

# Advertisements on digital platforms: How transparent and observable are they?

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# Introduction

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We use digital technologies for work, study, and leisure every day. This makes our digital experiences and digital presence significant. Similar to our physical world, our digital world must be designed to promote our health and wellbeing. However, much of the architecture of the digital world remains hidden, enabling digital systems to be designed in ways that nudge us in unhealthy directions. This includes the extensive online marketing of harmful and addictive products like alcohol, gambling, and unhealthy foods.

Most digital marketing by companies selling harmful and addictive products happens below the radar. Furthermore, it is short-lived, making it difficult for researchers, civil society, and governments to identify and control such advertisements. This also means that children, young people, and people at risk of harm from such marketing can be targeted out of sight.

While we know that alcohol, gambling, and unhealthy food companies use digital marketing to sell their products,<sup>1-3</sup> the true nature and extent of such tactics is not clear. But what we do know is concerning.

Our community is constantly inundated with digital marketing for harmful and addictive products. For example, in April 2020 – at the height of the COVID-19 pandemic in Australia – during a one-hour use of Facebook and Instagram on a Friday night, one user received 107 advertisements promoting alcohol products, including promoted messages about using alcohol to cope and feel better.<sup>4</sup> Research also found children are exposed to approximately 100 advertisements for unhealthy food and beverages via mobile devices each week.<sup>5</sup>

Digital marketing is also becoming increasingly personalised and targeted. Digital platforms and marketers develop detailed profiles of people, including children and young people, by extensively processing attributes, such as their characteristics, interests, and behaviours, to develop advertisements most likely to affect them.<sup>6</sup> Leaked Meta documents showed how Facebook targeted advertisements to children and young people in Australia by gathering psychological insights on them, including monitoring their moods to identify when they were feeling overwhelmed and anxious.<sup>7</sup>

Companies must be held accountable for harmful digital marketing practices. Therefore, digital marketing practices of companies selling harmful and addictive products must be made transparent to understand the true impact of such practices.



## About this report

This report audits the transparency and observability of paid advertising on major digital platforms: Facebook, Instagram, Google search, YouTube, Twitter, Snapchat, and TikTok. These platforms dominate digital advertising markets and are the most used platforms in Australia. Meta (Facebook and Instagram) and Alphabet (Google and YouTube) constitute 80 per cent of Australia's digital advertising market.<sup>8</sup> While Twitter, Snapchat, and TikTok have a lower market share, their advertiser-funded digital platforms are popular in Australia.<sup>9</sup>

In this study, we evaluated the transparency of each platform's advertising model by investigating platform features, reviewing academic and public interest research, and analysing platforms' service offerings and business or developer blogs. We set out to document what advertising looks like on each platform and whether advertisements can be observed. This enabled us to determine whether we can monitor advertisements, advertiser tactics, and algorithms underpinning targeted advertising on these digital platforms.

# Assessing transparency and observability of advertising on digital platforms

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The primary challenge when observing advertisements on digital platforms is that the content is no longer 'published'. Most advertisements are only visible to users at a particular moment. This is a challenge because existing research, policy, and civil society approach to advertising accountability depend on public observability.

While there has been a range of efforts to theorise the data-driven advertising model of digital platforms and collect large sets of advertisements for analysis, researchers, policymakers, and civil society organisations need to assess the transparency and observability of advertising on such platforms.

We assessed the transparency of advertising on Meta, Alphabet, Snapchat, Twitter, and TikTok against nine criteria. We developed these criteria to evaluate the accessibility and permanency of information about advertisements on digital platforms and the depth of information provided.

The first criterion assessed was:

- **A public archive of advertisements published on the platform.** This basic transparency criterion requires all advertisements published on the platform to be publicly viewable and stored over time.

If a public archive is available, then the following eight criteria were assessed:

- **Access to archive of advertisements.** The type of access is a critical factor. Given the enormous volume of advertisements on digital platforms, the capacity to access and analyse data through a dedicated application programming interface (API) is critical to meaningful transparency.
- **Access to a public searchable dashboard.** A searchable dashboard enables users, especially members of the public and civil society organisations, to monitor advertising in real-time.
- **Permanency of advertisements in the archive.** The permanency of data is critical to meaningful transparency. Some archives only contain advertisements that are currently running on the platform. This is particularly important for ephemeral campaigns (active for short periods of time, e.g., 24 hours), which can be easily missed by monitoring systems.
- **Access to deleted advertisements.** Some archives remove advertisements that have been 'deleted' from the platform for violating platform terms or because advertisers have removed them. This limits transparency, particularly in harmful forms of advertising.
- **Extraction of advertisements for analysis.** Enabling the extraction of advertisements and metadata for analysis is important for researchers to undertake a detailed analysis of advertising over time.
- **Information on targeting criteria.** Digital advertising is data driven. The type and content of advertisements are of limited value without understanding how advertisements are targeted towards particular demographics.
- **Information on spend.** The amount spent on advertisement campaigns is important to understand which advertisers dominate the market.
- **Information on reach.** Information on the demographics and number of people an advertisement reaches is important to judge the effects of advertising on targeted groups of people.

Table 1 rates each platform against these criteria as at 24 March 2022.

**Table 1: Advertising transparency on platforms**

CRITERIA	META (FACEBOOK AND INSTAGRAM)	ALPHABET (GOOGLE AND YOUTUBE)	SNAPCHAT	TWITTER	TIKTOK
A public archive of ads published on the platform	Partial. All ads are indexed while active, but only political ads are available for a longer time period through Facebook's Ad Library. <sup>i</sup>	Partial. Only political ads, through Google's Transparency Report. <sup>ii</sup>	Partial. Only political ads in the US, through Snap Political Ad Library. <sup>iii</sup>	Partial. Only historical political ads, through the Ad Transparency Centre. <sup>iv</sup>	No public archive.
Access to archive of ads	Partial. Access through Facebook's Ad Library API, but only for political ads.	Partial. Access through Google Big Query public datasets (API), but only for political ads. <sup>v</sup>	Partial. Political ads in the US are accessible only as a downloadable historical archive.	Partial. Historical political ads are accessible only as a downloadable historical archive.	No public archive.
Access to a public searchable dashboard	Yes.	Partial. Only for political ads.	No.	No.	No public archive.
Permanency of ads in the archive	Partial. Political ads are stored for seven years. All other ads are only available in the archive while the campaign is 'live'.	Partial. Only for political ads.	Partial. Only for political ads in the US.	Partial. Only for historical political ads.	No public archive.
Access to deleted ads	No. Deleted ads are flagged in the system, but no ad details are available.	No.	No.	No.	No public archive.
Extraction of ads for analysis	Partial. Only for political ads.	Partial. Only for political ads.	No.	No.	No public archive.
Information on targeting criteria	Partial. Basic demographic criteria but no breakdown is provided - for political ads only.	Partial. Basic demographic criteria but no breakdown is provided for political ads.	Partial. Basic demographic and some interest criteria are provided for political ads in the US.	Partial. Ad text, and some additional metadata is available for historical political ads.	No public archive.
Information on spend	Partial. Overall spend with no breakdown is provided - for political ads only.	Partial. Overall spend with no breakdown is provided for political ads.	Partial. Overall spend with no breakdown is provided for political ads in the US.	Partial. Overall spend with no breakdown is provided for historical political ads.	No public archive.
Information on reach	Partial. Overall reach with no breakdown is provided for political ads only.	Partial. Overall reach with no breakdown is provided for political ads.	Partial. Overall reach with no breakdown is provided for political ads in the US.	Partial. Overall reach with no breakdown is provided for historical political ads.	No public archive.

i The Facebook Ad Library is here: <https://www.facebook.com/ads/library>. Influencer content is only available through Crowdtangle, or through the advertiser page if they have shared ad ID.

ii The Google Transparency Report is here: <https://transparencyreport.google.com/political-ads/region/AU>

iii The Snap Political Ad Library is here: <https://snap.com/en-US/political-ads>

iv The Twitter Ad Transparency Centre is here: <https://business.twitter.com/en/help/ads-policies/product-policies/ads-transparency.html>

v Google Big Query datasets here: <https://cloud.google.com/bigquery/public-data>

## Can we monitor advertisements?

Of the platforms we assessed, only Meta platforms (Facebook and Instagram) have a public archive for all advertising categories. They are the only platforms where all current advertisements can be independently observed. This means for all other platforms assessed, advertising of harmful and addictive products like alcohol, gambling, and unhealthy foods cannot be seen by anyone other than people directly targeted with these advertisements.

However, a notable limitation is that advertisements on Meta platforms are only visible while they are 'live' and searched by individual advertisers, without the ability to search by category (i.e., 'alcohol advertising'). In this sense, no platform creates a durable, permanent archive of advertising. Several other platforms only provide an archive for political advertising.

Alphabet has a permanent public archive for political advertisements. Similar to Meta platforms, Alphabet has a searchable dashboard for public and civil society organisations to monitor advertisements close to real-time, enabling researchers to extract advertisements for analysis.

Snapchat has an archive of political advertisements in the US, and Twitter has an archive of historical political advertisements. This indicates that there are no technical barriers to making available a permanent and complete archive of all advertising on these platforms.

TikTok currently has no transparency for advertising on the platform.

## Can we monitor tactics, reach and spending of advertisers?

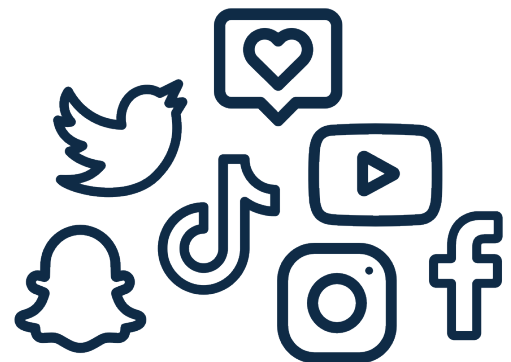
The types of advertisements published on Meta platforms can be monitored if researchers extract advertisements while they are 'live'. This means that ephemeral ad formats can easily be missed.

However, no platform currently provides enough information on targeting, spend, or reach to meaningfully monitor the advertisements. While some information is provided on targeting, spend, and reach for political advertisements, it is very limited. For example, targeting information includes basic demographic criteria, such as age range, general location, and gender, whereas information on total spend and reach is provided but without demographic breakdown.

## Can we monitor algorithms underpinning targeted advertising?

Meta and Alphabet provide general information on audience tools for targeting (e.g., custom audiences and ad interests). This information is not available through advertisement archives but through platform policies or individual accounts (providing information to individuals about the advertisements they see). This points towards "transparency", but in effect it means that this information cannot be assessed or monitored at a systems level.

The algorithmic models and tools used by advertisers are a core part of platforms' advertising systems and should be transparent. If archives only make advertisements observable, we only know what is being published. If the archives were to include information about spend, targeting, and reach, then we can develop a better understanding of who the advertisers are trying to target and how the algorithmic advertising model targets ads at consumers. However, we do not know how people are being targeted without this information on platforms' algorithmic models. This is a particular issue when it comes to the marketing of harmful and addictive products, where a key part of accountability is monitoring and assessing harm to people most at risk.



## Transparency, observability, and accountability

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The advertising model of digital platforms should be accountable to the public. Accountability can be realised through laws, policies, and cultural and institutional norms. Accountability depends on independent observation and monitoring from researchers, civil society, and regulators. Making platform advertising models accountable to shared public values requires platforms to make their advertising model transparent for routine observations and monitoring. Meaningful accountability depends on systems-level transparency, not just providing individual platform users with information on how they are targeted by advertisers.

In this assessment, we have demonstrated that platforms are currently not meeting this first requirement of making the operations of their advertising models transparent enough for independent observation and monitoring to take place. These advertising models influence the public but are not open to public scrutiny.

## Conclusion

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Although digital platforms and advertising agencies have access to detailed information about the digital marketing activities they provide, they have largely failed to make this information accessible in the absence of regulatory requirements for transparency. This means that the true nature and extent of harmful digital marketing practices remain largely under the radar, allowing digital platforms to not be held accountable for the harm perpetuated by their business actions.

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