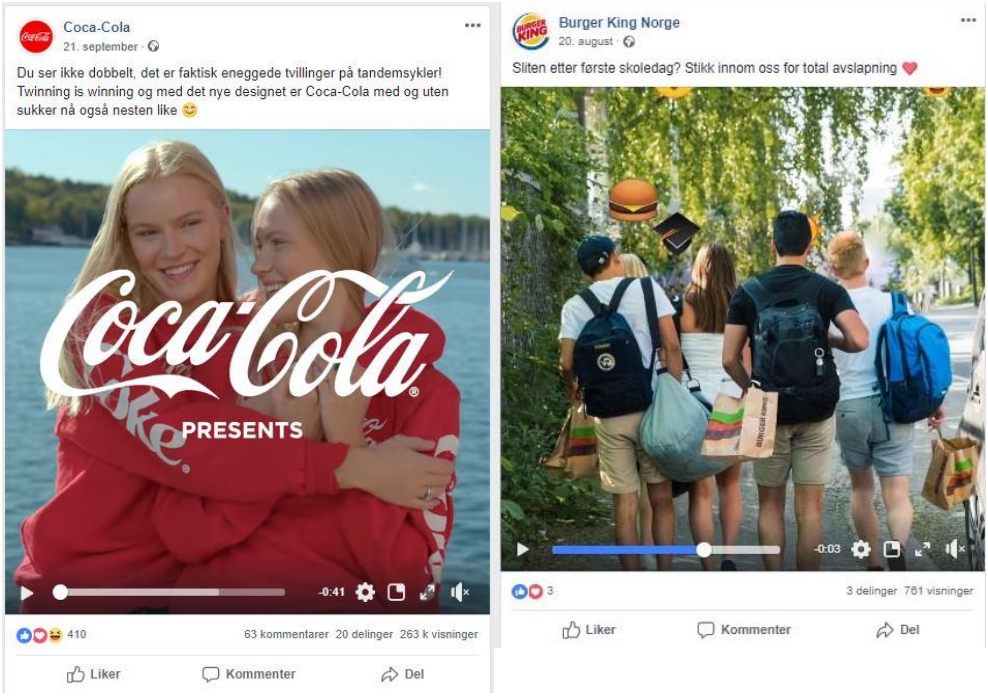
The use of teenagers or their role models in advertising is a well-known strategy for targeting the age group with marketing (19). In our survey we found that Burger King, McDonald's and Coca-Cola were the most likely to use young people and youth culture to appeal to teenagers. This included influencers and artists popular with teenagers as well as music.

One of the role models McDonald's has partnered with is Malin Nesvoll. She was previously known as *Makeupmalin*, but now runs a YouTube channel simply called *Malin Nesvoll*. In the summer of 2018 a series of videos was published in which Nesvoll samples various McDonald's "hacks" – new ways of combining different dishes. The videos are humorous and similar in style to many of the YouTube videos described earlier in this report.

McDonald's also linked to two interviews with young artists on its Facebook page. These posts are good examples of how marketing adopts multiple platforms and approaches. The posts link to interviews with the artists published on 730.no, and they also make mentions of competitions on Instagram.

Coca-Cola's YouTube channel CokeTV has been described earlier in this report. Many of the posts on Coca-Cola's Facebook page link to CokeTV episodes. This shows how multiple platforms are used to spread advertising that plays on the popularity of young celebrities. The videos being linked to on CokeTV feature Noobwork (YouTuber popular with children), Ola Klæbo (aka DJ OKEY) and Jarl Andersen.

As well as using young people well known to teenagers, some Facebook content also uses young people as models in general. They promote unhealthy brands as a natural part of young people's lives.



Burger King focuses strongly on building its brand through music on its Facebook page by sponsoring the VG-lista music charts and organising its own music competition, Music is King. Music is an important identity marker for young people. By maintaining a presence on the young music scene, Burger King is able to establish itself as a strong brand that teenagers associate with something trendy and cool. Facebook posts showing Burger King handing out goody bags from its stand at VG-lista events reveal how important it is to the food industry to be present where young people meet, both physically and digitally.

3.5 The results are an indication of the overall advertising pressure

The content marketing we studied is of course only a small part of the overall advertising pressure that children and young people are exposed to in social media. In addition to content marketing, YouTube users are also exposed to large numbers of adverts displayed before, during and on top of (banner adverts) the videos. Children and young people are also exposed to extensive advertising and content marketing on other digital platforms such as Snapchat, Instagram and Facebook.

More extensive research would be useful, but this requires both time and resources. The YouTube survey only covers a small, strategic selection of the many channels popular with young people. YouTubers' popularity and audience numbers will change over time. We cannot rule out that the food industry has partnered with many more YouTubers than we have been able to identify, such as those with a more niche and specific focus. For example, Beatriz Neves (YouTube channel *BeasVerden*) is just one of several Fanta ambassadors but the only one amongst the YouTube channels studied in our survey.

Also, we opted to look at only two platforms: YouTube and Facebook. Instagram and Snapchat are now more popular than Facebook amongst children and teenagers. Yet we chose to focus on Facebook primarily because the food industry runs its own open pages there and has a significant number of followers. We assume that Facebook posts can serve as an indication of the marketing being published on other platforms, too. Commercial campaigns are integrated and run across all channels, both traditional and digital. Our spot checks found a high degree of overlap between industry activity on Facebook and Instagram. Marketing on Instagram, and not least on Snapchat, can adapt its approach depending on target audience and adopt a clearer youth profile because these platforms attract a larger proportion of teenagers.

4 Policy: Current status and the road ahead

Curbing marketing of unhealthy foods to children has been identified as a political priority in Norway in order to prevent obesity and promote healthy eating amongst the younger population.

This chapter will first provide an account of the political commitments Norway needs to follow up on. Next, we will discuss the MFU's diligence rules in light of the findings made in the survey and the lack of progress in developing a practical interpretation of the rules. Finally, we will compare the self-regulation scheme in Norway with regimes in other countries and demonstrate how Norway is now lagging behind.

4.1 International obligations

Norway has signed up to the WHO's recommendations on the marketing of food and drink with high fat, salt and sugar contents to children. The recommendations were adopted at the World Health Assembly in 2010 (3). The aim of the recommendations is to reduce the negative impact of unhealthy food and drink marketing on children, both by reducing *overall exposure* to such marketing and by reducing the *power* of the marketing, i.e. limiting the use of techniques that are particularly effective on children.

The recommendations state that the authorities should take the lead in developing policy and showing leadership in implementing the recommendations. The authorities should bear the main responsibility for setting targets and defining what should be classed as marketing, which age limits should be imposed, and which foods, channels and media should be covered.

A comprehensive implementation of the recommendations whereby all marketing of unhealthy food and drink is banned will have a greater effect than a stepwise approach which only limits certain forms of marketing (3).

An evaluation of the implementation of the WHO recommendations in Europe found that efforts to launch initiatives to protect children and young people from this form of marketing are making slow progress (8). The measures that have been put in place often contain weaknesses which mean they have a limited effect in terms of reducing the actual marketing that children and young people are exposed to. Among the weaknesses highlighted in the report are:

- Definitions of what constitutes marketing are often inadequate.
- Regulations often focus exclusively on channels and techniques aimed at children.
- They only cover children under the age of 12–13, leaving teenagers unprotected.

The Norwegian self-regulation scheme has also been criticised for this. Marketing techniques such as packaging, shelf location and sponsorships have been excluded from the MFU definition of marketing ever since the scheme was introduced. The fact that the rules only cover marketing aimed specifically at

children is another major weakness. When considering whether marketing is aimed especially at children, the MFU makes an overall assessment taking into account

- whether the products in question are of particular appeal to children,
- whether the marketing medium in question is of particular appeal to children,
- whether the techniques being used are of particular appeal to children.

In other words, Norway has a relatively high threshold for defining marketing as child-directed because several criteria need to be fulfilled.[18] The result is that much of the marketing that children are exposed to in practice is not deemed a breach of the MFU code of conduct.

Teenagers are an attractive target audience for food manufacturers and marketing agencies. The lack of protections for children over the age of 12–13 identified by WHO Europe is also a problem in Norway. Our survey and past MFU rulings both show that teenagers receive no better protections from the self-regulation regime than they do from existing legislation. Before discussing the diligence rule concerning marketing aimed at teenagers, we will first show how the Convention on the Rights of the Child (UNCRC) can be applied to strengthen protections for teenagers.

4.2 The children's rights perspective according to the UNCRC

Several international organisations have recommended that national authorities adopt a children's rights perspective when seeking to restrict the marketing of unhealthy food and drink to children and young people (8, 20). Norway has ratified the International Covenant on Economic, Social and Cultural Rights and the UNCRC. The authorities are therefore obliged by law to respect, protect and realise children's rights, including the right to the highest attainable standard of physical and mental health and to adequate food.[19] Because marketing of unhealthy food and drink to children has a negative impact on their diet, and subsequently on their long-term health, the authorities have an obligation under human rights law to protect children and young people against such marketing (8, 20).

International human rights treaties provide a legal framework for the authorities to protect children against the marketing of unhealthy food and drink. The UNCRC also contains fundamental principles that should be applied to support the development and implementation of political initiatives. One key principle concerns the best interests of the child and states that the child's

[18] For an example, see MFU's ruling 21 2017, which can be downloaded here: http://mfu.as/58140-Vedtak-2017

[19] International Covenant on Economic, Social and Cultural Rights, articles 11 and 12; Convention on the Rights of the Child, articles 6, 24 and 27.

interests shall be at the heart of every decision relating to their health and development and override economic considerations wherever possible (20).

Because the convention defines a child as any person under the age of 18, the juridical approach can be used to reinforce the authorities' implementation of the WHO recommendations in a way that protects all children, including teenagers. The principle of the best interests of the child also requires initiatives aiming to curb marketing to children and young people to be as effective as possible in order that they can reduce actual exposure. This means that the WHO recommendations must be introduced on a large scale, including by setting a high age limit, adopting a broad definition of what constitutes marketing, and preventing conflicts of interest that can occur when private commercial interests take an active role in initiatives that seek to reduce marketing (8, 20).

The Norwegian health authorities themselves state that human rights are a core principle in their efforts to promote healthy food and eating. White Paper 19 (2014-2015) on public health (21, p. 50) states that:

Children and young people are entitled to particular protections. They are more vulnerable than adults and often incapable of making informed decisions or understanding the consequences of their decisions. […] In terms of eating habits, that means protecting children and young people against marketing of unhealthy food and drink.

The Norwegian National Action Plan for a Healthier Diet (22, p. 6) reads:

As described in the UN Guiding Principles on Business and Human Rights of 2011, the states have a duty to protect human rights and companies have a responsibility to respect them.

When the authorities themselves cite human rights as a fundamental principle for food and nutrition policy, it is important that they are held accountable for their obligations. The same applies to business, which has an independent responsibility for respecting and supporting children's rights. This responsibility includes not marketing unhealthy products to children and young people (20). In a human rights perspective, however, it is the authorities that bear the legal duties and should instruct business. According to a legal opinion from the Norwegian Cancer Society, questions could also be raised about whether the Norwegian authorities are fulfilling their legal obligation to protect children against the marketing of unhealthy food and drink.

4.3 The diligence clause offers no additional protection of teenagers

WHAT IS THE MFU?

The MFU is the food and drink industry's own self-regulation scheme set up to enforce the code of conduct for marketing certain types of food and drink to children and young people. The purpose of the code is to supplement and clarify existing legislation and help ensure good and responsible marketing practices. The code seeks to make retailers, manufacturers and importers aware of the issues surrounding the marketing of food and drink to children and young people, thereby helping to ensure that they are protected against inappropriate marketing influences.
Source: http://www.mfu.as

When in 2012 the Norwegian authorities proposed legislation to ban the marketing of unhealthy food and drink to children, the initial recommendation was to protect all children under the age of 18. Following strong opposition from the food industry, which interpreted the proposal as a blanket ban on food marketing, the proposal was subsequently amended. The industry itself suggested a 13-year age limit. In a consultation document dated 16 May 2013 the Ministry of Health and Care Services and the Ministry of Children, Equality and Social Inclusion stated that they disagreed with the claim that marketing does not influence children over the age of 12. The Ministries believed that an age limit that only covered children up to the age of 12 would deny protection to many children who need it. The Ministries therefore proposed a compromise whereby the regulations should be restricted to cover persons up to the age of 15 (23).

The proposed regulations were subsequently rejected by the government, and the MFU was established in 2014, initially as a 2-year pilot scheme. The self-regulation scheme adopted the food industry's own proposed age limit, which meant the scheme covered children up to the age of 12. However, Article 4 of the MFU code of conduct stipulates that: *"In the case of marketing of products on the product list which is specifically aimed at young people, caution and consideration must be exercised in respect of their age and development."* (the diligence clause) (6).

The diligence clause has been interpreted by the Consumer Council and voluntary organisations to mean that teenagers, too, are entitled to protection against the marketing of unhealthy foods when the methods used are especially effective on teenagers.

In its evaluation of the MFU scheme in 2016[20] the Norwegian Directorate of Health wrote that it is important for the committee to take into account the diligence clause when evaluating marketing campaigns and that it must carefully monitor marketing campaigns aimed at teenagers. However, at the time the evaluation was carried out the MFU had not yet issued guidelines on how the diligence clause should be interpreted, and it had made no rulings that mentioned the clause.

Complaints made by the Consumer Council to the MFU in 2017 and 2018 have challenged the diligence clause based on the premise that the industry has failed to exercise caution when marketing unhealthy products by using strategies that teenagers are particularly vulnerable to. These strategies include the use of popular role models, competitions with particular appeal to teenagers, and encouraging teenagers to engage by submitting their own material – thus making them producers of marketing. The complaints were not upheld by the committee.[21]

In 2018 the MFU published a guide to social media in which it describes criteria for applying the diligence clause for the first time. The guide concludes that the advertising must not be hidden, that direct appeals to buy are not permitted and that the advertising must not be misleading (24). These criteria are taken directly from the Norwegian Consumer Authority's guide to social media in relation to the Marketing Control Act (25).

The clause on purchasing appeals is the only one of the three criteria in the MFU's guide which addresses a specific marketing strategy. The guide states that:

Appeals such as: "the next time you make a purchase", "available from your nearest toy shop", "take mum and dad to", "click here and use the discount code xyz" etc. may also be illegal.

Direct appeals to buy are prohibited under the Marketing Control Act, which means that such marketing is deemed unfair and illegal in any circumstance. Yet, as we have demonstrated in this report, marketing strategies aimed at teenagers are generally more subtle than appeals to *"buy now"*. The advertising is entertaining and engaging, and it is promoted by people teenagers trust.

The Marketing Control Act covers minors under the age of 18, which also means teenagers. The Marketing Control Act's definition of a minor is flexible, however, and the Consumer Authority writes in its guidelines that marketing initiatives will be judged more strictly the younger the children they target (26). "Emphasis will be placed on the age and level of development of the target audience when assessing the fairness of the marketing," it states. One key question is whether the interpretation and observance of the Marketing Control

[20] The Norwegian Directorate of Health delivered its evaluation to the Ministry of Health and Care Services January 2017.
[21] Cf. MFU rulings 21-2017 Tine Litago Snapchat and Facebook; 20-2017 Tine Bottle Flip and 4-2018 Coke TV: http://mfu.as/44514-Vedtak

Act are keeping up with technological advances and with the kind of marketing now being aimed at young people. In any case it can be concluded that the MFU's diligence clause, which seeks to protect teenagers, fails to offer any additional protections above and beyond prevailing legislation when taking into account the current interpretation and observance of the Marketing Control Act.

4.4 Regulations to protect teenagers

As mentioned previously, most regulations and voluntary arrangements designed to restrict the marketing of unhealthy food and drink to children define the beneficiaries of the protections as children up to the age of 12 or 13. Teenagers are thus given limited protection, although several countries have introduced age limits higher than 13 in recent years.

The UK introduced updated and tighter rules on the marketing of unhealthy food and drink in 2017, extending the protections to children up to the age of 16. The advertising codes are an industry-funded self-regulation regime overseen by the sister organisations the Committee of Advertising Practice (CAP) and the Advertising Standards Authority (ASA). The ASA is responsible for writing the codes, while the ASA ensures that marketing campaigns adhere to them by hearing complaints, imposing sanctions on those who breach the codes, and proactively monitoring advertising campaigns. The ASA oversees two different codes: the BCAP Code, which covers broadcast media, i.e. TV and radio, and the CAP Code, which applies to all non-broadcast marketing, including online.

Both codes contain dedicated chapters addressing the marketing of foods, including unhealthy foods (known as HFSS products),[22] aimed at children. The BCAP rules were previously stricter than the CAP code, but in 2017 the codes were harmonised when a set of rules specifically addressing HFSS marketing was incorporated into the CAP code. The same rules now apply to all media, and the age limit is 16.

The most important rule on the marketing of unhealthy foods is clause 15.18 of the CAP code, which covers the selection of media for placing ads for unhealthy foods. The clause states:

HFSS product advertisements must not be directed at people under 16 through the selection of media or the context in which they appear. No medium should be used to advertise HFSS products, if more than 25% of its audience is under 16 years of age.

This means that adverts must not be placed in media aimed specifically at children under the age of 16. Examples include children's magazines and websites designed to appeal especially to children and teenagers under the age

[22] The codes describe unhealthy foods as HFSS, that is food containing high levels of fat, sugar and/or salt, and they use nutrient profiling developed by the Food Standards Agency in 2004/2005. The nutrient profiling model is now under review.

of 16. Nor is it permitted to place HFSS adverts in media where more than 25 per cent of the audience is under the age of 16, irrespective of whether or not the channel is aimed at children. One example of this is influencers with broad appeal but also a significant number of children under the age of 16 in their audience.[23]

To ensure that advertising is not placed in channels where more than 25 per cent of the audience is under 16, the marketer must be familiar with the audience make-up of various media and channels. According to the CAP code, there are two ways of doing this: either through traditional audience surveys or by defining which members of the channel's audience should receive or be excluded from marketing. The latter method is according to the CAP code especially relevant in digital media. It can be done by studying age data where such data is available or by estimating audience age by examining information about the users' interests, usage patterns and networks. However, using data in this way can be problematic from a privacy perspective.

The rule permitting HFSS advertising to be placed in channels where less than 25 per cent of the audience is made up of children has been criticised by many (8, 27). The criticism is based on the fact that many children watch channels not specifically aimed at them, such as when they watch TV programmes like the X Factor and other family programmes or when following popular influencers. The absolute number of children exposed to such marketing in these channels can therefore be very high, even though the proportion of children in the audience is below 25 per cent. Our survey also found that children watch channels generally aimed at an older age group.

The UK health authorities, however, find it problematic that many children who watch family programmes on TV are being exposed to extensive marketing of unhealthy foods and have therefore proposed a ban on HFSS marketing before 9 pm. The authorities acknowledge that media habits are in flux and that many children spend a great deal of time online. The proposed ban on HFSS advertising before 9 pm therefore also extends to digital media (28).

If the UK proposals were to pass, British children and teenagers will enjoy considerably stronger protections than their Norwegian peers, both due to the strict age limit and the fact that the 9 pm watershed-proposal also covers digital media. However, a time restriction on online marketing would only cover paid ad placements and not have an effect on the extensive use of content marketing in the form of collaborations between the food industry and influencers.

[23] https://www.asa.org.uk/advice-online/food-hfss-media-placement.html#practice

COUNTRIES WITH RULES THAT ALSO COVER TEENAGERS

Several countries have introduced marketing regulations with stricter age limits than that which exists in Norway, although many of them also contain critical weaknesses.

- **South Korea** has introduced rules which prohibit the marketing of unhealthy food categories to children under the age of 18. The rules set restrictions on timing (they only apply between 5 pm and 7 pm in the case of TV advertising) and on which channels they apply to (only to specific children's programmes), something which weakens their impact.
- In 2013 **Peru** introduced a law which imposed restrictions on the marketing of unhealthy foods to children under the age of 16 in all channels. However, the food industry has done little to comply with the rules, and the government is expected to follow up with guidelines for implementation.
- **Brazil** has adopted two age limits applicable to marketing aimed at children in general. "Exploitative strategies" must not be used to target children under the age of 11 or young people aged 11–18, e.g. by applying techniques such as childish language, music, gifts or people or celebrities who appeal to children. It is not clear whether strategies and techniques that appeal to teenagers are covered.
- **Spain** operates two different self-regulation schemes with a 15-year age limit on the online marketing of unhealthy foods and 12 years in other media.
- **Chile** introduced a law on food marketing in 2016 which restricts marketing of foods defined as "high in" (in relation to overall energy intake, saturated fat, sugar and salt) to children under the age of 14. It is considered "marketing to children" when the channel or programme is directly aimed at children; when its child audience exceeds 20 per cent; or when it applies techniques that appeal to children (cartoons, animations and toys etc.).
- **Slovenia** has passed a law that requires media providers to draw up guidelines on advertising foods which have a nutritional or physiological impact during children's programming. The legislation is based on a nutritional profiling model and stipulates a 15-year age limit.
- **Latvia** and **Lithuania** both have dedicated laws on the marketing and sale of energy drinks, including an 18-year age limit.
- **Ireland** launched a new voluntary code for food marketing in February 2018. The age limit is 15 years. The code has yet to be implemented.
- In 2016 in **Canada** a draft proposal was tabled that would ban marketing aimed at children under the age of 17. The law was passed in autumn 2017, but a few months later the age limit was dropped to 13. It has been stated that the change was made because the food industry was preparing to take legal action and because a 13-year age limit would make the proposal more likely to pass as Canadian legal precedent has supported regional regulations involving a 13-year age limit.

Sources: https://www.wcrf.org/int/policy/nourishing-database, https://www.democraticmedia.org/blog/canadians-advance-bill-limit-marketing-unhealthy-foods-children-including-online

The biggest difference between the UK and Norwegian schemes is the age limit. Despite weaknesses such as the proportion of children in the audience, UK teenagers under the age of 16 are shielded from a considerable amount of advertising designed to appeal to this age group both on TV and online. This distinction becomes particularly conspicuous in the case of advertising in digital media. There are also certain organisational differences where the UK does better such as the extent to which it limits the direct involvement of the food industry in drawing up and enforcing the regulations.

ORGANISATIONAL STRENGTHS OF THE ASA COMPARED WITH THE MFU

What can Norway learn from the UK about organisation, visibility and complaints handling?

- **Greater independence and transparency**
  Only 2 of the MFU's 7 members come from outside the industry, while two thirds of the ASA Council's members are independent. The ASA operates an open recruitment process, and all positions are advertised. Despite the make-up of its council, the ASA is criticised for its lack of independence and consequently for potential conflicts of interests. Yet the contrast with the MFU is significant.
- **More visibility**
  As well as running an informative website, the ASA also has an active Facebook page and a Twitter account where it shares information about its rulings, amongst other things. It is considerably more proactive in its communication with the public than the MFU. According to the MFU, its decisions must be published on Facebook, its website and ntb.no. The MFU website has only published a single post, however. The lower number of complaints made to the MFU also suggests that its existence is not well known to the general public.
- **Complaints handling**
  The ASA may reconsider a ruling if the complainant or respondent believes they can prove that the ruling contains material errors concerning the process or decision or that there is additional relevant data that should be disclosed. An independent reviewer affiliated to the ASA will be asked to decide on whether to hear the appeal. The MFU does not offer the opportunity to appeal against a ruling.

Sources: https://www.asa.org.uk/about-asa-and-cap/people/asa-council.html, https://www.facebook.com/adauthority/, https://twitter.com/ASA_UK

USE OF THE GDPR TO PREVENT MICRO-TARGETING OF ADVERTISING AT CHILDREN

The extensive harvesting of data taking place online has attracted widespread attention in recent years. The detail of the information being collected and the risk of misuse is worrying in terms of both privacy and commercial exploitation.

Digital data harvesting allows marketing to be personalised not just according to demographics, but also based on the user's interests, usage patterns, preferences, engagement (likes, shares etc.) and location, all of which mean that adverts can be targeted and personalised in real time.

There is currently keen interest in applying the General Data Protection Regulation (GDPR) as leverage to protect children against such data harvesting as it could result in less targeted advertising aimed at children and young people. For example, the Irish parliament passed a law in 2018 which will ban the collection of micro-data from children under 16 and therefore also advertising targeted to individuals. The change in the law is expected to reduce children and young people's exposure to online advertising, including adverts for unhealthy foods.

Sources: http://www.euro.who.int/__data/assets/pdf_file/0017/322226/Tackling-food-marketing-children-digital-world-trans-disciplinary-perspectives-en.pdf, https://irishheart.ie/news/new-law-bans-advertisers-targeting-kids-online/

5 Conclusion: Stronger protections for teenagers are needed

Teenagers are exposed to significant amounts of marketing on social media, and the marketing is so subtle, entertaining and targeted that it is difficult to both recognise it and protect against its effects. In this report we have described how new studies on the effects of digital marketing on young people support the existing evidence: the marketing of unhealthy foods has an adverse effect on children's eating habits and increases the risk of obesity and poor health later in life.

When teenagers in a vulnerable phase of their lives are being exposed to marketing of products that are detrimental to them, combined with the fact it is a stated goal for Norway to improve teenagers' eating habits (22), it is clear that it is time to put in place protections for this age group. This would also be in line with Norway's international and human rights obligations.

Our survey, which covers some of the social media platforms frequented by teenagers, identifies just the tip of the iceberg. It is highly likely that teenagers are exposed to extensive marketing of unhealthy brands and products in other digital channels, too. Add to that the intense marketing pressure they encounter outdoors, on TV and in the cinema and print media. The complaints made to the MFU and the committee's subsequent rulings show that the diligence clause, which was assumed to have been drawn up to protect teenagers, fails to offer any additional protections against the marketing of unhealthy food and drink to teenagers above and beyond those that already exist in the Marketing Control Act.

Since we know that many children are active on social media without being of the required age or visit YouTube where there is no age limit, we can safely assume that advertising designed to reach 13 to 15-year olds online also reaches younger children. Weak protections for teenagers therefore also affect the younger children.

The Norwegian Consumer Council is of the opinion that children and young people are not being given the protections against the marketing of unhealthy food and drink that they are entitled to. The existing self-regulation regime contains weaknesses that particularly affect the protections for teenagers. When the authorities come to evaluate the MFU in 2019, they must obtain independent assessments of the scheme in terms of the rules that have been adopted, how those rules are enforced as well as the very organisation of the MFU. The authorities must take greater responsibility and show leadership to create regulations that offer better protections for teenagers against the marketing of unhealthy food and drink in social media.

References

1. Norwegian Institute of Public Health. Kosthaldet hos barn og unge. Norwegian Institute of Public Health; 2017. Available at: https://www.fhi.no/nettpub/hin/levevaner/kosthald/#kosthaldet-hos-barn-og-unge
2. Norwegian Institute of Public Health. Overvekt og fedme. Norwegian Institute of Public Health; 2017. Available at: https://www.fhi.no/nettpub/hin/levevaner/overvekt-og-fedme/
3. WHO. Set of recommendations on the marketing of foods and non-alcoholic beverages to children. World Health Organization; 2010. Available at: https://www.who.int/dietphysicalactivity/publications/recsmarketing/en/
4. Cairns G, Angus K, Hastings G, Caraher M. Systematic reviews of the evidence on the nature, extent and effects of food marketing to children. A retrospective summary. Appetite. 2013; 62, pp. 209-215. doi: 10.1016/j.appet.2012.04.017
5. Food and Drink Industry Professional Practices Committee (MFU). Hvorfor er Matbransjens Faglige Utvalg opprettet? Food and Drink Industry Professional Practices Committee; 2018. Available at: http://mfu.as/36574-OM-MFU
6. Food and Drink Industry Professional Practices Committee (MFU). Retningslinjer for markedsføring av mat og drikke rettet mot barn. Food and Drink Industry Professional Practices Committee; 2016. Available at: http://mfu.as/44549-Retningslinjer-for-markedsforing-oppdatert-1-9-2016
7. WHO EURO. Tackling food marketing to children in a digital world: trans-disciplinary perspectives. WHO Regional Office for Europe; 2016. Available at: http://www.euro.who.int/__data/assets/pdf_file/0017/322226/Tackling-food-marketing-children-digital-world-trans-disciplinary-perspectives-en.pdf
8. WHO EURO. Evaluating implementation of the WHO Set of Recommendations on the marketing of foods and non-alcoholic beverages to children. WHO Regional Office for Europe; 2018. Available at: http://www.euro.who.int/__data/assets/pdf_file/0003/384015/food-marketing-kids-eng.pdf
9. Norwegian Consumer Council. Markedsføring av usunn mat og drikke i sosiale medier – en fokusgruppestudie med 13- og 15-åringer. Norwegian Consumer Council; 2017. Available at: https://fil.forbrukerradet.no/wp-content/uploads/2017/05/20170523-ke-some-sukker-rapport.pdf
10. Norwegian Media Authority. Trygg bruk-undersøkelsen 2008. En kartlegging av 8 til 18-åringers bruk av digitale medier. Norwegian

Media Authority; 2008. Available at: http://www.medietilsynet.no/globalassets/publikasjoner/barn-og-medier-undersokelser/2008-barn-og-medier-8---18-ar.pdf
11. Norwegian Media Authority. Barn og medier-undersøkelsen 2018. 9–18-åringer om medievaner og opplevelser. Norwegian Media Authority; 2018. Available at: http://www.medietilsynet.no/globalassets/publikasjoner/barn-og-medier-undersokelser/2018-barn-og-medier
12. Harris JL, Brownell KD, Bargh JA. The food marketing defense model: integrating psychological research to protect youth and inform public policy. Social Issues Policy Rev 2009; 3:211–71.
13. Freeman B, Kelly B, Vandevijvere S, Baur, L. Young adults: beloved by food and drink marketers and forgotten by public health? Health Promotion International. 2016;31:954–961. doi: 10.1093/heapro/dav081
14. Buchanan L, Kelly B, Yeatman H, Kariippanon K. The Effects of Digital Marketing of Unhealthy Commodities on Young People: A Systematic Review. Nutrients 2018;10(148):pii: E148. doi: 10.3390/nu10020148
15. Buchanan L, Kelly B, Yeatman H. Exposure to digital marketing enhances young adults' interest in energy drinks: An exploratory investigation. PLoS ONE. 2017;12(2): doi:10.1371/journal.pone.0171226
16. Baldwin HJ, Freeman B, Kelly B. Like and share: associations between social media engagement and dietary choices in children. Public Health Nutr. 2018;21(17):3210-3215. doi: 10.1017/S1368980018001866
17. Holmberg C, E Chaplin J, Hillman T, Berg C. Adolescents' presentation of food in social media: An explorative study. Appetite. 2016; 1(99):121-129. doi: 10.1016/j.appet.2016.01.009.
18. Sherman LE, Payton AA, Hernandez LM, Greenfield PM, Dapretto M. The Power of the Like in Adolescence: Effects of Peer Influence on Neural and Behavioral Responses to Social Media. Psychol Sci. 2016;27(7):1027-35. doi: 10.1177/0956797616645673
19. Ólafsdóttir S, Marniemi A, Andersen MC, Berg C and Prell H, Gísladóttir E, Helleve A. Monitoring food marketing to children. A joint Nordic monitoring protocol for marketing of foods and beverages high in fat, salt and sugar (HFSS) towards children and young people. Nordic Council of Ministers; 2018. Available at: http://norden.diva-portal.org/smash/get/diva2:1183357/FULLTEXT02.pdf
20. Garde A, Byrne S, Gokani N, Murphy B. A child rights-based approach to food marketing: a guide for policy makers. UNICEF; 2018. Available at: https://www.unicef.nl/files/A%20Child%20Rights-Based%20Approach%20to%20Food%20Marketing_Report.pdf
21. White Paper 19 (2014-2015). Folkehelsemeldingen Mestring og muligheter. Oslo: Ministry of Health and Care Services; 2015. Available

at: https://www.regjeringen.no/no/dokumenter/meld.-st.-19-2014-2015/id2402807/

22. The Ministries. Nasjonal handlingsplan for bedre kosthold (2017–2021). Sunt kosthold, måltidsglede og god helse for alle! Ministry of Health and Care Services; 2017. Available at: https://www.regjeringen.no/contentassets/fab53cd681b247bfa8c03a3767c75e66/handlingsplan_kosthold_2017-2021.pdf
23. Ministry of Health and Care Services and Ministry of Children, Equality and Social Inclusion. Høringsnotat – revidert forslag forskrift om markedsføring rettet mot barn av usunn mat og drikke. The Ministries; 2013. Available at: https://www.regjeringen.no/contentassets/f1a82c7111674735902cafb8f170f8f5/hoering.pdf
24. Food and Drink Industry Professional Practices Committee (MFU). MFU veiledning til bruk av sosiale medier [Internett]. Food and Drink Industry Professional Practices Committee; undated. Available at: http://mfu.as/60775-MFU-veiledning-til-bruk-av-sosiale-medier
25. Norwegian Consumer Authority. Forbrukertilsynets veileder for merking av reklame i sosiale medier. Norwegian Consumer Authority; 2018. Available at: https://www.forbrukertilsynet.no/veiledning-reklame-some
26. Norwegian Consumer Authority. Forbrukertilsynets veiledning om handelspraksis overfor barn og unge. Norwegian Consumer Authority; 2018.
27. The Food Foundation. UK's restrictions on junk food advertising to children. The Food Foundation; 2018. Available at: https://foodfoundation.org.uk/wp-content/uploads/2017/07/3-Briefing-UK-Junk-Food_vF.pdf
28. HM Government. Childhood obesity: a plan for action, Chapter 2. Department of Health and Social Care; 2018. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718903/childhood-obesity-a-plan-for-action-chapter-2.pdf

Appendices: Methodologies used in the Consumer Council's survey

Methodological issues surrounding the survey on marketing in new media

Investigating marketing in digital media, including social media, is very different from investigating marketing in other media. Digital technologies mean that there is currently no methodology that enables us to systematically identify the full extent of marketing aimed at children and young people.

The challenge in terms of identifying marketing in social media is partly that it is difficult to collect data on exactly what children and teenagers are exposed to. Parents have traditionally been used to collect data on their children's media use by monitoring which TV channels and programmes they watch. When it comes to digital media, they tend to be accessed in private and on small screens, which makes this approach problematic. Another method used to identify marketing on TV is to record programmes that children could be expected to watch on relevant TV channels in a given time period. With regard to digital media, there are huge variations in respect of the platforms and channels accessed by children and young people and of when they access them, and the "recording strategy" used for TV is therefore not suitable for digital media.

Personalised marketing is the single biggest challenge, however. Digital technologies – which base themselves on extensive harvesting of personal data, including internet use, interests and social networks – ensure that marketing on digital platforms can be aimed at individuals or defined user groups rather than at all viewers of a given channel. The marketing will also vary depending on the users' social networks. Parents, children and teenagers all with their separate profiles on the same digital platform will therefore be exposed to different adverts. A researcher studying digital channels or platforms popular with children and young people cannot expect to be able to identify the same marketing that children and teenagers are exposed to.

It is possible to try to bypass the problems associated with personalised marketing in a variety of ways. The literature suggests measures such as creating *avatars* and then simulating the internet use of a relevant age group, or recruiting children and young people to share their profiles or submit screen grabs of the advertising they see (so-called *crowdsourcing*).[24] These methods come with their own challenges, however. The challenges are both ethical and legal in nature in terms of privacy and the platforms' terms of use as well as the quality of the information being collected. It is doubtful whether fake profiles can manage to create credible, digital tracks that will lead them to realistic

[24] Nordic monitoring protocol for marketing to children and young people: https://www.norden.org/en/publication/monitoring-food-marketing-children-0

advertising exposure, and crowdsourcing relies on children and teenagers actually being able to identify marketing, something which is not always the case.

Choice of methodology and channels for the Consumer Council's survey

The Nordic Council's protocol for monitoring marketing aimed at children and young people[25] was used as a starting point for the Consumer Council's survey. The protocol states that an exploratory approach must be taken when monitoring advertising in digital media due to the challenges described above. It also warns that any paid advertising must be viewed with great caution, given the challenges surrounding targeted and personalised marketing.

The protocol sets out three different strategies that can be applied to investigate online marketing:

- use avatars (fake profiles) or recruit children and young people to crowdsource online advertising
- monitor selected industry actors in social media
- monitor websites and blogs based on the most popular sites and blogs amongst boys and girls

Due to ethical, legal and practical issues surrounding the use of fake profiles and crowdsourcing, we opted not to make use of these methods. We therefore needed to find a method that could identify marketing but where the marketing did not change for each user and where paid adverts were not a priority. We therefore chose to focus our attention on the following two channels and forms of marketing:

Content marketing from popular YouTubers

As mentioned earlier in this report, Norwegian children and teenagers spend a great deal of time on YouTube, and as many as two thirds of boys say they use the platform for more than two hours a day. Advertising on YouTube is ubiquitous both in terms of adverts displayed before and during videos and content marketing where YouTubers create editorial content that more or less promotes a product or brand. We also define product placement as a form of content marketing.

The use of influencers to create content marketing is becoming increasingly important to businesses and is seen as a highly effective way of reaching a defined target audience. Content marketing has also become important because it is a way of bypassing ad blocking technology. Influencers give businesses "instant access to trust" amongst their followers, who tend to be very loyal. The relationship between the influencers and their followers can be

[25] See note 25.

very close, and followers may feel that they have a friendship or even a sibling relationship with the influencers.

When the Consumer Council conducted focus group interviews with teenagers in 2017 it transpired that the teenagers struggled to recognise advertising in the form of content marketing and that the credibility of the YouTubers and their ability to entertain were felt to be stronger than the commercial content. We therefore believe that it is important to monitor the food industry's use of popular YouTubers who appeal to young people as channels for content marketing of brands and products.

Content on the food industry's own Facebook pages

The second method applied to identify marketing involved the industry's own Facebook pages. According to the Norwegian Media Authority's Children and Media report from 2018, between 80 and 90 per cent of Norwegian teenagers are Facebook users by the time they reach the age of 15. Marketing on this platform therefore has the potential to reach a large number of Norwegian teenagers. Posts published on the brands' Facebook pages can appear in the news feeds of their followers but also in the news feeds of non-followers. This happens either when a business pays to "boost" a post so that it is displayed as an advert to a defined target audience or when Facebook friends "like" or otherwise engage with the post. This is described by Facebook as paid and organic reach respectively.[26] Boosted Facebook posts can also be shared on Instagram.

We can assume that content placed on the industry's own Facebook pages will also reach Norwegian teenagers through both paid posts and organic reach. The industry's own Facebook posts can therefore be seen as an indicator of some of the marketing pressure aimed at teenagers. It is therefore relevant to monitor the strategies used in these posts and especially strategies that can have a particularly strong effect on teenagers.

How we conducted the survey

YouTube

Three strategies were applied to identify popular Norwegian YouTube channels. First, the most popular YouTubers amongst girls and boys aged 9–18 were taken from a list published in the Norwegian Media Authority's Children and Media report from 2018. Non-Norwegian channels and channels covering only a specific topic (make-up and slime respectively) were excluded. This left six channels. Next, the list was supplemented with YouTubers included in the influencer marketing agencies Nordic Screens[27] and Splay's[28] own lists of popular YouTube channels based on subscriber numbers (above 50,000) and

[26] https://www.facebook.com/help/285625061456389?helpref=uf_permalink
[27] https://www.youtube.com/user/NordicScreens/channels
[28] https://www.youtube.com/user/SPLAYnorge/channels

provided the channel had been active in the past month. This expanded the list by a further nine YouTube channels. Finally, we made a strategic selection of YouTubers who had appeared as guests on the CokeTV YouTube channel in the past year. This exercise identified one new influencer (the other guests had already been identified through steps 1 and 2). A total of 16 YouTube channels were included in the survey (Table 1).

Table 1. Channels analysed in the survey. Name, number of followers and selection strategy.

YouTube channel	Followers (October 2018)	Children and Media list	Splay / Nordic Screens	Former CokeTV guest
Sunny	470,100		x	
Jarl Andersen	304,800		x	x
Emma Ellingsen	270,000		x	
Amalie Olsen	137,000	x	x	
Randulle	122,300	x	x	x
Herman Dahl	109,400	x	x	
Murdrocks	108,000		x	
Dennis Vareide	91,900		x	x
Hanna-Martine	86,600	x		
Sara Høydahl	70,000		x	
Agnetesh	65,300		x	x
Stina Talling	64,400	x	x	
Nellie Krokstad	64,400	x	x	
Beas verden	61,800		x	
Kristine Bremnes	56,900		x	
Malin Nesvoll	44,500			x

Most of the channels were analysed by watching every video uploaded in 2018 in full. Three of the channels had uploaded so many videos that a shorter time period was analysed instead. This included the Randulle channel, where we analysed 44 videos posted over a period of around 2 months. However, in the case of this particular channel we performed a targeted search for videos labelled as advertising, which led to two additional videos being identified. In the case of the Sara Høydahl and Nellie Krokstad channels, we analysed videos posted over a 6 and 4-month period respectively.

The survey was carried out between 10 and 19 October 2018 with a further update in early November for some of the channels. The following data was collected from each channel:

- total number of videos 2018
- number of videos with advertising 2018
- names of collaboration partners and number of adverts for each collaboration
- number of videos advertising food/drink
- number of videos with food/drink covered by the MFU product list
- description of marketing of food/drink covered by the MFU product list

- number of views, likes and comments per video in the MFU category

Screen grabs were also taken of the videos containing adverts for unhealthy food or drink.

Facebook

The Nordic protocol for monitoring marketing recommends monitoring selected industry actors on Facebook based on seven food categories. We decided to focus on chocolate and sugar confectionary, beverages, savoury snacks and fast food. With regard to brands, we chose well known national brands with a Facebook presence. Table 2 lists the brands included in the survey.

Table 2. Industry brands and number of Facebook followers.

Category/brand	Facebook followers
Chocolate and sweets	
Freia Melkesjokolade	150,000
Haribo	53,000
Nidar	64,000
Beverages	
Coca-Cola	Declares international followers
Solo	108,000
Litago	168,000
Sunniva IsTe	52,000
Savoury snacks	
Maarud Potetgull	43,000
Sørlandschips	118,000
Fast food	
McDonald's	198,000
Burger King	31,000

We chose to focus on posts that apply marketing strategies popular with teenagers such as entertainment in the form of competitions and puzzles, invitations to engage, and the use of popular role models. In other words, our methodology involved a basic content analysis.

The survey was carried out in late October 2018 and included posts made on the brands' Facebook pages in 2018. The posts were documented in an Excel sheet with text (date and description of each post) and screen grabs of all the posts. Posts concerning taste tests, product launches and corporate social responsibilities were *not* registered.