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Issue-Based Advertising

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Issue-based advertising

This report provides an overview of issue-based advertising, as understood and dealt with under the Code of Practice on Online Disinformation - currently the key instrument of EU policy against disinformation.[1]

Executive Summary

Issue-based advertising is a form of paid-for advertising which advocates for broad political and legislative issues rather than specific candidates or political parties. It is sometimes recognized as a separate category of advertising, but despite its ability to influence the outcome of elections, issue-based advertising is often subject to less regulation than the more traditional and explicit forms of political advertising. The European Court of Human Rights has reasoned in its case-law that controversial opinions that are discussed in political debates could be considered political.

Issue-based advertising is a relevant problem when it comes to regulating the online environment. Platforms provide politically motivated actors with the opportunity to make use of a large amount of personal data and micro-target advertising. Many of these advertisements are paid for or run by actors with no formal political affiliation. To better understand who caters what kinds of messages with potentially political goals and to which audiences, meaningful transparency should be required from both advertisers and online platforms.

This is highlighted in the 2018 Code of Practice on Disinformation (Code), which requires its signatories to make advertising distinguishable from editorial content, publicly disclose political advertising and to "use reasonable efforts towards devising

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approaches to publicly disclose 'issue-based advertising'". Issue-based advertising, however, is undefined in the Code. Instead, the text requires signatories to come up

with their own definition. Relying on signatories' self-reports, press releases, and content policy explanations, this report maps the terminology and descriptions used by signatories and the European Commission. As our analysis shows, each signatory approaches issue-based advertising differently; what they mean by the term and how they operationalise it in their policies, however, is rarely defined.

Introduction

Issue advertising or issue campaigns are not a new phenomenon in political communication and election campaigns regulation. Long before online platforms even came into existence, issue advertisements (referred to also as issue-based or social issue ads) have been a matter of public discussion and dealt with by case-law. In the landmark 1976 decision, Buckley v. Valeo, the United States Supreme Court created two broad categories of political advertising: express advocacy and issue advocacy. Express advocacy, as advertising that explicitly calls to vote or not for a candidate, is a subject to federal campaign regulations, including campaign financing restrictions and public disclosure of contributors. On the other hand, issue advocacy that discusses broad political and legislative issues rather than specific candidates was seen as protected by the Constitutional guarantees of free speech. Accordingly, it was exempted from federal campaign regulations and there is no requirement on public disclosure or any spending limits related to issue ad campaigns. Even before online platforms have enabled a wide range of individuals and interest groups to engage in political communication and campaigns online, various groups were taking advantage of this loophole in the US law, which made it legally possible for groups, with formally no links with any candidate in an election, to spend more money on advertising than the candidates themselves.[2] In their study, released in 2018, Young Mie Kim and others showed how the majority of divisive issue campaigns on Facebook in the weeks

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[2] See for more: https://www.pbs.org/wgbh/pages/frontline/shows/scandal/etc/ads.html

before the 2016 US elections were run by groups which did not file reports to the Federal Election Commission. These groups, clustered by the authors as non-profits, astroturf/movement groups, and unidentifiable "suspicious" groups, have sponsored four times more ads than those that filed reports to the Commission.[3]

In 2018, the Canadian Parliament added provisions to the Canada Elections Act (CEA) that define online platforms and impose obligations on them to keep and publish a digital registry of all regulated ads and the name of the person who authorized the ad.[4] The legislation applies to two categories of ads: partisan advertising and election advertising. Both are defined as "ads that promote or oppose a party or a candidate", but election advertising in addition includes also "advertising that takes a position on anything that is or may become an issue during a federal election campaign". This resembles issue or issue-based advertising, and in this case is only regulated during an election period.

The European Union area and its member states have specific legal, political, and electoral contexts, with external differences compared to the United States and Canada, and with internal varieties in interpreting the lines between free speech and regulated speech. In existing regulations, there are different approaches to defining political ads within Europe, including: (1) *the media-centered*, which is predominant but mostly limited to traditional, broadcast, and in particular public service media; (2) *the timing-centered*, often equating political advertising with electoral advertising, and leaving out all the paid political communication outside of an electoral period; (3) *the content-centered*, which determines a set of issues to be considered "political"; and (4) the advertiser-centered, by looking at who the advertiser is, which often narrowly focuses on political parties and candidates.[5] The content-centered approach contains the idea that certain content even when not advocating explicitly for or against an option competing in an election, and even if it is not commissioned by political organizations, parties or candidates, may still be "political". The European Court of

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Human Rights has taken a similar stance, reasoning in its case-law that "expressions reflecting controversial opinions pertaining to modern society in general and also lying at the heart of various political debates could be considered as `political`".[6]

Political communication today is increasingly taking place online, with the new or upgraded techniques of political advertising based on processing a large amount of personal data to deliver micro-targeted political messages. The platform environment has also facilitated the conditions for a permanent political debate and campaigning; and a wide array of actors with no explicit political affiliation but with some political agendas take part in political communication and advertising that covers many issues not explicitly related to candidates, but which may affect voters' behaviour. With this in mind, it becomes necessary to require advertisers and advertising platforms to provide meaningful transparency on their ads, in particular as political advertising and issue-based advertising is concerned.

The EU is trying to achieve this also with the recent Proposal for a Regulation on the transparency and targeting of political advertising[7], a supplementary regulation to the Digital Services Act[8]. In the Proposal for a Regulation on the transparency and targeting of political advertising, issue-based advertising is defined under recital 17, stating that:

> "*The publication or dissemination by other actors of a message that is liable to influence the outcome of an election or referendum, legislative or regulatory process or voting behaviour should also constitute political advertising. In order to determine whether the publication or dissemination of a message is liable to influence the outcome of an election or referendum, a legislative or regulatory process or voting behaviour, account should be taken of all relevant factors such as the content of the message, the language used to convey the message, the context in which the message is conveyed, the objective of the message*

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and the means by which the message is published or disseminated. Messages on societal or controversial issues may, as the case may be, be liable to influence the outcome of an election or referendum, a legislative or regulatory process or voting behaviour".

Political advertising and issue-based advertising stand also as one of the five pillars[9] of the 2018 Code of Practice on Disinformation[10]. The pillar contains three commitments that signatories endorsed: (1) making all advertisements clearly distinguishable from editorial content, (2) publicly disclosing political advertising ("defined as advertisements advocating for or against the election of a candidate or passage of referenda in national and European elections"), including actual sponsor identity and amounts spent, and (3) "to use reasonable efforts towards devising approaches to publicly disclose 'issue-based advertising'". The last commitment is clearly the most complex one as it seeks to tackle a form of expression that balances between political speech, speech that concerns matters of public importance, and commercial speech.

In this report we aim to map the terminology and descriptions used by the Commission and the Code's signatories in dealing with issue-based advertising, as well as to outline the progress achieved under the Code's commitment to make issue-based advertising transparent. In this exercise we rely on signatories' self-reports, press releases, and content policy explanations. The report provides no assessment of the effectiveness of platform policies related to issue-based advertising as that would require access to platforms' data and more in-depth examination of platform practices in relation to such advertising. The main contribution of the report is to provide the state of play of issue-based advertising as dealt with under the Code in order to observe inconsistencies and to suggest areas for improvement.

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[9] Other four pillars are: Scrutiny of ad placements; Integrity of services; Empowering consumers; Empowering the research community
[10] https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation

Understanding and defining issue-based advertising

In its Code-related documents, the European Commission provides no definition of issue-based advertising, only vaguely stating that it refers to advertisements "about social issues such as e.g. economy, health or environmental policies"[11]. Issue-based advertising is also undefined in the Code of Practice. The signatories acknowledge that any definition developed under the Code should be "reflective of the European market for political and issue-based advertising", and they also refer to the European Commission Recommendation on election cooperation networks, online transparency, protection against cybersecurity incidents and fighting disinformation campaigns in the context of elections to the European Parliament[12]. The Recommendation (2018), limited to the context of European elections[13], emphasizes the "need to further enhance the transparency of paid online political advertisements and communications vis-à-vis citizens of the Union" with participation of various actors to this end, including online platforms, advertising industry, European and national political parties, foundations and campaign organisations acting on behalf or in cooperation with political parties. In this context transparency is understood as an "active disclosure of who is behind paid online political advertisements and communications during electoral campaigns, while fully respecting freedom of expression", "transparency of the sources and amount of campaign funding for online activities", and "information on any targeting criteria used in the dissemination of such advertisements and communications". In particular as regards clear identification of "the origin of the messages" in paid political advertisements and communications, the Recommendation suggests that "such transparency should be ensured for paid advertisements advocating for or against candidates as well as for online paid

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[11] See: https://digital-strategy.ec.europa.eu/en/library/assessment-code-practice-disinformation-achievements-and-areas-further-improvement

[12] https://ec.europa.eu/info/sites/default/files/soteu2018-cybersecurity-elections-recommendation-5949_en.pdf

[13] As the elections are primarily a national matter so the protection of the electoral process (and media pluralism) falls primarily within the competence of member states.

communications on a specific issue during the European Parliament election campaign period".

Under the Proposal for a Regulation on the transparency and targeting of political advertising, presented in November 2021 as part of measures aimed at protecting the integrity of elections, the European Commission considers "*issue-based ads which are liable to influence the outcome of an election or referendum, a legislative or regulatory process or voting behaviour* as political ads executed *by, for or on behalf of a political actor*". It is expected that the Regulation will be adopted ahead of the 2024 elections to the European Parliament. If it happens, the proposed rules will require any political advert to be clearly labelled as such and include information such as who paid for it and how much. Political targeting and amplification techniques would also need to be explained publicly in detail and would be banned when using sensitive personal data without explicit consent of the individual. This way, hard law would regulate what is now being tested under the self-regulatory regime.

In the meantime, the area is shaped by the self-regulatory Code of Practice. Under the Code, the signatories have been hesitant in providing a definition of issue-based advertising, justifying it with freedom of expression concerns. The commitments they agreed to envisage "the development of a working definition of issue-based advertising which does not limit reporting on political discussion and the publishing of political opinion and excludes commercial advertising". Furthermore, and given the implications related to freedom of expression, "signatories encourage engagement with expert stakeholders to explore approaches that both achieve transparency but also uphold fundamental rights".

1.1 Trade association signatories

In their annual self-assessments to the Code, none of the trade association signatories from the online advertising sector proposed a definition of issue-based advertising nor did they discuss any policy related to this type of advertising.

1.2 Platform signatories

Facebook defines advertisements about social issues, elections or politics as: "Made by, on behalf of, or about a candidate for public office, a political figure, a political party, a political action committee or advocates for the outcome of an election to public office; or About any election, referendum, or ballot initiative, including "go out and vote" or election campaigns; or

About social issues in any place where the ad is being placed; or Regulated as political advertising".

Under **social issues**, the company considers: "heavily debated and highly politicized sensitive topics that can influence many people and may impact the outcome of an election or result in legislation".[14] The company further adds that "There are a variety of methods that people use to address social issues, in addition to elections or politics:

- Leaders build their agendas around issues to inspire voters
- People vote on issues or support organizations and brands that align with their ideals
- Brands, advocacy groups and organizations may try to use paid advertising to broaden their voice or influence the sentiment of people to shape culture and inspire change".

To be able to place ads about social issues, elections or politics, advertisers need to verify their accounts by providing proof of their identity.[15] Advertisers can only place such ads in the country in which they are authorized. Advertisers themself need to label their ads as social issues, elections or political, and need to provide a disclaimer about who paid for the ad. Such ads then enter the Ad Library and remain there for seven years.

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[14] https://www.facebook.com/business/m/election-integrity
[15] https://www.facebook.com/business/help/208949576550051?country_select=HR

Facebook further recognises that social issue ads "that seek to influence public opinion through discussion, debate or advocacy for or against important topics, like Health and Civil and Social Rights" can come from **a range of advertisers** - including activists, brands, non-profit groups and political organizations - who are all required to get authorized and use "Paid for by" disclaimers on ads that take a stand on issues within Facebook policy.

Intergovernmental organizations (defined as having a membership of three or more sovereign states bound together by a treaty) qualify to run ads about social issues in member states unless otherwise prohibited to do so. Such ads also require disclaimers and, as per Facebook policy, must not include electoral, political or legislative content.

Social issues "vary depending on which country one is planning to run ads about social issues, elections or politics in". Table 1, below, shows Facebook's selection of social issues in the United States, European Union, and Australia - used as examples for the purpose of this overview. While most of the issues between these three regions are the same, unlike the US and Australia, Europe does not have guns and education among the social issues. It is, however, not clear what method or criteria Facebook uses to compose this list for each country or region.

Table 1. Facebook's selection of social issues per country/region

US[16]	EU	Australia
civil and social rights	civil and social rights	civil and social rights
crime	crime	crime
economy	economy	economy
education	environmental politics	education

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[16] Source: https://www.facebook.com/business/help/214754279118974?id=288762101909005

environmental politics	health	environmental politics
guns	immigration	guns
health	political values and governance	health
immigration	security and foreign policy	immigration
political values and governance		political values and governance
security and foreign policy		security and foreign policy

Google has a policy on "political content", where it considers *political* and *election* advertising. The company imposes different requirements for such advertising based on region[17] and expects all political ads to comply with local legal requirements.

In the EU, Google considers under election ads those ads that feature:

- "a political party, a current elected officeholder, or candidate for the EU Parliament
- a political party, a current officeholder, or candidate for an elected national office within an EU member state. Examples include members of a national parliament and presidents that are directly elected
- a referendum question up for vote, a referendum campaign group, or a call to vote related to a national referendum or a state or provincial referendum on sovereignty".

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[17] https://support.google.com/adspolicy/answer/6014595?hl=en

Google further clarifies that "election ads don't include ads for products or services, including promotional political merchandise like t-shirts, or ads run by news organizations to promote their coverage of referendums, political parties, candidates, or current elected officeholders".

The only instance in which Google refers to something that could fall under the category of issue-based advertising is in relation to regional restrictions on political ads. In the case of **France** Google prohibits on its platforms "**ads containing informational content relating to a debate of general interest**" during the time period beginning three months before the first day of the month during which a general election is to be held and ending when the election is over. This excludes advertisements run by official government communication bodies (i.e. the Service d'information du Gouvernement) promoting public health guidance related to the COVID-19 crisis or information about electoral processes.

Only verified advertisers can run election ads and all election ads must show a disclosure that identifies who paid for the ad. While for most ad formats, Google will automatically generate a "Paid for by" disclosure, using the information provided during the verification process, it still retains the responsibility with advertisers to include such information. Election ads can only be targeted by geographic regions (except radius around a location), age, gender, and contextual targeting options such as ad placements, topics, keywords against sites, apps, pages, and videos.

Twitter defines political content as content that references a candidate, political party, elected or appointed government official, election, referendum, ballot measure, legislation, regulation, directive, or judicial outcome. According to its policy, Twitter globally prohibits the promotion of political content.[18] Alongside political advertising, this policy also includes a ban on issue advertising. As of 30 August 2018, Twitter had a US-specific Issue Ads Policy and certification process that encompassed: "Ads that refer to an election or a clearly identified candidate, or Ads that advocate for legislative issues of national importance".[19] Examples of legislative issues of national importance

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[18] https://business.twitter.com/en/help/ads-policies/ads-content-policies/political-content.html
[19] https://blog.twitter.com/en_us/topics/company/2018/Announcing-new-US-issue-ads-policy

include topics such as abortion, civil rights, climate change, guns, healthcare, immigration, national security, social security, taxes, and trade.

Twitter's ad repository that contained political advertising and issue advertising (only in the US) is no longer active. Twitter closed its Ads Transparency Center (ATC) "following the prohibition of both Political and Issue ads on Twitter in November 2019 and the establishment of a mandatory Cause-Based Ad certification and review process". The platform is now providing only an archived version of ATC data from Political ads that ran between 24 May 2018 and 22 November 2019 and Issue ads that ran between 8 August 2018 and 22 November 2019.

Twitter's cause-based advertising policy[20] "restricts the promotion of and requires advertiser certification for ads that educate, raise awareness, and/or call for people to take action in connection with civic engagement, economic growth, environmental stewardship, or social equity causes". Twitter justifies its different approach to cause-based advertising with the following claims:

- "Advertising should not be used to drive political, judicial, legislative, or regulatory outcomes; however, cause-based advertising can facilitate public conversation around important topics.
- Advertising that uses micro-targeting presents entirely new challenges to civic discourse that are not yet fully understood".

Twitter restricts targeting to geographic location (at the state, province, or region level and above); and keyword and interest targeting (which may not include terms associated with political content, prohibited advertisers, or political leanings or affiliations, e.g., "conservative," "liberal," "political elections," etc.). Government and supranational agencies and entities are not subject to geo-targeting restrictions.

TikTok defines political ads as paid ads that promote or oppose a candidate, current leader, political party or group, or issue at the federal, state, or local level — including

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[20] https://business.twitter.com/en/help/ads-policies/ads-content-policies/cause-based-advertising.html

election-related ads, advocacy ads, or issue ads.[21] The platform has a policy of banning all political ads.

Microsoft does not differentiate between political and issue-based advertising. Its advertising policies group political and religious advertising together, and include forms of advertising that might fall into what some of the previously discussed definitions would consider issue-based advertising. Through the services of Microsoft, Advertising ads and fundraising "for election related content, political parties, candidates, and ballot measures" are not allowed. Microsoft's Disallowed content policies add that "[a]dvertising that exploits political agendas, sensitive political issues or uses 'hot button' political issues or names of prominent politicians is not allowed regardless of whether the advertiser has a political agenda." In addition, in the case of France, the ban is extended to "content related to debate of general interest linked to an electoral campaign". In relation to religious content, the guidelines say: "Advertising cannot exploit sensitive political or religious issues for commercial gain or promote extreme political or extreme religious agendas or any known associations with hate, criminal or terrorist activities." In the case of Germany advertisements connected to Scientology are also banned.[22]

Lack of common understanding and of clear definitions of issue-based advertising

The analysis clearly shows that each platform defines and approaches political content and ads differently. While all platform signatories of the Code consider issue-based advertising in their political content and advertising related policies, they use different terminology for the phenomenon, rarely defining it, and using widely different policies to address it.

Terminology and definitions

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[21] https://newsroom.tiktok.com/en-us/understanding-our-policies-around-paid-ads
[22] https://about.ads.microsoft.com/en-us/resources/policies/disallowed-content-policies

While *issue-based advertising* is a term used in the Code, including in the title of one of the Code's five pillars, none of the platform signatories use the same term in relevant policies and their descriptions. Facebook talks about "social issues", which it defines as "heavily debated and highly politicized sensitive topics that can influence many people and may impact the outcome of an election or result in legislation". Google uses no specific term as it only mentions "ads containing informational content relating to a debate of general interest" in a specific policy applied to France, due to country's regulation around election campaigns and online platforms[23]. TikTok talks about "election-related ads", "advocacy ads", or "issue ads", but gives no definition to any of the categories. Microsoft's policies consider "advertising that exploits political agendas, sensitive political issues or uses 'hot button' political issues", but again without an explanation or example of how such issues are defined, detected, and extracted in different countries and regions. Twitter considers and addresses "issue advertising" under its political content policy, but it looks like the definition (ads that advocate for legislative issues of national importance) and examples (abortion, civil rights, climate change, guns, healthcare, immigration, national security, social security, taxes, and trade) the company used were developed only for the US context. In addition to its Political content policy, Twitter has Cause-based advertising policy. Twitter considers "cause-based advertising" as important in facilitating public conversation around important topics and distinguishes it from political issue (based) advertising. Unlike "issue advertising" that Twitter considers political, cause-based advertising in the company's interpretation "should not be used to drive political, judicial, legislative, or regulatory outcomes". As per the platform's policy, cause-based advertisements must undergo a certification and review process, but there is no available repository to review such ads.

Policies

All platform signatories have policies for political advertising, but their approaches vary widely. For instance, Microsoft, Twitter and TikTok prohibit political advertising, and this ban seemingly applies to what could be subsumed as issue-based advertising.

However, due to a lack of clear and operational definitions, and transparency in companies deciding what is a political issue, we cannot be sure if this ban applies to intended advertising while compliant with freedom of expression. Microsoft changed its Political Ads Policy to "disallow political candidate and ballot measure ads" first in the United States in October 2018, and then in April 2019 decided to enforce this policy globally, starting with France.[24] The since resigned Twitter CEO Jack Dorsey announced the company's decision to "stop all political advertising on Twitter globally" in October 2019, adding that they: "considered stopping only candidate ads, but issue ads present a way to circumvent. Additionally, it isn't fair for everyone but candidates to buy ads for issues they want to push. So we're stopping these too"[25]. However, unlike this press release or CEO's brief public announcement, the actual policy that was revealed two weeks later slightly changed the course and, instead of banning all issue ads, it introduced a new policy on cause-based advertising. The key difference between the two categories, as described by Twitter, is that the latter is allowed as long as it does not advocate for or against a specific political, judicial, legislative, or regulatory outcome related to social issues such as abortion, civil rights, climate change, healthcare, immigration, national security, etc. If it advocates for such an outcome, it would be considered a (political) issue ad, and would be banned under the current Twitter policy description.

Google and Facebook allow all sponsored political communications (i.e. political and issue-based ads) on their services, but require advertisers to verify their accounts and to identify who paid for the ad. Google restricts micro-targeting of political ads to use of geographic location, age, gender, and contextual targeting, while Facebook presents no specific restriction on micro-targeting technique. Google has no specific policy for issue-based advertising. Facebook is the only platform among the Code signatories that has a relatively elaborated policy on "social issues" and advertising related to elections and politics. To be able to place ads about social issues (as well as on elections or politics), advertisers need to verify their accounts by providing proof of their identity; they can only place such ads in the country in which they are authorized; and need to themself label their ads as social issues (elections or political),

[24] https://about.ads.microsoft.com/en-us/blog/post/october-2018/changes-to-our-political-ads-policy
[25] https://twitter.com/jack/status/1189634360472829952

including a disclaimer on who paid for the ad. Facebook composes a list of "social issues" for different countries and regions. There is, however, little clarity as to what factors are taken into account in determining such lists in all possible countries where Facebook operates and applies this policy. Furthermore, social issues can change in time. It is not clear whether Facebook policy is reflective of this.

As a result of commitments under the Code, in 2018, Facebook, Google and Twitter created publicly accessible repositories of advertisements that featured on their services as political and/or issue-based. In the meantime, Twitter closed its Ads Transparency Center (ATC) after it prohibited political and issue ads in November 2019. The platform is now providing only an archived version of ATC data from Political ads that ran between 24 May 2018 and 22 November 2019 and Issue ads that ran between 8 August 2018 and 22 November 2019.

While the report provides no assessment of the effectiveness of platform policies related to issue-based advertising, it is important to highlight that recent research has found that there are still significant problems when it comes to the design and enforcement of platforms' measures. Research by Mozilla found that (at least in the US-context) a number of "influencers" that were financed by political organizations used TikTok to spread politically motivated messages.[26] The research also found that "TikTok does not effectively monitor and enforce its rule that creators must disclose paid partnerships, nor does the platform proactively label sponsored posts as advertisements. Inconsistent disclosure practices—paired with zero ad transparency tools—makes it very difficult to monitor how political organizations are paying for influence on TikTok". A team of computer scientists from the Katholieke Universiteit Leuven and New York University assessed the enforcement of Facebook's political ad policy enforcement: they found that the platform fails to detect and mislabels political ads in vast numbers.[27] In the context of the German federal election of September 2021, a joint investigation of the ZDF Magazin Royale and Who Targets Me? has found that Facebook's ad library was incomplete: thousands of ads by political parties,

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[26] https://assets.mofoprod.net/network/documents/TikTok-Advertising-Report_e5GrWx5.pdf
[27] Victor Le Pochat et al. 2021. An Audit of Facebook's Political Ad Policy Enforcement. USENIX Security '22 paper. https://lepoch.at/files/facebook-political-ads-usenix22.pdf

ministries and the federal government were missing.[28] Another empirical research, recently published by Vera Sosnovik and Oana Goga[29], showed that there is a significant disagreement between what ad platforms, ordinary people, and advertisers consider political, with disagreement mainly coming from diverging opinions on which ads address social issues.

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[28] https://targetleaks.de/

[29] Vera Sosnovik and Oana Goga. 2021. Understanding the Complexity of Detecting Political Ads. In Proceedings of the Web Conference 2021 (WWW '21), April 19–23, 2021, Ljubljana, Slovenia. ACM, New York, NY, USA, 12 pages. https://doi.org/10.1145/3442381.3450049