



Study to support the preparation of implementing legislation on labels and transparency notices accompanying political advertisements, required by Regulation 2024/900 on the transparency and targeting of political advertising

Final report

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(DG JUST)

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Executive summary

Context and objective of the study

In response to growing concerns about transparency and accountability in political advertising, the European Commission is advancing the implementation of Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising (the Regulation). It aims to enhance the transparency of political advertisements (ads) across various media platforms by establishing clear requirements for labels and transparency notices. The Commission undertook a study to collect robust evidence and analyse the technical options for these labels and notices, ensuring that they meet the objectives of the Regulation while being both effective and feasible for all stakeholders.

The study aims to identify the most viable technical options for implementing labels and transparency notices for political ads across various media types and to assess the strengths and weaknesses of those options. It considers multiple factors, including proportionality, particularly with respect to the impact on small and medium-sized enterprises (SMEs), cost efficiency, the overall benefits of implementation, and the potential administrative burdens of these options.

The study collected data on existing technical practices, requirements, and formatting for labels and transparency notices across various advertising sectors, including outside the political advertising domain. It describes and compares the available technical options based on their potential impacts on service providers, including SMEs, and recipients' preferences. It includes a behavioural assessment to understand how transparency measures are perceived by the public.

The study takes into account the preparatory work undertaken by the Commission and Member States, including the development of guidance and the designation of supervisory authorities. It incorporates insights from other studies and impact assessments of related legislation to ensure a comprehensive approach. Its scope covers a broad range of media types, including digital, audiovisual, print, and physical objects, while also drawing on practices from other sectors, such as commercial advertising, public health campaigns, food labelling, and financial advertising. Although the study does not directly address the European repository for online political ads, it aligns with ongoing work on the technical specifications for transparency notices in online political ads.

Methodology

The study was carried out by a consortium led by Wavestone, alongside Open Evidence and ICF, between September 2024 and April 2025. The study team began the process with an in-depth legal analysis of Regulation (EU) 2024/900 to establish the foundational framework for labels and transparency notices. It also explored provisions within similar European Union (EU) initiatives and other relevant regulatory contexts. It drew on industry practices and innovative approaches from various sectors, enriching the study's recommendations and ensuring they were forward-thinking, adaptable, and compliant.

Following the legal analysis, the study team focused on industry practices in the development of labels and transparency notices. This involved examining formatting practices by medium of publication (such as digital (including online), audiovisual, print, and physical objects), gaining insight into how different formats influence the effectiveness and presentation of labels. Reviewing these practices enabled the study team to identify the most effective methods currently in use, which could be adapted to the needs of political advertising.

Next, the study identified the functional requirements specific to each medium of publication, ensuring that the technical options considered were appropriate to the particular characteristics and constraints of different media. For example, the requirements for digital platforms were treated separately from those for print or audiovisual media. This nuanced approach allowed the development of technical options tailored to each medium's unique needs.

The technical options were analysed in detail across all media types, providing a comprehensive comparison of their strengths and weaknesses. The analysis also considered the impacts on service providers, including SMEs, as well as recipients' preferences through a behavioural analysis.

The study team employed a combination of desk research, interviews, focus groups, and working meetings:

- **Desk research and literature review:** The study team conducted a thorough review of existing literature, official reports, white papers, studies, policies, strategies, and other relevant documents at national, EU, and international level. This provided the foundational

knowledge on technical practices, requirements, and existing regulatory frameworks for labels and transparency notices across various sectors.

- **Interviews:** The study team conducted a series of semi-structured interviews with key stakeholders. This included five in-depth interviews with industry associations representing various publisher categories, 12 interviews with businesses, and 15 interviews with voters from three EU countries (Ireland, Italy, Poland). The interviews gathered insights into the technical options, challenges, and preferences regarding political advertising transparency.
- **Focus groups:** As part of the behavioural analysis, the study team organised an online focus group involving eight voters from seven countries (Czechia, France, Germany, Ireland, Poland, Romania, Spain). This provided valuable feedback on potential formats and technical standards for the labels and transparency notices.
- **Working meetings:** The study team participated in two working meetings with the Commission to ensure alignment and gather feedback on the study's findings. The first took place in October 2024, presenting preliminary results, while the second was held in March 2025 to discuss the final findings.

Main findings

Legal analysis

The Regulation establishes clear requirements for the implementation of labels and transparency notices for political ads, focusing on content, format, and accessibility. It mandates that labels include essential information, such as the nature of the ad, the sponsor's identity, applicable elections or referendums, and whether the ad has been subject to targeting techniques. These labels must be prominent, easily identifiable, and remain visible when the ad is shared or further disseminated. Transparency notices, offering more detailed information, must include the sponsor's identity and contact information, the period of publication, financial aspects of the ad, and targeting techniques used. These notices must be machine-readable, accessible, and user-friendly, taking into account the needs of individuals with disabilities. The information should be updated regularly and remain available for the entire duration of the ad's publication, with all transparency data retained for seven years.

The study also draws insights from other EU and international legislative frameworks, providing guidance for the design and content of political advertising labels and transparency notices. These frameworks emphasise the importance of user-friendly transparency, effective use of symbols, and clear legibility requirements for a robust regulatory approach to political advertising across the EU.

The legal analysis highlights the need to strike a balance between broad legibility principles, such as clarity and intelligibility, and specific requirements for label size, design, layout, syntax, font size, style, and audio formatting in the implementing acts. For example, while the use of standardised symbols (e.g. party logos) is encouraged, they should supplement – not replace – written transparency information. Accessibility standards, particularly those in the European Accessibility Act, focus on ensuring that information is accessible through more than one sensory channel and integrates seamlessly with assistive technologies. Implementation of these standards will ensure that political ads comply with clarity, readability, and accessibility requirements across all media.

Industry practices

The implementation of labels and transparency notices in political advertising follows key industry practices aimed at ensuring transparency, accessibility, and compliance with legal standards. Essential content specifications, as required by the Regulation, mandate clear identification of sponsors and the provision of critical details about the ad. Metadata standards are crucial for organising and sharing information across platforms, enabling smooth interoperability. Design principles prioritise legibility, clear placement, and visibility, ensuring that labels are easily identifiable, even in audio-based ads. User experience (UX) considerations focus on integrating labels and transparency notices seamlessly into ads, with interactive elements enhancing user engagement without compromising accessibility. Accessibility standards, such as the Web Content Accessibility Guidelines (WCAG 2.1) and EN 301 549, ensure that labels and notices are usable for all voters, including those with disabilities. Legal compliance with EU and national regulations is essential to maintaining trust and integrity in the system, alongside robust security measures to protect voter data.

Political advertising market

The political advertising market in the EU is rapidly transitioning from traditional media (TV, radio, print) to online platforms, with Google and Meta dominating over 60% of the market. This shift is

driven by changing viewer habits and the platforms' ability to target specific voter groups with tailored ads. In 2024, Google alone saw EUR 20.7 million in political ad spending, but overall market size remains difficult to estimate due to gaps in data on offline ads and non-very large online platforms (VLOP) advertising.

Digital platforms increasingly rely on video ads, with a rise in cross-border political advertising targeting expatriate voters. The market includes both publishers (offline and online) and intermediaries such as marketing agencies and data brokers. Despite political ads being a small fraction of total ad revenue in non-election years, they represent a much larger share during elections.

Business models in political advertising have evolved, incorporating data-driven targeting and micro-targeting through technologies such as Big Data, machine learning, and artificial intelligence (AI). However, new regulations require stricter transparency, with Google planning to cease political ads in the EU by October 2025, likely altering the current market dynamics.

Technical options

The technical options for labels and transparency notices under the Regulation are designed to address key issues in political advertising by ensuring transparency and accessibility across various media platforms. The consultations revealed significant uncertainties among service providers on the scope of the Regulation, particularly in defining political advertising, labels and transparency notices, with some service providers interpreting the label as an icon that only displays the required written information after user interaction, creating a mismatch between expectations and practical implementation. In addition, the responsibility and liability chain within the political advertising ecosystem remain a critical point of ambiguity. Publishers and intermediaries expressed a need for greater clarity on their roles and the enforcement measures tied to non-compliance.

Stakeholders emphasised the potential negative impact of rigid formatting requirements, such as specific size, font, and placement rules for labels. Many service providers, especially SMEs, argued that such prescriptive measures could create unnecessary operational challenges, increase compliance costs, and, in some cases, render compliance impractical. These concerns could lead to some service providers disengaging from political advertising altogether, undermining the Regulation's goal of increasing transparency in the political advertising space. The flexibility and adaptability of political advertising systems were seen as essential to broad compliance and engagement.

A principle-based approach to the implementation of labels and transparency notices is preferred by most stakeholders. This approach would focus on overarching principles such as clarity, salience, unambiguity, and accessibility, rather than rigid, one-size-fits-all requirements. By prioritising these principles, the Regulation would accommodate the unique constraints of different media types and political advertising practices, while ensuring the effectiveness of transparency measures. Nonetheless, minimal requirements could be prescribed to ensure the visibility and accessibility of labels and transparency notices. Labels should be clear and easily distinguishable, with appropriate size and readability that align with the medium in which the ad appears, allowing for some flexibility in design. For example, the label should be visible and proportionate to the ad's dimensions, with the font size, style, and contrast designed for maximum readability. Placement flexibility should also be maintained, respecting national and local practices in terms of where and how transparency information is displayed.

Similarly, transparency notices should be designed to be user-friendly, clear, and accessible, ensuring that all necessary information is easy to retrieve. Transparency notices should be presented in a simple and understandable format, particularly when displayed alongside the label or through hyperlinks or QR codes, depending on the medium. This ensures that transparency information is readily available to citizens, whether the ad is displayed online, on television, in print, or in physical locations. For electronic media, the transparency notice should be machine-readable, allowing for automated processing and compliance with data accessibility standards. The accessibility of these notices is also critical; they should comply with existing accessibility standards such as the European Accessibility Act and, where applicable, the Web Accessibility Directive.

Conclusions

The study indicates that a principle-based approach to the implementation of labels and transparency notices under the Regulation is central to ensuring effective, practical, and adaptable political advertising regulation. Stakeholders noted that overly prescriptive and standardised requirements could be impractical across various media formats, particularly for SMEs, and may lead to unnecessary compliance burdens. Instead, they would prefer a flexible framework that prioritises

clarity, accessibility, and usability, while accommodating technical constraints and differing national practices. This approach aims to balance principles such as clarity, intelligibility, and legibility with medium-specific requirements for label size, font style, and contrast. The study also emphasises the importance of using standardised symbols alongside written transparency information and adhering to accessibility standards, ensuring that all citizens, including those with disabilities, can easily access political ads. As the EU political advertising market rapidly shifts toward online platforms, the need for tailored and adaptable transparency measures has become more pressing. With the growing digitalisation and targeting of political advertising, the technical requirements for labels and transparency notices must evolve to accommodate this changing landscape. A principle-based framework would ensure that the Regulation remains effective, while also future-proofing it in the face of technological developments.

The study outlines several recommendations for label formatting and transparency notice requirements, as well as their benefits and shortcomings:

- **Use of a logo:** For online media, an industry-standardised logo or icon should be used to clearly identify political ads. However, challenges include the time needed for public recognition of the logo or icon and the technical difficulties involved in implementing it across various platforms.
- **Audio requirements:** In radio formats, the label should be presented at the same volume as the rest of the ad. However, mixed stakeholder feedback suggests concerns about the speed of the label's delivery, as well as the potential for additional elements like jingles, which might cause inconsistencies across formats and countries.
- **Size:** The label size should cover at least 5% of the ad for online media, TV, print, and physical objects. However, this requirement may face challenges in smaller formats, particularly online ads on small screens, and may not be feasible for certain physical objects due to their size constraints. For font size, a minimum of 8 to 12 points is recommended for online media, TV, and print, and a minimum height of 1.2 mm for physical objects. A 1:32 height ratio is suggested for billboards. However, smaller physical objects and small-screen online formats may struggle to comply with these size requirements, and service providers may face design constraints that limit their ability to meet these demands.
- **Font type:** The font type should be a sans serif typeface for online, TV, print, and physical objects. Although this approach ensures legibility, some stakeholders expressed concerns about limiting branding and creative freedom, particularly in cases where political parties may wish to maintain a specific identity in their ads.
- **Contrast:** A ratio of 4.5:1 for normal text and 3:1 for large text should be applied to online media, with non-black backgrounds for all media types. However, implementing these contrast standards may restrict design flexibility, especially for dark or branded colour schemes, potentially disrupting the aesthetics of certain ads.
- **Placement:** Labels should be placed above or below the ad for online, TV, and print formats. For TV and radio, labels should be placed before or after the ad. The study acknowledges mixed feedback on this approach, particularly from stakeholders concerned with different national and local practices, which may influence the uniformity of placement across platforms.
- **Unambiguity:** Although there is no specific requirement for unambiguity, the study suggests adopting a principle-based approach to ensure that transparency notices are as clear as possible, regardless of the medium. It also emphasises the need for accessibility, suggesting adherence to existing standards to ensure that citizens with disabilities can access transparency notices.
- **Access to the transparency notice:** Several options are recommended, depending on the medium. For physical objects, the transparency notice could be included alongside the label. However, small items may face challenges in displaying both the label and the notice clearly. For online media, hyperlinks should be used, while short links should be read aloud in radio formats. TV and print ads should use QR codes, though care must be taken to ensure these codes are large enough to be scannable, especially for smaller print ads. Additionally, links must be short and clear to ensure ease of use and accessibility.
- **Machine-readability:** The study recommends structuring data fields for sponsor information, benefits, and ad descriptions to facilitate automated processing. For example, mandatory fields such as sponsor name and contact details, the period of ad use, and the origin of benefits should be clearly structured. However, challenges exist in ensuring that these data

fields are consistent across different media and platforms. The study also recommends that the change record for each transparency notice be included, detailing when the version was live. This would help to track modifications, although stakeholder feedback indicates concerns about the feasibility of implementing such detailed records in certain formats.

- **Retrievability of transparency notice:** The transparency notice must be easily retrievable. Options include embedding links for digital media, using QR codes for offline audiovisual and print media, and providing short links in radio. For physical objects, QR codes or URLs should be available. However, access issues might arise with certain formats, such as smaller print ads or limited screen sizes in online media, which could restrict the effectiveness of these retrieval options.

Overall, the study stresses that a principle-based approach is key to the successful implementation of the Regulation. This approach will ensure that transparency measures remain practical, adaptable, and effective across different platforms, while reducing the compliance burden, particularly for smaller stakeholders.

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Abstract

This study to support the preparation of implementing legislation on labels and transparency notices accompanying political advertisements (ads), required by Regulation (EU) 2024/900 on the transparency and targeting of political advertising contributes to the European Commission's efforts to provide guidance to providers of political advertising on the implementation of the Regulation on labels and transparency notices. Through an assessment of existing requirements on labels and transparency notices in the EU and beyond, an analysis of industry practices and the political advertising market, a behavioural analysis, and an analysis of the feasibility of formatting options, the study concludes that providers favour a principle-based approach to facilitate the implementation of labels and transparency notices in various media of publication, delivery or dissemination of political ads, combined with guidance on how each principle should be interpreted. Citizens favour visible but non-intrusive labels. The study also provides a set of minimal requirements that could guide the implementation of labels and transparency notices. However, opinions are divided on their feasibility and, if compulsory, the minimal requirements should take into account the technical challenges for each category of providers.

The information and views set out in this report are those of the author(s) and do not necessarily reflect the official opinion of the Commission. The Commission does not guarantee the accuracy of the data included in this study. Neither the Commission nor any person acting on the Commission's behalf may be held responsible for the use which may be made of the information contained herein.

1. Introduction

This final report is the last deliverable for the **Study to support the preparation of implementing legislation on labels and transparency notices accompanying political advertisements, required by Regulation (EU) 2024/900 on the transparency and targeting of political advertising** (the Regulation). The report is submitted to the European Commission – Directorate General for Justice and Consumers (DG JUST) by the study team led by Wavestone, in collaboration with ICF and OpenEvidence.

Purpose of the study

In the context of the implementation of the Regulation, specifically the preparation of implementing acts on labels and transparency notices, the Commission sought to collect evidence and analysis on the technical options for labels and transparency notices of political advertisements (ads). The **objective of this study** was to gather solid evidence to identify the technical options for labels and transparency notices and to provide the Commission with an analysis of the technical options' strengths and weaknesses, looking at aspects of proportionality (particularly small and medium-sized enterprises' (SMEs') needs/impacts), cost efficiency, benefits, and administrative burdens. The study:

- Collected available information on technical steps and formatting practices, as well as existing requirements for labels and transparency notices in similar advertising domains and other relevant sectors;
- Provides a detailed description of the options;
- Analyses and compares the options, based on the analysis of the impacts for the service providers, including SMEs, and recipients' reactions and preferences (behavioural analysis).

The study considers the preparatory and ongoing work of the Commission (and Member States) on the Regulation, such as the development of guidance and the designation of supervisory authorities with enforcement powers, as well as other studies and impact assessments of this and other relevant legislation.

Scope of the study

This study collected evidence on the technical options for labels and transparency notices within the framework of the Regulation, describes and assesses the options according to their strengths and weaknesses, looking at aspects of proportionality, cost efficiency, benefits, and administrative burdens. The **scope of the study** encompasses **various media of publication, delivery or dissemination of political ads**, including print, audiovisual, online and offline media, and physical objects. Table 1 presents a breakdown of the media, as defined and discussed with the Commission.

Table 1: Main media of publication, delivery or dissemination of political advertising

Category	Medium type
Digital, including online	Electronic billboards (audio and visual) LED displays (audio and visual) Direct mail (audio and visual) Websites (audio and visual) Search engines (audio and visual) Mobile apps (audio and visual) Platforms (audio and visual) Social media (audio and visual) Online TV (audio and visual) Online games (audio and visual) Podcasts (audio)
Offline – Audiovisual medium	TV (audio and visual) Cinema (audio and visual) Radio (audio)
Offline – Print medium	Newspapers Leaflets Billboards Posters Books

Category	Medium type
Physical objects	Merchandising

While the study focuses on the domain of political advertising, the **scope of its data collection** includes other relevant advertising and non-advertising domains, such as commercial advertising, public health campaigns, financial and investment advertising, food labelling, medicinal products labelling, and energy labelling and advertising. Incorporating findings from other domains with established transparency requirements and practices enriches the study's comprehensiveness and contextual depth. While giving priority to EU sources, the study also draws insights from the relevant legislation in the Member States and countries outside the EU, as those with advanced labelling standards or regulatory approaches could inform more robust and innovative EU legislation.

The detailed arrangements for the operation of the **European repository for online political ads** are the object of another set of implementing acts and are outside the scope of this study. However, given the European repository's link to the technical specifications for the transparency notices of online political ads¹, this study will be aligned with the parallel work of the Commission on the repository to the extent possible.

Methodological approach

This section presents an overview of the methodology and operational approach of the study. The methodological approach gathered evidence on the technical options for labels and transparency notices, enabling a detailed description and assessment of these options. Each option is evaluated based on its strengths and weaknesses, with a focus on proportionality, cost efficiency, benefits, and administrative burdens.

The rationale is to ensure a comprehensive understanding of the landscape surrounding labels and transparency notices. The study begins by studying the legal requirements, including a detailed overview of the Regulation, which provides the legal framework necessary for the implementation of labels and transparency notices. It then examines provisions in similar EU initiatives that provide examples of how labels and transparency notices are implemented in other domains. This broader examination makes it possible to identify and incorporate industry practices and innovative approaches from other regulatory contexts, ensuring that recommendations are not only compliant but also forward-thinking and adaptable to various scenarios.

Following the legal analysis, the focus shifts to industry practices for the development of labels and transparency notices. This includes reviewing formatting practices by medium of publication, which aids understanding of how different media can affect the presentation and effectiveness of these labels. By studying these practices, it is possible to identify the most effective methods currently in use and adapt them to specific needs.

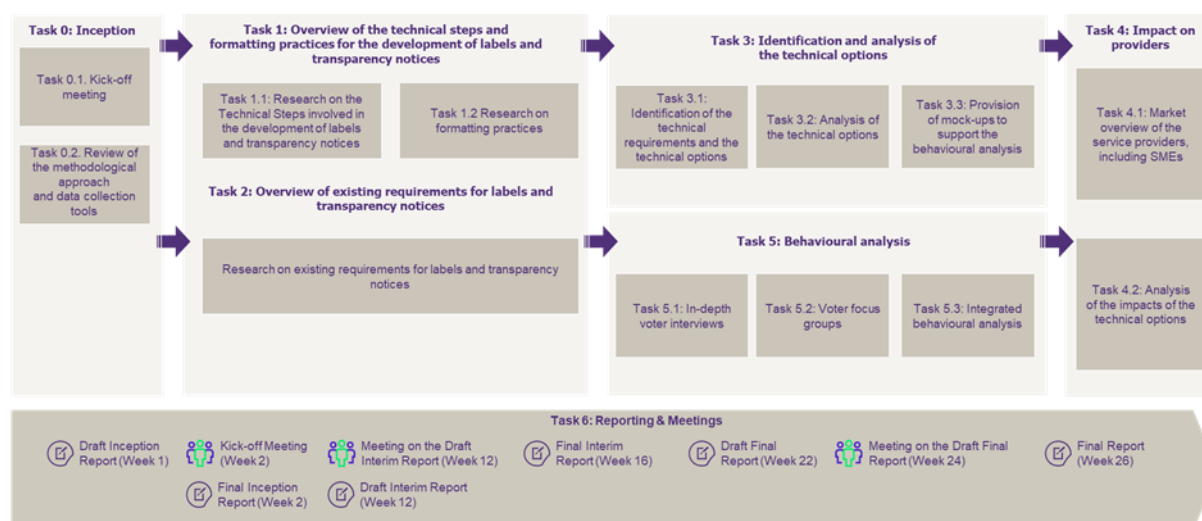
Next, the functional requirements per medium of publication are identified. This step is crucial as it ensures that the technical options developed are tailored to the specific characteristics and constraints of each medium. For instance, the requirements for digital publications may differ significantly from those for print. By understanding these nuances, standard technical options can be developed.

These technical options are analysed per medium, allowing for a detailed and systematic assessment of their strengths and weaknesses. This holistic approach ensures that all relevant aspects are addressed, from legal compliance to practical implementation.

Figure 1 presents an overview of the methodological approach, followed by a more detailed description.

¹ In drawing up implementing acts for the European repository of online political ads, the Commission shall achieve the following objectives: (1) allow easy public access to online transparency notices through the use of a common application programming interface (API) that would enable the notices to be accessed and the relevant databases to be queried; and (2) support third-party and public access to transparency notices, including by enabling analysis of online transparency notices and their presentation through a user-friendly single portal and search services (Regulation (EU) 2024/900, Article 13(6)).

Figure 1: Overview of methodological approach



Source: Authors' elaboration.

The methodological approach consists of the following data collection methods:

- **Desk research and literature review:** The desk research gathered available evidence on the technical steps and formatting practices involved in the development of labels and transparency notices, as well as reviewing existing requirements. Information was drawn from a range of relevant documents, including official statistics at national, EU and international level, academic research, studies, and official documents, reports, white papers, legislation, policies, strategies, initiatives, and other research projects (see Annex 5).
- **Interviews:** All interviews followed a semi-structured approach, in line with an interview guide prepared by the study team and validated by the Directorate-General for Justice and Consumers (DG JUST). Under Tasks 1 and 2, 5 in-depth interviews were conducted with industry associations representing different categories of publishers. Under Task 4, 12 interviews were conducted and two written responses to the interview questionnaire were received from businesses, and for Task 5, 15 interviews were conducted with voters from three countries (Ireland, Italy, Poland).
- **Focus groups:** Under Task 5 (behavioural analysis), an online focus group was organised by the study team to consult eight voters from seven countries (Czechia, France, Germany, Ireland, Poland, Romania, Spain) on the possible formats and technical standards of the labels and transparency notices for political ads.
- **Working meetings:** As part of Task 3, a working meeting with the Commission was organised on 18 October 2024 to present the preliminary findings and gather feedback regarding the technical options for labels and transparency notices. A second working meeting, under Task 4, took place on 6 March 2025 to present the final report findings.

Detailed descriptions of targeted stakeholders and data collection tools (e.g. interview questionnaires) are available in the annexes.

Structure of the report

This report is organised as follows:

- **Chapter 1 – Introduction** gives an overview of the study objective and general and operational approach.
- **Chapter 2 – Legal requirements** provides an overview of the existing legal requirements for labels and transparency notices.
- **Chapter 3 – Industry practices and formatting practices** presents an overview of the normal technical steps and formatting practices involved in the development of labels and transparency notices for political advertising, similar advertising domains, and other relevant sectors.
- **Chapter 4 – Overview of the political advertising market** provides an overview of the political advertising market in the EU delivered or disseminated through all types of media: online, audiovisual, radio, print, and merchandising.
- **Chapter 5 – Identification of technical options** provides an overview of the formatting requirements for labels and transparency notices, alongside findings on their feasibility and impacts on voters and publishers.
- **Chapter 6 – Conclusions** presents a summary of the findings and recommendations.

The report contains five annexes :

- **Annex 1 – Stakeholder engagement plan**
- **Annex 2 – Data collection tools**
- **Annex 3 – Formatting practices per publication support**
- **Annex 4 – Behavioural analysis**
- **Annex 5 – Bibliography**

2. Legal requirements for the implementation of labels and transparency notices

This chapter provides an overview of the existing legal requirements for the implementation of labels and transparency notices for political ads from the Regulation and other applicable pieces of EU legislation. It also explores requirements from other domains and analyses Member State and international legislation and policy instruments. The findings are developed using desk research, literature review, legislation and policy instruments in the EU and outside the EU.

2.1. Overview of the Regulation

Key objectives and scope

The Regulation establishes a series of requirements for the content and format of labels and transparency notices of political ads. Article 13 specifies that online political ads, together with labels and transparency notices, will be made available through a European repository. Very large online platforms (VLOPs) or very large online search engines (VLOSEs) should make transparency notices available in the European repository for online political ads. Online political advertising publishers other than VLOPs and VLOSEs must do so no later than 72 hours after the first publication of the political ad.

Implementing legislation

By 10 July 2025, the Commission should adopt implementing acts establishing:

- the format and the template of the labels;
- the format and technical specifications of transparency notices accompanying the political ads.

The implementing acts should include and consider the medium used, its characteristics, latest technological and market developments, relevant scientific research and industry practices. Following Declaration No 22 regarding persons with a disability, annexed to the Treaty of Amsterdam, the needs of persons with disabilities are to be taken into account (Recital 3). Finally, the implementing acts should take into consideration the specific needs of SMEs.

While explicit definitions of labels and transparency notices are not provided in the Regulation, they can still be deduced from its overall objective and requirements. For the purposes of the current study, the following definitions are used:

- A **label** can be defined as mandatory, clearly distinguishable information provided together with the political ad that enables individuals to easily identify the content they are viewing or hearing as a political ad.
- A **transparency notice** is more detailed information associated with the political ad that is included in the label or is provided separately. It is intended to enhance transparency by providing extensive information about the ad, the sponsor behind it, the cost, and the context of the political ad and the processing of personal data, where targeting and ad-delivery techniques are used.

Specific provisions for labels

In accordance with Article 11 of the Regulation, a label must contain the following data elements:

- (a) A statement that it is a political ad;
- (b) The identity of the sponsor of the political ad and, where applicable, the entity ultimately controlling the sponsor; where appropriate, the name of the sponsor could include a political logo;
- (c) Where applicable, the election, referendum, legislative or regulatory process to which the political ad is linked;
- (d) Where applicable, a statement to the effect that the political ad has been subject to targeting or ad-delivery techniques;

- (e) A transparency notice or a clear indication of where it can be easily and directly retrieved.

The labels shall be prominent, enable individuals to easily identify a political ad as such, and remain in place in case the political ad is further disseminated. Finally, while a label may include the transparency notice, the latter may be published separately if the label contains a clear indication of where the transparency notice can be easily and directly retrieved.

Specific provisions for transparency notices

In accordance with Article 12 of the Regulation, a transparency notice must contain the following data elements:

- (a) The identity of the sponsor and, where applicable, of the entity ultimately controlling the sponsor, including their name, email address, and, where made public, their postal address, and, when the sponsor is not a natural person, the address of its place of establishment;
- (b) Information required under point (a) on the natural or legal person that provides remuneration in exchange for the political advertisement, in case this person is different from the sponsor or the entity ultimately controlling the sponsor;
- (c) The period during which the political advertisement is intended to be published, delivered or disseminated;
- (d) Aggregated amounts and the aggregated value of other benefits received by the providers of political advertising services, including those received by the publisher in part or full exchange for the political advertising services, and, where relevant, of the political advertising campaign;
- (e) Information on the public or private origin of the amounts and other benefits referred to in point (d), as well as whether they originate from within or outside the Union;
- (f) Methodology used for the calculation of the amounts and value referred to in point (d);
- (g) Where applicable, an indication of the elections or referendums and legislative or regulatory processes with which the political advertisement is linked;
- (h) Where the political advertisement is linked to specific elections or referendums, links to official information about the modalities for participation in the related election or referendum;
- (i) Where applicable, links to the European repository for online political advertisements;
- (j) Information on the mechanisms enabling natural or legal persons to notify in case a specific political advertisement that they published does not comply with the Regulation²;
- (k) Where applicable, whether a previous publication of the political advertisement or of an earlier version of has been suspended or discontinued due to an infringement of this Regulation;
- (l) Where applicable, a statement declaring that the political advertisement has been subject to targeting techniques or ad-delivery techniques on the basis of the use of personal data, including information specified in Article 19(1), points (c) and (e)²;
- (m) Where applicable and technically feasible, the reach of the political advertisement in terms of the number of views and of engagements with the political advertisement³.

The presentation of the information in the transparency notice can vary depending on the means used (Recital 59). Where political advertising is made available electronically, including through an online medium, the accompanying transparency notice should also be available electronically and in a machine-readable format. Political advertising made available only through an offline medium, such as printed leaflets or newspapers, can be accompanied by transparency notices made available only through an offline medium (included in the same printed leaflet or newspaper), as well as

² Mechanisms to report such ads should be free of charge, user-friendly, easy to access and use, and they should be adapted to the form of advertising distributed by the political advertising publisher (Article 15(2); Recital 69). Additional information and effective tools for data subjects to support the exercise of their rights under the Union's data protection legal framework, including the right to amend their personal data or withdraw their consent when targeted with a political advertisement, should be easily accessible directly from the transparency notice (Recital 86).

³ Reach relates to data that enable quantification of geographical distribution and number of individuals who viewed, received or otherwise interacted with the political advertising, including the number of views, impressions and clicks. Engagement relates to data that enable quantification of the interactions of individuals with online political advertising, measured by various means, including the period of interaction with the political advertisement (Recital 58).

electronically, in which case the transparency notice should be in a machine-readable format (Recital 60). To easily retrieve the information in the transparency notice in offline ads, a dedicated webpage link, a Quick Response code (or QR code), or equivalent user-friendly technical measures can be used.

Information on the transparency notice is to be clearly visible (i.e. it should feature prominently in or with the ad), easily accessible, machine-readable where technically possible, and user-friendly, including using plain language. It should address the needs of people with disabilities by complying with applicable accessibility requirements, including, where technically feasible, by making the information available via more than one sensory channel (Recital 59). Finally, the transparency notice shall be written in the language of the political ad⁴.

The transparency notice should be made available immediately when the ad is published or disseminated, the information it contains should be kept up to date (Recital 57), and it should remain so until the end of the ad's publication (Recital 62). Like the label, the transparency notice should be designed to remain in place or remain accessible if a political ad is further disseminated, for instance by being posted on another platform or forwarded between individuals. Political advertising publishers⁵ should retain, and make available on request, their transparency notices, together with any modification, for seven years after last publication (Recital 62). Political advertising publishers that are VLOPs or VLOSEs within the meaning of Regulation (EU) 2022/2065, should also ensure that for each political ad, the information contained in the transparency notice is made available in the repositories of ads referenced in Article 39 of that Regulation, and accessible through the European repository for online political ads. Such information should be provided according to an agreed industry standard for accessibility, data structure and access, by means of a common publicly available API (Recital 66). Online political advertising publishers other than VLOPs and VLOSEs shall make each political ad and the information required under Article 12(1) available in the European repository no later than 72 hours after first publication of the political ad. Where political advertising publishers remove or disable access to a specific political ad on the basis of alleged illegality or incompatibility with their terms and conditions, they shall continue to provide access to the information required by Article 12(1) of the Regulation for seven years from the date of last preparation, placement, promotion, publication, delivery or dissemination (Article 13(3)).

2.2. Provisions in similar initiatives in the EU and beyond

Other pieces of EU legislation provide requirements that need to be considered in this research, either because they relate directly to the implementation of political advertising labels and transparency notices or because they offer examples of labelling requirements from other sectors that could inform the development of these political advertising standards. An overview of the existing transparency notices and label requirements across sectors is useful for analysing the EU approach to their drafting, as well as for ensuring the alignment of the implementing acts of the Regulation with proven, effective standards, facilitating a coherent and robust regulatory environment.

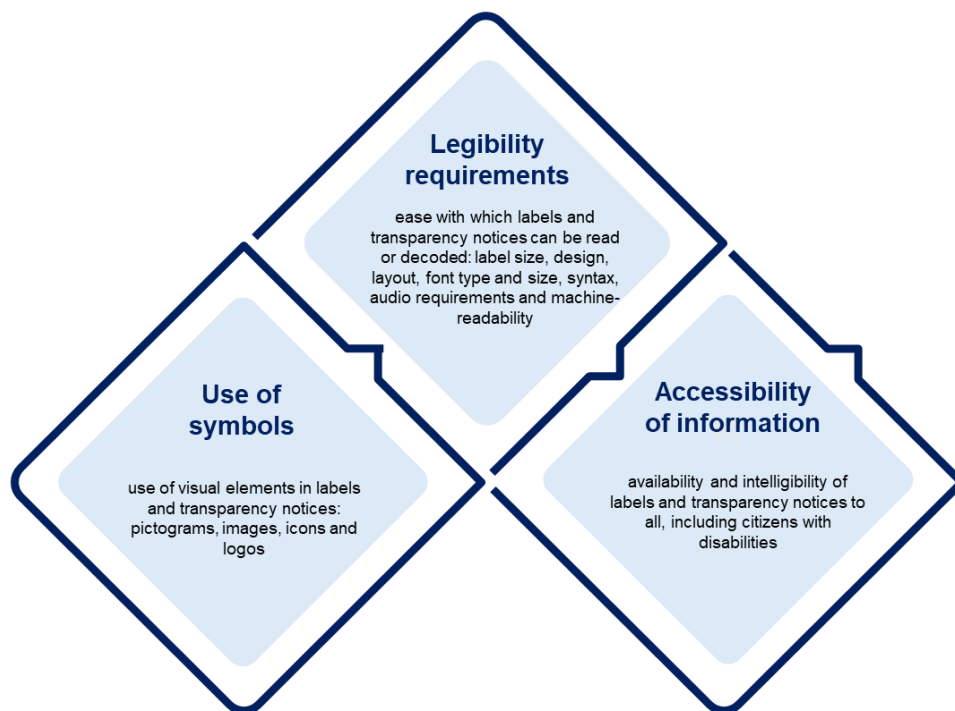
It is also useful to explore the requirements for labels and transparency notices from national legislation and policy instruments of the Member States and from outside the EU in the political advertising and similar advertising domains. Legislative sources with an established and advanced framework for the format of labels and transparency notices – particularly those from the United States (US) – can inform more robust implementing acts of the Regulation. National legislation and policy instruments from the Member States will be superseded by the Regulation and its accompanying implementing acts. While some Member States' national legislation centres on political advertising, they mostly provide content requirements for labels and transparency notices, with no provisions on format.

The main findings are clustered in **three thematic areas**: the **use of symbols**, **legibility requirements**, and **accessibility of information**.

⁴ Language should be understood to include any language used in the Union, including regional dialects and sign language, using any means of communication or codification, such as braille and other means (Recital 23).

⁵ Apart from micro-undertakings qualifying under Article 3(1) of Directive 2013/34/EU, provided that the provision of advertising services is purely marginal and ancillary to their main activities.

Figure 2: Thematic areas



Source: Authors' elaboration.

Use of symbols

In the scope of this study, the use of symbols is understood as the use of visual elements, including pictograms, images, icons and logos, to depict the required information applicable to labels and transparency notices. Depending on the sector, legislation in the EU and beyond takes a mixed approach to regulating symbol use, by imposing strict conditions, indicating general guidelines, or limiting symbol use:

- **Limiting symbol use:** Regulation 2017/1369 on energy labelling⁶ and Regulation 1272/2008 on the labelling of substances and mixtures⁷ permit only the use of symbols as per the specific design and layout contained in the regulations and prohibits all other graphics. Directive 2002/65/EC on financial marketing and the Unfair Commercial Practices Directive (UCPD), for instance, do not explicitly mention symbols but only specify that any information provided should not mislead consumers⁸. This is reflected in the legislative framework applicable to political advertising of some countries, as the State of California Political Advertising Disclosure Chart⁹ and the Approval of the Description of the Procedure for Marking Political Advertising from the Republic of Lithuania¹⁰ state that no graphics or images are allowed for political advertising labels.
- **Publishing guidelines for symbol use:** The Digital Services Act (DSA) broadly allows for the use of graphical elements like icons to illustrate the main elements of the transparency requirements for terms and conditions¹¹, and endorses the use of 'prominent markings' for advertising disclosures¹². The US Federal Trade Commission guidelines on commercial

⁶ Regulation (EU) 2017/1369 setting a framework for energy labelling, Article 6(c), p. 10.

⁷ Regulation (EU) 1272/2008 on classification, labelling and packaging of substances and mixtures, Articles 17 & 18, p. 15.

⁸ Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council (Unfair Commercial Practices Directive), Article 6, p.7.

⁹ California Fair Political Practices Commission, Political Advertising Disclosure Chart, 2023,

<https://www.fppc.ca.gov/learn/campaign-rules/campaign-advertising-requirements-restrictions.html>.

¹⁰ Central Electoral Commission of the Republic of Lithuania, Approval of the Description of the Procedure for Marking Political Advertising, 2010, <https://www.e-tar.lt/portal/lt/legalAct/TAR.F0C8BEB6051F/asr>.

¹¹ DSA, Recital 45, p.12.

¹² Ibid., Article 26(1)(a), p. 59.

advertising disclosures¹³ allow for the use of symbols but only in addition to written text, and not as a substitute, as symbols alone are deemed ineffective for the communication of the required information¹⁴.

- **Regulating symbol use:** Of the selected EU acquis, Regulation (EU) 1169/2011 on food information is the strictest on the conditions of use for symbols. It permits pictograms as an addition to text and numbers for mandatory food information, provided they: (1) aim to facilitate consumer understanding without misleading the consumer, (2) are based on sound consumer research and scientific evidence, (3) are objective and non-discriminatory, and (4) do not obstruct the free movement of goods¹⁵. Other examples include Directive 2001/83/EC on medicinal products, which allows for the use of symbols on the outer packaging to clarify key information¹⁶, provided their graphics are easily legible and their meaning is evident to consumers¹⁷. However, symbols should not substitute written text¹⁸. The latter prohibition is also common to the General Data Protection Regulation (GDPR)¹⁹, which prescribes that information on data processing may be provided in combination with icons to give an easily visible, intelligible, and legible overview²⁰. The GDPR also adds the requirement of machine-readability for icons that are presented electronically²¹ and specifies that their utility to effectively convey the information required is dependent on their standardisation, i.e. to be universally used and recognised across the EU as shorthand for that information²².

The legislation consulted for this chapter establish provisions where symbols alone should be used together with text and/or numbers. The overview of the selected EU regulatory landscape on symbol use reveals key additional lessons for implementing the Regulation effectively:

- **Clarity:** Given the context of political advertising, it is reasonable to assume that symbols (including political parties' logos) should supplement rather than replace the related information in the labels and the transparency notices, prioritising voter comprehension and information clarity;
- **Machine-readability:** A requirement in case of electronic publication, delivery or dissemination of the ad;
- **Transparency:** The use of a standardised symbol accompanying labels and indicating the political nature of the ad could be considered. Any misleading symbol or, more strictly, any additional symbol not defined in the implementing legislation could be prohibited.

Legibility requirements

Legibility requirements play a crucial role in ensuring that consumers and users receive visible, clear and comprehensible information. In the scope of this study, legibility is understood as the ease with which something can be read or decoded²³. Legibility requirements thus refer to elements such as label size, design (including contrast ratios between text and background), layout, font type and size, and syntax, as well as machine-readability of labels and transparency notices.

The legislation consulted includes legibility requirements, albeit to different degrees. More generic legibility requirements are contained in regulations and directives, with more detail provided in accompanying implementing acts or policy instruments. The sources examined include one or more of the following wordings for labels' and transparency notices' legibility requirements: easily/clearly

¹³ US Federal Trade Commission, How to Make Effective Disclosures in Digital Advertising, 2013, <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>.

¹⁴ Ibid.

¹⁵ Regulation (EU) 1169/2011 on the provision of food information to consumers, Article 9(2), p.11 and Article 35(1), p. 19.

¹⁶ Community code relating to medicinal products for human use, Article 62, p. 21.

¹⁷ European Commission, Guideline on the Readability of the Labelling and Package Leaflet of Medicinal Products for Human Use, 2009, https://health.ec.europa.eu/system/files/2016-11/2009_01_12_readability_guideline_final_en_0.pdf.

¹⁸ Ibid.

¹⁹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

²⁰ GDPR, Recital 60, p. 12.

²¹ Ibid.

²² Article 29 Data Protection Working Party, Guidelines on transparency under Regulation (EU) 2016/679, 2018, https://www.edpb.europa.eu/our-work-tools/our-documents/article-29-working-party-guidelines-transparency-under-regulation_en.

²³ Cambridge Dictionary, Legibility, n.d., <https://dictionary.cambridge.org/dictionary/english/legibility>.

legible²⁴, easily readable²⁵, clearly comprehensible²⁶, easily understandable²⁷, easily visible²⁸, succinct/concise²⁹, clearly differentiated from other content³⁰, easily recognisable³¹.

More specific requirements include:

- **Label size:** Where the medium size is less than 65 cm², the minimum size shall be 1.4 cm by 2.8 cm (3.92 cm²). In all other cases, the label shall cover at least 5%³² or 6% of the total ad area size³³;
- **Font style:** in sans serif typeface (Arial, Verdana, Calibri, Myriad Pro, Helvetica, etc.)^{34, 35};
- **Font size:** Proportionate to the size and format of the medium of communication³⁶, including the size of the screen for online political ads³⁷. Minimum font sizes that emerged from the desk research are:
 - 7 points for physical objects³⁸;
 - 9-10 points for print medium³⁹;
 - 8-12 points for online medium⁴⁰;
 - In the US, letters should be at least as large as the size of the content text in the political ad⁴¹; in the case of billboards, the minimum font size should be 1:32 of the billboard's total height dimension⁴²;
- **Design:** Adequate contrast (ideally equal to 100%, with light background and dark text)^{43,44}, prohibition of other text or images that obscure the required transparency information⁴⁵;

²⁴ Community code relating to medicinal products for human use; Regulation (EU) 1169/2011 on the provision of food information to consumers; Regulation (EU) 2017/1369 setting a framework for energy labelling; Regulation (EU) 66/2010 on the EU Ecolabel.

²⁵ Directive 2002/65/EC concerning the distance marketing of consumer financial services.

²⁶ Community code relating to medicinal products for human use; DSA; Directive 2002/65/EC concerning the distance marketing of consumer financial services; e-Commerce Directive.

²⁷ DSA.

²⁸ Regulation (EU) 1169/2011 on the provision of food information to consumers; Regulation (EU) 66/2010 on the EU Ecolabel.

²⁹ GDPR; Guidelines on transparency under Regulation 2016/679 (GDPR); DSA.

³⁰ Guidelines on transparency under Regulation 2016/679 (GDPR); European Commission, Legal Brief #6: How to disclose advertising on social media, 2023, https://commission.europa.eu/document/download/74f60707-1207-4a6f-a9aa-033ca8a3d382_en?filename=Legal%20brief%206.pdf.

³¹ Audiovisual medium Services Directive; Regulation (EU) 66/2010 on the EU Ecolabel.

³² California Fair Political Practices Commission, Political Advertising Disclosure Chart, p. 1.

³³ Commission Implementing Regulation (EU) 2020/2151 of 17 December 2020 laying down rules on harmonised marking specifications on single-use plastic products listed in Part D of the Annex to Directive (EU) 2019/904 of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment. https://data.europa.eu/eli/reg_impl/2020/2151/oj.

³⁴ Commission Delegated Regulation (EU) 2019/2013 of 11 March 2019 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of electronic displays and repealing Commission Delegated Regulation (EU) No 1062/2010; Regulation 66/2010 on the EU Ecolabel;

³⁵ California Fair Political Practices Commission, Political Advertising Disclosure Chart, p. 2; Central Electoral Commission of the Republic of Lithuania, Approval of the Description of the Procedure for Marking Political Advertising, p. 9.

³⁶ European Securities and Market Authority (ESMA), Guidelines on marketing communications under the Regulation on cross-border distribution of funds, 2021, <https://www.esma.europa.eu/document/guidelines-marketing-communications-under-regulation-cross-border-distribution-funds>; European Commission, The 'Blue Guide' on the implementation of EU product rules 2022, Commission Notice, 2022, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:C:2022:247:TOC>.

³⁷ Commission Delegated Regulation 2019/2013 with regard to energy labelling of electronic displays.

³⁸ Guideline on the Readability of the Labelling and Package Leaflet of Medicinal Products for Human Use.

³⁹ Ibid.

⁴⁰ Nanavati, A., 'What is the legal font size for terms and conditions?', n.d., <https://www.cimphony.ai/insights/what-is-the-legal-font-size-for-terms-and-conditions>.

⁴¹ US Senate Honest Ads Act, p. 13.; Office of the Chief Electoral Officer, Alberta, Canada, Advertising Guidelines for Political Participants, p. 7; US Federal Trade Commission, How to Make Effective Disclosures in Digital Advertising, p. 17.

⁴² Office of the Chief Electoral Officer, Alberta, Canada, Advertising Guidelines for Political Participants, 2022.

⁴³ Guideline on the Readability of the Labelling and Package Leaflet of Medicinal Products for Human Use; Commission Delegated Regulation (EU) 2019/2013 with regard to energy labelling of electronic displays.

⁴⁴ California Fair Political Practices Commission, Political Advertising Disclosure Chart, pp. 2, 6; Office of the Chief Electoral Officer, Alberta, Canada, Advertising Guidelines for Political Participants, p. 7; Central Electoral Commission of the Republic of Lithuania, Approval of the Description of the Procedure for Marking Political Advertising, pp. 8, 10; US Federal Trade Commission, How to Make Effective Disclosures in Digital Advertising, p. 17.

⁴⁵ Regulation (EU) 1169/2011 on the provision of food information to consumers, Article 13, p.12; Regulation (EU) 66/2010 on the EU Ecolabel, Annex II.

- **Syntax:** Clear, plain and user-friendly language⁴⁶, including simple words of few syllables, short sentences, active style/voice, and no scientific symbols (e.g. <, >), acronyms and abbreviations⁴⁷;
- **Layout:** Short paragraphs or bullet points (ideally maximum 5/6) for longer text, no justification of the text⁴⁸, well-structured paragraphs and sentences, using bullets and indents to signal hierarchical relationships⁴⁹. Labels should be clearly separated from the content of the ad⁵⁰. The State of California Political Advertising Disclosure Chart specifies that labels should be underlined to enhance visibility and comprehension⁵¹;
- **Machine readability:** Implementing act to the DSA requires providers to use comma-separated values (CSV) format⁵²;
- **Audio requirements:** Clearly and intelligibly speech⁵³, in the same volume, pitch and tone as the rest of the ad⁵⁴, at the same pace as the rest of the ad⁵⁵, and without overpowering background music or external noise⁵⁶. The documentation consulted does not mention a specific metric such as the number of words per minute or an acceptable speed variation between the enunciation of the ad content and that of the label. Rather, clarity and intelligibility are prescribed by national legislators in a general way. The interview with the Association of European Radios (AER) confirmed that specific standards are not traditionally set.

Detailed legibility requirements on the design of the labels are provided for food, medicinal and energy products, as well as the EU Ecolabel logo and European Conformity (*Conformité Européenne*, CE) marking. However, given their specificity, their use here is limited.

The review of legibility requirements in selected EU legislation and third countries highlights the need to strike a careful balance between broad legibility principles, such as clarity and intelligibility, with specific requirements on font, design, layout, syntax, and format in the implementing acts of the Regulation. Notably, the legibility requirements tend to be tailored to the medium of publication, delivery or dissemination of the ad, particularly font size, albeit with some common standards across media.

Accessibility of information

Accessibility requirements within legislative frameworks ensure that essential information is available and understandable to all, including citizens with disabilities. The selected EU and third countries legislation incorporates accessibility requirements inconsistently across different domains and means of communication.

At EU level, accessibility requirements for medicinal products are the most comprehensive, as outlined in the Commission Guidelines, which state that for blind and visually impaired individuals, the label must use uncontracted, standardised Braille, with the Marburg Medium format highly recommended, whereas the leaflet should feature a sans serif typeface in 16–20-point font and an audio format⁵⁷. Similarly, the GDPR mandates the possibility for citizens to request the oral provision of transparency information⁵⁸, which can be in person or by telephone, but also automated, such as

⁴⁶ GDPR, Recital 58, p. 11; Article 12(1), p. 39; DSA, Article 14, p. 49.

⁴⁷ Guideline on the Readability of the Labelling and Package Leaflet of Medicinal Products for Human Use.

⁴⁸ Ibid.

⁴⁹ Guidelines on transparency under the GDPR.

⁵⁰ Government of the Republic of Austria, Federal Act on the Financing of Political Parties, 2012, https://www.ris.bka.gv.at/Dokumente/ErV/ERV_2012_1_56/ERV_2012_1_56.pdf; Government of the Republic of Cyprus, Amending law L.85(I)2006 of the Law on Radio and Television Stations of 1998, Official Gazette of 20 April 2006; Government of Ireland, Electoral Reform Act 2022, <https://www.oireachtas.ie/en/bills/bill/2022/37/>; California Fair Political Practices Commission, Political Advertising Disclosure Chart, p. 9.

⁵¹ California Fair Political Practices Commission, Political Advertising Disclosure Chart, p. 2.

⁵² European Commission, Draft ANNEX to the Commission Implementing Regulation (EU).../... laying down templates concerning the transparency reporting obligations of providers of intermediary services and of providers of online platforms under Regulation (EU) 2022/2065 of the European Parliament and of the Council, 2023, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=PI_COM%3AAres%282023%298428591.

⁵³ US Senate Honest Ads Act, pp. 13-14.

⁵⁴ Office of the Chief Electoral Officer, Alberta, Canada, Advertising Guidelines for Political Participants, p. 8; Central Electoral Commission of the Republic of Lithuania, Approval of the Description of the Procedure for Marking Political Advertising, p. 6.

⁵⁵ Central Electoral Commission of the Republic of Lithuania, Approval of the Description of the Procedure for Marking Political Advertising, p. 6.

⁵⁶ Ibid.

⁵⁷ Guideline on the Readability of the Labelling and Package Leaflet of Medicinal Products for Human Use, pp. 16-18.

⁵⁸ GDPR, Article 12(1), p. 39.

through pre-recorded messages⁵⁹. Other legislation addresses accessibility requirements broadly, without reference to a specific type of disability. For instance, the DSA mandates that required information should be available such that it is easy to find, easy to understand, and accessible to persons with disabilities⁶⁰. The Commission should encourage and facilitate the drawing up of codes of conduct for accessibility with online platforms and other relevant service providers, as well as civil society organisations representing people with disabilities⁶¹. Similarly, the Audiovisual and Media Services Directive (AMSD) requires media service providers to make their services progressively and continuously accessible to persons with disabilities through (unspecified) proportionate measures⁶², and the e-Commerce Directive endorses the drafting of codes of conduct for accessibility⁶³.

Providing information through more than one sensory channel seems to be the most common standard in some EU Member States, while others require accessibility of information without prescribing specific standards. For example, in France, election candidates are required to provide all campaign material in printed form, on a website, and in an accessible format that meets the accessibility standards outlined in the Equal Rights and Opportunities Act⁶⁴. Additionally, these materials must be available in an easy-to-read and intelligible format⁶⁵. In Spain, political organisations must ensure accessibility of their public activities and materials by providing the same information through webpages, printed materials, telephone assistance, and audiovisual formats. The Spanish National Organisation of the Blind (ONCE) is promoting the inclusion of a QR code for political ads on print media⁶⁶. This initiative, already in place in Andorra and Czechia, would allow citizens with disabilities to access the content of printed political ads through an accessible website⁶⁷. National television and radio stations are also required to provide free airtime for political advertising that accommodates accessibility needs⁶⁸. Finally, in countries such as Hungary⁶⁹ or the US, the legislation mandates sponsors to ensure the accessibility of political ads but does not provide specific standards.

Almost all other sources outside of the political advertising domain do not explicitly mention any accessibility requirements, or simply refer to compliance with accessibility-specific pieces of legislation such as the European Accessibility Act⁷⁰ or the Web Accessibility Directive⁷¹. The European Accessibility Act is particularly helpful in determining the content of accessibility standards, as it mandates the required information for a product or service⁷² to:

- Be provided through more than one sensory channel (e.g. visual, tactile, or auditory);
- Be understandable and perceivable;
- Be presented in fonts of adequate size and suitable shape considering the expected conditions of use, and with sufficient contrast and adjustable spacing between letters, lines,

⁵⁹ Guidelines on transparency under the GDPR, p.13.

⁶⁰ DSA, Article 47, p. 77.

⁶¹ Ibid.

⁶² Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual medium services (Audiovisual Medium Services Directive), Article 7, p.16.

⁶³ Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market (Directive on electronic commerce), Article 16(2), p.14.

⁶⁴ National Assembly of France, *Loi No. 2005-102 du 11 Février 2005 pour L'égalité des Droits et des Chances, La Participation et La Citoyenneté des Personnes Handicapées*, 2005, <https://extranet.who.int/mindbank/item/855>.

⁶⁵ European Commission, Guide of good electoral practices in Member States addressing the participation of citizens with disabilities in the electoral process, SWD(2023) 408 final, [66b9212e-e9b0-409d-88a3-c0e505a5e670_en](https://eur-lex.europa.eu/eli/dir/2019/882/oj).

⁶⁶ Grupo Social ONCE, Derecho al voto sostenible, 2024, <https://gruposocialonce.com/autonomia/derecho-al-voto-accesible>.

⁶⁷ Ibid.; Interview with the European Disability Forum (EDF).

⁶⁸ Ibid.

⁶⁹ Ibid.

⁷⁰ Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services, <https://eur-lex.europa.eu/eli/dir/2019/882/oj>.

⁷¹ Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies, <https://eur-lex.europa.eu/eli/dir/2016/2102/oj>.

⁷² Products and services in scope of the European Accessibility Directive include computers and operating systems; automated teller machines (ATMs), ticketing and check-in machines; smartphones; TV equipment related to digital television services; telephony services and related equipment; access to audio-visual media services such as television broadcast and related consumer equipment; services related to air, bus, rail and waterborne passenger transport; banking services; e-books; and e-commerce.

and paragraphs, making it easier for people with visual or cognitive impairments to read and comprehend⁷³;

- Be provided in formats that support alternative presentations, such as assistive technologies (only for services)⁷⁴.

These insights could feed into the drafting of the implementing acts for labels and transparency notices in the framework of the Regulation. In particular, implementing acts could consider the applicability of the Web Accessibility Directive and European Accessibility Act, and the interplay with voluntary codes of conduct on labelling of political advertising to encourage adherence to accessibility standards across all media of publication, delivery or dissemination of political ads.

⁷³ European Accessibility Directive, Annex I.

⁷⁴ Ibid.

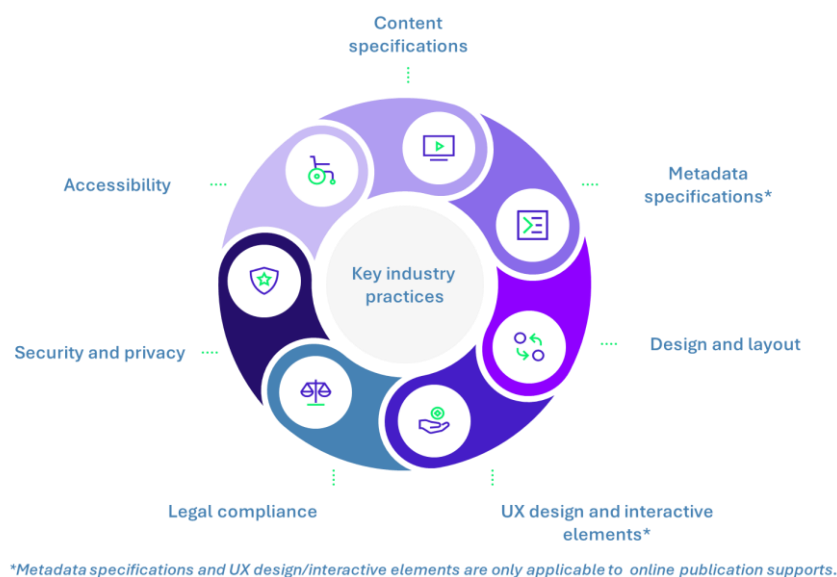
3. Industry and formatting practices in implementing labels and transparency notices

This chapter presents an overview of industry practices in implementing labels and transparency notices (e.g. technical steps, formatting guidelines) for political advertising, similar advertising domains, and other relevant sectors, based on desk research, and literature review. After an overview of the key industry practices, the chapter also details formatting practices for each publication support.

The study team consulted a range of documents to identify industry practices, including formatting practices, in the development and implementation of labels and transparency notices. Sources included industry codes (e.g. the International Chamber of Commerce Marketing and Communications Code); corporate advertising policies (e.g. Meta; Alphabet); guidelines from regulatory bodies (e.g. ESMA); guidelines from self-regulatory organisations (e.g. Digital Advertising Alliance (DAA)); guidelines from non-governmental organisations (NGOs) (e.g. Transparency International) (see Annex 5 for full list).

The analysis did not find evidence of a series of technical steps to be followed, but, rather, highlighted seven key industry practices to consider when implementing labels and transparency notices. Figure 3 presents these key practices, showcasing the necessary considerations to ensure that labels and transparency notices are transparent, secure, and fit-for-purpose.

Figure 3: Key industry practices in implementing labels and transparency notices



Source: Authors' elaboration.

Content specifications

Implementation of labels and transparency notices requires the definition of content specifications, i.e. substantive information the labels and transparency notices must include. For political ads, content specifications for labels are specified in Article 11 of the Regulation, while those for transparency notices are outlined in Article 12 (see section 2.1). In the case of political ad labels and transparency notices, this step is inherently linked to legal compliance, as sponsors and political ad publishers need to comply with the provisions of Article 41 of the Regulation.

Metadata specifications

Establishing metadata specifications is important in developing labels and transparency notices for online political ads as it serves the effective organisation, storage, and retrieval of the information. Metadata standards provide a structured approach to cataloguing the essential data elements

required by Articles 11 and 12 of the Regulation. They should be established to facilitate interoperability between the European repository for online political ads (Article 13), the repository of ads referred to in Article 39 of Regulation (EU) 2022/2065⁷⁵, and the platforms where ads are provided or disseminated.

Metadata are information describing the characteristics of data (e.g. data format, syntax, semantics). They provide critical context and attributes that describe the content, structure, and management of data and enable accessibility and exchange across systems. Each medium format necessitates different metadata inclusions to accommodate its unique requirements. General standards exist for structural, administrative, and descriptive metadata, offering a foundation for consistency. However, specific formats, such as video, text, or image-based ads, demand tailored metadata specifications to ensure accuracy and relevance. Resources like [Schema.org](https://schema.org) and the [Dublin Core Metadata Initiative](https://dublincore.org/) provide guidance on metadata specifications.

Design and layout principles

The design and layout of labels and transparency notices affects voters' identification of political ads. Design and layout principles should therefore be set to ensure that labels and transparency notices fulfil their designated purpose, in line with the Regulation. The desk research identified several design and layout principles:

- Legibility, including elements such as adequate font size and style⁷⁶, contrasting colour ratios between text and background⁷⁷ and simple syntax⁷⁸;
- Visual balance and clear separation between the content of the ad and its label⁷⁹;
- Conspicuous and upfront placement of the label and indication of retrieval of the transparency notice⁸⁰;
- Hierarchical layout structure that guides voters' attention and understanding;
- For audio-based labels and transparency notices, such as those accompanying political ads disseminated through radio, podcast, phone call or video, audibility is the principle to follow, including clear and articulate enunciation, adequate volume, tone and pace⁸¹.

While the US Honest Ads Act⁸² and the Canadian Advertising Guidelines for Political Participants⁸³ do not explicitly address the use of symbols, American and Canadian online political ads frequently feature a standardised icon. Despite its voluntary nature, the Political Ad Icon⁸⁴ developed by the [Digital Advertising Alliance](https://digitaladvertisingalliance.org/) (DAA) and modelled after its commercial counterpart, the AdChoices Icon, is widely used in both countries.

More specific information on design and layout can be found in Annex 3.

⁷⁵ Only political ad providers that are VLOPs within the meaning of Regulation (EU) 2022/2065 are subject to maintaining this repository.

⁷⁶ Central Bank of Ireland, Guidance on the Advertising Requirements of the Consumer Protection Code 2012, 2012, <https://www.centralbank.ie/docs/default-source/regulation/consumer-protection/other-codes-of-conduct/7-gns-4-2-7-guidance-on-the-advertising.pdf?sfvrsn=6>.

⁷⁷ Ibid.

⁷⁸ Ibid.

⁷⁹ European Commission, Five key principles on social media marketing disclosures, n.d., [6099530c-b21f-4f69-87b3-0681a2a63650_en](https://ec.europa.eu/competition/antitrust/actions_penalties/enforcement/guidelines-restrictions/sponsor-id-placement-and-size); Washington Public Disclosure Commission, Sponsor ID Placement and Size, n.d., <https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/sponsor-id-placement-and-size>.

⁸⁰ Internet Advertising Bureau (IAB), Content & Native Disclosure Good Practice Guidelines, 2018, https://www.iabuk.com/sites/default/files/public_files/IAB%20UK%20content%20and%20native%20disclosure%20guidelines%20v.2%202018%29.pdf; US Federal Trade Commission, How to Make Effective Disclosures in Digital Advertising; European Advertising Standards Alliance (EASA), Recommendation on Influencer Marketing Guidance 2023, 2023, https://www.easa-alliance.org/publications/best-practice-recommendation-on-influencer-marketing-guidance_v2023/.

⁸¹ US Federal Trade Commission, Radio Advertising Guidelines, 2021.

⁸² US Senate, US Senate Bill S. 1356, Honest Ads Act, 2019, <https://www.congress.gov/bill/116th-congress/senate-bill/1356>.

⁸³ Office of the Chief Electoral Officer, Alberta, Canada, Advertising Guidelines for Political Participants, 2022, <https://www.elections.ab.ca/uploads/Advertising-Guidelines-for-Political-Participants.pdf>.

⁸⁴ Digital Advertising Alliance of Canada (DAAC), The Self-Regulatory Principles of Transparency for Political Advertising for Federal Elections, 2021, <https://assets.youradchoices.ca/pdf/pa/DAAC-Principles-English.pdf>.

User experience (UX) design and interactive elements

UX⁸⁵ design and interactive elements should be considered to ensure that labels and transparency notices are both user-friendly and engaging.

Effective UX design prioritises simplicity, focusing on a non-intrusive layout that integrates labels and transparency notices seamlessly into ads⁸⁶. Responsive design is also essential⁸⁷, allowing labels and transparency notices to adapt across devices with different screen sizes, from mobile to desktop, and ensuring voters have a consistent and accessible experience no matter how they view the political ad.

For labels, interactive elements such as hover-over effects and pop-ups should only be considered for highlighting purposes, i.e. to make the labels more visible, but they cannot be used to display the essential information of the labels, which must be visible without user interaction. On the other hand, interactive elements can be very helpful for transparency notices, as they allow voters to access additional information without overwhelming the initial ad display⁸⁸ and are especially useful when there are space constraints⁸⁹.

Accessibility considerations

Integrating accessibility considerations is crucial to ensure that labels and transparency notices are usable and understandable by all voters, including citizens with disabilities. Depending on the medium of publication, delivery or dissemination, accessibility considerations will differ in their application. For the online medium, the most notable accessibility standards are given by the Web Content Accessibility Guidelines (WCAG) 2.1⁹⁰ and the EN 301 549 V3.2.1 accessibility requirements for information and communications technology (ICT) products and services⁹¹.

The WCAG has three levels of conformity, from A (minimum) to AAA (maximum inclusivity). For the purposes of this study, the following standards should be borne in mind:

- **Font size and style:** Large-scale text should be at least 18 points in size, or 14 points if bold (AA). Fonts should not have unusual or overly thin strokes, as these can reduce legibility at smaller sizes (AA);
- **Design:** Text and images of text must have a minimum contrast ratio of 4.5:1 for normal text and 3:1 for large text (AA). Colour should not be the only visual means of conveying information or distinguishing a visual element (AA). Instructions for understanding and operating content should not rely solely on sensory characteristics of components such as shape, colour, size, visual location, orientation, or sound (AA). Content should not be designed in a way that is known to cause seizures (A);
- **Layout:** Text should not be justified and should be resizable up to 200% without assistive technology and loss of content or functionality (AAA). Line spacing should be at least 1.5 times the font size, paragraph spacing at least twice the font size, letter spacing at least 0.12 times the font size, and word spacing at least 0.16 times the font size (AA). Information, structure, and relationships conveyed through the layout should be programmatically determined or available in text (A);
- **Use of symbols:** All non-text content should have a text alternative that serves the equivalent purpose (A). If non-text content is pure decoration, is used only for visual formatting, or is not presented to users, then it can be ignored by assistive technology (A);

⁸⁵ UX design refers to the creation of products that provide meaningful and relevant experiences to users. It involves the design of the entire process of acquiring and integrating the product, including aspects of branding, design, [usability](#) and function.

⁸⁶ Microsoft, UI and user experience guidelines for ads, 2023, <https://learn.microsoft.com/en-us/windows/uwp/monetize/ui-and-user-experience-guidelines#general-best-practices>.

⁸⁷ IAB, Responsive Design and Ad Creative: An IAB Perspective, 2012, <https://www.iab.com/wp-content/uploads/2015/07/ResponsivePerspectiveFinal.pdf>.

⁸⁸ OpenX, OpenX Political Advertising Policy, 2024, <https://www.openx.com/legal/political-advertising-policy/>.

⁸⁹ California Fair Political Practices Committee, Campaign Manual 4 – Chapter 9: Advertising Disclosures, 2024, https://www.fppc.ca.gov/content/dam/fppc/NS-Documents/TAD/Campaign%20Manuals/Manual_4/Manual_4_Ch_9_Ad_Disclosures.pdf.

⁹⁰ Accessibility Guidelines Working Group, Web Content Accessibility Guidelines (WCAG) 2.1., 2023, <https://www.w3.org/TR/WCAG21/>.

⁹¹ European Telecommunications Standards Institute (ETSI), EN 301 549 V3.2.1. Accessibility requirements for ICT products and services, 2021, https://www.etsi.org/deliver/etsi_en/301500_301599/301549/03.02.01_60/en_301549v030201p.pdf.

- **Audio:** captions should be provided for all live and prerecorded audio or video content, except when the media is a media alternative for text and is clearly labelled as such (A). If any audio plays automatically for more than three seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independent of the overall system volume level (A).

Apart from formatting aspects, the most fundamental accessibility consideration that applies to all online media is ensuring **accessibility through assistive technologies** such as screen readers and Braille displays.

Unlike the international WCAG, the EN 301 549 V3.2.1 accessibility requirements represent a European standard that is harmonised with the Web Accessibility Directive⁹² and is in the process of harmonisation with the European Accessibility Act⁹³. The accessibility standards are aligned with the WCAG, as the EN 301 549 standards make explicit reference to the WCAG 2.1 and adopt the same success criteria. In the scope of this study, the most relevant chapters from the EN 301 549 are:

- Chapter 9 on web accessibility;
- Chapter 10 on accessibility for non-web documents;
- Chapter 11 on accessible software.

For TV, the main accessibility considerations include integrating sign language, subtitles or closed captions, and audio descriptions⁹⁴. Closed captions are generally regarded as more inclusive than subtitles as they include a description of sounds and background music. For radio and any other audio-based medium, providing a written transcript is a best practice⁹⁵. Finally, the main accessibility considerations for print medium and physical objects are the use of Braille to address the needs of blind and visually impaired voters⁹⁶, as well as the inclusion of a QR code leading citizens with disabilities to an accessible website with the same information contained in the ad and its label⁹⁷.

Legal compliance

Labels and transparency notices should be developed in accordance with all applicable legal requirements to ensure compliance from the outset. This includes the provisions of the Regulation, as well as other EU legislation and Member States' national, regional or local requirements. In fact, while the Regulation sets the framework and the minimum requirements, this is without prejudice to stricter national, regional or local rules (Article 5(1)). The body of EU legislation applicable to the political advertising domain, as identified by the European Commission's Impact Assessment Report accompanying the Proposal for a Regulation on the transparency and targeting of political advertising⁹⁸ consists of: the DSA, the Digital Markets Act (DMA)⁹⁹, the ePrivacy Directive¹⁰⁰, the GDPR, the eCommerce Directive, the AMSD, the UCPD, the Consumer Rights Directive¹⁰¹, the Misleading and Comparative Advertising Directive¹⁰², the Directive on services in the internal

⁹² Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies, <https://eur-lex.europa.eu/eli/dir/2016/2102/oj>.

⁹³ Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services, <https://eur-lex.europa.eu/eli/dir/2019/882/oj>.

⁹⁴ Thinkbox, Introduction to accessible TV advertising, 2023, <https://www.thinkbox.tv/how-to-use-tv/tvs-positive-impact/introduction-to-accessible-tv-advertising>.

⁹⁵ Dallas College, Accessibility Guidelines: Transcripts for Audio Files, n.d., <https://www.dallascollege.edu/about/accessibility/guidelines/pages/audio-transcripts.aspx>.

⁹⁶ We Are Unlimited, Accessible Marketing Guide, n.d., <https://weareunlimited.org.uk/wp-content/uploads/2024/05/Large-Print-Accessible-Marketing-Guide-2024-Word-Doc.pdf>.

⁹⁷ Interview with accessibility experts from the EDF on 12 December 2024.

⁹⁸ Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act).

⁹⁹ Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act).

¹⁰⁰ Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications).

¹⁰¹ Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on consumer rights, amending Council Directive 93/13/EEC and Directive 1999/44/EC of the European Parliament and of the Council and repealing Council Directive 85/577/EEC and Directive 97/7/EC of the European Parliament and of the Council.

¹⁰² Directive 2006/114/EC of the European Parliament and of the Council of 12 December 2006 concerning misleading and comparative advertising.

market¹⁰³ and the Platform-to-Business Regulation¹⁰⁴. Additionally, the AI Regulation's labelling requirements could also apply to political advertising.

Security and privacy

Finally, building on the legal compliance requirements, security and privacy considerations are paramount in developing labels and transparency notices for political ads to protect both the integrity of the information and voters' privacy. Security protocols must safeguard data associated with labels and transparency notices against unauthorised access, tampering, and other vulnerabilities¹⁰⁵. Labels and notices should align with data protection regulations, namely the GDPR, to ensure that any information gathered or displayed is handled responsibly, with clear boundaries on data collection, processing, and storage. This is particularly true for transparency notices which, where applicable and technically feasible, may involve data analytics on the viewers of the political ad in terms of reach and engagement data (Recital 58 of the Regulation; Article 12(1)1(m)).

¹⁰³ Directive 2006/123/EC of the European Parliament and of the Council of 12 December 2006 on services in the internal market.

¹⁰⁴ Regulation (EU) 2019/1150 of the European Parliament and of the Council of 20 June 2019 on promoting fairness and transparency for business users of online intermediation services.

¹⁰⁵ Transparency International, Paying for Views: Solving Transparency and Accountability Risks in Online Political Advertising, 2021, <https://www.transparency.org/en/publications/paying-for-views>.

4. Overview of political advertising market

This chapter provides an overview of the political advertising market in the EU delivered or disseminated through all types of media: online, audiovisual, radio, print, and merchandising. It begins by describing the market structure and dynamics, including market size, trends, and top players, then presents business models, dependencies and technologies. The findings are based on desk research, literature review, and interviews with advertising industry associations and service providers, including both qualitative and quantitative sources. Data from the Google Ads Transparency Centre¹⁰⁶ and the Meta Ad Library¹⁰⁷ have been analysed by the study team.

While the analysis draws on a range of sources, a significant gap remains in the availability of data on offline political advertising and online political advertising not disseminated through VLOPs and VLOSEs, which operate their own ad repositories. The findings should be read in light of this limitation.

4.1. Market structure and dynamics

The political advertising market in the EU is a dynamic and evolving sector encompassing online, audiovisual, print, and merchandising¹⁰⁸. The total size of the market is difficult to estimate due to gaps in data and research on offline political advertising and merchandising, differences in the definition of political advertising, and political parties' hesitancy to disclose disaggregated advertising expenditure¹⁰⁹. However, data on online political advertising reveal a moderate market size, with EUR 20.7 million spent on political advertising on Google platforms¹¹⁰ in the EU in 2024¹¹¹, the year of the latest elections for the European Parliament, and 80,057 political ads disseminated¹¹². While disaggregated data are not available on political advertising by year on Meta platforms¹¹³, the total amount spent in the Member States between April 2019 and February 2025 was EUR 781.5 million, with over 10 million ads delivered. Nevertheless, the size of the EU market is modest compared to the online political advertising market in the US, which saw USD 831.2 million spent and a total of 169,877 political ads on Google platforms¹¹⁴ in 2024¹¹⁵, the year of a presidential election¹¹⁶.

The political advertising market in the EU has grown significantly in recent years, mainly driven by its online segment. The amount spent on political ads on Google platforms amounted to EUR 7.6 million in 2019, the year of the previous European elections, reaching EUR 10.2 million in 2022 and EUR 20.7 million in 2024¹¹⁷, an increase of approximately 172% over the period. Figure 4 shows the spending on political advertising on Google in the EU in recent years.

¹⁰⁶ Google, Google Ads Transparency Centre: Political Advertising on Google, 2025, <https://adstransparency.google.com/>.

¹⁰⁷ Meta (2025). Meta Ad Library. <https://www.facebook.com/adlibrary>.

¹⁰⁸ Political advertising on physical objects, i.e. merchandising, was not identified in the desk research.

¹⁰⁹ VVA, LE Europe and Asterisk Research & Analysis, Annexes to the study for the preparation of impact assessment on political advertising, Annex 6: Market data, 2020, https://commission.europa.eu/document/298fc92d-1b8d-43c4-9145-9b1d35a00acb_en.

¹¹⁰ Google Maps, Google Play, Google Shopping, Google Search, and YouTube, in accordance with the definition of political advertising of each platform.

¹¹¹ Data extracted for the period between 1 January 2024 and 1 January 2025.

¹¹² Google, Google Ads Transparency Centre: Political Advertising on Google, 2025.

¹¹³ Facebook, Instagram, Messenger.

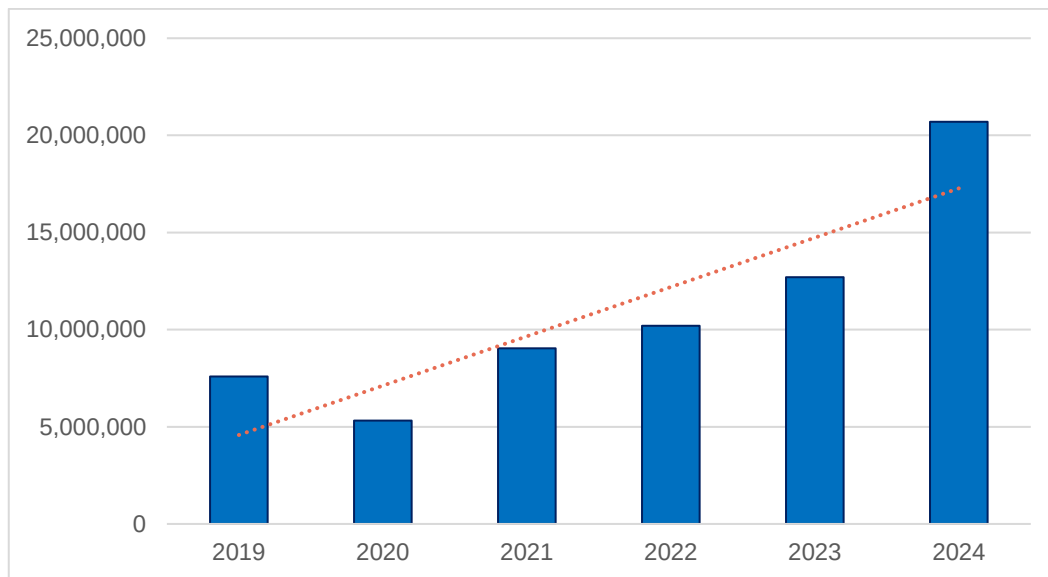
¹¹⁴ Ibid.

¹¹⁵ Data extracted for the period between 1 January 2024 and 1 January 2025.

¹¹⁶ The same comparison for Meta platforms cannot be performed as Meta does not offer disaggregated data on political advertising by year. The starting period of reporting for the US is May 2018, compared to April 2019 for EU Member States.

¹¹⁷ Ibid.

Figure 4: Spending (EUR) on political advertising on Google in the EU, 2019-2024



Source: Authors' elaboration based on data from Google, Google Ads Transparency Center: Political Advertising on Google, 2025, <https://adstransparency.google.com/>.

The market has experienced a progressive shift away from traditional media (TV, radio, print) into the online environment, as political campaigns globally and in the EU have become increasingly digital¹¹⁸. The trend goes hand-in-hand with the commercial advertising sector, which, between 2010 and 2016, saw online advertising go from the third largest ad market in Europe – behind newspapers and television – to the leading sector¹¹⁹. While exact figures on market shares for political advertising by medium are unavailable, the Council of the European Union reports that online political advertising is now the 'largest advertising channel in the European Economic Area, generating more revenue than all other advertising channels combined'¹²⁰. There are several reasons behind this shift towards online media. Firstly, the trend mirrors changing viewer habits, as an increasing number of voters consume content on social media and digital platforms. According to a 2022 Eurobarometer survey, 52% of respondents use the internet to access news on European political matters, 39% use information websites (e.g. online newspapers) and 25% get informed through online social networks¹²¹. Another reason for increasing reliance on digital platforms is their market efficiency. In addition to offering relatively lower costs for political ads, online platforms provide the possibility to reach large audiences and optimise ads' effectiveness through targeting technologies¹²². Finally, ads on digital platforms are particularly suited for political candidates as they are shorter, more informal, and designed to blend in with regular social media content, making them feel personal and relatable for the voters¹²³.

The Google Transparency Centre reveals that video ads represented the majority (61.5%) of political ads on Google platforms in 2024, followed by image (29.7%) and text (8.85%) formats¹²⁴. The finding was confirmed by the study supporting the impact assessment for the Regulation, with online video advertising reported to be a common and frequent means of advertising for political parties and

¹¹⁸ VVA, LE Europe and Asterisk Research & Analysis, *Study to support the preparation of an EU instrument to facilitate the provision of cross-border advertising and related services in the internal market while supporting fair democratic processes based on high transparency standards*, 2021, https://commission.europa.eu/document/download/7b8a5236-2a59-462a-a394-a658e37c2d2e_en?filename=3_3_177624_study-polads_en.pdf.pdf.

¹¹⁹ European Audiovisual Medium Observatory, *The online advertising market in the EU - Update 2016, 2017*, https://www.amic.media/media/files/file_352_1509.pdf.

¹²⁰ Council of the European Union, *Transparency and targeting of political advertising*, 2023, <https://www.consilium.europa.eu/en/infographics/political-advertising/>.

¹²¹ European Commission, *Standard Eurobarometer 96 - Public opinion in the European Union*, 2022, p. T205, in Statista, *Principal media used by citizens for news on European political matters in the European Union as of February 2022*, 2022, <https://www.statista.com/statistics/454444/europe-media-used-for-national-political-news/>.

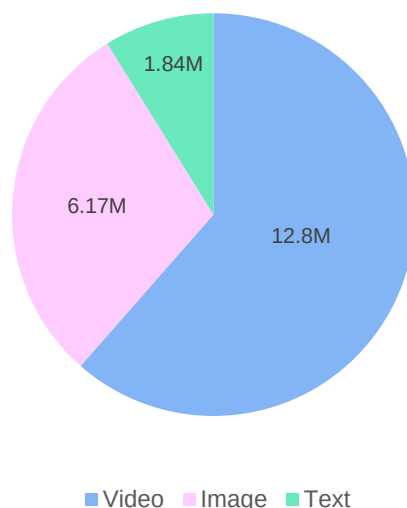
¹²² European Regulators Group for Audiovisual medium (ERGA), *ERGA Position Paper on the Regulation on the transparency and targeting of political advertising*, 2022, <https://erga-online.eu/wp-content/uploads/2022/09/2022-08-31-ERGA-Position-Paper-on-the-proposed-Regulation-on-political-advertising-2022-as-adopted.pdf>.

¹²³ Endale, B., 'SMPA Hosts Discussion on How Digital Ads Are Transforming Political Campaigns', *GW Today*, 2024, <https://gwtoday.gwu.edu/smpa-hosts-discussion-how-digital-ads-are-transforming-political-campaigns>.

¹²⁴ Google, *Google Ads Transparency Centre: Political Advertising on Google*, 2025.

candidates in Europe¹²⁵. Figure 5 presents the market share on Google platforms by ad format in the EU in 2024.

Figure 5: Market share (EUR) on Google platforms by ad format, EU, 1 January 2024-1 January 2025



Source: Authors' elaboration based on data from Google, Google Ads Transparency Centre: Political Advertising on Google, 2025, <https://adstransparency.google.com/>.

Finally, a market trend of increasing relevance is the increase in cross-border political advertising between Member States¹²⁶. In the context of political advertising, 'cross-border advertising is defined as a service in which the actor on behalf of which the service is provided is extraterritorial to the jurisdiction where the ad is posted'¹²⁷. Of all media supports, online political advertising channels are the most suited for cross-border activity. Between March 2019 and April 2021, approximately EUR 6.19 million was spent on cross-border online political advertising, with significant activity observed between neighbouring countries¹²⁸. According to the European Commission, the phenomenon is not limited to European Parliament elections, but also occurs during national electoral processes. Political parties and candidates often seek the votes of nationals residing in different Member States, targeting their ads to diasporas¹²⁹. This is the case, for instance, for political advertising from Poland to Germany and from the Netherlands to Belgium¹³⁰.

Before exploring the top players in the political advertising market, a distinction should be drawn between the two main categories of service providers: publishers and intermediaries. Publishers encompass media outlets that disseminate political ads directly to the public. This category includes:

- Offline publishers¹³¹: Television and radio stations, print medium such as newspapers, magazines, publishing companies for leaflets, billboards, including digital, etc, and merchandising companies¹³²;

¹²⁵ VVA, LE Europe and Asterisk Research & Analysis, *Study to support the preparation of an EU instrument to facilitate the provision of cross-border advertising and related services in the internal market while supporting fair democratic processes based on high transparency standards*, 2021.

¹²⁶ ERGA, ERGA Position Paper on the Regulation on the transparency and targeting of political advertising, 2022.

¹²⁷ VVA, LE Europe and Asterisk Research & Analysis, *Study to support the preparation of an EU instrument to facilitate the provision of cross-border advertising and related services in the internal market while supporting fair democratic processes based on high transparency standards*, 2021, p. 18.

¹²⁸ Ibid.

¹²⁹ European Commission, Impact Assessment Report Accompanying the document Proposal for a Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising, SWD(2021) 355 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52021SC0355>.

¹³⁰ Ibid.

¹³¹ This term does not reflect the terminology of the Regulation.

¹³² ERGA, ERGA Position Paper on the Regulation on the transparency and targeting of political advertising, 2022.

- Online publishers¹³³: News websites and online platforms, including news aggregators, search engines, and social media networks¹³⁴.

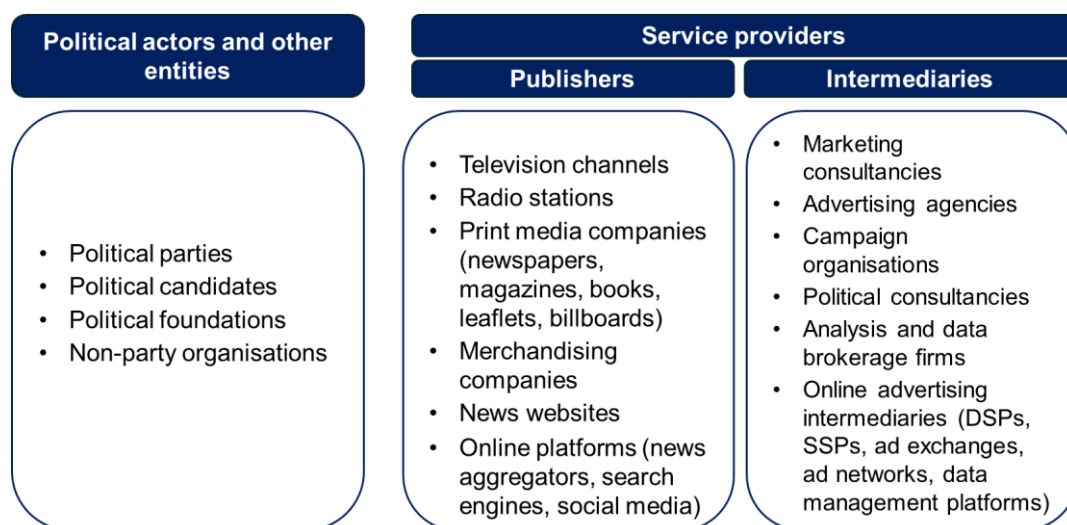
Intermediaries play a crucial role in facilitating and optimising the delivery of political ads. They include:

- Marketing consultancies and advertising agencies: Firms that develop strategic communication plans and create compelling ad content tailored to target audiences;
- Campaign organisations and political consultancies: Specialists who provide insights into voter behaviour, manage campaign logistics, and advise on political strategy;
- Analysis and data brokerage firms: Companies that collect and analyse data to inform targeted advertising efforts, ensuring that messages reach the most receptive audiences;
- Online advertising intermediaries, such as:
 - Demand-Side Platforms (DSPs): Platforms that allow advertisers to purchase digital ad inventory across multiple sources;
 - Supply-Side Platforms (SSPs): Platforms that enable publishers to manage, sell, and optimise their available ad space;
 - Ad exchanges and ad networks: Marketplaces that facilitate the buying and selling of ad inventory between advertisers and publishers;
 - Data management platforms (DMPs): Systems that collect and analyse large sets of data to help advertisers to craft targeted campaigns.

Further details on the role of intermediaries are provided in section 4.2.

Figure 6 provides a summary of actors involved in the political advertising industry.

Figure 6: Actors in the political advertising market



Source: Authors' elaboration based on ERGA, *ERGA Position Paper on the Regulation on the transparency and targeting of political advertising*, 2022, <https://erga-online.eu/wp-content/uploads/2022/09/2022-08-31-ERGA-Position-Paper-on-the-proposed-Regulation-on-political-advertising-2022-as-adopted.pdf>.

The top publishers in the political advertising market are digital platforms, with Google and Meta accounting for over 60% of online political ad revenue¹³⁵. Between 2019 and 2025, Germany was the Member State with most political ads on Google, followed by Romania, Hungary, Poland, and the Netherlands¹³⁶. In the same period, the countries that spent the most on political ads on Meta were

¹³³ This term does not reflect the terminology of the Regulation.

¹³⁴ Ibid.

¹³⁵ VVA, LE Europe and Asterisk Research & Analysis, *Study to support the preparation of an EU instrument to facilitate the provision of cross-border advertising and related services in the internal market while supporting fair democratic processes based on high transparency standards*, 2021.

¹³⁶ Google, Google Ads Transparency Centre: Political Advertising on Google, 2025.

Germany, Italy, Sweden, France, and the Netherlands¹³⁷. Between 2019 and 2025, the top advertisers on Google¹³⁸ were political parties, both national and European^{139,140}. Upon the adoption of the Regulation, Google announced that it will cease delivering and disseminating political ads in the EU from October 2025, the day of entry into effect of the Regulation¹⁴¹. This exit is likely to significantly impact the structure of the political advertising market, potentially redistributing ad spending to other platforms and media.

Among intermediaries, while exact figures on market shares are missing, the top players are companies operating in all media segments, with a strong presence in digital advertising. Some businesses worth highlighting¹⁴² are:

- mc Group¹⁴³ (formerly Media Consulta), Germany's largest communication agency also ranks among the top five in Europe. It offers integrated communication services, including political consulting and campaign management, with a presence in all Member States¹⁴⁴;
- Publicis Groupe¹⁴⁵, a major French advertising and communications agency, ranking second worldwide. It works with political campaigns, advocacy groups, and government bodies¹⁴⁶;
- WPP Group¹⁴⁷, a British multinational communications, advertising, and public relations company with a strong market presence in the EU¹⁴⁸;
- Adform¹⁴⁹, a Danish-based global ad exchange¹⁵⁰ company offering an integrated platform that enables advertisers, agencies, and publishers to efficiently manage and optimise digital campaigns across various channels;
- Google's Display & Video 360¹⁵¹ and Ad Manager¹⁵², DSP and SSP services, respectively;
- Microsoft Advertising (Xandr)¹⁵³, the advertising and analytics subsidiary of Microsoft.

Finally, in the broader context of advertising, political advertising accounts for only a small fraction of overall advertising revenue, with its share varying significantly depending on electoral cycles. According to advertising industry associations and service providers for general media, political ads generally make up less than 1% of total advertising expenditure, with notable spikes during election years or when non-political actors, such as NGOs, are involved¹⁵⁴. In election years, this can rise to around 5%, according to one stakeholder¹⁵⁵. However, two stakeholders, who are publishers focused solely on political affairs, estimated it to be over 80%. Overall, the percentage of advertising revenue from political ads is small, with higher estimates from specialised publishers. Additionally, the interviews highlight the key role of intermediaries in the ecosystem, with media agencies, advertising/marketing agencies, and ad exchanges/networks the most frequently mentioned actors.

¹³⁷ Meta, Meta Ad Library, 2025.

¹³⁸ Google, Google Ads Transparency Centre: Political Advertising on Google, 2025.

¹³⁹ Top political advertisers on Google between 2019 and 2025:

1. Partidul Uniunea Salvati Romania (Romania)
2. Partidul Social Democrat – PSD (Romania)
3. Komitet Wyborczy Prawo i Sprawiedliwość (Poland)
4. FIDESZ (Hungary)
5. Renew Europe Group (EU).

¹⁴⁰ The estimation of top advertisers for Meta can only be made at the level of each individual Member State.

¹⁴¹ Kroeber-Riel, A., 'An update on political advertising in the European Union', Blog, 14 November 2024, <https://blog.google/around-the-globe/google-europe/political-advertising-in-eu/>.

¹⁴² Data on market shares of political advertising intermediaries are not available. The list provided is a combination of desk research and interview findings, which must not be understood as a definitive ranking of the largest intermediaries in the EU.

¹⁴³ mc Group, n.d., <https://www.mcgroup.com/>.

¹⁴⁴ PRovoke Media, Global Top 250 PR Agency Ranking 2024, 2024, <https://www.provokemedia.com/ranking-and-data/global-pr-agency-rankings/2024-pr-agency-rankings/top-250>.

¹⁴⁵ Publicis group, n.d., <https://www.publicisgroupe.com/en/the-groupe/>.

¹⁴⁶ PRovoke Media, Global Top 250 PR Agency Ranking 2024, 2024.

¹⁴⁷ WPP Group, n.d., <https://www.wpp.com/en>.

¹⁴⁸ Interviews with service providers.

¹⁴⁹ Adform, n.d., <https://site.adform.com/>.

¹⁵⁰ European Commission, Impact Assessment Report Accompanying the document Proposal for a Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising, SWD(2021) 355 final.

¹⁵¹ Google Display & Video 360, n.d., <https://marketingplatform.google.com/about/display-video-360/>.

¹⁵² Ad Manager, n.d., <https://admanager.google.com/home/>.

¹⁵³ Microsoft Advertising (Xander), n.d., <https://about.ads.microsoft.com/en/blog/post/december-2021/microsoft-to-acquire-xandr-to-accelerate-its-digital-advertising-and-retail-media-solutions>

¹⁵⁴ Interviews with advertising industry associations and service providers.

¹⁵⁵ Ibid.

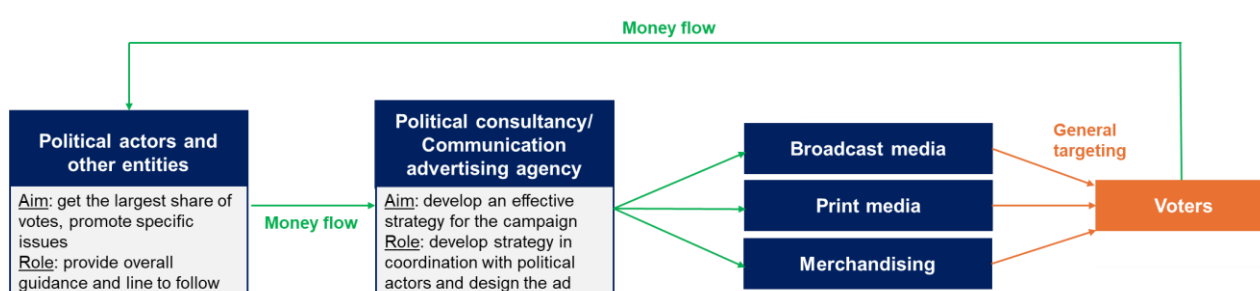
From an intermediary perspective, political ads can account for up to 10%, particularly when part of larger campaigns¹⁵⁶.

4.2. Business models, dependencies and technologies

Following the digitalisation of the market, modern political advertising relies on multiple business models.

Traditional political advertising consists of a relatively straightforward transaction involving a sponsor (political actors or other entities), including the entity ultimately controlling it and the paying entity, and an advertising publisher on TV, radio, print medium and merchandising. It can also involve an intermediary service, such as an advertising agency, consultancy, or marketing and branding advice company that provides services not related to ad delivery and dissemination. For political actors, normally there is a relatively simple money flow: based on contributions and donations received from their audience, they hire different kinds of media to spread their messages to audiences. Data are not gathered in a structured way, as traditional media only allow for general targeting¹⁵⁷. Figure 7 showcases the processes and actors involved in traditional political advertising.

Figure 7: Processes and actors in traditional political advertising



Source: Authors' elaboration based on European Commission, *Impact Assessment Report Accompanying the document Proposal for a Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising*, SWD(2021) 355 final, p. 96, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52021SC0355>.

The rise of online political advertising has introduced a more complex ecosystem, with new actors and more intricate money and data flows¹⁵⁸.

In addition to traditional intermediaries like advertising agencies, consultants, and marketing and branding experts, there are newer intermediary services, such as data analysis firms¹⁵⁹. This is due to the targeting capability of online media, which is the core of the modern political advertising business model. On top of selling ad space to sponsors, online platforms sell data-based targeting and micro-targeting services that allow advertisers to target specific groups of voters with tailored political messages¹⁶⁰. In this way, sponsors can bid for ad placements and optimise reach and engagement. Targeting adds a layer of complexity to the political advertising business process, as it not only involves money flow from sponsors to intermediaries and online platforms, but an inverse data flow from the audience to intermediaries through the online platforms, finally reaching the political actors or their representatives, such as political communication agencies¹⁶¹.

¹⁵⁶ Ibid.

¹⁵⁷ European Commission, *Impact Assessment Report Accompanying the document Proposal for a Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising*, SWD(2021) 355 final.

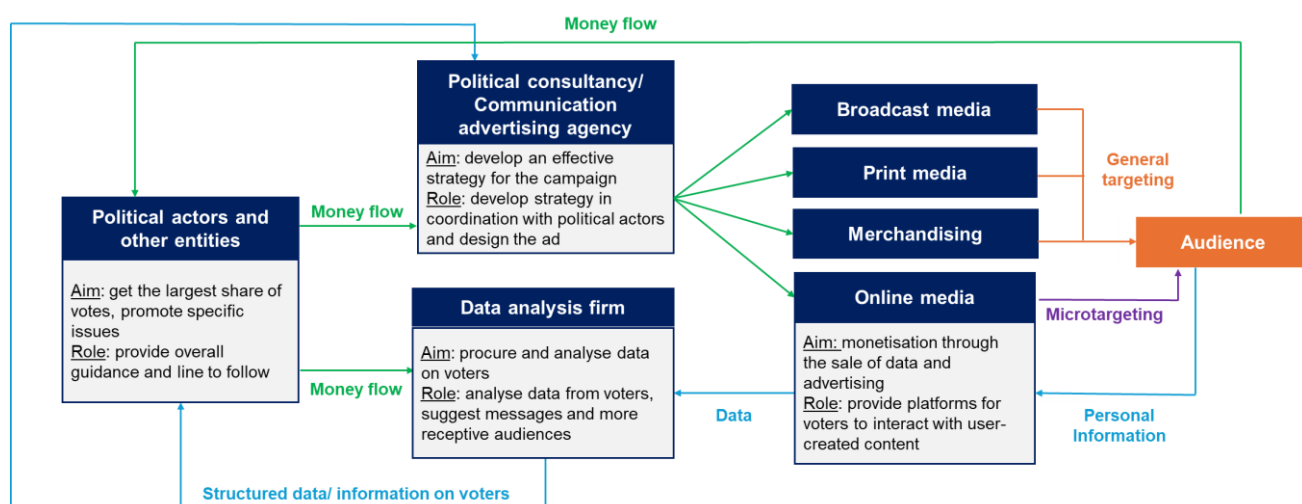
¹⁵⁸ Ibid.

¹⁵⁹ Ibid.

¹⁶⁰ Council of the European Union, *Transparency and targeting of political advertising*, 2023.

¹⁶¹ European Commission, *Impact Assessment Report Accompanying the document Proposal for a Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising*, SWD(2021) 355 final.

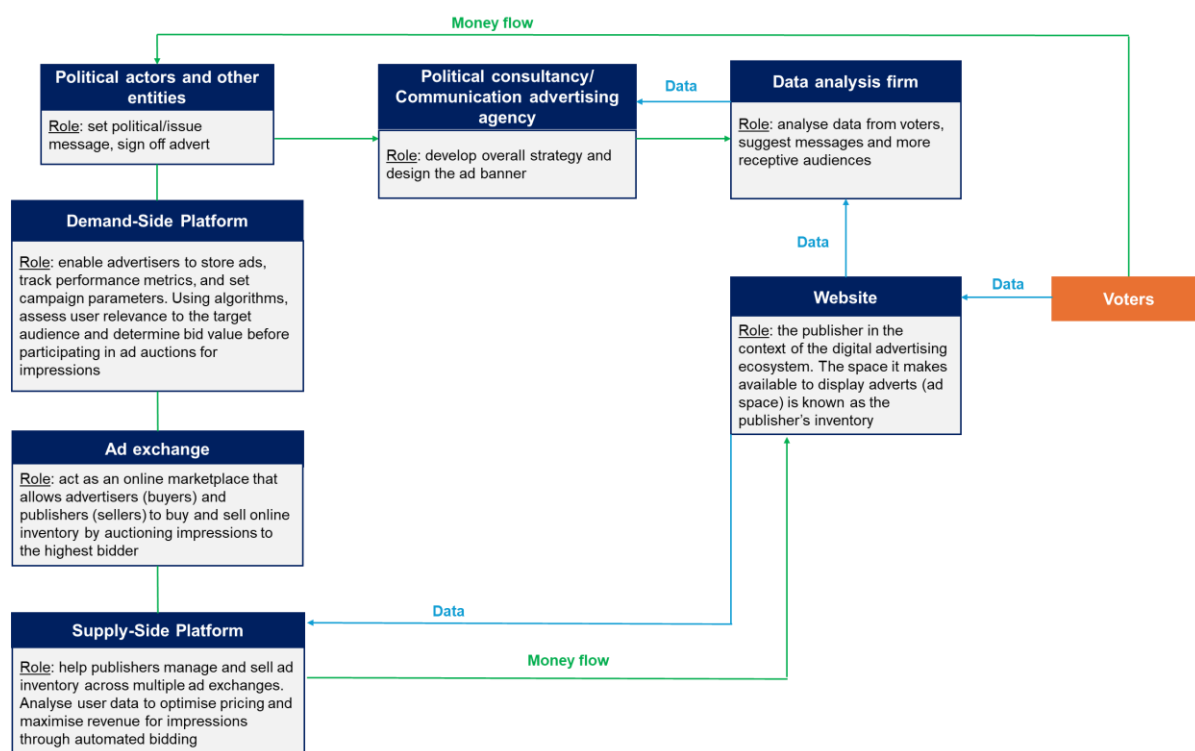
Figure 8: Processes and actors in modern political advertising



Source: Authors' elaboration based on European Commission, *Impact Assessment Report Accompanying the document Proposal for a Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising*, SWD(2021) 355 final, p. 96, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52021SC0355>.

Processes and actors involved in online political advertising differ depending on the online medium channel or format used. For instance, when political actors want to advertise their message on a website, they usually do not have direct contact with the website provider; rather, they use DSPs to store and manage their ads, while websites use SSPs to manage and sell their ad space. Advertisers and websites then buy and sell ad space on ad exchanges, with impressions going to the highest bidder¹⁶². In this case, DSPs, SSPs and ad exchanges are intermediaries.

Figure 9: Processes and actors in political advertising on websites (ad banners)

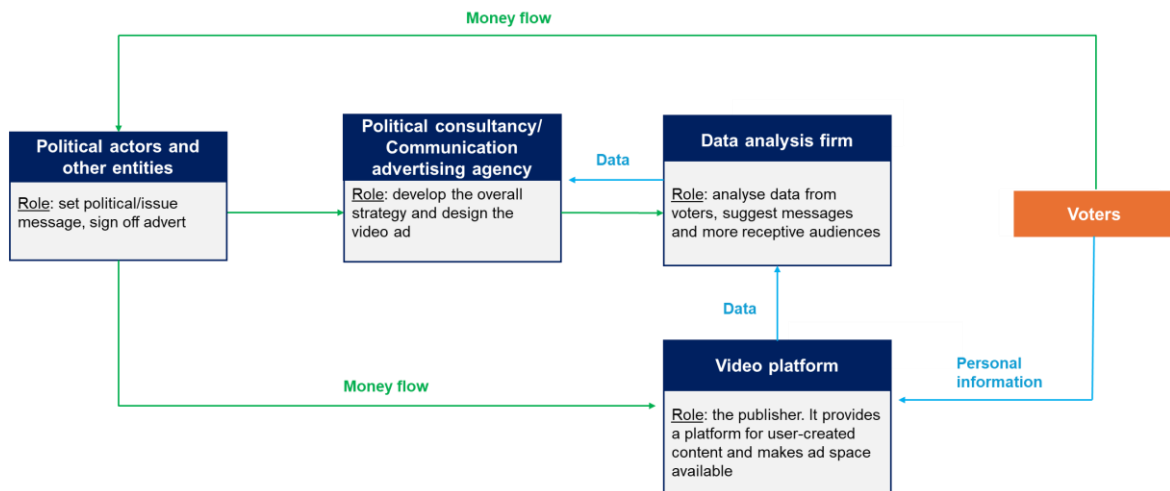


Source: Authors' elaboration based on European Commission, *Impact Assessment Report Accompanying the document Proposal for a Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising*, SWD(2021) 355 final, p. 97, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52021SC0355>.

¹⁶² Ibid.

Given the prominence of online political ads in video format (see section 4.1), Figure 10 presents its specific processes and actors.

Figure 10: Processes and actors in online political advertising on video



Source: Authors' elaboration based on European Commission, Impact Assessment Report Accompanying the document Proposal for a Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising, SWD(2021) 355 final, p. 98, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52021SC0355>.

Political actors, either directly or through political communication agencies, pay online platforms like YouTube to display their ads. At the same time, voters' personal data are gathered by online platforms, processed by data analysis firms, and used by political communication agencies to develop political campaigns¹⁶³. The same process is in place for advertising in the form of social media posts.

Finally, while the targeting and data exchange selling point reaches its peak in VLOPs and VLOSEs, these online platforms often have direct-sold political ads akin to those of traditional media, with few if any intermediaries¹⁶⁴.

A key underlying component common to these business models is the pricing of political ads. While the pricing method for political ads is not fundamentally different from non-political ads, it varies depending on the medium of publication. Pricing is generally determined by factors such as ad size, duration, number of impressions, and prominence of the ad space¹⁶⁵. Higher prominence typically leads to more impressions, which can increase the cost. For online ads, stakeholders reported that pricing is typically based on a cost-per-thousand-impressions (cost-per-mille, CPM) model, where a fixed amount is charged per 1,000 views. By contrast, offline ads are usually priced based on the duration of display, with size a key determinant of cost. Additionally, the budget and bid of advertisers influence pricing, particularly for digital ads. Pricing can also vary significantly between different media outlets, with larger and more widely circulated publications generally commanding higher prices than smaller regional ones¹⁶⁶.

For radio and TV advertising, the duration of the ad is a primary pricing factor, with average durations of up to 20 seconds for radio and up to 30 seconds for TV. Prime-time ads often cost more due to higher audience reach. Other influencing factors include audience demographics, ad placement, broadcasters' rate card and competition for ad space. In print and digital media, the pricing structure varies, with costs influenced by platform type and campaign duration. Political ads are generally reported to be more expensive than commercial ads due to editorial considerations and their potential impact on audience engagement. Some media outlets charge a premium to mitigate the risk of alienating readers, while strict regulations on programmatic advertising in some markets limit access to lower-cost ad placements¹⁶⁷.

¹⁶³ European Commission, Impact Assessment Report Accompanying the document Proposal for a Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising, SWD(2021) 355 final.

¹⁶⁴ Interviews with digital advertising industry associations and service providers.

¹⁶⁵ Interviews with advertising industry associations and service providers.

¹⁶⁶ Ibid.

¹⁶⁷ Ibid.

There was no clear consensus between stakeholders on the pricing of labels or transparency notices, with opinions divided on whether they should be priced separately from the ad itself. Some argued that legal requirements and factors such as volume or compliance could lead to separate pricing, with industry associations charging yearly fees and commercial actors using a CPM model. Others contended that many platforms bundle the ad and label costs, and when labels incur additional expenses, these costs are typically passed on to the sponsor, increasing the overall price of the ad. In terms of the average format and size of political ads sold, online media predominantly features standard display banners for static ads and conventional video placements (pre-roll, mid-roll, and post-roll) for video ads. Occasionally, there are homepage takeovers. In print media, the most common ad sizes are A4 pages or full/one-page ads, followed by half-page and quarter-page ads¹⁶⁸.

Understanding the processes of online and offline political advertising is crucial to filling in information in labels and transparency notices, such as the identity of the different actors.

It is essential to consider the evolving technologies that underpin the political advertising market. Targeting is at the root of the modern political advertising business model, while microtargeting relies on machine learning algorithms, big data analytics, and real-time bidding systems to segment voters based on demographics, behaviours, geolocation, and social connections, refined through tools like Meta's API graph¹⁶⁹. AI enhances these processes by automating ad moderation and performance optimisation, with tools like Google Analytics providing detailed audience insights and political campaign measurement¹⁷⁰. Finally, algorithm-driven content amplification, which prioritises engagement-based delivery, is used to promote political ads that evoke strong emotional reactions¹⁷¹. As these technologies evolve, building a technical infrastructure that supports regulatory compliance is essential for transparent and effective political advertising.

¹⁶⁸ Ibid.

¹⁶⁹ Meta, Graph API, n.d., <https://developers.facebook.com/docs/graph-api/>.

¹⁷⁰ Google, Google Marketing Platform, n.d., <https://marketingplatform.google.com/about/analytics/>.

¹⁷¹ Quaritsch, L., *Political advertising in the 2024 European elections - between Europeanisation and the protection of electoral integrity online*, Jacques Delors Centre, Hertie School, 2024, https://www.delorscentre.eu/fileadmin/2_Research/1_About_our_research/2_Research_centres/6_Jacques_Delors_Centre/Publications/20240604_Political_Ads_Policy_Brief_Luise_Quaritsch.pdf.

5. Identification of technical options

This chapter presents technical options for a standardised format and template for labels and transparency notices. Despite significant overlaps and commonalities across media, for convenience, formatting requirements are presented by medium of publication, delivery or dissemination of political ads, distinguishing, where applicable, by audio and visual requirements.

5.1. Formatting of labels

To develop technical options for the labels of political ads, it is essential to consider legal and formatting requirements. Legal requirements defined in the Regulation specify the elements of labels and transparency notices to ensure compliance (see section 2.1). On the other hand, formatting requirements can be understood as the features that ensure that labels perform their intended functions effectively. In the scope of this study, formatting requirements are understood as the essential features labels must have to perform their basic function, i.e. to clearly and effectively provide transparency information on the political ad to voters. Without these, the labels would fail to serve their purpose.

The identification of formatting requirements derives from the desk research and literature review under Tasks 1 and 2 of this study, presented in chapters 2 and 3. The feasibility and impact of each formatting requirement on both providers and voters were tested through a series of semi-structured interviews with publishers and intermediaries. Voters were also consulted through interviews and a focus group in the framework of a behavioural analysis, with the support of mock-ups of political advertising labels. The box below presents the limitations of the research.

Research limitations

The findings presented here should be considered in light of the following limitations:

- Stakeholder representation: The research plan under Task 4 aimed to include interviews with both political advertising publishers and intermediaries. However, only one interview was conducted with an intermediary, while the remainder were with publishers. This may have influenced the balance of perspectives in the analysis.
- Coverage of mediums: While the study team sought to cover all media used for the publication and dissemination of political advertising, the extent of that coverage varied. For example, only one response was recorded for physical objects. As a result, findings related to this category should be interpreted with caution.
- Duration of display: The study did not specifically explore requirements relating to the duration of display for labels in the interviews. Consequently, insights on this aspect remain limited.
- Awareness of the Regulation: All interviewees had questions on the scope of application of the Regulation and the chain of liability.

Online medium

Given the variety of publication, delivery or dissemination media of online political ads, the formatting requirements for this category include both audio and visual requirements. For video-based ads, visible, written labels could be complemented by audible labels. The formatting requirements might differ for small screens (e.g. mobile devices).

Table 2 presents the formatting requirements for the online medium, along with the results of the analysis of the impacts on providers and citizens based on the interviews.

Table 2: Formatting for online medium

Options	Description	Impact on providers	Impact on citizens
<i>Size and layout</i>			
Clear visibility and distinguishability	The label must be clearly visible and distinguishable from other content in the ad, ensuring that an average viewer can easily identify it. It should be positioned in a way that prevents it from being overlooked.	A large proportion of publishers expressed a preference for a principle-based approach that would give them more flexibility to implement the Regulation in accordance with the technical feasibility of their publication support.	Most participants agreed that clear, visible labels are important, but they should be integrated smoothly into the ad rather than feeling like an aggressive warning. Labels should be clear, easy to read, and stand out from the ad. Labels must stand out without feeling intrusive – they should inform, not alarm. In Ireland, for example, some noted that political ads are already recognisable, so labels should not make them confusing. The interviews revealed a risk that people will ignore the labels over time, similar to how they ignore cookie consent banners. However, if well-integrated, labels could become a reference for transparency rather than a disruptive element. To remain effective, labels must be concise, recognisable and visually engaging.
Size of the label: - Minimum 5% - Minimum 6% - Smaller size for small screens (e.g. mobile devices)	The label should cover at least 5% or 6% of the size of the ad. In the case of mobile devices, the label should cover at least 3% of the size of the ad.	Opinions were divided on the feasibility of a 5% minimum label, with half of the respondents saying it would be feasible and the other half seeing it as unfeasible. Respondents noted the need to take into account small devices/screens. Several interviewees stated that overly prescriptive requirements might result in a difficult implementation of the Regulation, whereas a principle-based approach (e.g. the label should be visible) would be less burdensome, especially for SMEs. Six respondents indicated that a 5% label size would have no financial impact or a slight impact, while three respondents indicated a moderate financial impact, and one a significant impact.	Labels must stand out without feeling intrusive – they should inform, not alarm (see previous row).

Options	Description	Impact on providers	Impact on citizens
Layout: - Single paragraph - Bullet points - Text not condensed or justified	The text of the label should be a single paragraph or with bullet points. The text should not be condensed or justified.	<i>Not tested.</i>	Bullet points were preferred as they make the information easier to scan. Long paragraphs discourage reading and risk being ignored. In Italy, some were concerned that overly structured labels could be too intrusive. In Ireland, some interviewees felt that continuous text sounds more natural. In Poland, some interviewees linked bullet points to marketing strategies, stating that they increase engagement. The focus group noted that information should be presented in bite-sized, scannable formats (e.g. bullet points, bolded keywords) rather than dense text blocks.
Placement: - Above the ad - Below the ad	The label should be placed above or below the image or text of the ad.	Most interviewees did not express a preference regarding the placement of the label. One interviewee mentioned that it would be best not to legislate on this requirement and let publishers decide in accordance with national/local practices (e.g. in Finland, readers are used to have transparency announcements placed above ads).	Some interviewees suggested placing labels only at the bottom, while others found it useful to have a notice at the top to draw attention. For example, of the five interviewees in Italy, two suggested placing labels only at the bottom, while three preferred a notice at the top.
Icon/logo	The label should contain an icon or logo.	Stakeholders expressed mixed views on the inclusion of a logo or pictogram. Some respondents believed that a visual element could enhance clarity and recognisability, particularly from a media consumer's perspective. However, they emphasised that any logo should be industry standard and carefully designed to ensure legibility across different formats. A layered approach, where an icon leads to additional information, was seen as the most feasible solution. Others questioned the added value of a logo, arguing that platforms already indicate political ads through labels. Concerns were raised about feasibility, enforcement, and the risk of over-prescription, particularly for smaller publishers. Some highlighted	Icons and logos help to draw attention and reinforce the political nature of the ad. The icon should be recognisable, but public awareness efforts would be needed to ensure people associate it with political ads. During the focus group, it emerged that including an election-related symbol (rather than a generic ad logo) can make the label more meaningful and easier to identify. In Italy, there was general agreement on the usefulness of an icon, with some preferring the triangle with an "i" and others the ballot box icon.

Options	Description	Impact on providers	Impact on citizens
		potential downsides, such as reducing available ad space, increasing redesign costs, and complicating audience recognition. Additionally, the time required to establish a widely recognised logo was seen as a significant barrier. Feedback on the financial impact of adding an icon/logo was mixed. Some indicated that it would have no impact, while others noted a slight effect, mainly due to minor cost implications. If an industry standard logo were used, the cost impact would be limited to a fixed annual participation fee. Several interviewees highlighted a moderate impact, citing potential increases in technical development and compliance costs, depending on the level of regulatory prescription. One respondent stated that the logo would have a significant to very significant impact.	In Ireland, opinions were divided: some thought icons help to make it clear that an ad is political, while others would not associate them with politics unless educated. In Poland, some liked the idea of a standardised icon, but others found icons unclear, with the ballot box icon seen as too abstract.
Readability			
Clear legibility	The label must use a font size and style that ensures legibility across different formats and devices. It should maintain sufficient contrast with the background to enhance readability and the text should remain clear without requiring zooming or additional effort from the viewer.	A large proportion of publishers expressed a preference for a principle-based approach that would give them more flexibility to implement the Regulation in accordance with the technical feasibility of their publication support.	Labels should be clear and easy to read.
Font size: - Minimum 8-12 points - If written in bold, minimum 14-18 points	The text of the label should be at least 8 to 12 points in size. If written in bold, it should be at least 14 to 18 points.	The majority of interviewees were unable to provide an answer. Five indicated that a minimum font size between 8 and 12 points is feasible. Three mentioned that it would have no or a slight financial impact, two indicated a moderate impact, and two mentioned a significant impact. One interviewee stated that while having a numerical requirement is difficult to implement, one solution could be to link the size to the label size.	Text size should be large enough for readability.

Options	Description	Impact on providers	Impact on citizens
		Finally, it was noted that the font size requirement should take into account small screens and devices.	
Font type: - Sans serif - Other types of fonts	The text of the label should be in sans serif font or other types of fonts that ensure legibility.	Opinions were divided on the feasibility of using the sans serif type font. Some interviewees mentioned that it should be feasible as long as publishers were not required to pay for a specific font. Another interviewee mentioned that prescribing a specific font would restrict the creative freedom and branding strategy of ad designers and publishers. Similarly, opinions were divided on the financial impact of font type requirements: half of the interviewees indicated no or slight impact while the other half indicated a moderate or significant impact.	<i>Not tested.</i>
Contrast: 4.5:1 for normal text and 3:1 for large text 100% dark text - Coloured text - Light-coloured background - Dark coloured background	The label should have a contrast ratio of 4.5:1 for normal text and 3:1 for large text. This means the lighter colour (e.g. background) should be 4.5 times brighter than the darker colour (e.g. text) for normal-sized text, and three times brighter for large text. The text of the label should be in 100% dark colour or in a colour contrasting with the background. The background of the label should be light-coloured or dark coloured, contrasting with the ad.	The contrast requirements are generally considered feasible, with stakeholders noting that options like 100% dark text on a light background are effective for ensuring legibility and accessibility. However, two stakeholders argued that the requirements are not feasible, particularly when the label is placed on top of the ad creative, as this could interfere with the ad's design, especially for darker ads. They believe the strict contrast guidelines could limit creative flexibility and would require additional design solutions, such as text containers, to achieve the desired contrast. Despite these concerns, other stakeholders felt that the requirements, particularly when the label is embedded within the creative, are technically achievable and could improve user engagement. The impact of the contrast requirements for all options is similar, with the potential for slight to very significant increases in cost. According to one interviewee, the impact on costs for online media is expected to be slight due to the ease of digital adjustments.	Labels should be clear, easy to read, and stand out from the ad. The label should contrast with the ad but not be too overwhelming. Labels that blend too much with the ad's design risk being overlooked. The label should contrast with the ad but not be too overwhelming. Black backgrounds were generally seen as too strong, unpleasant and aggressive, while purple or blue offered good contrast without negative connotations. White was clear but sometimes perceived as too neutral or boring. In Italy, a bright but not extreme colour was preferred. In Ireland, opinions varied: some preferred labels in the same colour scheme as the ad to look natural, while others preferred contrasting colours (but not purple). In Poland, a white background with black text was the most readable option, but some also suggested red or navy blue as colours associated with politics.
Accessibility			

Options	Description	Impact on providers	Impact on citizens
Compliance with accessibility standards	The label must be designed to be accessible to individuals with disabilities, ensuring compliance with recognised accessibility standards (Web Accessibility Directive).	A large proportion of publishers expressed a preference to adhere to recognised accessibility standards (WCAG), considering them sufficient without adding additional requirements.	<i>Not tested.</i>
Clarity	The label should be clear.	A large proportion of publishers expressed a preference for a principle-based approach that would give them more flexibility to implement the Regulation in accordance with the technical feasibility of their publication support.	Labels should be clear and easy to read.
Audio			
Audibility and clarity	The label must be conveyed in a manner that ensures it is clearly perceivable by listeners. It should be delivered at a comprehensible speed and volume.	A large proportion of publishers expressed a preference for a principle-based approach that would give them more flexibility to implement the Regulation in accordance with the technical feasibility of their publication support.	<i>Not tested.</i>
Volume: Same volume as the ad	If played aloud, the label should match the volume of the ad.	Some providers indicated that industry norms and regulatory standards already govern aspects like audio levels, including the volume of ads in relation to regular content, as consumer frustration has been noted when ads are louder than surrounding content.	<i>Not tested.</i>
Speed: - Same speed as the ad - Speed >1x and ≤1.2x - Speed >1.2x and ≤1.5x	If played aloud, the label should match the speed of the ad. If displayed at a different speed, it should be greater than 1x and up to 2x, with the following ranges: greater than 1x and up to 1.2x; greater than 1.2x and up to 1.5x; and greater than 1.5x and up to 2x.	A large number of providers indicated that the longer the duration of the ad (label included), the greater the financial impact for the end client, as it would increase the price of the ad, and for providers, as some of them provide discounts for the time spent on transparency information. The slower the pace of the label, the higher the financial impact.	<i>Not tested.</i>

Options	Description	Impact on providers	Impact on citizens
Speed >1.5x and ≤2x			
Placement - At the beginning of the ad - At the end of the ad	The label should be played at the beginning or at the end of the ad.	The placement of the label before the ad was seen as more impactful for providers as it interferes with viewer engagement and incites viewers to change channel. The addition of a jingle was seen as causing a significant financial impact by a majority of respondents.	<i>Not tested.</i>
Addition of jingle	A jingle should be added before playing the label.	Providers were divided on the inclusion of a jingle, which was seen as helpful to indicate the label, but disruptive for viewers' experience.	<i>Not tested.</i>
Access to transparency notice			
Hyperlink	The label should include a hyperlink to access the transparency notice.	The majority of stakeholders expressed positive views on the inclusion of links in political ad labels. They highlighted that links would enhance transparency by providing direct access to additional information, thus improving the overall user experience. Hyperlinks were particularly favoured for online media, where they were seen as more efficient than full URLs. Stakeholders noted that incorporating links could help to reduce the need to display lengthy transparency notices alongside labels. However, some concerns were raised about the practicality of links, with some publishers preferring to keep users within the same platform rather than directing them to external websites, which might impact user engagement.	Written links could be an alternative, but many people would not manually type them, so they would have to be clickable.

Offline – TV

Similar to the formatting requirements for online, those for the offline medium of TV also include both audio and visual components. However, the implementing acts of the Regulation should mandate only a visible, written label, with the inclusion of an audible label left to the discretion of providers.

Table 3 outlines the formatting requirements for labels on TV and their impact on both providers and citizens.

Table 3: Formatting for TV

Options	Description	Impact on providers	Impact on citizens
Size and layout			
Clear visibility and distinguishability	The label must be clearly visible and distinguishable from other content in the ad, ensuring that an average viewer can easily identify it. It should be positioned in a way that prevents it from being overlooked.	Some publishers expressed a preference for a principle-based approach that would ensure the visibility of the label while guaranteeing the creative freedom of ad designers and the technical feasibility of labels.	<i>See section on online medium.</i>
Size of the label: Minimum 5%	The label should cover at least 5% of the size of the ad.	Publishers mostly indicated that this requirement would be feasible. However, opinions were divided on the financial impact of such a requirement, with responses ranging from no impact to very significant impact. One interviewee mentioned that the financial impact should be non-existent, or minimal, if the label did not extend the duration of an ad.	<i>See section on online medium.</i>
Layout: - Single paragraph or bullet points - Text not condensed nor justified	The text of the label should be a single paragraph or with bullet points. The text should not be condensed or justified.	<i>Not tested.</i>	<i>See section on online medium.</i>
Placement: - Top of the ad - Bottom of the ad - Full screen before the ad	The label should be placed either on top or on the bottom of the ad. Alternatively, the label should cover the entire screen for a minimum duration before or after the ad.	Publishers did not indicate any preferences for the placement of the label. Usually, transparency information is displayed either by a banner at the bottom, a full screen after the ad, or a split screen.	<i>See section on online medium.</i>

Options	Description	Impact on providers	Impact on citizens
Full screen after the ad			
Icon/logo	The label should contain an icon or logo.	<i>See section on online medium.</i> One interviewee pointed out that on TV, where multiple icons are already present, adding another could create confusion rather than improve clarity.	<i>See section on online medium.</i>
Readability			
Clear legibility	The label must use a font size and style that ensure legibility across different formats and devices. It should maintain sufficient contrast with the background to enhance readability and the text should remain clear without requiring zooming or additional effort from the viewer.	The majority of stakeholders viewed the overly prescriptive colour and contrast requirements as disproportionate and unsuitable. A more pragmatic approach is preferred, focusing on the fundamental principles of legibility and readability rather than an exhaustive and complex set of requirements. Imposing rigid standards could introduce unnecessary complexity, making the process harder to understand and comply with, and in some cases, unfeasible. The focus should be on ensuring clarity and ease of comprehension, rather than overcomplicating the regulatory framework with rules that could hinder the primary goal of effective communication.	<i>See section on online medium.</i>
Font size: - Minimum 8-12 points - If written in bold, minimum 14-18 points	The text of the label should be at least 8 to 12 points in size. If written in bold, it should be at least 14 to 18 points following the WCAG.	A very limited number of interviewees provided input on the font size requirements for TV. One mentioned that it would have a significant impact and likely be unfeasible, another suggested it would be feasible with a slight financial impact, while a third indicated it would have a moderate impact. No conclusive findings could be drawn on this specific requirement.	<i>See section on online medium.</i>
Font type: - Sans serif - Other font types	The text of the label should be in sans serif font or other types of fonts that ensure legibility.	A very limited number of interviewees provided input on the font type requirements for TV. One mentioned that it would have a significant impact and likely be unfeasible, another suggested it would be feasible with a slight financial impact, while a third indicated it would have a moderate impact. No conclusive findings could be drawn on this specific requirement.	<i>See section on online medium.</i>
Contrast: 100% dark text - Coloured text	The text of the label should be in 100% dark colour or in a colour contrasting with the background.	Only two interviewees provided input on the contrast requirements for TV, both agreeing that while implementing contrast features is technically feasible, it presents significant challenges. These challenges are especially difficult for SMEs, which may struggle with varying national regulations and the complexity of defining background colours for political ads. The need for specific adaptations, such as detailed guides for fonts, colours, and	<i>See section on online medium.</i>

Options	Description	Impact on providers	Impact on citizens
- Light-coloured background - Dark coloured background	The background of the label should be light-coloured or dark coloured, contrasting with the ad.	backgrounds, could increase resource demands, while centralised compliance models and transparency notices would add to costs. The interplay between EU regulations and national laws could complicate implementation. Interviewees felt that while the requirements are technically possible, they are too prescriptive, and it would be more effective for the creative team to decide on the colour and contrast to ensure a good match between the label and the ad. In terms of financial impact, the cost implications were believed to range from none to significant.	
Accessibility			
Compliance with accessibility standards	The label must be designed to be accessible to individuals with disabilities, ensuring compliance with recognised accessibility standards.	<i>See section on online medium.</i>	<i>See section on online medium.</i>
Clarity	The label should be clear.	<i>See section on online medium.</i>	<i>See section on online medium.</i>
Audio			
Audibility and clarity	The label must be conveyed in a manner that ensures it is clearly perceivable by listeners. It should be delivered at a comprehensible speed and volume.	<i>See section on online medium.</i>	<i>See section on online medium.</i>
Volume: Same volume as the ad	The label should match the volume of the ad.	<i>See section on online medium.</i>	<i>See section on online medium.</i>
Speed: - Same speed as the ad - Speed >1x and ≤1.2x	The label should match the speed of the ad. If displayed at a different speed, it should be greater than 1x and up to 2x, with the following ranges: greater than 1x and up to	<i>See section on online medium.</i> TV publishers had a preference for the inclusion of a visual label that could be displayed at the same time as the ad. By contrast, an audio label was seen as having a significant impact on costs.	<i>See section on online medium.</i>

Options	Description	Impact on providers	Impact on citizens
- Speed >1.2x and ≤1.5x - Speed >1.5x and ≤2x	1.2x; greater than 1.2x and up to 1.5x; and greater than 1.5x and up to 2x.		
Placement - At the beginning of the ad - At the end of the ad	The label should be played at the beginning or at the end of the ad.	See section on online medium.	See section on online medium.
Addition of jingle	A jingle should be added before playing the label.	See section on online medium.	See section on online medium.
Access to transparency notice			
QR code	The label should include a QR code to access the transparency notice.	Stakeholders generally expressed positive views about incorporating QR codes into labels, which was seen as an efficient and feasible solution to provide easy access to additional information without disrupting UX. In TV ads, QR codes were noted as more efficient than links, although practical challenges exist, such as ensuring they stay on screen long enough for viewers to scan. However, there were some considerations. QR codes have minimum size requirements and the complexity of their design depends on the amount of data encoded, which could complicate their implementation. Additionally, QR codes are not universally accessible, particularly for older users. There were also concerns about the potential for future regulatory requirements to become outdated if the technology behind QR codes evolves. Stakeholders suggested varying degrees of cost implications. For most, the addition would have a slight to moderate impact, mainly due to the technology required for creating QR codes, including adding URLs for each specific ad. Technical development and compliance costs could also increase, depending on the level of regulatory prescription. In some cases, providers might need to outsource QR code creation if they lacked the necessary tools or expertise. Two respondents noted that adding a QR code would have no impact, while one suggested it could lead to a very significant increase in costs.	QR codes were generally seen as useful, especially for younger people, although older people may be less likely to scan QR codes. QR codes are useful as a way to provide extra information without cluttering the label. QR codes can provide transparency without overwhelming the ad – they allow for optional engagement rather than forced complexity.

Options	Description	Impact on providers	Impact on citizens
Link	The label should include a link to access the transparency notice.	Most stakeholders were positive about the inclusion of links, noting that they could enhance transparency by providing direct access to additional information. Incorporating links could reduce the need for displaying lengthy transparency notices alongside labels, streamlining the information while maintaining clarity. However, several highlighted that the feasibility of including links would depend on the specific design of the label.	<i>See section on online medium.</i>

Offline – radio and podcasts

Table 4 presents the formatting requirements for radio and podcasts, which are solely focused on audio. In this case, access to the transparency notice will be ensured by reading the URL link aloud as part of the label.

Table 4: Formatting for radio and podcasts

Options	Description	Impact on providers	Impact on citizens
Audio			
Audibility and clarity	The label must be conveyed in a manner that ensures it is clearly perceivable by listeners. It should be delivered at a comprehensible speed and volume.	A large proportion of publishers expressed a preference for a principle-based approach that would give them more flexibility to implement the Regulation in accordance with the technical feasibility of their publication support.	<i>See section on online medium.</i>
Volume: Same volume as the ad	If played aloud, the label should match the volume of the ad.	Some providers indicated that industry norms and regulatory standards already govern aspects like audio levels, including the volume of ads in relation to regular content, as consumer frustration has been noted when ads are louder than surrounding content.	<i>See section on online medium.</i>
Speed: - Same speed as the ad - Speed >1x and ≤1.2x - Speed >1.2x and ≤1.5x - Speed >1.5x and ≤2x	If played aloud, the label should match the speed of the ad. If displayed at a different speed, it should be greater than 1x and up to 2x, with the following ranges: greater than 1x and up to 1.2x; greater than 1.2x and up to 1.5x; and greater than 1.5x and up to 2x.	A large number of providers indicated that the longer the duration of the ad (label included), the greater the financial impact for the end client, as it would increase the price of the ad, and for providers, as some provide discounts for the time spent on transparency information. In addition, airtime spent on transparency information could have been sold to another advertiser. The slower the requirement, the higher the financial impact.	<i>See section on online medium.</i>
Placement - At the beginning of the ad - At the end of the ad	The label should be played at the beginning or at the end of the ad.	The placement of the label before the ad was seen as more impactful for providers, as it interferes with viewer engagement and incites viewers to change channel. The addition of a jingle would have a significant financial impact, according to a majority of respondents.	<i>See section on online medium.</i>
Addition of jingle	A jingle should be added before playing the label.	Providers' opinions were divided on the inclusion of a jingle, which was seen as helpful to indicate the label but disruptive for viewers' experience.	<i>See section on online medium.</i>

Options	Description	Impact on providers	Impact on citizens
Accessibility			
Compliance with accessibility standards	The label must be designed to be accessible to individuals with disabilities, ensuring compliance with recognised accessibility standards (WCAG).	<i>Not tested.</i>	<i>See section on online medium.</i>
Clarity	The label should be clear.	A large proportion of publishers expressed a preference for a principle-based approach that would give them more flexibility to implement the Regulation in accordance with the technical feasibility of their publication support.	<i>See section on online medium.</i>
Access to transparency notice			
Link read aloud	The link to the transparency notice must be read aloud in a clear and audible manner, ensuring that it is easily understood by listeners.	According to research published by the <i>Association européenne des radios</i> (AER) on terms and conditions read aloud, 72% of listeners in the United Kingdom (UK) and 86% in France prefer a shorter warning message signposting to a website to get further information and read the terms and conditions in their own time on a website ¹⁷² . Similarly, it is presumed that it would be unfeasible to read aloud the transparency on the radio (for cost and engagement purposes); rather, the label should include the reference to a website where the transparency notice can be found.	<i>See section on online medium.</i>

¹⁷² AER, Protecting Consumers: Why long and complex terms and conditions on radio advertising don't work, n.d., p.2.

Offline – print

Table 5 outlines the formatting requirements for print, including newspapers, leaflets, billboards, posters, and books. These requirements address size and layout, readability, accessibility, and access to the transparency notice.

Table 5: Formatting for print

Options	Description	Impact on providers	Impact on citizens
Size and layout			
Clear visibility and distinguishability	The label must be clearly visible and distinguishable from other content in the ad, ensuring that an average viewer can easily identify it. It should be positioned in a way that prevents it from being overlooked.	Some publishers expressed a preference for a principle-based approach that would ensure the visibility of the label while guaranteeing the creative freedom of ad designers and the technical feasibility of labels.	<i>See section on online medium.</i>
Size of the label: - Minimum 5% - Minimum 6% - If medium < 65 cm², minimum size 1.4 cm by 2.8 cm (3.92 cm²)	The label should cover at least 5% or 6% of the size of the ad. If the medium is less than 65 cm², the minimum size of the label shall be 1.4 cm by 2.8 cm (3.92 cm²).	The majority of interviewees deemed a 5% minimum size for labels feasible, with three interviewees believing it would have little or no impact, three indicating a moderate impact, and one a significant impact. A 6% label size was seen as most costly, with two interviewees indicating a significant impact on costs. One mentioned a preference for principle-based requirements, indicating that strict requirements would restrain creative freedom for the advertiser (e.g. having to resize ads to include the label).	<i>See section on online medium.</i>
Layout: - Single paragraph or bullet points - Text not condensed nor justified	The text of the label should be a single paragraph or with bullet points. The text should not be condensed nor justified.	<i>Not tested.</i>	<i>See section on online medium.</i>
Placement: - Above the ad - Below the ad	The label should be placed above or below the image or text of the ad.	<i>See section on online medium.</i>	<i>See section on online medium.</i>

Options	Description	Impact on providers	Impact on citizens
Icon/logo	The label should contain an icon or logo.	See section on online medium.	See section on online medium.
Readability			
Clear legibility	The label must use a font size and style that ensure legibility across different formats and devices. It should maintain sufficient contrast with the background to enhance readability. The text should remain clear without requiring zooming or additional effort from the viewer.	Some publishers expressed a preference for a principle-based approach that would ensure the readability of the label while guaranteeing the creative freedom of ad designers and the technical feasibility of labels.	See section on online medium.
Font size: - Minimum 9-10 points - Minimum 1.2 mm height 1:32 height for billboards	The text of the label should be at least 9 to 10 points in size or at least 1.2 mm in height. For billboards, the label should be 1:32 of the billboards' total height.	Four respondents indicated that those minimum font sizes are feasible. Interviewees mentioned that the font size should be linked to the size of the label and respond to general principles of readability without impeding access to the message of the ad. While one mentioned that having different font requirements across platform would increase publishers' compliance costs, another indicated that publishers usually use different fonts to improve readability and reader-friendliness. Having a single unique required font for the labels was seen as a negative step. Three interviewees indicated that these requirements would have little or no impact on costs for publishers, while three mentioned moderate to significant financial costs.	See section on online medium.
Font type: - Sans serif - Other font types	The text of the label should be in sans serif font or other types of fonts that ensure legibility.	Three interviewees indicated that the use of sans serif fonts was possible. One mentioned that it would restrict publishers and designers from implementing their branding strategy. However, another interviewee believed that using a different font than the one used in the ad would increase the visibility of the label. Three interviewees mentioned that the use of sans serif fonts would have little or no impact, while three indicated a moderate to significant impact on costs.	See section on online medium.

Options	Description	Impact on providers	Impact on citizens
Contrast: 100% dark text - Coloured text - Light-coloured background or dark coloured background	The text of the label should be in 100% dark colour or in a colour contrasting with the background. The background of the label should be light-coloured or dark coloured, contrasting with the ad.	Two stakeholders believed the contrast requirements were feasible, while one disagreed. The impact of the contrast requirements for all options was similar, with the potential for slight to very significant increases in cost. According to one interviewee, the only impact would be for coloured ads, if the rest of the paper was in black and white, but the impact would be minimal.	<i>See section on online medium.</i>
Accessibility			
Compliance with accessibility standards	The label must be designed to be accessible to individuals with disabilities, ensuring compliance with recognised accessibility standards.	<i>See section on online medium.</i>	<i>See section on online medium.</i>
Clarity	The label should be clear.	<i>See section on online medium.</i>	<i>See section on online medium.</i>
Access to transparency notice			
QR code	The label should include a QR code to access the transparency notice.	Stakeholders generally expressed a positive view about incorporating QR codes into labels. They were seen as an efficient and feasible solution to provide easy access to additional information without disrupting UX. However, there were a few considerations. QR codes have minimum size requirements and the complexity of their design depends on the amount of data encoded, which could complicate their implementation. Additionally, QR codes are not universally accessible, particularly for older users. There were also concerns about the potential for future regulatory requirements to become outdated if the technology behind QR codes evolves. Stakeholders suggested varying degrees of cost implications. For most stakeholders, the addition would have a slight to moderate impact, mainly due to the technology required for creating QR codes, including adding URLs for each specific ad. Technical development and compliance costs could also increase, depending on the level of regulatory prescription. In some cases, providers might need to outsource QR code creation if they lacked the necessary tools or expertise. Two respondents noted that adding	<i>See section on TV.</i>

Options	Description	Impact on providers	Impact on citizens
		a QR code would have no impact, while one suggested it could lead to a very significant increase in costs.	
Link	The label should include a link to access the transparency notice.	<i>See section on TV.</i>	<i>See section on online medium.</i>

Offline – physical objects

Similar to print, the formatting requirements for physical objects (i.e. merchandise) outlined in Table 6 address size and layout, readability, accessibility, and access to the transparency notice.

Table 6: Formatting for physical objects

Options	Description	Impact on providers	Impact on citizens
Size and layout			
Clear visibility and distinguishability	The label must be clearly visible and distinguishable from other content in the ad, ensuring that an average viewer can easily identify it. It should be positioned in a way that prevents it from being overlooked.	<i>See section on online medium.</i>	<i>See section on online medium.</i>
Size of the label: - Minimum 5% - Minimum 6%. - If the medium is < 65 cm², the minimum size shall be 1.4 cm by 2.8 cm (3.92 cm²). - Minimum 96 mm wide and 192 mm high.	The label should cover at least 5% or 6% of the size of the ad. Alternatively, the label should be at least 96 mm wide and 192 mm high. If the medium is less than 65 cm ² , the minimum size shall be 1.4 cm by 2.8 cm (3.92 cm ²).	The publisher interviewed indicated that a 5% label size requirement is feasible and would have a moderate impact on cost.	<i>See section on online medium.</i>
Layout: - Single paragraph - Bullet points - Text not condensed nor justified	The text of the label should be a single paragraph or with bullet points. The text should not be condensed nor justified.	<i>Not tested.</i>	<i>See section on online medium.</i>
Placement: - Above the ad - Below the ad	The label should be placed above or below the image or text of the ad.	<i>Not answered due to variety of physical objects.</i>	<i>See section on online medium.</i>

Options	Description	Impact on providers	Impact on citizens
Icon/logo	The label should contain an icon or logo.	<i>See section on online medium.</i>	<i>See section on online medium.</i>
Readability			
Clear legibility	The label must use a font size and style that ensure legibility across different formats and devices. It should maintain sufficient contrast with the background to enhance readability and the text should remain clear without requiring zooming or additional effort from the viewer.	<i>See section on online medium.</i>	<i>See section on online medium.</i>
Font size: - Minimum 7 points - Minimum 1.2 mm height - Proportionate	The text of the label should be at least 7 points in size and at least 1.2 mm in height. Alternatively, it should be proportionate to the size of the ad.	The publisher mentioned that the listed requirements are feasible, but fonts should not be of a size that impedes the view of the main message of the ad.	<i>See section on online medium.</i>
Font type: - Sans serif - Other font types	The text of the label should be in sans serif font or other types of fonts that ensure legibility.	The publisher interviewed indicated that the use of a sans serif font is feasible, although the inclusion of a label is itself challenging.	<i>See section on online medium.</i>
Contrast: 100% dark text - Coloured text - Light-coloured background - Dark coloured background	The text of the label should be in 100% dark colour or in a colour contrasting with the background. The background of the label should be light-coloured or dark coloured, contrasting with the ad.	<i>Not answered.</i>	<i>See section on online medium.</i>
Accessibility			

Options	Description	Impact on providers	Impact on citizens
Compliance with accessibility standards	The label must be designed to be accessible to individuals with disabilities, ensuring compliance with recognised accessibility standards.	<i>See section on online medium.</i>	<i>See section on online medium.</i>
Clarity	The label should be clear.	<i>See section on online medium.</i>	<i>See section on online medium.</i>
<i>Access to transparency notice</i>			
QR code	The label should include a QR code to access the transparency notice.	<i>See section on print medium.</i>	<i>See section on TV.</i>
Link	The label should include a link to access the transparency notice.	<i>See section on TV.</i>	<i>See section on online medium.</i>

Administrative obligations and material costs

Additional considerations valid across different media and options include potential additional costs associated with variations in label size, font requirements, logos or pictograms, colour and contrast, and audio requirements. While the impact on **administrative obligations** varied, stakeholders generally indicated that the tested requirements would lead to a significant increase in administrative tasks. Some responses suggested a minimal impact, such as the need to provide compliance templates, but most highlighted the need for ongoing adjustments to ad content and compliance efforts. These tasks often involve redesigning materials, coordinating with legal teams, and ensuring consistency across different platforms. The complexity of addressing cross-border variations in regulations adds further burdens, as differing national requirements necessitates additional legal reviews and content adaptation. Audio requirements posed particularly significant challenges, requiring extensive coordination and technical adjustments.

Stakeholders also indicated that variations in label requirements would necessitate the production of **additional forms, materials, and training programmes**, with the impact differing slightly depending on the specific requirement. Many stakeholders anticipated significant or very significant impacts, especially considering the need for new public policies, sales team training, and both internal and external training initiatives. The frequency of these updates would depend on regulatory changes, with several stakeholders noting that continuous modifications would create ongoing demands for updated training and materials. Publishers expressed concerns about the burden of adapting to these changes, particularly for SMEs, which would include new forms and ensuring compliance across both print and digital adaptations. Two stakeholders highlighted that audio requirements would have a very significant impact, necessitating substantial training and new materials. Several suggested that the impact would be moderate or slight, mainly depending on how frequently label requirements are updated.

Finally, stakeholder feedback highlighted a range of potential impacts on the **purchase or substitution of materials** (software, hardware), with most respondents indicating a slight to significant impact. Some noted that small adjustments in materials like fonts or colours would primarily affect smaller publishers with limited resources. Moderate impacts were reported in cases where new technology or software investments would be necessary, although larger players in the industry could absorb these costs more easily. Some responses pointed to significant impacts, especially when entire advertising portfolios would have to be adapted to comply with new label standards, requiring development and software costs. One stakeholder suggested that the impact could be very significant, particularly due to the need for comprehensive compliance measures, including new software for label management and integration with external resources.

Overall, while the extent of the impact varies depending on the size and capabilities of the publisher, most stakeholders foresee notable costs, particularly in compliance, technology investment, and material substitution.

5.2. Formatting of transparency notices

Field formatting requirements

Interview feedback on the field formats was limited. For most field formatting requirements, respondents noted that the Commission should specify the requirements to which they would then adhere. Some comments related to their ability to produce aggregate values, while the remaining feedback focused on content provision and technical implementation requirements.

One respondent indicated that it would be technically very difficult to provide granular detail on the remuneration charged for individual political advertising events. They also voiced the concern that prices for individual advertising events were commercially sensitive information that they would not want to make publicly available. They indicated that where precise values would be difficult and commercially sensitive to provide at any granular level, aggregate values could be provided in a value range. Some consideration should be given in the recommendations as to how precise the stated value should be, and the level of granularity required.

To maintain an easy-to-read and consistent presentation of the transparency notice, some data points related to the same piece of information have been combined into a single data field in the recommendation. This prevents the number of fields from becoming overly numerous and keeps the focus of information shared concise. Recommendations refer to specific data points that should be structured (machine-readable fixed option) and unstructured (free format) data to help with access, usability and conciseness of the transparency notice. As a guiding principle, all data fields are defined to be as structured as possible to enable automated processing of data and easy identification of individual data attributes contained in each field.

Specific data formatting standards are recommended to bring the standard into alignment with DSA recommendations.

Some fields would be mandatory (i.e. data must be presented), some are conditional on whether the requirement applies to the specific ad, and some are discretionary (i.e. the feasibility of providing the data will vary between sources and it is left to the providers to determine if they can provide the relevant information).

Table 7 Field formatting requirements

Data field required	Description	Mandatory, conditional or discretionary	Formatting requirements
Sponsor name and contact details	Field should display identity of the sponsor, including their name, email address, and, where made public, their postal address. When the sponsor is not a natural person, the address of its place of establishment.	Mandatory.	Field should be free text with a combination of data attributes in the following sequence: • Name (mandatory) • Email address (mandatory) that can be copied and connect to a valid mailbox • Postal address (conditional – where the postal address is publicly available information) Each data attribute should be machine readable to enable automated identification and verification of the name, email address and postal address of the sponsor.
Ultimate provider of remuneration for the advert	Where applicable, details should be provided of the entity ultimately controlling the sponsor.	Conditional: where the person or entity is different from the sponsor.	Field should be free text with a combination of data attributes in the following sequence: • Name (mandatory) • Email address (mandatory) that can

Data field required	Description	Mandatory, conditional or discretionary	Formatting requirements
	Identity and contact details of the natural or legal person that provides remuneration in exchange for the political ad, where different from the sponsor or the entity ultimately controlling the sponsor.		be copied and connect to a valid mailbox Postal address (conditional – where the postal address is publicly available information) Each data attribute should be machine readable to enable automated identification and verification of the name, email address and postal address of the ultimate provider of remuneration.
Period of use	Time period of publication, delivery and dissemination.	Mandatory.	Field should contain two dates; a start and an end date that are human and machine readable. The dates should be presented in the ISO 8601 format ¹⁷³ [start: YYYY/MM/DD end: YYYY/MM/DD], and decipherable by a machine.
Value of benefits	The aggregate value of benefits received for publication. The benefits for individual transmissions of the ad do not need to be presented; rather, a total for the publication of the ad by the publisher can be used.	Mandatory.	A numerical value should be presented where possible, including a currency denomination. The value should cover the use of the version of the ad covered by the transparency notice on the publishers' platform and be accurate to within a decimal place. Where benefits received are not directly translatable into a financial value, the most practical method of tangible definition of benefit possible should be used.
Origin of benefits	Provide details of public or private origin of benefits received (indicating within or outside the EU).	Mandatory.	Details should begin with structured data indicating: [Public] and/or [Private], and [from within the EU] and/or [from outside the EU] Free text should follow describing the identity or multiple identities of the originator(s) of the benefits, including the name of the person or legal entity.
Method of benefit calculation	Describe methodology for calculating the value of benefits.	Mandatory.	Free format description of the calculation method.

¹⁷³ ISO Standard 8601 for format of dates and times, <https://www.iso.org/iso-8601-date-and-time-format.html>.

Data field required	Description	Mandatory, conditional or discretionary	Formatting requirements
Relate political campaign	Provide indication of the election or referendum and legislative or regulatory processes links to official information about the modalities for participation in that election or referendum.	Conditional; where applicable.	Free format text field naming the process in unambiguous recognisable terms. Include hyperlinks to sources of official information, or if no online source is available, contact details for making a manual enquiry to request details (details do not need to be machine readable).
Location in European repository	Provide links to the European repository for online ads.	Conditional: where the ad falls in scope to be included in the European repository (i.e. an online ad).	Free text field including hyperlink connecting to the details of the ad and transparency notice.
Compliance notification mechanism	Provide information on the mechanisms enabling notification of non-compliance.	Mandatory.	Free format text field.
Discontinuation and withdrawals	Must provide notice of previous publication discontinued or suspended due to non-compliance with the Regulation on any platform and with any publisher.	Conditional – when a previous publication of the political ad or an earlier version was suspended or discontinued due to an infringement of the Regulation.	Free format text field. The notice should describe the location and time of publication, as well as where and when the ad was withdrawn.
Targeting and ad-delivery techniques	Describing, where applicable, targeting or ad delivery techniques based on the use of personal data.	Conditional: where targeting and ad delivery techniques are used.	Free format text field.
Reach of the ad	Describe, where feasible, the reach of the political ad in terms of the number of views and engagements.	Discretionary.	Free format text field.

Formatting of transparency notice

Table 8 Transparency notice metadata requirements

Data field	Description	Mandatory, conditional or discretionary	Format constraints
Political ad name	Political ad name can assist the user in confirming they have located the relevant transparency notice if these data are visible to them.	Discretionary.	Free format text field.
Transparency notice ID	Transparency notice ID is a unique identifier that can enable the user to find the notice (when directed to a store of transparency notices in a separate location from	Conditional: where the ID is needed to navigate to the transparency	No specific format constraints. The ID should be sufficiently complex to ensure it is unique. The ID can be a code combining letters and numbers that are meaningful or not meaningful.

Data field	Description	Mandatory, conditional or discretionary	Format constraints
	the ad without aid of automated links). The ID can also help with version control. Where the transparency notice is displayed adjacent to the ad or linked via automatic means of connection (hyperlink, QR code, etc.), a transparency notice ID is not required. More details on the conditions are in the Transparency notice ID topic of the metadata technical specification section (see below).	notice from the ad.	If a user needs the code to be able to find the transparency notice, it should be as easy to read and use as possible, potentially including named publishing location and date-time of broadcast or display as contextual information built into the identifier.
Copy/description/link to the ad	An image or recording of the ad may be embedded in the transparency notice to aid the user in confirming the relationship of the transparency notice to the ad. Alternatively, a description of the ad may be provided, or a description of the location or hyperlink to the ad while it is still available there. More details are in the linking topic of the Metadata technical specification section (see below).	Discretionary.	Content could include one of: - Embedded image or video file should be viewable using native capabilities of the viewing platform – standard browser or app features; - A description of the ad or a transcript of the audio content of broadcast ads; - Description of the location (and time of broadcast/display) of the ad; - Direct link back to the live ad. When a URL is provided, it should be clear to a person or a machine whether a URL is held here or not.
Change record	The transparency notice provides details of any changes. More details on the change record requirements are presented in the Change Control technical specification section (see below).	Discretionary.	The transparency notice should provide clear information on the version(s) of the ad to which it relates, when the transparency notice became the applicable version, and/or when it was superseded. The change record should hold an identifier for the ad to which the transparency notice refers (unique identifier, contextual description, or copy of the ad), and a start and an end date/time following ISO 8601 format¹⁷⁴ [start: YYYY-MM-DD hh:mm end YYYY/MM/DD hh:mm] that the transparency notice was the correct live version. These details should be easily

¹⁷⁴ ISO Standard 8601 for the format of dates and times, <https://www.iso.org/iso-8601-date-and-time-format.html>.

Data field	Description	Mandatory, conditional or discretionary	Format constraints
			distinguishable from the rest of the transparency notice record and from each other. When an ad is changed, a new version of the transparency notice should be provided to describe the new version of the advert.

Ownership requirements

General responsibilities

Some respondents indicated that hosting the transparency notices on the publisher platform would be a significant burden, particularly for smaller operators (publishers), potentially forcing them out of the market. They felt that responsibility should fall on the advertisers (creators of the ad) rather than the publishers.

Their main concern was whether they would be held accountable or liable for the accuracy of information provided. A lack of control may lead some publishers to reconsider their involvement if they risk liability for aspects they cannot fully oversee.

Information provision

Publishers expressed their concerns about having to verify the information provided, as they did not see clearly how they could do this, and requested clarity on whether they would be held accountable for the accuracy of information in the transparency notice. The availability of information and the responsibility for validating its accuracy is challenging because publishers rely on advertisers to provide accurate information. Keeping the information of the transparency notice up to date is another challenge and may burdensome manual intervention or the creation of automated solutions.

More specifically:

- Publishers said it is difficult, and in some cases impossible, to provide exact amounts paid for publishing ads, given competitive sensitivity and the complexity of cost estimates for advertising spend. Platforms cannot specify the amount spent for each individual political ad, but, rather, the amount spent for the ad campaign on its channels in its entirety. Finally, there is no way for the platform to verify the cost of the political campaign outside of its channels. To overcome these challenges, they suggested providing ranges.
- Platform providers expressed concerns about being able to ensure the accuracy of links to official information about the modalities for participation in the elections or referendum, noting that they cannot verify and guarantee that the links indeed point to the correct official information.
- Platform providers rely on advertisers to provide the information to be included in the transparency notice. There is no way for them to verify all of the information independently. Thus, the implementing legislation should clarify that the provision of the correct information for the transparency notice is the advertisers' responsibility and obligation.
- Publishers referenced the same challenges in maintaining details of prior withdrawals of the ad. Monitoring the compliance of the transparency notices may be very costly, adding layers of administrative overhead.

Conclusions

The specifications need to make clear the responsibilities of the publisher and those of the advertiser and advertising services providers to make the process efficient and the cost/effort burden as light as possible. In particular:

- Specifications should establish the publishers' responsibility to ensure that a transparency notice is made available and complies with the specifications. The requirement should not dictate whether the transparency notice is displayed on the publishers' platform, with the ad, or on a third-party platform, but that it should be the responsibility of the publisher to ensure that the transparency notice is displayed in one of those places.
- The regulation divides responsibility for the provision of all details in the transparency notice. While the publisher should ensure that all the required information is provided, any advertising service provider must ensure the accuracy of the information provided and inform the publisher if any changes or updates need to be made. This should reduce the burden for the publisher in maintaining up-to-date information in the transparency notice.
- Where the transparency notice is displayed in the same context as the ad and cannot be retroactively updated, then the information provided in the transparency notice should be correct at the time of publishing.

Table 9 Ownership requirements

Requirement	Description	Implementation guidelines
Information provision	The publisher must ensure that all required information is included, but advertising services providers must inform the publisher if any details need to be updated or corrected.	Any party involved in providing the transparency notice, whether the sponsor, a creative intermediary, the publisher or a platform provider, can provide the details, but it is ultimately the publishers' responsibility to ensure that all details are provided. Advertising services providers should ensure that details are correct and up-to-date. When the transparency notice is displayed in context with the ad and cannot be updated, the information should be correct at the time of publishing.
Display	It will be the publishers' responsibility to ensure that the transparency notice is made available.	The default location for making transparency notices available will be the publishers' own platform or media. Where they do not have an appropriate platform, they can utilise a third-party platform, including one offered by a platform provider or creative agency. However, responsibility for ensuring the transparency notice is available and displayed remains with the publisher.
Reuse	Any reuse of the ad on a different publishers' platform requires a separate transparency notice on that new platform.	The publisher has no responsibility for referencing any subsequent reuse of the ad and related transparency notice elsewhere. If the sponsor chooses to reuse the ad, it is their responsibility to ensure that the new publisher enacts their responsibility to display an associated transparency notice.

Availability requirements

Hosting

The first choice that publishers have to make to ensure the availability of the transparency notice is **whether to publish it together with the ad or in a separate location**. While the majority of publishers would prefer to display the transparency notice in a separate location for technical feasibility and user engagement purposes, some interviewees were in favour of the option to include it in the same place as the label, as it could be more efficient for physical media and in some online cases.

The majority of publishers willing to display the transparency notice in a separate location indicated that they could host the transparency notice on their own website, while noting the cost impacts for websites. Ensuring that the transparency notice is prominently displayed and easily accessible may require adjustments to the website's design and functionality, including updating the website infrastructure to display transparency notices clearly. Some publishers highlighted challenges with that option:

- **Mobile application:** Display of transparency notices would require higher technical costs than displaying them on the publisher's website. Integrating transparency notices without disrupting the UX is particularly challenging for smaller screens. Political ads on mobile apps should instead include a link to the transparency notice hosted on the publisher's website.

- **Publishers without a website:** Smaller publishers voiced their concerns about the administrative burden associated with developing and maintaining a consolidated platform (such as a website) to host transparency notices. Without clear, step-by-step guidance, the process may become fragmented among multiple stakeholders, making compliance more difficult. Representatives indicated that some smaller broadcasters and publishers do not have websites with the capacity to implement such processes, while others do not have websites at all.

To mitigate those challenges, publishers mentioned alternative means of displaying the transparency notice information that could be controlled by the creators of the ad (e.g. an i-hover feature). Publishers suggested that political ads on broadcast media could include a link to the transparency notice hosted in the European repository. This could be a solution for making the transparency notice available for offline media without a website. As the timeline for the establishment of the European repository is longer, it would also ease compliance. The creation of the link to the European repository is expected to be the publisher's responsibility.

Representatives of VLOPs and VLOSEs advised that they already had established ad repositories and transparency notices that could be stored, with minimal development required.

Duration

Keeping a record of the ad in the transparency notice for a specified time period after its final broadcast poses no challenges for platform providers. Many indicated that their platforms are already in line with the Regulation and retain the ad and the transparency notice for seven years after it is no longer displayed.

Availability

Platform providers and publishers indicated that making the transparency notice available at all times during the publication period of the political ad posed no challenge.

Conclusions

Different means of displaying the transparency notice could meet the requirements and be effective. Some of the alternative options should be presented, along with what is essentially required - a clear means of navigating to the transparency notice information (hosted in a place where it can be easily and directly retrieved), with certainty about which political ad it describes.

The specification needs to clarify that the transparency notice can be displayed in the same place as the label, or in another location, but with conditions. If the ad is online, the transparency notice must also be online. If the ad is in physical media, the transparency notice can be included in the same physical media and/or made available online.

Where an i-hover solution was suggested, this method could be used to display both the information in the label and in the transparency notice.

Where the transparency notice is hosted in a different location, the requirements for user discoverability and context apply.

Table 10 Availability requirements

Requirement	Description	Implementation guidelines
Hosting	The transparency notice should be easily retrievable from the publishers' own platform.	The transparency notice does not need to be hosted directly on the publisher's own platform, although that will be the default standard. A publisher can display the transparency notice contextually adjacent to the ad in their media or use a third-party platform to host the transparency notice. The transparency notice must be clearly indicated and easily navigable from the ad.
Language	The transparency notice should be written in the same language as the political advert.	If the political ad is published in more than one language, a transparency notice should be linked to each language version of the ad in the relevant language.

Requirement	Description	Implementation guidelines
Due	The transparency notice is made available at the same time as the ad.	The publisher should ensure that the transparency notice is available and accessible within 72 hours of the first transmission of the ad. For VLOPs and VLOSEs, the transparency notice should be published before the first transmission.
Duration	The transparency notice can be accessed while the ad is active.	The transparency notice should be available and accessible for the duration of transmission of the ad and for the subsequent seven years.
Availability	The transparency notice will always be available to citizens.	During any given day that the political ad is live, the transparency notice should always be available, with unavoidable factors causing unavailability for a maximum of eight hours of continuous service disruption. During a calendar year the transparency notice should be available 98% of the time, or not available for a maximum combined seven days in a year.

Accessibility requirements

User discoverability

One publisher's representative expressed concern about the challenges in ensuring accessibility for different demographics. Factors such as users' ability to recall and interact with links, particularly in audio or radio formats, can present obstacles. Ensuring that all users, regardless of age or digital literacy, can **easily locate and understand the notice** is a critical consideration.

For mobile apps and social media, displaying the transparency notice on mobile apps is problematic. Ads on mobile apps typically consist of small-size banners with layered approaches, i.e. the information is not visible at all times, but is displayed after user interaction. Also, users would not be able to use a link embedded in the ad to automatically navigate to the transparency notice and would have to manually type in the link to the transparency notice to access it. This is because, typically, clicking on the ad banner leads to information on the election or the website of the political actor, rather than to transparency information related to the ad (an ad cannot hold more than one link).

Radio broadcasters indicated that signposting listeners to a website to obtain the details in the transparency notice would be a relatively simple, straightforward and normalised operation (albeit reliant on digital literacy and internet access).

Printed media could host the transparency notice in the same context as the ad but it would be difficult to include within the ad itself. This is because printed ads have fixed dimensions, making it difficult to include a transparency notice without compromising the ad's design and readability.

Where publishers use an online platform belonging to a third-party platform provider, they are concerned that they would have little control over what is displayed around the advert. As they cannot control navigation to the transparency notice, they would be somewhat reliant on the platform provider to manage this.

Some publishers suggested that navigation is always challenging as it largely depends on user behaviour and device features. They suggested that the implementing legislation should consider navigation mechanisms that are both flexible for providers and efficient for consumers. Digital platforms may have different display limitations, affecting how links, buttons, or interactive elements are rendered, and users on mobile devices may find it more difficult to interact with transparency notices, particularly if they require multiple clicks or redirects. Users with motor impairments may have difficulty interacting with small buttons or links, especially on mobile devices. In printed ads, individuals with visual impairments may not be able to access transparency information unless alternative formats (e.g. QR codes leading to an accessible webpage) are provided. Suggested alternatives include:

- Where a URL can be provided, it could open the hosting location of the transparency notice in a new web page;
- If the link to the transparency notice leads to a pop-up and the user has pop-up blockers on their browser, they would not be able to access it;
- On TV, including links (URLs) to the transparency notice could be less consumer-friendly than including QR codes. Even though some argue that older voters may not have the digital skills to operate QR codes, they are becoming increasingly established and are considered the preferred option to navigate to the transparency notice from TV ads.

Publishers indicated that setting up the navigation from the transparency notice back to the original ad could be **very challenging from a technical viewpoint**. Users redirected to a separate page for the transparency notice may find it inconvenient to return to the original ad. On mobile devices, multiple redirects or the lack of a clear 'back to ad' button could create a frustrating UX. Ensuring that the return navigation works correctly across various digital environments (web, apps, social media) may require additional development and testing. Radio listeners would not be able to use any means to return to the broadcast ad. Representatives expressed a desire to address these issues in further discussions with stakeholders from the advertising chain to ensure a realistic and effective solution. Options considered include embedding a copy of the ad in the transparency notice to enable the user to directly view the ad (see metadata requirements section below).

Accessibility

Interviewees advised that most publishers' platforms will already have accessibility standards/best practices in place, and the transparency notice data should have the existing accessibility controls applied in alignment with the European Accessibility Act.

For TV and other offline media, ensuring accessibility will be very challenging, particularly if accessibility requirements would include reading the transparency information out loud. Smart TV software may be able to provide solutions but would not be backwards compatible with all TVs or other offline media. Read-out-loud options for blind and visually impaired citizens are not yet available on some publishers' online platforms but are in development in most cases. For digital formats, technology already exists to help those with visual impairments, such as AI-powered tools that read content aloud. In print, however, there are more limitations, such as the inability to provide alternative formats like Braille. Publishers suggested that these challenges can be mitigated by leveraging existing technologies and solutions. These are not specific to political ads but should be addressed as part of broader accessibility efforts.

Conclusions

The means of navigating to the transparency notice from the ad needs to suit the medium. The specification must accommodate suitable options for each medium, centring the important principle that the transparency notice can be easily found. Accessibility standards should be applied to the transparency notice consistently with other information provided by the publisher. The standards of the European Accessibility Act should be applied as much as possible, for example presenting ads in a way that enables integration with assistive devices.

Table 11 Accessibility requirements

Requirement	Description	Implementation guidelines
User discoverability	The label should contain information to access the transparency notice.	The instructions (found within the label) on how to find the transparency notice should be intuitive to all users and easy to follow.
	The means of navigating to the transparency notice from the ad can be adjusted to suit the medium.	The means of navigating to the transparency notice can be an embedded link, a URL or QR code, or directions to the location when the transparency notice is displayed in the same context as the ad.
Context	The transparency notice should be displayed in a context that	The transparency notice can be displayed in the same context as the ad in printed and online

Requirement	Description	Implementation guidelines
	makes clear it is associated with the publishers' domain, even if an intermediary has been contracted to make the transparency notices available.	media, in which case the presentation of the transparency notice should make clear that it relates to the specific ad it describes. Where the transparency notice is presented in a different location, it should clearly show that it relates to the broadcast of the ad on the publishers' platform, as well as identifying the location and time of transmission of the ad so that the relationship between the specific transparency notice and the ad is unambiguous.
Return	The transparency notice should contain information to access the ad. The principle to follow is that the user must be able to refer back to the ad from the transparency notice; however, it is not essential that they are provided with a link that automatically navigates back to the ad for them.	For ads presented online, the transparency notice should provide a link back to the ad or should open in a separate browser window or pop-up so that the origin ad remains open where it was first encountered, or a copy of the ad should be embedded in the transparency notice. For ads presented offline, a copy of the ad can be embedded in the transparency notice or a contextual description of where and when it was broadcast can be provided.
Accessibility	The transparency notice presentation format must meet the accessibility requirements of citizens with disabilities and impairments.	Display of transparency notices should comply with the Web Accessibility Directive and/or the European Accessibility Act and meet industry standards following the WCAG .

Metadata requirements

Unique identifier coding

Some publishers expressed concerns that implementing and managing unique identifiers across different platforms and ad formats (print, digital, video, social media) may be difficult and need significant technical development. It would be much simpler to ensure they are unique only on the platform where they are created, whether that be a publisher, a platform provider, or a creative party. The uniqueness and reliability of the identifier beyond the origin platform could not easily be ensured.

Ensuring that the same identifier correctly links all relevant versions of an ad and its transparency notice across multiple media formats could be complex, particularly when ads are adapted for different placements. Maintaining accurate links between each deployment of an ad and the corresponding transparency notice using unique identifiers would be very difficult, especially when ads are distributed via third-party platforms (e.g. social media, ad networks), as there may be variations in and limitations to how identifiers can be assigned, stored, or retrieved in each case, affecting the reliability of the linking process.

Using a coding method that includes reference to the context location to guarantee uniqueness (similar to a MAC address) could help, but whether that would apply to the creative origin, the publisher (which may be an intermediary), or the platform provider, which would be able to generate and apply the identifier code, will become complex and challenging.

Transparency notice identifier

Some publishers supported the use of identifiers to help to ensure the authenticity of the transparency notice. Identifiers can help users to avoid encountering misleading or fake notices, ensuring they access the correct information. Platform providers already use unique identifiers for internal purposes. On the other hand, for general use, in one association's view, as long as there is a link, a unique identifier only has marginal added value.

There is also concern about using unique identifiers to link versions of political ads with their corresponding transparency notices, particularly in the context of radio advertising. While unique identifiers can easily be displayed in text-based or visual formats (e.g. on screens), the same approach becomes problematic for radio. It would not be practical or meaningful to announce a unique identifier, (e.g. '5NF capital Q') during a radio ad, as it would not provide clarity or utility for listeners.

Linking

Publishers do not consider it challenging to provide a link to the transparency notice from the label, providing the label itself is not too cluttered with information. The key concern is ensuring that there is a seamless and intuitive path from the label to the transparency notice so users can easily find the information they need without confusion.

Online publishers, however, expressed concerns about embedding the link to the transparency notice in the ad or specifically in the label as a hyperlink, as the ad image, including the label, will already have an embedded URL linking to the advertisers' (e.g. political party) website. It is unclear how two URLs could be included in the same image. Certain tools, such as Google Ad Manager, allow only one URL per image.

Platform providers indicated that their platform architecture allows navigating from the ad to the platform's own ad repository – which contains the transparency notice – but not the reverse. Users can view the ad in the platform's ad repository but cannot navigate back to their feed. While integrating a copy of the ad to which the transparency notice is linked could be a mitigating measure, some publishers pointed out that it would be a costly additional development.

Conclusions

The means of developing a globally unique identifier will be complex to implement such that they are effective in creating a truly unique identifier and can be included in the reference information of the ad and transparency notice. There may be limits to the level of granularity where unique identifiers can be applied, limiting use of a unique identifier to each platform on which the ad is used. A separate transparency notice will need to be linked to each ad on each platform, so each uniquely identified ad has a corresponding dedicated transparency notice. The use cases for the identifier are to enable linking the ad and the transparency notice and to enable version control indicating the version of the ad to which a transparency notice refers. These use cases may be more simply addressed by using linking mechanisms between the ad and the transparency notice, such as URLs, hyperlinks, QR codes, and contextual descriptions for analogue and broadcasting media (e.g. page 9 on Sunday 21st, Channel 4 at 6.29pm Coordinated Universal Time (UTC), etc.).

A single format for unique identifiers of ads and transparency notices is not essential to support the different ways of displaying ads and transparency notices and the suitable means of linking them in each medium. Rather, the linkage mechanism used to connect to the transparency notice must reliably lead the user to at least the version of information in the transparency notice that was correct at the time of publication of the ad, and preferably to the latest version of the information relevant to the version of the ad. Where the transparency notice is displayed in the same context as the ad, the link may be as simple as a context-adjacent display or details of where to find the information.

It may not be possible to navigate back to the original ad location from the transparency notice for some media channels (e.g. print and broadcasting) and would be extremely challenging for others. This is not an essential feature and the specifications should highlight that the user must be able to identify and find the ad described in the transparency notice, whether through a link or other means of identification. Alternative options for enabling association of the transparency notice back to the ad could include:

- Opening the transparency notice in a separate browser window so that the ad remains displayed in the original window;
- Embedding a copy of the ad in the transparency notice;
- Including a description of the advertisement or a transcript of the audio content of broadcast advertisements;
- Providing a reference location describing where the ad was displayed or broadcast for physical and analogue media.

Table 12 Metadata requirements

Requirement	Description	Implementation guidelines
Coding	A coding system should be used to uniquely identify and link each ad/label/transparency notice. Using a unique identifier for the ad and the transparency notice will assist with linking correct versions of the ad and transparency notice together and preserve the integrity of those links when updates are made to the ad or transparency notice. Coding is not essential to preserve the connection, however, and other methods of linking can be used where necessary.	No specific coding structure is specified, as it will not be applied to all ads and transparency notices and will not guarantee unique identification. Where a code is applied, it should be complex enough to uniquely identify the ad or transparency notice on the hosting platform(s) and successfully distinguish unique ads and transparency notices, including unique versions of the ad and transparency notice when either are updated. If a URL or QR code is used to enable automatic navigation to the transparency notice, the publisher should ensure that any change to the transparency notice hosting location does not break the automatic linking function of the URLs or QR codes by maintaining Domain Name System (DNS) records, etc. Where contextual information is used to describe the ad so its corresponding transparency notice can be found in a registry, that information should be sufficiently specific to uniquely identify the ad, including publication name, country <i>and</i> regional/local descriptors, date <i>and</i> hour/minute of broadcast where relevant.
Ad/label identifier	The ad label should have a unique identifier to help preserve the integrity of alignment between the label on an ad and the transparency notice and ensure it is up to date.	The identifier for an ad, where used, should uniquely identify the version of the ad and enable users to accurately establish the link between correct versions of the ad and transparency notice.
Transparency notice identifier	The transparency notice should have a unique identifier to help preserve the integrity of alignment between the label on an ad and the transparency notice and ensure it is up to date.	The identifier for a transparency notice, where used, should uniquely identify the version of the transparency notice and enable users to accurately establish the link between correct versions of the ad and transparency notice.
Identification	The identifier should be visible in the information presented.	The information relevant to the user to enable navigation between the ad and the transparency notice must be visible to the user and clearly provided as a means for navigation. Where unique identifiers are used, they should be described as unique identifiers, including reference to where to use them to find the transparency notice. Where URLs or QR codes are used, they should unambiguously be displayed as a URL hyperlink or QR code, so the user knows to click or scan them. Where contextual information is provided, the user should understand where they can use the information to search for and find the transparency notice.
Linking	The identifiers should enable linking between versions of the ad and the transparency notice.	Hyperlinks. Contextual information. Embedded copies/descriptions.

Transparency notice status - change control requirements

Modification

Publishers gave no indication of challenges in the technical process of updating the transparency notice, but raised concerns about maintaining the accuracy of information, for example the amount spent on the ad. An ad can surpass the initial budget if it gets a lot of impressions and engagement. This is because if an ad does well, funds are redistributed across advertising elements and more money gets poured into the most successful ads. The advertiser/sponsor will be best placed to provide updated information, but may find it difficult to keep advertising spend details up to date.

Version control

Online platform providers indicated that providing version control on ads and transparency notices would not pose any challenges. A change in the transparency notice creates a new ad in the platform's system, so users are able to access both old and new ad versions. The process would be the same as referencing updated privacy policies. However, showing previous versions implies a slight increase in implementation costs in addition to maintenance costs.

Association representatives for other publishers indicated that the challenge of maintaining an accurate change record for the transparency notice is significant and would need a rigorous change control process. The need to ensure that the transparency notice remains up-to-date and accurately shows information pertinent to the latest version of the political ad would require real-time communication with the advertiser. Changes in the campaign, such as extensions or modifications, would necessitate careful tracking and prompt updates to the notice. This could entail a considerable investment of resources and effort to guarantee that the change record is consistently accurate and reflective of the current ad. Any record of previous versions may be complex and costly to implement, indicating the currency of the transparency notice and the ad that it describes, less so.

One publisher advised maintaining a log of updates to clearly indicate when the transparency notice had been revised, ensuring that users could easily identify the latest version. If a change log was to be consolidated into a central repository, the records would need to be structured in the same format to ease integration.

Record of withdrawal

Online platform providers advised that as the withdrawal record is already implemented under the DSA transparency database, no challenges are envisaged.

Tracking withdrawals due to contravention of advertising rules would be challenging for publishers, requiring tracking and ongoing communication activity with the advertisers. Displaying the information does not pose a problem for publishers, but maintaining the accuracy of information provided can only be done efficiently by the advertiser. Keeping the withdrawal record up-to-date and accurate across platforms could be challenging if the ad is placed in multiple channels (digital, print, etc.).

Broadcasters advised that when an ad is withdrawn, it is the same as the last broadcast date. However, indicating the reason the ad is no longer being shown may be difficult.

Conclusions

Holding a record of changes to the ad and the transparency notice does not pose a problem, but maintaining the accuracy of information on changes would be challenging for publishers. The change record should show when a transparency notice was created or updated, as well as the version of an ad to which it applies. The indication of the ad can be through specific linking mechanisms, such as a link back to the ad, a copy of the ad embedded in the notice, or contextual information about where/when the ad can be found.

Publishers advised that media regulators will check ad details and ascertain whether the transparency notice information is correct. It will be in the interests of the sponsor and publishing parties to ensure that records are updated. This record should be limited to recording withdrawals related to breaches of the Regulation and not attempt to cover other advertising rules on the hosting platform or elsewhere, as this will become confusing and complex.

Table 13 Change control requirements

Requirement	Description	Implementation guidelines
Modification	The transparency notice can be modified.	The publisher must provide means for the details of the transparency notice to be reviewed, updated, or deleted after they have been created. It is not essential that the publisher performs the updates. If they have agreed with other parties that the advertiser, creative agency or other intermediary will perform these updates, they must provide access for those updates to be performed.
Version control	The transparency notice indicates whether it is the latest or an old version.	If a transparency notice is updated for later broadcasts of an ad, the previous version should be updated to show that it has been superseded and its information only applies to earlier broadcasts of the ad, up to a given date/time.

6. Conclusions

This report presented comprehensive evidence and analysis of technical options for labels and transparency notices of political advertisements under Regulation (EU) 2024/900.

It began with an overview of the legal requirements for labels and transparency notices from the Regulation, as well as from other applicable pieces of EU and international legislation in political advertising and related domains. Chapter 2 highlighted the need to carefully strike a **balance between broad legibility principles**, such as clarity and intelligibility, **and specific requirements** on label size, design, layout, syntax, font size and style, and audio formatting in the implementing acts. The use of **standardised symbols** is recommended to supplement but not replace written transparency information. Accessibility standards, including the **European Accessibility Act**, focus on ensuring accessibility of information through more than one sensory channel, as well as seamless integration with assistive technologies.

Following the overview of existing legal requirements, in Chapter 3, the report examined industry practices for implementing labels and transparency notices. These include defining **content specifications** under the Regulation, establishing **metadata standards** for data organisation and interoperability, and applying **design principles** to enhance visibility and readability. The chapter also underscored the role of **UX design** and interactive elements in improving user engagement, while maintaining **accessibility**, as guided by the WCAG 2.1 and EN 301 549 standards. Finally, **legal compliance** with EU and national regulations was emphasised, alongside **security** and **privacy** measures to protect voter data and prevent unauthorised access.

Chapter 4 presented an overview of the EU political advertising market, highlighting its rapid **shift towards online platforms** (e.g. Google and Meta, which hold over 60% of the market) and away from traditional media (TV, radio, print). The digitalisation of the market introduced complexity in its business models, with **new intermediaries and data flows** enabling targeted and microtargeted advertising based on voters' online behaviour. Challenges remain in estimating the size of the market and exact market shares, as data are not available on offline and non-VLOP political advertising.

Chapter 5 presented technical options for labels and transparency notices based on desk research and assessed the feasibility and impact of those options based on the findings from consultations with political advertising service providers and voters.

A first finding from the consultations, which preceded the assessment of the technical options, was service providers' **uncertainty** about the provisions of the Regulation, which affected their ability to fully evaluate their compliance obligations. Uncertainty related to the scope of the Regulation (definition of political advertising), definition of labels and transparency notices, and clarification of the responsibilities and liabilities of various stakeholders within the political advertising ecosystem.

Beyond regulatory clarity, stakeholder feedback across media of publication, delivery and dissemination of political advertisements suggested that the **proposed formatting requirements risk being overly prescriptive**, particularly for SMEs. Many service providers expressed concern that rigid, number-based requirements on label size, font size and style, and colour and contrast could introduce unnecessary challenges, burdens and costs. Rigid requirements could make compliance impractical, and, in some cases, unfeasible, increasing the risk of some service providers disengaging from political advertising altogether. Instead, a **principle-based approach** was widely preferred, focusing on clarity, salience, unambiguous accessibility, and the other principles mentioned in the Regulation, accommodating the specificities of different mediums of publication, political advertising national practices, and service providers' branding strategies. This approach would also ensure that the legislation is future-proof in a fast-changing technological environment.

Following the principles outlined in the Regulation, a principle-based approach could translate into the following requirements for labels:

- **Clarity** (Article 11)
 - The label should be clearly distinguishable from the rest of the political ad.
- **Salience** (Article 11)
 - The label should be visible and readable. Audio labels should be read at a pace that enables good comprehension of the message;

- The label should be an appropriate size and font size, proportionate to the dimensions of the political ad and the medium of its publication, delivery, or dissemination. It should use a suitable font style and colour, ensuring sufficient contrast, as well as adequate spacing between letters, lines, and paragraphs;
- The placement of the label should be at the publisher's discretion, in line with national and local practices for the display of transparency information;
- A logo could be included in the label. However, prior work on the standardisation of the label should be performed to enhance its recognisability by citizens.
- **Unambiguity** (Article 11)
 - The label should be written in unambiguous and simple language.
- **Accessibility** (Recital 3)
 - The label should comply with existing accessibility standards, particularly the European Accessibility Act and, where applicable, the Web Accessibility Directive (see section 2.2).
- **Access to the transparency notice** (Article 11)
 - The label should either include the transparency notice or provide a direct link to it through a hyperlink, link or QR code. The selection of a hyperlink, link or QR code should be at the publisher's discretion, taking into account the medium of publication, delivery, or dissemination of the political ad.

Similarly, requirements for transparency notices could include:

- **Visibility** (Article 12)
 - The transparency notice should be visible and readable.
 - The transparency notice should have an appropriate size and font size, proportionate to the medium of publication, delivery, or dissemination of the political advertisement. It should use a suitable font style and colour, ensuring sufficient contrast, as well as adequate spacing between letters, lines, and paragraphs.
- **User-friendliness** (Recital 59, Article 12)
 - The transparency notice should be presented in a user-friendly format and be written in simple language.
- **Accessibility** (Recitals 3, 59, and 87, Article 12)
 - The transparency notice should comply with existing accessibility standards, in particular the European Accessibility Act and, where applicable, the Web Accessibility Directive (see section 2.2).
- **Machine-readability** (Recital 59, Article 12)
 - Transparency notices made available electronically should be in a machine-readable format, ensuring compatibility with automated processing and compliance with applicable data accessibility standards.
- **Retrievability** (Recital 59, Article 12)
 - Transparency notices should be easily retrievable, either provided alongside the label or separately through a hyperlink, link or QR code. The selection of a hyperlink, link or QR code should be at the publisher's discretion, taking into account the medium of publication, delivery, or dissemination of the political advertisement.

If a principle-based approach is not adopted and more detailed formatting requirements for labels and transparency notices are to be defined, then each **possible medium subtype of publication would have to be considered**, which could lead to gaps in implementation. According to the stakeholder consultation, a principle-based approach could ensure feasibility and effective implementation by considering differentiated requirements addressing the constraints and capabilities of the broader medium of publication categories. Tables 14 and 15 present the most feasible formatting requirements

for labels and transparency notices, according to the consultations (see Chapter 5 for the impact of each requirement).

Table 14: Recommendations for label formatting requirements

Regulation provision	Formatting requirement	Most feasible option(s) and limitations
Clarity (Article 11)	Logo/icon	▪ Industry-standardised logo/icon for political ads for online media. Key limitations include the time needed for public recognition of the logo/icon and challenges for its technical implementation. Radio formats are exempt from logo/icon requirements.
	Audio requirements	▪ Same volume as the rest of the ad for radio. Key limitations include different national and local practices and mixed stakeholder feedback on speed and the addition of a jingle. ▪ Comprehensible speed The speed of the label should enable listeners to comprehend the message.
Salience (Article 11)	Label size	▪ Minimum 5% of the size of the ad for online media, TV, print, and physical objects. Key limitations include small-screen adaptability (online) and feasibility concerns for certain physical objects. Radio formats are exempt from label size requirements.
	Font size	▪ Minimum 8 to 12 points (or proportional equivalents) for online media, TV, and print. ▪ Minimum height of 1.2 mm for physical objects. ▪ 1:32 height ratio for billboards. Key limitations include feasibility challenges for small screens, small print ads and physical objects, as well as service providers' design constraints across media. Radio formats are exempt from font size requirements.
	Font type	▪ Sans serif typeface for online, TV, print, and physical objects. Key limitations include mixed stakeholder feedback, with concerns about restricted branding and creative freedom. Radio formats are exempt from font type requirements.
	Contrast	▪ Contrast ratio of 4.5:1 for normal text and 3:1 for large text for online media. ▪ Non-black background for all medium types. Key limitations include restricted design flexibility and disruptive advertising aesthetics, particularly for darker ads or branded colour schemes.
	Placement	▪ Placement above or below the advertisement for online, TV, print. ▪ Placement before or after the ad for TV and radio.

Regulation provision	Formatting requirement	Most feasible option(s) and limitations
		Key limitations include mixed stakeholder feedback and different national and local practices.
Unambiguity (Article 11)	<i>No specific requirement emerged. See principle-based approach.</i>	
Accessibility (Recital 3)	<i>See principle-based approach and specific requirements of existing legislation in section 2.2.</i>	
Access to the transparency notice (Article 11)	Included in the label	Provision of the transparency notice together with the label for some physical objects. Key limitations include limited stakeholder feedback and the need to consider small objects.
	Separate from the label	Hyperlink for online media. Short links read out loud for radio. QR codes for TV and print. Key limitations include low rates of clicks in privacy policies and Terms of Service hyperlinks when provided¹⁷⁵ and potential issues in accessibility of QR codes for older voters, as well as the fact that QR codes must be large enough to be scannable, which can be challenging for small print ads. Links must be short and clear.

Table 15: Recommendations for transparency notice formatting requirements

Regulation provision	Formatting requirement	Most feasible option(s) and limitations
User-friendliness	Layout	Bite-sized format (e.g. bullet points) for the display of transparency information. Key limitations include restricted design flexibility and space constraints, particularly for small-screen devices, print media, and physical objects.
Visibility	<i>See findings for labels on font size, font type and contrast in Table 14.</i>	
Accessibility	<i>See principle-based approach and specific requirements of existing legislation in section 2.2.</i>	
Machine-readability	Field formatting Metadata	All of the specified data fields should be identifiable by automated processes. The following additional structuring requirements are specified for individual data fields to aid machine readability: Sponsor name and contact details: Name (mandatory), email address (mandatory), postal address (conditional). Ultimate provider of remuneration for the advert: Name (mandatory), email address (mandatory), postal address (conditional).

¹⁷⁵ Obar, J. A. and Oeldorf-Hirsch, A., 'The biggest lie on the Internet: ignoring the privacy policies and terms of service policies of social networking services', *Information, Communication & Society*, Vol. 23, Issue 1, 2018, pp. 128-147, <https://doi.org/10.1080/1369118X.2018.1486870>; Karegar, F., Pettersson, J. S. and Fischer-Hübner, S., 'The dilemma of user engagement in privacy notices: Effects of interaction modes and habituation on user attention', *ACM Transactions on Privacy and Security (TOPS)*, Vol. 23, Issue 1, 2020, pp. 1-38.

Regulation provision	Formatting requirement	Most feasible option(s) and limitations
		• Period of use: Use ISO 8601 date format: [start: YYYY/MM/DD end: YYYY/MM/DD]. • Value of benefits: A numerical value should be presented where possible, including a currency denomination. Where benefits received are not directly translatable into a financial value, the most practical method of tangible definition of benefit possible should be used. • Origin of benefits: Begin with structured data indicating: [Public] and/or [Private], and [from within the EU] and/or [from outside the EU]. Free text should describe the identity or multiple identities of the originator(s) of the benefits. • Copy/description or link to the ad: The field may contain a hyperlink to the original transmission location of the ad. It should be clear whether a URL is held here or not. • Change record: The change record should include identifiable details that show when the transparency notice was the live version for the ad, with a start and end date in ISO 8601 format: [start: YYYY-MM-DD hh:mm end YYYY/MM/DD hh:mm].
Retrievability	Access/availability/ease of navigation to the transparency notice	There will be different options to access the transparency notice that will be appropriate from the label in different mediums: • Digital, including online: Embedded link, a URL or QR code, or directions to the location when the transparency notice is displayed in the same context as the ad. • Offline – audiovisual medium: Provision of a URL or QR code • Offline – print: Provision of a URL or QR code or directions to the location when the transparency notice is displayed in the same context as the ad. • Physical objects: Provision of a URL or QR code.

Overall, the findings underscored the importance of adopting a **principle-based approach** for the implementation of labels and transparency notices under the Regulation, with minimal requirements ensuring the visibility and accessibility of labels and transparency notices. Stakeholder feedback highlighted that standardised and overly prescriptive requirements could be unfeasible across the various types of medium of publication, delivery or dissemination of political advertisements. Rigid, number-based requirements may introduce unnecessary burdens and compliance costs, especially for SMEs. Rather, a flexible framework that prioritises clarity and accessibility while allowing industry stakeholders to adapt requirements according to technical and contextual constraints is widely preferred. A principle-based approach will ensure that transparency measures remain effective, practical, and adaptable in an evolving digital landscape, while also fostering regulatory compliance and engagement across the political advertising ecosystem.

Annex 1: Stakeholder engagement plan

Following the Better Regulation Guidelines, the stakeholder engagement strategy is a way of ensuring both interest and participation in this study from a wide range of stakeholders as well as their support for its findings. The Study Team carried out meetings with DG JUST to scope the study and validate the technical options, and 33 targeted consultations, more specifically 32 interviews and 1 focus group. Consultations were performed face-to-face or through the support of videoconferencing tools (e.g., Microsoft Teams).

Overall approach

The stakeholder engagement strategy defines which stakeholders and interested parties we aim to engage with, how we will engage with them, and the key issues of interest for each group of stakeholders or interested parties identified. Building on the Study Team's research and on the kick-off meeting discussions, a mapping of the stakeholders is available in Table 16. The consultations sought feedback from the main categories of stakeholders who would be impacted by the Regulation, in order to generate as much information and as wide a range of views as possible to inform the study and cover all aspects of the assessment of the technical options for labels and transparency notices.

Table 16: Stakeholder categories

Stakeholder category	Composition and description	Data provided
Category 1 – Businesses	Providers, including publishers such as TV and radio stations, publishing companies and online platforms, and intermediaries such as marketing consultancies, advertising agencies, campaign organisations, political consultancies, analysis and data brokerage firms. Some examples follow: ▪ Very large online platforms (e.g., Meta) ▪ Very large search engines (e.g., Google) ▪ SMEs (e.g., EUobserver) ▪ Multinationals (e.g., Politico Europe, DPG Media, Ringier, Sanoma) ▪ Industry associations (e.g., News Media Europe, Association of European Radios (AER), Association of Commercial Television and Video on Demand Services in Europe (ACT), European Broadcasting Union (EBU), EGTA - international trade body of multiplatform TV and audio businesses, European Interactive Digital Advertising Alliance (EDAA), European Association of Communication Agencies (EACA))	Input: ▪ Assessment of the impact of options Data collection methods: ▪ Interviews
Category 2 – Voters	▪ Voters selected from random samples through the Study Team's network from previous studies and professional market research firms and sampling companies	Input: ▪ Perceptions and preferences on the options Data collection methods: ▪ Interviews ▪ Focus group

Source: Authors' own elaboration.

Engagement approaches

Consistent with the Better Regulation Toolbox¹⁷⁶, efforts to engage the different stakeholder types targeted considered the following factors:

- **Influence:** How much influence the stakeholder directly exercises over the policies regarding online and offline political advertising.
- **Impact:** The extent to which stakeholder groups are affected by online and offline political advertising.
- **Interest:** The degree of concern for and interest in regulations and policy changes in the field of political advertising.
- **Awareness:** The extent to which groups are aware of challenges related to online and offline political advertising and the existing regulatory framework and funding programmes.
- **Accessibility:** The extent to which the stakeholder group would be accessible for the consultation activities.

The table below maps each group against the above factors.

Table 17: Overview of stakeholder engagement factors

Category	Influence	Impact	Interest	Awareness	Accessibility
1. Businesses	Medium	High	High	High	Medium
2. Civil society, voters	Medium	High	Medium	Medium	Medium
3. Academia including experts from NGOs	Medium	Medium	Medium	Medium	Medium

Source: Authors' own elaboration.

Targeted consultations

The targeted consultation activities were conducted with specific stakeholder groups (i.e., categories) to get complementary information or fill any gap necessary for the analysis of the technical options for labels and transparency notices.

The specific approach to these data collection activities is explained in the remainder of this section.

Table 18: Consultation activities' coverage of the study tasks

Activity	Number	Primary focus	Stakeholder group targeted
In-depth interviews	5	Tasks 1 and Task 2	Academia including experts from NGOs
	12	Task 4	Businesses
	15	Task 5	Voters
Focus groups	1	Task 5	Voters

¹⁷⁶ https://commission.europa.eu/document/download/9c8d2189-8abd-4f29-84e9-abc843cc68e0_en?filename=BR%20toolbox%20-%20Jul%202023%20-%20FINAL.pdf

Activity	Number	Primary focus	Stakeholder group targeted
Working meeting	1	Task 3	Commission, Experts (if needed)

Source: Authors' own elaboration.

Interviews

The approach to interviews can be summarised in three steps, as follows:

▪ **Step 1 – Identification of stakeholders**

During the inception phase, a preliminary stakeholder mapping was performed. The stakeholder mapping relied on a combination of sources: existing contacts with relevant stakeholders (i.e., existing databases), review of relevant studies and documents related to the study topic, desk research, and screening of relevant repositories. The preliminary stakeholder mapping (i.e., stakeholder list) was shared with DG JUST for comments and feedback. The file, in excel format, also served as an **interview tracking file**.

▪ **Step 2 – Preparation of the interviews**

Interview guides represent the starting point of the discussion with the interviewee as they enable the interviewer to cover all relevant issues at stake in the study. However, the interview guide should not be seen as a mere script. In fact, the interviewer should use some flexibility to focus on the data gaps and/or needs for clarification that might have resulted from the dissemination of the questionnaire. The interview questions were provided to DG JUST for review and validation. Once validated, the interview guide was shared with the interviewees ahead of the interview to give them the possibility to prepare, understand the questions, and ask for clarifications.

▪ **Step 3 – Performing the interviews**

A **guidance note** was prepared and shared among the interviewers ahead of the interviews to ensure a common understanding of the questions and the purpose of the interviews. The guidance note included the following sections:

- introduction and objectives of the project;
- preliminary results of the tasks performed so far (if relevant);
- interview questions and interview guideline;
- standard steps for performing the interview;
- and guidance for writing interview notes and reporting.

Interviews lasted a **maximum of one hour** to avoid respondents' fatigue and were planned well in advance. A briefing session with the interviewers was organised during which the guidance note, interview guide and overall objectives were discussed to make sure that the methodology and approach were aligned across interviewers. To guarantee the smooth running of the logistics and note-taking, at least two interviewers were present at each interview. Moreover, interviews were recorded and/or transcribed following the interviewees' consent.

▪ **Step 4 – Validation and feedback**

For each interview conducted, the Study Team prepared interview notes providing a summary of the responses for each of the questions included in the interview guide. The interview notes were sent to each interviewee for validation, allowing the interviewees to make amendments, where necessary, as well as to provide any further information of relevance. This process also ensured the reassurance of the interviewees regarding the information included in the study.

Focus groups

The table below and the following paragraphs provide an overview of the steps related to the organisation and performance of a focus group.

Table 19: Focus group organisation: an overview of steps and activities

Step	Activities
1 Set up the logistics	• Decision on tool(s) used during the meeting; • Definition of timeframe and duration of the meeting; and • Selection of facilitators and speakers and clarification around their roles and responsibilities.
2 Scoping the meeting	• Development of the agenda, discussion items and relevant support material; • Identification and selection of stakeholders; and • Sharing of documentation with attendees.
3 Sharing the invitations	• Sharing invitations to the selected stakeholders; and • Sharing the registration link and technical information.
4 Running the meeting	• Addressing technical issues that may arise; and • Facilitation for interactive exchanges and timekeeping.
5 Producing the summary reports	• Drafting of a summary of discussion points and main findings.

Source: Authors' own elaboration

A specific more in-depth methodology for the focus group under the behavioural analysis is presented under Task 5.

▪ **Step 1 – Set up the logistics**

The setup of the logistics encompasses an initial decision on the software to use during the focus groups, the definition of the timeframe and duration, the identification of facilitators and speakers and the subsequent clarification of their responsibilities.

Different software is likely to be used for the performance of the focus groups of this study, as the focus group for voters (Task 5) will be run on a specific platform.

The focus group under Task 5 was organised with 8 participants from 7 countries. Regarding **duration**, a virtual focus group should ideally last no longer than 120 minutes, as participants' capacity to attend a virtual meeting for longer periods must be taken into consideration.

▪ **Step 2 – Scoping the meeting**

The scoping of the focus group concerns the development of the agenda and the identification and selection of the most relevant stakeholders for participation.

Draft agendas will be developed and refined based on the information gathered during the preparatory phase (e.g., desk research and/or other stakeholder consultation activities). A brainstorming session may be needed to refine the questions and develop the focus group agenda, together with DG JUST.

The **identification and selection of key stakeholders** for participation is made in close collaboration with DG JUST. While for Task 5 a random selection of voters will be called, participants of the focus group of Task 1 and Task 2 will be duly discussed with DG JUST.

▪ **Step 3 – Sharing the invitations**

Having identified the dates and participants list, **a formal invitation is shared** with information about the specific topic under discussion during the focus group (including an accreditation letter from DG

JUST), ideally four weeks in advance of their planned date. The invitation contains information about a confirmation deadline (two weeks before the meeting). To ensure participation of key stakeholders, follow-up with phone calls is done if needed. In this regard, a reserve list is used in case one or more selected stakeholders are unresponsive or unavailable. Upon confirmation, the participants receive a **registration link** together with information on the technical requirements. **A final agenda** is circulated nearer the date of the meeting (approximately one week before the scheduled date).

- **Step 4 – Running the meetings**

The main facilitator is the person leading the virtual focus groups with the technical support from a second facilitator. Some measures should be put in place in case technology fails (e.g.; connection, equipment, power), for example:

- Back-up equipment (e.g. second internet connection, laptop etc.) at hand;
- During registration, participants should be informed of available technical guidance; and
- Additional support staff should be available to support participants joining the virtual meeting and answer any technical queries.

- **Step 5 – Producing the summary reports**

After the focus group, a summary report is usually produced, summarising the discussion around the main agenda items and the outcomes reached against the research questions.

Annex 2: Data collection tools

The present annex provides details on the refined data collection tools elaborated by the Study Team, in particular:

- The interview questionnaire for in-depth interviews under Task 1 & Task 2;
- The interview questionnaire for in-depth interviews under Task 4;
- The interview questionnaire for in-depth interviews under Task 5.

Questionnaire for T1 & T2

The expert interviews had one main objective:

- Validate the findings from Task 1 and Task 2 of the study, which involved desk research on political advertising labelling and transparency practices, including relevant regulations, industry standards, and accessibility requirements.
- Validate the rationale behind the identification of technical options for political advertising labelling and transparency notices, which were developed based on the findings from Tasks 1 and 2.

The interviews were conducted with two categories of stakeholders—accessibility experts and industry associations—to ensure that the findings and the rationale behind the technical options were both accurate and practical from different stakeholders' perspectives.

At the beginning of each interview, the Study Team provided a comprehensive overview of the study, its key definitions, and the findings of Task 1 and Task 2.

Accessibility experts

Aim: To validate the findings from Task 1 and Task 2 related to accessibility in political advertising labelling and transparency notices, gather feedback on good practices for each type of medium and explore the hard vs soft accessibility requirements.

Questions:

- Based on the findings from Task 1 and Task 2, do you agree with the identified accessibility requirements for political advertising labels (e.g., WCAG, braille, audio descriptions)?
- What are the hard requirements when considering accessibility for political advertising labels and transparency notices?
- Could you provide examples of good practices in accessibility for political advertising labelling (or labelling in other sectors such as financial products and medical products advertising) for different types of media (e.g., online, TV, radio, printed)?
- What are the challenges for achieving accessibility in various media types (e.g., online, TV, radio, printed)?
- Are there specific tools or technologies commonly used in the implementation of accessibility requirements for labels and transparency notices?

Industry associations

Aim: To validate the findings from Task 1 and Task 2 regarding industry standards and practices, frame the key issues and identify the different types of stakeholders in the industry, preparing for follow-up interviews under Task 4.

Questions:

- Based on Task 1 and Task 2 findings, what are your views on the industry standards and practices identified for political advertising transparency and labelling?
- Who are the key stakeholders involved in the development and implementation of political advertising labels and transparency notices? How do these stakeholders interact (e.g., publishers, advertisers, regulatory bodies)?

- What are the key issues or challenges the industry faces concerning political advertising labelling, and what should be taken into account for future developments?
- Can you provide examples of best practices in labelling and transparency notices implemented for other advertising domains that could be leveraged for political advertising?
- What are the main categories of impact when implementing the identified technical options? Please consider potential impacts on areas such as business processes, technical infrastructure, operational efficiency, and compliance requirements.
- Are there specific tools or technologies commonly used in the creation and implementation of labels and transparency notices in the context of political advertising?

Questionnaire for T4

The interviews with businesses aimed to achieve two main objectives:

- Validate the feasibility of technical options for political advertising labels and transparency notices, which were developed based on the findings from Tasks 1 and 2.
- Assess the impact on costs, administrative obligations, additional forms/material/training and purchase or substitution of material (software, hardware) of the technical options for labels and transparency notices on the service providers.

The interviews were conducted with two categories of stakeholders—publishers and intermediaries—as well as with respective industry associations, to ensure that the technical options were feasible and practical from the perspectives of different stakeholders along the political advertising supply chain.

At the beginning of each interview, the Study Team provided a comprehensive overview of the study, its key definitions and obligations, and the identified technical options.

Questions

Political advertising market

- What percentage of your revenue is approximately derived from political advertisements?
- [For publishers] Do you have any intermediaries? If so, which ones?
- Does the pricing of a label / transparency notice differ from the pricing of the ad itself? If so, how?
- [Print medium only] What is the average format of the political ads you sell? [All media] What is the average size of the political ads you sell?
- What is the pricing method of the political ads you sell? If possible, please provide average figures.
- [Audio-only media] What is the average duration of the political ads you sell? And what is the pricing method? If possible, please provide average figures.

Implementation of labels for political ads

- Do you think the following label sizes per type of medium are feasible?

Online medium	Offline - TV	Offline - Radio	Offline - Print medium	Offline - Physical objects
At least 5% compared to the size of the advertisement	At least 5% compared to the size of the advertisement	N/A	• <i>Option 1:</i> At least 5% compared to the size of the advertisement. • <i>Option 2:</i> At least 6% compared to the size of the advertisement.	• <i>Option 1:</i> At least 5% compared to the size of the advertisement. • <i>Option 2:</i> At least 6% compared to the size of the advertisement. If the medium is < 65 cm², the

			If the medium is < 65 cm ² , the minimum size shall be 1,4 cm by 2,8 cm (3,92 cm ²).	minimum size shall be 1,4 cm by 2,8 cm (3,92 cm ²). • <i>Option 3</i>: min.96 mm wide and 192 mm high.
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[For publishers] How would the different size requirements impact costs?

Media type	Requirement	No impact	Slight impact	Moderate impact	Significant impact	Very significant impact
Online medium	5% of ad size					
Offline TV	5% of ad size					
Offline print	5% of ad size					
	6% of ad size					
Physical objects	5% of ad size					
	6% of ad size					
	96 mm. wide and 192 mm. high					

- [For intermediaries] Would the inclusion of any of these requirements have an impact on the final cost for sponsors? Please provide estimates.
- Do you think the following font requirements per type of medium are feasible?

Online medium	Offline - TV	Offline - Radio	Offline - Print medium	Offline - Physical objects
• <i>Option 1</i> : 8-12 pts. min. • <i>Option 2</i>: 14-18 pts. min if written in bold (WCAG). • Use of Sans Serif fonts	• <i>Option 1</i> : 10-12 pts. min. • <i>Option 2</i>: 14-18 pts. min if written in bold (WCAG). • Use of Sans Serif fonts	N/A	• 9-10 pts. min. • Font height (as in lowercase 'x') minimum 1.2 mm • [For billboards] 1:32 of the total height dimension • Use of Sans Serif fonts	• 7 pts. min. • Font height (as in lowercase 'x') minimum 1.2 mm • Use of Sans Serif fonts

- [For publishers] How would the different font requirements impact costs?

Media type	Requirement	No increase/ impact	Slight increase/ impact	Moderate increase/ impact	Significant increase/ impact	Very significant increase/ impact
Online medium	8-12 pts min.					

	14-18 pts min. if written in bold					
	Sans Serif fonts					
Offline TV	10-12 pts min.					
	14-18 pts min. if written in bold					
	Sans Serif fonts					
Offline print	9-10 pts. min.					
	1.2 mm min. for lowercase					
	<i>[For billboards]</i> 1:32 of the total height dimension					
	Sans Serif fonts					
Physical objects	7 pts min.					
	1.2 mm min. for lowercase					
	Sans Serif fonts					

- [For intermediaries] Would the inclusion of any of these requirements have an impact on the final cost for sponsors? Please provide estimates.
- What are your thoughts about adding visual elements to labels, like a specific logo/pictogram specifically designed for political ads to increase clarity?
- What are your thoughts about including links and/or QR codes in labels for additional information?
- [For publishers] How would the addition of a logo or pictogram impact the cost of labels?

	No impact	Slight impact	Moderate impact	Significant impact	Very significant impact	Comments
Addition of a QR code						
Addition of a logo						

- [For intermediaries] Would the inclusion of any of these requirements have an impact on the final cost for sponsors? Please provide estimates.

- Do you think the following contrast features per type of medium are feasible?

Online medium	Offline - TV	Offline - Radio	Offline - Print medium	Offline - Physical objects
100% - dark text, light background 4.5:1 for normal text and 3:1 for large text (WCAG)¹⁷⁷ - Coloured background	100% - dark text, light background - Coloured background	N/A	100% - dark text, light background - Coloured background	100% - dark text, light background - Coloured background

- [For publishers] How would the different colour and contrast requirements impact costs?

Media type	Requirement	No increase/ impact	Slight increase/ impact	Moderate increase/ impact	Significant increase/ impact	Very significant increase/ impact
Online medium	100% - dark text, light background					
	4.5:1 for normal text and 3:1 for large text					
	Coloured background					
Offline TV	100% - dark text, light background					
	Coloured background					
Offline print	100% - dark text, light background					
	Coloured background					
Physical objects	100% - dark text, light background					
	Coloured background					

- [For intermediaries] Would the inclusion of any of these requirements have an impact on the final cost for sponsors? Please provide estimates.
- [For publishers] How would different audio requirements impact the cost?

¹⁷⁷ The lighter colour (e.g., background) is 4.5 times brighter than the darker colour (e.g., text) for normal-sized text, and 3 times brighter for large text.

Requirements	No impact	Slight impact	Moderate impact	Significant impact	Very significant impact
Same speed as the ad					
Speed >1x and ≤1.2x					
Speed >1.2x and ≤1.5x					
Speed >1.5x and ≤2x					
Addition of a jingle					

- [For intermediaries] If the inclusion of labels results in higher costs, what would be the estimated impact on the final cost for sponsors?
- Would variations in the following requirements for the label bring any additional administrative obligations? Please specify any tasks or processes that would need to be implemented.

Requirements	No impact	Slight impact	Moderate impact	Significant impact	Very significant impact
Label size					
Font requirements					
Logo or pictogram					
Colour and contrast					
Audio requirements					

- Would variations in the following requirements for the label bring any additional forms/material/training that you would have to produce? With what frequency?

Requirements	No impact	Slight impact	Moderate impact	Significant impact	Very significant impact
Label size					
Font requirements					
Logo or pictogram					
Colour and contrast					
Audio requirements					

- Would variations in the following requirements for the label result in the purchase or substitute material (software, hardware) to include specific fonts, colour codes, contrast ratio, etc. in labels? If possible, please provide an estimate (in EUR).

Requirements	No impact	Slight impact	Moderate impact	Significant impact	Very significant impact
Label size					
Font requirements					
Logo or pictogram					

Colour and contrast					
Audio requirements					

Transparency notices

- What challenges do you envisage will affect your ability to make the transparency notice available? (please ignore or put "N/A" for each channel that is not applicable to you).
 - a. Owned and/or operated websites
 - b. Mobile apps
 - c. Social media channels
 - d. Email
 - e. Text message
 - f. Read out (for radio)
 - g. Printed ads
 - h. Intermediary provided online hosting location
 - i. National repository
 - j. European repository for online political advertisements
 - k. Other third-party service (please describe).
- Do you foresee any issues with navigation between the political advertisement and the transparency notice?
 - a. Navigating to the transparency notice from details in the label
 - b. Navigating back to the advertisement from the transparency notice.
- Do you have any concerns about accessibility for people with disabilities or impairments?
 - a. Being able to navigate to the transparency notice
 - b. Being able to read/hear and understand the information in the transparency notice.
- Do you have any concerns about or constraints that would affect your ability to use unique identifiers to link versions of the political advertisement with relevant versions of the transparency notice?
- Will you face any challenges referencing the following aspects of the transparency notice?
 - A change record that indicates whether the transparency notice is up to date and reflects the latest version of the political advertisement
 - Making the transparency notice available at all times during the period the political advertisement is published
 - A record of any withdrawal of the political advertisement for contravening advertising rules.

Implementing legislation

- What do you expect from the implementing legislation on labels and transparency notices accompanying political advertisements? Please specify the core aspects that the Commission should clarify in order of importance.
- Are there any additional comments or observations you would like to share?

Questionnaire for T5

1. General Awareness and Understanding

- Can you describe any labels you have come across recently in different context (e.g., on social media, TV, or product packaging)?
- How clear or helpful did you find these labels?
- Have you experienced difficulties in understanding these labels? If so, can you provide examples?

2. Familiarity with Political Advertising

- Thinking about political ads you see in different contexts (social media, websites, newsletters, TV, newspapers),
- How easy is it to identify it is a political ad?
- What makes it clear to you that it is a political ad?
- How easy is it to identify who sponsored the ad?
- What should the political ad label contain?

3. Presentation of Mock-Ups

- Present **mock-ups 1 to 6** one by one, highlighting the following variations:
 - **Logo/Symbol:** The presence or absence of a logo to increase saliency.
 - **Text Presentation:** Plain text vs. bullet points with a title.
 - **Placement:** Top vs. bottom of the ad.
 - **Contrast:** Use of background colour to enhance visibility.
- Briefly explain the purpose of the label and encourage participants to share their initial reactions.

4. Visual Attention and Recognition

- How likely are you to notice the label when viewing a political ad?
- Does the label make it clear that the ad is “paid content”? Why or why not?

5. Perceptions and Reactions to Labels

- What are your thoughts on the style of each label? (repeat for all mock-ups)
- Which label do you find most effective and why?
- How does each label affect your perception of the ad (e.g., credibility, transparency)?

6. Sponsorship Identification and Credibility

- How clear is the text included in the label?
- How easy is it to identify the sponsor of a political ad based on this label?
- Does knowing the sponsor of a political ad influence your perception of it? If so, how?

7. Exploration of the 'Cookie Fatigue Effect'

- Imagine labels like these were included in every political ad you see. How do you feel about that?
- How likely would it be that you'd read this label?

- Will you click on this label if the label were ... (alternative technical solution)

8. Final Steps

- Are there any additional features or improvements you think a political advertising label would need?
- Do you think a more extensive use of labels will make political advertising more transparent?

Annex 3: Formatting practices per publication support

Creating labels and transparency notices for advertising requires employing diverse formatting practices to guarantee clarity, legal compliance, and efficacy across multiple mediums of publication, delivery or dissemination.

In the scope of this study, formatting practices are understood as a set of standards for the visualisation and audibility of labels and transparency notices of political advertisements. Based on desk research and literature review, formatting elements include the following:

- font size and style;
- placement;
- language;
- use of symbols (including political party logos);
- duration;
- interactive elements¹⁷⁸;
- visual formatting;
- audio formatting
- QR code formatting.

To get a comprehensive overview of the formatting practices for labels and transparency notices, a variety of sources has been examined, including industry codes of conduct, codes of practice, formatting guidelines from advertising associations from within and outside the EU and from VLOPs and VLOSEs.

While label size can be considered a formatting practice, it has not been included in the list above due to the lack of specific numbers, ratios, or percentages in the industry literature. The only specification that can be made regarding size is that the label should be proportional to the size of the advertisement, not obscuring its content while maintaining prominence.

The findings from the overview are presented in the following sections by the medium of publication, delivery or dissemination.

Online medium

From the consulted sources, formatting practices for labels and transparency notices provided in online medium seem to be comprehensively defined, albeit the degree of specificity by formatting element varies. The results are presented in the table below.

¹⁷⁸ Only for labels and transparency notices provided or disseminated through online medium.

Table 20: Formatting practices for online medium

Formatting element	Industry practice
Font size and style	- Sufficient size to ensure legibility for the average viewer¹⁷⁹, often around 10-12 points¹⁸⁰ but variable depending on the size of the screen of the device being used¹⁸¹. - Sans -serif typeface, particularly Arial as deemed more legible¹⁸², OR the same font style as the rest of the advertisement¹⁸³. - Bold or italic style for some essential words such as “Sponsored”¹⁸⁴. - For labels included in videos, the font size should be at least as large as the majority of the text in the advertisement. Capital letters must be 4% of the display screen's height or width, whichever is less¹⁸⁵.
Placement	- Social media posts/websites/search engines: typically, at the top of the ad¹⁸⁶. - Photo/video advertisements provided through Instagram Stories, Snapchat or similar: label superimposed within the ad itself¹⁸⁷. - For video-based ads, the label should not cover video player's controls or other elements of the player, and it should be affixed in a corner of the video display and not “float”¹⁸⁸.
Language	Same language as the rest of the ad¹⁸⁹.
Use of symbols	A symbol in addition to mentions such as “advertisement”, “advertising” or sponsored”, or specific markings for advertisements could be used for advertisements through social media posts in addition to the label¹⁹⁰.

¹⁷⁹ Alphabet. n.d. Google Advertising Policies Help: Political Content. <https://support.google.com/adspolicy/answer/6014595?hl=en#zippy=%2Ceuropa-union-eu-election-ads%2Cadvertiser-verification-requirement-for-eu-election-ads>; OpenX. Political Advertising Policy.

¹⁸⁰ Among the consulted sources, there is no consensus on a specific number indicating the minimum requirement for font size. Therefore, an average range is provided.

¹⁸¹ Meta. n.d. About ads about social issues, elections or politics. <https://www.facebook.com/business/help/167836590566506?id=288762101909005>.

¹⁸² Digital Advertising Alliance. 2018. Political Ad Icon & Ad Marker Creative Guidelines. https://digitaladvertisingalliance.org/sites/politic/files/DAA_files/PA_Icon_AdMarker_Creative_Guidelines_V1_September_2018.pdf; Meta. n.d. About ads about social issues, elections or politics.

¹⁸³ Digital Advertising Alliance. 2009. Self-regulatory Principles for Online Behavioural Advertising. https://digitaladvertisingalliance.org/sites/aboutads/files/DAA_files/seven-principles-07-01-09.pdf.

¹⁸⁴ Digital Advertising Alliance. Political Ad Icon & Ad Marker Creative Guidelines.

¹⁸⁵ Office of the Chief Electoral Officer, Alberta, Canada, Advertising Guidelines for Political Participants, p.8; Central Electoral Commission of the Republic of Lithuania, Approval of the Description of the Procedure for Marking Political Advertising.

¹⁸⁶ Alphabet. Google Advertising Policies Help: Political Content; Meta. About ads about social issues, elections or politics; Die Medienanstalten. 2022. Labelling of advertising in online medium. https://www.die-medienanstalten.de/fileadmin/user_upload/die_medienanstalten/Service/Merkblaetter_Leitfaeden/english_versions/Guideline_Labeling_Advertising_Online_Media.pdf.

¹⁸⁷ U.S. Federal Trade Commission. n.d. Disclosures 101 for Social Media Influencers. https://www.ftc.gov/system/files/documents/plain-language/1001a-influencer-guide-508_1.pdf.

¹⁸⁸ European Interactive Digital Advertising Alliance (EDAA). 2016. Ad Marker Implementation Guidelines for Video. [Ad-Marker-Implementation-Guidelines-For-Video-FINAL_2.pdf](https://www.edaa.eu/files/Ad-Marker-Implementation-Guidelines-For-Video-FINAL_2.pdf).

¹⁸⁹ Alphabet. Google Advertising Policies Help; Meta. About ads about social issues, elections or politics; U.S. Federal Trade Commission. Disclosures 101 for Social Media Influencers.

¹⁹⁰ EU Commission. 2023. Legal Brief #6: How to Disclose Advertising on Social Media. https://commission.europa.eu/document/download/74f60707-1207-4a6f-a9aa%20033ca8a3d382_en?filename=Legal%20brief%206.pdf

Formatting element	Industry practice
	- Standardised symbols such as the Political Ad Icon: by clicking or hovering over the purple icon, voters can get access to the full transparency information¹⁹¹. - The size of the Political Ad Icon in video-based content should be at least 12x12 pixels¹⁹².
Duration	- The label should be visible at least for a specified time for visual and video-based ads (including reels and similar)¹⁹³. - For audio-based ads, the label should be announced at the start and/or the end of the ad for the minimum duration necessary to state the required information respecting audio formatting practices¹⁹⁴. - For live streams, the label should be repeated periodically¹⁹⁵.
Interactive elements	- Hyperlinked label – or part of the label - that directs to the transparency notice¹⁹⁶. - Hover-over and/or pop-up options explaining why the voter is seeing the ad and providing options to hide the ad, report it, or manage ad preferences¹⁹⁷. - The label can be displayed affixed to the video ad as an overlay¹⁹⁸.
Visual formatting	- Contrasting colours to enhance legibility and visibility¹⁹⁹. - Possibility of including the label in a box to further differentiate it from the content of the ad²⁰⁰.
Audio formatting	- Similar pitch, tone and speed as the rest of the ad²⁰¹. - Possibility of adding a standardised “jingle” sound for the voters to recognise the content as an ad²⁰².
QR code formatting	- Minimum contrast ratio of 4:1 to ensure readability by most QR code scanners²⁰³. - Minimum 0,6 cm of white space around the QR Code to allow easy scanning²⁰⁴. - Minimum optimum pixel ratio should be approximately 38 x 38 px²⁰⁵.

¹⁹¹ Digital Advertising Alliance of Canada (DAAC). 2021. The Self-Regulatory Principles of Transparency for Political Advertising for Federal Elections. <https://assets.youradchoices.ca/pdf/pa/DAAC-Principles-English.pdf>.

¹⁹² European Interactive Digital Advertising Alliance (EDAA). 2016. Ad Marker Implementation Guidelines for Video. [Ad-Marker-Implementation-Guidelines-For-Video-FINAL_2.pdf](#).

¹⁹³ Alphabet. Google Advertising Policies Help; Meta. About ads about social issues, elections or politics. European Interactive Digital Advertising Alliance (EDAA). Ad Marker Implementation Guidelines for Video.

¹⁹⁴ Die Medienanstalten. Labelling of advertising in online medium.

¹⁹⁵ U.S. Federal Trade Commission. Disclosures 101 for Social Media Influencers.

¹⁹⁶ Alphabet. Google Advertising Policies Help.

¹⁹⁷ Meta. About ads about social issues, elections or politics.

¹⁹⁸ European Interactive Digital Advertising Alliance (EDAA). Ad Marker Implementation Guidelines for Video.

¹⁹⁹ Ibid.

²⁰⁰ Ibid.

²⁰¹ Alphabet. Google Advertising Policies Help.

²⁰² Die Medienanstalten. Labelling of advertising in online medium.

²⁰³ Coull, H. 2024. How to Choose the Right QR Code Size. <https://bling.me/blog/what-size-should-a-qr-code-be#:~:text=A%20minimum%20contrast%20ratio%20of,by%20most%20QR%20code%20scanners>.

²⁰⁴ Ibid.

²⁰⁵ Ibid.

Offline – Audiovisual medium

In selected sources, formatting practices for labels and transparency notices provided in offline audiovisual medium are defined mostly generically. The results are presented in the table below.

Table 21: Formatting practices for offline media – TV and radio

Formatting element	Industry practice
Font size and style	Use suitable and legible font sizes (recommendation: no smaller than 10 points)²⁰⁶.
Placement	Must be conspicuous²⁰⁷.
Language	Precise, same language as the ad²⁰⁸.
Use of symbols	- Logos can be displayed provided they do not mislead the audience about the nature of the product or service being advertised²⁰⁹. - Symbols should be used in accordance with brand guidelines to keep consistency and recognition. - Repeat the announcement and logo following each commercial break²¹⁰.
Duration	Succinct, aiming for no longer than a few seconds of airtime²¹¹, but also not rushed, to ensure voters' understanding²¹².
Visual formatting	Print must be large enough to read²¹³.
Audio formatting	- Spoken clearly and at a volume that is consistent with the main content of the advertisement²¹⁴. - Music/background noise should not overshadow spoken content. Key information should be repeated for emphasis in long political ads²¹⁵. - Tone should match the message²¹⁶.
QR code formatting	Minimum contrast ratio of 4:1 to ensure readability by most QR code scanners²¹⁷.

²⁰⁶ Cabinet Office UK. 2021. Guidance on Accessible communication formats. <https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats#accessible-print-publications>.

²⁰⁷ U.S. Federal Election Commission. 2014. Commission Advertising and Disclaimers. <https://www.fec.gov/business-guidance/blog/2014/09/full-disclosure>.

²⁰⁸ Ibid.

²⁰⁹ Committee of Advertising Practice (CAP). 2010. Broadcast Committee of Advertising Practice Code. https://www.asa.org.uk/type/non_broadcast/code_section/03.html.

²¹⁰ Canadian Radio-television and Telecommunication Commission. 2009. Broadcasting and Telecom Regulatory Policy CRTC 2009-430. <https://crtc.gc.ca/eng/archive/2009/2009-430.htm>.

²¹¹ U.S. Federal Trade Commission. 2014. Television Advertising Guidelines about Advertising and Marketing. <https://www.ftc.gov/business-guidance/blog/2014/09/full-disclosure>.

²¹² Committee of Advertising Practice (CAP). Broadcast Committee of Advertising Practice Code.

²¹³ U.S. Federal Trade Commission. 2014. Television Advertising Guidelines about Advertising and marketing.

²¹⁴ Ibid.

²¹⁵ Ibid.

²¹⁶ Canadian Radio-television and Telecommunications Commission. 2020. Radio Advertising Guidelines. <https://crtc.gc.ca/eng/archive/2019/2019-308.htm>.

²¹⁷ Coull, H. 2024. How to Choose the Right QR Code Size. <https://bling.me/blog/what-size-should-a-qr-code-be#:~:text=A%20minimum%20contrast%20ratio%20of,by%20most%20QR%20code%20scanners>.

Formatting element	Industry practice
	Minimum 0,6 cm of white space around the QR Code to allow easy scanning²¹⁸.

Offline – Print medium

Based on the consulted sources, the formatting practices for labels and transparency notices in printed media are generally well-defined, though the level of detail for each formatting element varies. The results are summarised in the table below.

Table 22: Formatting practices for offline print

Formatting element	Industry practice
Font size and style	- Sufficient font size and high colour contrast, such as black text in 12-point font on a white background²¹⁹. - Clear print requires a minimum font size of 12 points Arial²²⁰
Placement	- If the print is single-sided - or where most of the information is on one side - the label/transparency notice should be on that side. If the print is multi-sided, the label/transparency notice should be on the first or last page²²¹. - Prominent position on the print, typically at the bottom of the page or on the back cover of leaflets and brochures.²²²
Language	Clear and plain language to ensure the information is intelligible.
Use of symbols	Can be used alongside written information, but cannot replace it and must be easily visible, intelligible, and, if presented electronically, machine-readable²²³.
Visual formatting	Disclaimers must be clearly readable by, e.g., being placed in a separate box of text.
QR code formatting	- Minimum contrast ratio of 4:1 to ensure readability by most QR code scanners²²⁴. - Minimum 0,6 cm of white space around the QR Code to allow easy scanning²²⁵. - Minimum size is usually 2 x 2 cm with a 10:1 distance-to-size ratio but varies depending on the size of the printed support²²⁶.

²¹⁸ Ibid.

²¹⁹ Government of the United Kingdom. 2021. Guidance on Accessible communication formats. <https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats#accessible-print-publications>;

²²⁰ Ibid; Sensory Trust. 2022. Designing with clear and large print. <https://www.sensorytrust.org.uk/resources/guidance>.

²²¹ UK Electoral Commission. 2022 Statutory Guidance on digital imprint <https://www.electoralcommission.org.uk/imprints-printed-material-political-parties-uk-parliamentary-elections-and-elections-england-wales>.

²²² Ibid.

²²³ Article 29 Data Protection Working Party. Guidelines on transparency under Regulation 2016/679.

²²⁴ Coull, H. 2024. How to Choose the Right QR Code Size. <https://bling.me/blog/what-size-should-a-qr-code-be#:~:text=A%20minimum%20contrast%20ratio%20of,by%20most%20QR%20code%20scanners>.

²²⁵ Ibid.

²²⁶ Ibid.

Offline – Physical objects

There are no specific industry practices or guidelines regarding labels and transparency notices for merchandising. This is because most commercial and political advertising legislation until Regulation 2024/900 consider physical objects as an exception to the application of transparency requirements²²⁷. The only findings on formatting practices that may apply to this category of mediums refer to food and medicinal products labelling standards, where the labels are mostly on boxed packaging. Since it can be assumed that very few political advertisements in the form of merchandising are provided as a box, the applicability of these practices is considered limited for this study and is thus not reported.

²²⁷ Texas Ethics Commission. 2019. Political Advertising: What You Need to Know. https://www.ethics.state.tx.us/data/resources/advertising/Gpol_adv.pdf; California Fair Political Practices Commission, Political Advertising Disclosure Chart.

Annex 4: Behavioural analysis

Summary of Findings from Interviews in Italy, Ireland, and Poland

Visibility and readability of the labels

- Labels should be clear and easy to read to ensure they stand out from the advertisement.
- Text size should be large enough for readability.
- Labels that blend too much with the ad's design in terms of background colour risk being overlooked.

Differences across countries:

- In Italy, some interviewees suggested placing labels only at the bottom, while 3 out of 5 interviewees found it useful to have a notice also at the top to draw attention.
- In Ireland, some noted that political ads are already recognisable, so labels should not make them confusing.
- In Poland, participants emphasised distinctiveness but noted that labels should not be too intrusive.

Label colour

- The label should contrast with the advertisement but not be too overwhelming.
- Black backgrounds were generally seen as too strong and unpleasant.

Differences across countries:

- In Italy, a bright but not extreme colour was preferred.
- In Ireland, opinions varied: some preferred labels in the same colour scheme as the ad to look natural, while others preferred contrasting colours (but not purple).
- In Poland, white background with black text was the most readable option, but some also suggested red or navy blue as colours associated with politics.

Bullet-pointed text vs continuous text

- Bullet points were preferred in all three countries as they make the information easier to scan.
- Long paragraphs discourage reading and risk being ignored.

Differences across countries:

- In Italy, some were concerned that overly structured labels could be too intrusive.
- In Ireland, some interviewees felt that continuous text sounds more natural.
- In Poland, some interviewees linked bullet points to marketing strategies, stating they increase engagement.

Presence of an icon

- The usefulness of an icon was debated in all three countries.
- The icon should be recognisable, but public awareness efforts would be needed to ensure people associate it with political ads.

Differences across countries:

- In Italy, there was general agreement on the usefulness of an icon, with some preferring the triangle with an "i" and others the ballot box icon.
- In Ireland, opinions were divided: some thought icons help make it clear that an ad is political, while others would not associate them with politics unless educated.

- In Poland, some liked the idea of a standardised icon, but others found icons unclear, with the ballot box icon seen as too abstract.

Presence of a QR code or a link

- QR codes were generally seen as useful, especially for younger people.
- Older people may be less likely to scan QR codes.
- Written links could be an alternative, but many people would not manually type them.

Differences across countries:

- In Italy, QR codes were seen as better for print ads, while links were better for digital formats.
- In Ireland, some feared QR codes might be ineffective, as not everyone is willing to scan them.
- In Poland, some worried that QR codes might be misleading, with users assuming they lead to the candidate's page rather than transparency information.

Fatigue caused by the use of labels

- There is a risk that people will ignore the labels over time, similar to how they ignore cookie consent banners.
- If well-integrated, labels could become a reference for transparency rather than a disruptive element.

Differences across countries:

- In Italy, some participants saw a clear risk of desensitisation, but others felt labels could become a stable reference for transparency.
- In Ireland, it was noted that only those already interested in politics would read them.
- In Poland, one participant suggested making labels more educational, warning viewers that political ads may be manipulative and urging them to think critically.

Conclusion: Ideal Label Based on Insights from All Three Countries

Based on the interviews, the ideal label for political ads should:

- ✓ Be clear and readable, preferably using a white background with black text to enhance visibility
- ✓ Use bullet points rather than long paragraphs for better readability.
- ✓ Feature a QR code for easy access to more details but also include a written link as an alternative.
- ✓ Use an icon only if it becomes widely recognised, as opinions on its usefulness are divided.
- ✓ Contrast with the ad's colours, but without being too aggressive (e.g., avoiding overly strong colours like black or purple).
- ✓ Balance visibility and non-intrusiveness to ensure people notice and read the label rather than ignoring it.

Summary of Findings from the focus group

Visibility and readability of the labels

- Icons and election-related symbols enhance recognition.
- Bullet points are preferred over block text for readability.
- QR codes are essential—they allow users to access further details without cluttering the ad.

Label colour

- Black backgrounds were seen as too aggressive, while purple or blue offered good contrast without negative connotations.
- White was clear but sometimes perceived as too neutral or boring.
- Labels must stand out without overpowering the ad.

Bullet-pointed text vs continuous text

- Participants generally found that bullet points make information easier to process.
- Information should be presented in bite-sized, scannable formats (e.g., bullet points, bolded keywords) rather than dense text blocks.

Presence of an icon

- Icons and logos help draw attention and reinforce the political nature of the ad.
- Including an election-related symbol (rather than a generic ad logo) can make the label more meaningful and easier to identify.

Presence of a QR code or a link

- QR code useful as a way to provide extra information without cluttering the label.
- QR code can provide transparency without overwhelming the ad—it allows for optional engagement rather than forced complexity.

Fatigue caused by the use of labels

- Overexposure could lead to users ignoring the labels entirely, as happens with cookie disclaimers.
- To remain effective, labels must be concise, recognisable and visually engaging.

Conclusion: Ideal Label Based on Insights from All Three Countries

Based on the discussion, the ideal label for political ads should be:

- ✓ Short & structured – Essential information upfront, optional details via QR code or link
- ✓ Visually distinct but non-intrusive – Effective use of colour, contrast and election-related icons.
- ✓ Recognisable & standardised – Users should immediately understand its function without repeated explanation.

Findings from Interviews per country

Interviews in Italy:

1. Visibility and readability of the labels

- The labels should stand out clearly from the rest of the advertisement to grab attention. Using a contrasting colour against the background was suggested to enhance visibility. If the label blends too much with the ad's design, it might not be perceived as a distinct and important element.
- The text should be clear, not too small, and preferably structured in a way that facilitates quick reading.
- Placement is crucial: some prefer the label at the bottom to separate it from the main content, while others find it useful to have a notice at the top as well, to draw immediate attention.

2. Label colour

- The label should be a bright and contrasting colour to ensure it stands out.
- Some interviewees found overly strong colour combinations (e.g. purple) unpleasant, while others believed that a completely different colour from the ad helps make the label more noticeable.
- A dark background (e.g. black) was perceived as difficult to read and visually unappealing.

3. Bullet-pointed text vs continuous text

- Most respondents prefer bullet points over continuous text, as they make the information more immediate and readable.
- Bullet points help highlight key details quickly, whereas long paragraphs risk being ignored.

- However, some suggested that the label should not be overly emphasised to avoid being intrusive.

4. Presence of an icon

- There was general agreement on the usefulness of a standardised icon to indicate that the content is a political ad.
- Some preferred the triangle with an "i" as it resembles a warning or an important notice, while others favoured the ballot box icon, though it could cause confusion.
- It was noted that the icon should be instantly recognisable, requiring public awareness campaigns to ensure people associate it with political ads.

5. Presence of a QR code or a link

- The QR code is seen as an effective way for people to access additional information, especially when on the move.
- Some suggested that QR codes work better on printed posters, whereas a written link might be more suitable for digital formats.
- However, there is some uncertainty regarding its actual effectiveness, as not everyone may be willing to scan it.

6. Fatigue caused by the use of labels

- Some compared the use of political ad labels to the online cookie consent experience: initially, they grab attention, but over time, users may become desensitised and ignore them.
- However, if well-integrated and easily recognisable, they could become a useful reference for those interested in political ad transparency.
- It is important to strike a balance between visibility and non-intrusiveness, ensuring the label does not disrupt the user's engagement with the main content.

7 Conclusion

According to the interviewees, the ideal label should:

- ✓ Be highly visible by using a contrasting but not overly intrusive colour.
- ✓ Use bullet points to enhance readability.
- ✓ Feature a clear and recognisable icon that immediately signals the nature of the ad.
- ✓ Include a QR code to provide further details in an accessible manner.
- ✓ Avoid blending in too much with the rest of the advertisement to prevent it from going unnoticed.
- ✓ Maintain a balance between providing information and avoiding "visual fatigue" or intrusiveness.

Interviews in Ireland:

1. Visibility and readability of the labels

- Labels should be clear and easy to read, with text large enough to be noticed.
- Some interviewees mentioned that political ads already look recognisable, so adding a label should not make them more confusing.
- Colour contrast is important, but not too disruptive; labels that blend into the ad too much may be overlooked.
- Black text on white or white text on black was often preferred for readability.
- Some found labels similar to cookie banners, which are often ignored.

2. Label colour

- The best colour choice was debated:
 - Some preferred keeping the label in line with the ad's colours to make it look natural.
 - Others said a contrasting colour (but not extreme like purple) makes the label more noticeable.

- A black background was seen as too strong by some participants.

3. Bullet-pointed text vs continuous text

- Bullet points were preferred because they make the information clearer and easier to read quickly.
- Long paragraphs may discourage people from reading.
- Some found sentences easier to follow, as they sound more natural than a list.

4. Presence of an icon

- There was disagreement about whether an icon adds clarity:
 - Some found it helpful as a standard indicator of a political ad.
 - Others said they would not associate the icon with politics unless educated on its meaning.
 - The ballot box icon was sometimes confusing, while the triangle with an “i” was slightly more intuitive.
- Several respondents did not feel the icon was necessary.

5. Presence of a QR code or a link

- QR codes were well received, especially for younger people who are used to scanning them.
- However, older generations may not know how to use them.
- A written link may be useful, but people are unlikely to manually type it.

6. Fatigue caused by the use of labels

- Some participants compared these labels to cookie banners, warning that people might ignore them over time.
- Others saw no harm in adding them, saying it increases transparency.
- Some suggested that people would only read the label if they were already interested in politics.

2.7 Conclusion

From the Irish interviews, the ideal label for political ads should:

- ✓ Be clear and readable, using a black-on-white or white-on-black colour scheme.
- ✓ Use bullet points for concise information.
- ✓ Include a QR code for easy access to further details, but also a link for those who prefer typing it.
- ✓ Feature an icon, but only if it becomes widely recognised.
- ✓ Avoid overly strong or disruptive colours.
- ✓ Strike a balance between being visible and not intrusive, to avoid being ignored like cookie banners.

Interviews in Poland:

1. Visibility and readability of the labels

- Labels should be clear and easy to read, but not too intrusive.
- White background with black text was generally preferred for readability.
- Black background with white text was seen as too strong, resembling warning labels or cigarette packaging.
- Labels blending with the ad’s colours were less effective, as they looked like part of the campaign rather than a separate notice.
- The label should be visually distinct but not overpowering the advertisement.

2. Label colour

- White background with black text was the most readable option.

- Bright contrasting colours (e.g., purple) helped visibility, but some found them too aggressive.
- Green backgrounds (when matching the ad's colours) made the label less noticeable.
- Some suggested red or navy blue, as these colours are commonly associated with politics.

3. Bullet-pointed text vs continuous text

- Bullet points were preferred by some respondents because they make information easier to scan quickly.
- Some found block text intimidating and would be less likely to read it.
- One respondent mentioned bullet points work well in marketing and would increase engagement.

4. Presence of an icon

- The concept of an icon was debated:
 - Some found it useful if it was standardised over time.
 - Others did not immediately associate the icons with political ads and found them unclear.
 - The ballot box icon was seen as too abstract, while a triangle with an "i" was more intuitive.
- Having an icon at the top of the ad helped reinforce that it was a political advertisement, but some found it unnecessary.

5. Presence of a QR code or a link

- QR codes were widely supported, especially among younger users, as they are now commonly used in restaurants, public transport, and shopping.
- Some expressed concerns that older people may not scan QR codes.
- Including a website link was seen as useful, but some thought most people would not manually type it in.
- Some worried that QR codes might mislead people into thinking they were being directed to the candidate's campaign page rather than transparency information.

6. Fatigue caused by the use of labels

- Some compared the labels to cookie banners, which are often ignored.
- However, others said that if designed well, the labels could become a trusted reference for transparency.
- One respondent suggested that the label should be more educational, warning viewers that political ads might be manipulative and urging them to think critically.

7. Conclusion

From the Polish interviews, the ideal label for political ads should:

- ✓ Use a white background with black text for readability, avoiding overly dark or intense colours.
- ✓ Include bullet points rather than a block of text to improve clarity.
- ✓ Feature a QR code for easy access to more details, but also a website link for those who prefer to type it in.
- ✓ Use an icon only if it is widely recognised, otherwise, rely more on text to indicate that it is a political ad.
- ✓ Avoid blending into the ad's colours, as this reduces effectiveness.
- ✓ Strike a balance between visibility and non-intrusiveness, ensuring people actually read the label instead of ignoring it like cookie banners.

Findings from the focus group per activity

1. Ice-breaker activity: notable labels & initial reactions

Activity goal

Participants were asked to recall and describe a label, slogan, or advertisement that had caught their attention recently. The goal was to explore what elements make a label noticeable and memorable, before shifting the discussion to political advertising labels.

Key insights

1. Simplicity & clarity are key to visibility

Several participants highlighted that a simple, direct message makes a label or slogan more memorable.

→ Implication for political labels: the effectiveness of a label may depend on how instantly recognisable and digestible the information is. A lengthy or complex label might be ignored.

2. Emotional triggers make labels more memorable

Many participants recalled labels due to their personal or nostalgic connection.

→ Implication for political labels: if a label can establish an emotional connection (e.g., trust, responsibility, civic duty), it might be more effective in engaging citizens.

3. Repetition & familiarity can reinforce or undermine a label

While repetition makes a label memorable, it can also create overexposure or blind spots.

→ Implication for political labels: there's a fine line between making a label recognisable vs. ignorable. If political ad labels are too generic or too frequent, they might be overlooked (see "cookie fatigue" discussion).

4. Contrast & design play a role in attracting attention

Some participants noted visual elements that made a label stand out.

→ Implication for political labels: colour contrast, layout and structure matter in making a label noticeable. A label that blends too much into the ad (or is too discreet) might be ignored.

5. A label's credibility can be questioned

A few participants pointed out potential issues with credibility and transparency.

→ Implication for political labels: if transparency labels are not perceived as trustworthy, they could fail in their purpose. Clear explanations of their meaning and purpose are essential.

Conclusions

This exercise demonstrated that labels and slogans are effective when they are:

- Simple & easy to understand
- Emotionally engaging
- Visually distinctive
- Consistently recognisable (without becoming background noise)
- However, they must also be credible and transparent, otherwise, they can lose trust.

2. First impressions of the political labels

Activity goal

Participants were asked to reflect on their first impression of the prototype labels, focusing on clarity, visibility and overall effectiveness.

Key insights

▪ Labels should be prominent but not disruptive

Most participants agreed that clear, visible labels are important, but they should be integrated smoothly into the ad rather than feeling like an aggressive warning.

→ Implication for political labels: labels must stand out without feeling intrusive—they should inform, not alarm.

▪ The use of logos and symbols increases effectiveness

A recurring theme was that icons and logos help draw attention and reinforce the political nature

of the ad.

→ Implication for political labels: including an election-related symbol (rather than a generic ad logo) can make the label more meaningful and easier to identify.

- **Text structure matters: bullet points > block text**

Participants generally found that block text is difficult to read, while bullet points make information easier to process.

→ Implication for political labels: information should be presented in bite-sized, scannable formats (e.g., bullet points, bolded keywords) rather than dense text blocks.

- **QR codes are an effective addition**

Several participants found the QR code useful as a way to provide extra information without cluttering the label.

→ Implication for political labels: a QR code can provide transparency without overwhelming the ad—it allows for optional engagement rather than forced complexity.

- **Colour contrast is critical for visibility**

The use of colour sparked differing opinions, but some clear trends emerged:

- Black was perceived as too aggressive
 - White was seen as too neutral/boring
 - Blue was suggested as a more balanced alternative
 - Colour could reflect political themes—for example, associating label colours with party colours.
- Implication for political labels: labels need enough contrast to stand out but shouldn't feel alarmist or dull and at the same time colour choices should align with trust, credibility and political relevance.

Conclusions

This phase of the discussion highlighted key factors that make a political label effective and engaging:

- Visibility is crucial, but labels must integrate smoothly into the ad.
- Logos and election-related symbols enhance saliency and recognition.
- Bullet points improve readability—avoid long blocks of text.
- QR codes are valuable, offering extra information without clutter.
- Colour choice matters—it should be noticeable but not aggressive and potentially aligned with political themes.

3. Voting: most effective label in terms of visibility, clarity & transparency

Activity goal

Participants were asked to vote on which label or specific element they found most effective in terms of visibility, clarity and transparency.

Key preferences

- Icons and graphic elements were well received. They help draw attention and structure information visually.
- Bullet points over long text.
- QR codes add value without clutter.
- Negative feedback on black labels but emerging preference for contrasting colours.

Key takeaways from the voting session

1. **A combination of features would be ideal**

Label 1 was considered the best structured, but participants wanted to combine elements from other labels (e.g., icon from label 2, bullet point from label 3).

2. **Icons and QR codes improve visibility**

Icons provide a strong visual reference and QR codes enhance transparency without overloading the ad with text.

3. **Bullet points improve clarity**

The preference for bullet points over block text confirms what was already mentioned in Activity 2.

4. **Colour contrast matters, but preferences vary**

- Black is too strong (negative impact).
- White is too neutral and not eye-catching.
- Green blends too much.
- Purple (label 6) was considered a good alternative for contrast.

Conclusions

This phase confirmed the need for:

- A clear, structured format (like label 1).
- The right mix of iconography and symbols (like label 2).
- An optional engagement element (QR code).
- A visually striking but not overly aggressive colour scheme (avoid black, consider purple or blue).

4. Detailed review of labels: strengths & areas for improvement

Activity goal

Participants analysed each political label prototype, identifying what works well in terms of clarity, visibility and transparency and what could be improved.

Key insights across all labels

- **What works well**
 - Graphical elements (icons, symbols, logos) enhance visibility.
 - QR codes are widely appreciated as a way to provide transparency without overwhelming the label with text.
 - Bullet points improve readability, making the information easier to scan.
 - Contrast is important, but colours should be chosen carefully.
- **What needs improvement**
 - Block text is difficult to read and discourages engagement.
 - Black backgrounds are perceived negatively (associating them with warnings or negative content).
 - Some labels blend too much into the ad and are not noticeable enough.
 - A QR code should be included in all labels to connect to official information sources.

Label-by-label analysis

1. **Label 1**
 - Good balance overall but needs refinement in text structure and logo choice. QR code is a must-have.
2. **Label 2**
 - The election logo is a great addition, but the design lacks engagement. Adding a QR code and reformatting text would improve it.
3. **Label 3**
 - Bullet points are effective, but the black background should be replaced with a more neutral contrast (e.g., purple or blue). QR code is needed.
4. **Label 4**
 - This label lacks saliency and would likely be ignored. Needs a QR code, stronger contrast, and a better structure.

5. **Label 5**
 - Better than Label 4 but still lacks the necessary contrast and QR code for transparency.
6. **Label 6**
 - Aesthetically appealing but needs better information clarity and a QR code for full transparency.

Conclusions

The ideal political label would include:

- The structure of Label 1 (best balance of elements).
- The election logo from Label 2 (strong voting symbolism).
- The bullet point format from Label 3 (easier readability).
- A background colour like Label 6 (good contrast without being aggressive).
- A QR code across all designs (essential for transparency).
- Participants want graphical elements that trigger empathy and engagement.
- All participants agreed that the QR code should link to an official website.

5. Exploring the “cookie fatigue effect” & how to keep labels engaging

Activity goal

Participants were asked to reflect on how they would feel if political labels were included in every political advertisement, and to suggest ways to keep them noticeable without becoming intrusive or repetitive.

Key insights

1. **Risk of “cookie fatigue” is high**
 Most participants expressed concern that, like cookie banners, these labels would eventually become background noise and lose their impact.
→ Implication for political labels: if these labels become too generic and repetitive, they risk being skipped automatically by users, defeating their purpose.
2. **The labels must be recognisable but not overwhelming**
 Participants suggested that the labels should be:
 - Short and minimal.
 - Visually recognisable so that users understand their purpose immediately.
 - Designed to be aesthetically pleasing.
 - Structured so that only essential information is visible upfront, while additional details remain optional.
 Best practice suggestion:
 - A brief, clear label (e.g., “This is a political ad”) should be standardised for instant recognition.
 - Further details should only appear if the user chooses to engage (via QR code or link).
3. **Labels must not disrupt the user experience**
 Participants emphasised that the label should not interfere with the main content of the ad.
→ Implication for political labels: if the label is too prominent or too repetitive, users might see it as an obstacle rather than useful information.

Conclusions

This discussion confirmed that political labels must balance transparency with usability. While they should be noticeable, they must avoid becoming intrusive or annoying. The ideal solution:

- Minimal but effective design that signals the ad is political.
- Clear, structured information that doesn’t overwhelm.
- Optional engagement for deeper transparency (QR code or link).

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Interviews with political advertising service providers

Publishers

- Interview with the Association of Commercial Television and Video on Demand Services in Europe (ACT) on 20.02.2025
- Written response to the interview questionnaire from the Association of European Radios (AER) on 07.03.2025
- Interview with the Association of television and radio sales houses (EGTA) on 21.02.2025
- Interview with DPG Media Group on 24.02.2025
- Interview with EUobserver on 29.01.2025
- Interview with the European Broadcasting Union (EBU) on 21.02.2025
- Interview with the European Interactive Digital Advertising Alliance (EDAA) on 12.02.2025
- Interview with Meta on 06.02.2025
- Interview with News Media Europe on 17.02.2025
- Interview with Politico SRL on 25.02.2025
- Interview with Ringier on 17.02.2025
- Interview with Sanoma on 26.02.2025
- Written response to the interview questionnaire from Schibsted on 06.03.2025

Intermediaries

- Interview with the European Association of Communications Agencies (EACA), KreaKom, and Lead Agency on 24.02.2025