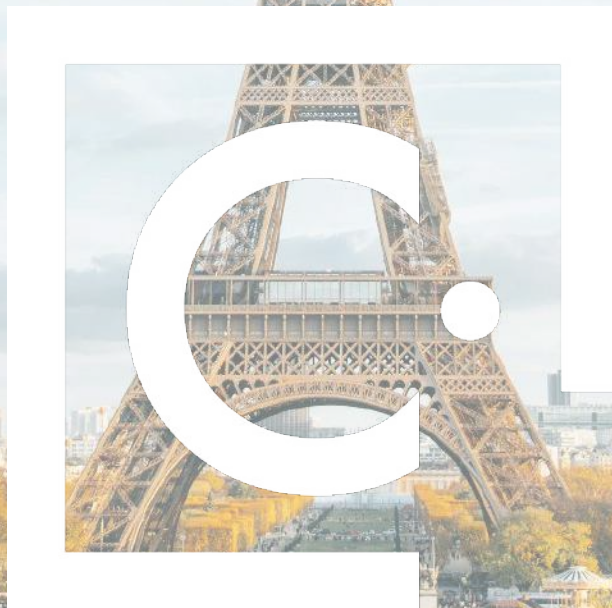# 22VLALA**PUB**

An analysis of political advertising on
Meta, Google and Snapchat during the
2022 French presidential elections

Conclusion: despite efforts at transparency, the categorisation of political advertising remains risky **46**

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Acknowledgements

About the authors

Check First is a software solutions and training company specialised in the fight against online disinformation. It was founded in 2020, and works with fact-checkers, researchers, media literacy actors as well as European and Francophonie institutions.

Nelly Pailleux is CKO and co-founder of Check First. Nelly is a journalist by training. She wrote for the French cultural and economic press before turning to the fight against disinformation. As a fact-checker and editor-in-chief of *Journalistes Solidaires* during the first lockdown in France, Nelly wanted to transcend her experience by going beyond the barriers of a single editorial office. She is now responsible for relations between initiatives within the Check First network, she coordinates the work of different newsrooms and journalists and conducts studies on disinformation in general.

Guillaume Kuster is CEO and co-founder of Check First. After working as a journalist, notably for Radio France and France Télévisions for almost 20 years, he is now a trainer and consultant. From TV journalism, data journalism, magazine and documentary production to mobile journalism, or "MoJo", he is an expert in journalistic and visual storytelling. He is a regular contributor to CIRCOM and operates in their network of 250 member stations in 32 European countries. His experience allows him to help initiatives and newsrooms organise and structure themselves. His network enables him to stay aware of the latest innovations in the fight against disinformation.

Amaury Lesplingart is the Vice President, CTO and co-founder of Check First. Amaury is an entrepreneur and a technology expert. He has worked for RTL Belgium, Automattic (WordPress) and the learning platform toutapprendre.com via the web agency he managed for almost 10 years. He launched and developed startups at an international scale from an early age (Neeed.com, XperLink, Adenum, Bon&Bon, etc.). In charge of the technological aspects of the fight against disinformation, he now creates monitoring and investigation tools for journalists, fact checkers and researchers working against disinformation. He is actively involved in making journalists responsible for their online safety.

About 22vlalapub

22vlalapub.fr is a tool which monitored political advertising on social media during the French presidential election of 2022, more specifically the candidates, their parties and campaign themes.

It collects information about political ads from Meta's, Google's and Snapchat's platforms: who finances the ads, who publishes them, to which audience, what are the amounts spent, etc....

22vlalapub.fr observed, via the platforms' ad libraries, the ads considered as political by the platforms i.e the ones that mention the candidates for the 2022 French presidential election, their political entity, or a list of campaign themes at the heart of the public debate.

For each candidate, 22vlalapub.fr aggregated ads and metadata either published by a candidate's personal page, or by a party's page, as well as the ads disseminated by any other actors that mention the candidate's surname and finally those that mention the candidate's party name.

For campaign themes, 22vlalapub.fr collected ads and associated data mentioning keywords related to these themes.

22vlalapub is a project run by Check First with the support of Reset and Luminate Group. It was used in particular in the context of the Online Election Integrity Watch Group, which monitors disinformation operations and foreign interference attempts during the 2022 presidential elections.

Executive summary

French law stipulates that all political advertising is prohibited six months prior to an election[1] whether in the press or by *"any means of audiovisual communication"*. Political advertising is also regulated by platforms themselves : Meta, Google and Snapchat have dedicated policies about political advertising on their platforms. The European Union is also addressing these issues at the European level through the upcoming Digital Services Act, the Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising, or through inputs of the European Regulators Group for Audiovisual Media Services (ERGA). However, political advertising did not stop during the 2022 French presidential campaign: on the contrary, it occupied quite a significant part of the media space in an electoral context.

Methodology

The 22vlalapub project monitored political advertisements during the 2022 French presidential campaign. To do so, Check First aggregated data provided by Meta, Google and Snapchat rendered available through their political ad libraries.

Meta data was shared publicly through a dashboard on 22vlalapub.fr, listing ads that mentioned the name of a candidate, a party, or campaign themes associated with keywords.

22vlalapub also observed ads in Google's dedicated libraries and Snapchat's. Check First also simulated user queries on the same themes, on Youtube and Google Search. This operation allowed for the identification of political ads which were not listed in their respective libraries.

In order to ensure the relevance of the analysis, Check First set up a sorting system for the ads, allowing them to be classified. This categorisation aims, among other things, to identify the type of advertiser (media, association, company, etc.), the origin of the ad, whether it is related to the current election, etc.

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[1] *Article L-52-1 of the Electoral Code*

Advertising by the politicians and on behalf of the politicians

Some political parties continued to publish or finance political advertising during the election period. Although unlawfully, both *Rassemblement National* and *Reconquête* continued to publish political advertising directly via their dedicated party pages on Meta. *La République en Marche* spent more than 200,000 euros on a campaign to encourage people to vote via another page called "La France aux Urnes". The government also published ads on Snapchat for the same purpose, spending around 83,000 euros.

In addition, many pages of various personalities or entities called to vote for their favourite candidate and/or clearly stated their disapproval of other candidate's ideas. They contributed to the exposure of the candidates in the political content landscape.

The place of media content

The analysis of the data collected in 22vlalapub.fr has shown that mainstream media take a significant share of the political advertising space, particularly on Meta. *Mediapart* and *Libération* are considered among the biggest publishers. Looking deeper in Meta's flagging, on one hand, it seems like every ad from *Mediapart* is labelled as "political", even if it doesn't fit the standards of such advertisement. Google applies the same treatment to the *Société éditrice de Mediapart*. On the other hand, some ads from other mainstream media, such as *Le Monde* or *TF1*, with narratives related to the election, do not appear as "political advertisements".

This observation reinforces the feeling of vagueness about the classification criteria for political advertisements, despite attempts to define them by law or through platform policies.

Satellite entities around the political campaign

The advertising space was also occupied by NGOs, which account for almost a third (28%) of the publishers of political ads on Meta and also appear in a privileged position on Google. Some comedians also appeared in content regularly categorised as 'political advertising'. This classification also raises questions, since most of the issued ads content does not necessarily meet the criteria for political ad designation as defined by the platforms.

Another troubling phenomenon is that ephemeral pages or pages reactivated during the campaign hosted massive advertising campaigns, either out of pure commercial interest or in pursuit of less clear objectives. *Amplify en France* is the most striking example. A large part of its promoted content referred to Marine Le Pen, with a budget spent of more than 60,000 euros. The page is linked to a website that doesn't exist anymore.

The need for control and the definition of the role of platforms

The 22vlalapub project highlighted the fact that the application of law on political advertising is subtle in a field as vast as social networks and large content distribution platforms.

It seems useful to foster a discussion on the means of control. Despite attempts at definition by the DSA or the Proposal for a Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising, the current situation leaves the field open to platforms to define and categorise, once again without control, what constitutes political advertising.

Introduction

The campaign leading up to the French presidential election in April 2022 gave candidates the opportunity to disseminate their ideas widely. While their television and radio speaking time was controlled by ARCOM (the French audiovisual and digital communications regulator), social media platforms offered them a free space to explain the details of their political programme.

However, those platforms are also regulated. For example political advertising by candidates or parties is prohibited in the six months preceding any election. Yet, advertising "on social, electoral and political issues", as defined by Meta, continued to be present on the platforms.

In order to ensure transparency regarding the distribution and financing of political advertisements, some platforms have set up more or less readable ads libraries which allow information to be collected about these advertisements.

We have chosen to look at political ads on Meta platforms (Facebook, Messenger, Instagram), Snapchat and Google thanks to the tool we have created: 22vlalapub.fr.

The 22vlalapub tool allowed us to collect data on the presence of the candidates for the French presidential election 2022 and their respective parties as well as on different themes, each associated with a list of keywords that have been pronounced regularly during the campaign and animated the public debate.

This report is the result of an analysis of the data collected and represented in the 22vlalapub's dashboard.
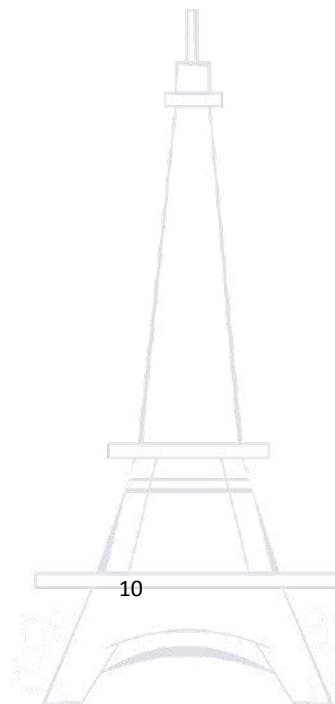
Context: laws, regulations and how to define political advertising

Political advertising on social networks is regulated at several levels, both by states and by platforms. The very definition of political advertising also differs depending on the texts and laws, which makes its regulation complex. The aim here is to establish a context in which political advertising is regulated.

EU Regulations

At European level, several texts are supposed to ensure the transparency of platforms with regard to political advertisements.

The Digital Services Act[2] (which should be adopted by the Council of the European Union in September, before coming into force in 2024) aims to regulate online advertising in general. It stipulates that platforms will no longer be able to serve ads based on profiling of sensitive personal data such as ethnicity, political orientation or sexual orientation. They will have to inform users targeted by ads of the funder of the ad. Sponsored content and commercial messages from influencers will also have to be flagged as such.

Platforms will have to create advertising libraries, which can be accessed by researchers, civil society groups and regulators. They will also be required to assess whether their ad buying systems are at risk to be manipulated or otherwise can contribute to societal risks, such as promoting or funding misinformation.

The Proposal for a regulation of the European Parliament and of the Council on the transparency and targeting of political advertising[3], currently being discussed, will specify the conditions for displaying political advertising on social media platforms by "*by laying down harmonised rules for a high level of transparency of political advertising and related services. These rules will apply to providers of political advertising services*"[4]. It will complement and specify the European democracy action plan[5] as well as the Digital Services Act[6] by "*expand[ing] the categories of information to be disclosed in the context of political advertising, as well as the scope of the relevant service providers concerned. While the DSA imposes*

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[2] https://eur-lex.europa.eu/legal-content/en/TXT/?uri=COM%3A2020%3A825%3AFIN
[3] https://eur-lex.europa.eu/legal-content/FR/ALL/?uri=CELEX%3A52021PC0731
[4] Proposal for a regulation of the European Parliament and of the Council on the transparency and targeting of political advertising, page 1
[5] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A790%3AFIN&qid=1607079662423
[6] https://eur-lex.europa.eu/legal-content/en/TXT/?uri=COM%3A2020%3A825%3AFIN

transparency requirements on online platforms, this initiative covers the entire spectrum of political advertising publishers, as well as other relevant service providers involved in the preparation, placement, promotion, publication and dissemination of political advertising"[7]

The Proposal defines political advertising as follows:

"*(16) The definition of political advertising should include advertising published or disseminated directly or indirectly by or published or disseminated directly or indirectly for or on behalf of a political actor. Since advertisements by, for or on behalf of a political actor cannot be detached from their activity in their role as political actor, they can be presumed to be liable to influence the political debate, except for messages of purely private or purely commercial nature.*

(17) The publication or dissemination by other actors of a message that is liable to influence the outcome of an election or referendum, legislative or regulatory process or voting behaviour should also constitute political advertising. In order to determine whether the publication or dissemination of a message is liable to influence the outcome of an election or referendum, a legislative or regulatory process or voting behaviour, account should be taken of all relevant factors such as the content of the message, the language used to convey the message, the context in which the message is conveyed, the objective of the message and the means by which the message is published or disseminated. Messages on societal or controversial issues may, as the case may be, be liable to influence the outcome of an election or referendum, a legislative or regulatory process or voting behaviour. »[8]

Overall, the Proposal aims to ensure greater transparency of political advertisements. Political advertisements will have to be labelled as such and the link between the advertisement and the election concerned will have to be established. Platforms will have to mention the funders of the ad concerned, as well as the amount spent. The proposal also aims to regulate the targeting and amplification of advertising campaigns:

(48) "*Targeting and amplification techniques in the context of political advertising involving the processing of data referred to in Article 9(1) of Regulation (EU) 2016/679 and Article 10(1) of Regulation (EU) 2018/1725 should therefore be prohibited. The use of such techniques should only be allowed when carried out by the controller, or someone acting on its behalf, on the basis of the explicit consent of the data subject or in the course of their legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical or religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact*

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[7] Proposal for a regulation of the European Parliament and of the Council on the transparency and targeting of political advertising, page 4
[8] Idem, page 18

with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects."[9]

The draft regulation provides that political targeting and amplification techniques that collect or process sensitive personal data (ethnic origin, sexual orientation...) will only be used with the explicit consent of the data subject. Detailed information on the targeting of data subjects will also have to be set up.

ERGA (European Regulators Group for Audiovisual Media Services)

ERGA has welcomed "*the proposed regulation on the transparency and targeting of political advertising and highlights the need for a higher level of harmonisation*"[10] and made some recommendations. In particular, the group of regulators:
- "*calls for the creation of comprehensive political ads repositories, providing more data granularity on each individual ad. [...]*
- *highlights that, [...], there is a strong need for the adoption of a more harmonized sanctioning regime and the introduction of proportionate, dissuasive, and effective sanctions in all Member States [...]*
- *advocates the idea to provide a common definition of political advertising [...]*
- *raises concern with regards to the appointment of a single point of contact at EU level [...]*"

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[9] Proposal for a regulation of the European Parliament and of the Council on the transparency and targeting of political advertising, page 23
[10]https://erga-online.eu/wp-content/uploads/2022/03/2022-03-ERGA-Statement-on-political-advertising-final_adopted.pdf

National regulation

By law

In France, political advertising is regulated by different laws depending on the media type. Broadly, article L52-1 of the French Electoral Code[11] states that "*during the six months prior to the first day of the month of an election and until the date on which this election is held, the use for electioneering purposes of any commercial advertising in the press or using any means of audiovisual communication is prohibited.*"

In addition, article L49-1 of the Electoral Code[12] prohibits the following from midnight on the eve of the election:

"*1° Distributing or having distributed ballot papers, circulars or other documents;*

2° Disseminating or having disseminated to the public by any means of electronic communication any message of an electioneering nature;

3° Mass-calling voters, using an automated system or otherwise, in order to encourage them to vote for a candidate;

4° Holding an election rally".

During this period of time, members of the government must not use state resources while an election campaign is underway. Candidates, their parties, but also polling institutes, media organisations and public figures likely to influence public opinion must also obey a reservation period from midnight on the eve of the election.

As said in a Checknews[13] article, Article 10 of the law of 19 July 1977[14] "*stipulates that it is forbidden to publish, disseminate or comment on polls or results before the last polling stations close. Failure to comply with these provisions is punishable by a fine of 75 000 euros. However, it is specified that the prohibition, which also applies on the web, does not apply to the dissemination of polls conducted before the 'reservation period', provided that "the date of first publication or dissemination, the media that published or disseminated them and the body that conducted them are indicated.*"

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[11]https://www.legifrance.gouv.fr/codes/section_lc/LEGITEXT000006070239/LEGISCTA000006148458?init=true&page=1&query=article+L52-1+du+code+%C3%A9lectoral&searchField=ALL&tab_selection=all&anchor=LEGIARTI000023883001#LEGIARTI000023883001

[12]https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000023878624#:~:text=Article%20L49%2D1%20(abrog%C3%A9)&text=A%20partir%20de%20la%20veille,%C3%A0%20voter%20pour%20un%20candidat.

[13]https://www.liberation.fr/checknews/la-periode-de-reserve-electorale-sapplique-t-elle-aussi-aux-particuliers-20220409_FVQ5NZXXXJECJG6DBZNWQVI5PA/

[14] https://www.legifrance.gouv.fr/loda/id/JORFTEXT000000522846/
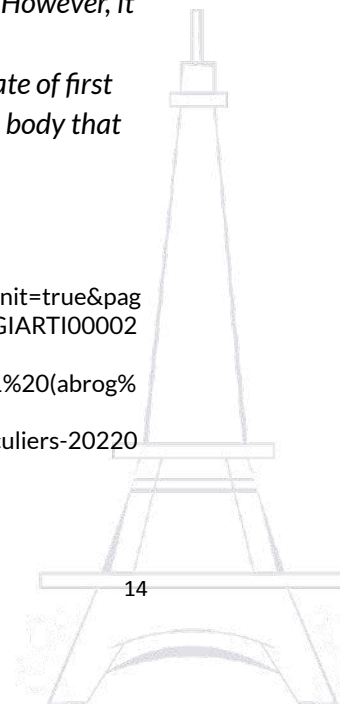
In the context of the 2022 French presidential election, some personalities,such as the youtuber Norman Thavaud[15] were in fact sanctioned[16] for attempting to publish political content during the reservation period. On the eve of the first round of presidential elections on 9 April 2022, France's third largest youtuber expressed concern about the rise of Marine Le Pen in the polls and criticised the Rassemblement National candidate's programme. The 12-million-subscribers creator was contacted by Arcom and asked to remove the video.

The French regulator: ARCOM - ex CSA

In its 2021 report, the authority —formerly called Conseil Supérieur de l'Audiovisuel (CSA) — wrote a few lines about the upcoming presidential elections on 10 and 24 April 2022. The Council adopted a recommendation aimed at completing the measures related to the principle of political pluralism applied in radio and television services during election times[17]. On the regulation of political advertising, the CSA explains that "*On 25 November 2021, the European Commission presented a proposal for a European regulation aimed at increasing the transparency of political advertising. For the first time, it defines the notion of political advertising at European level, provides for provisions to promote transparency and identification of such content and provides a framework for its targeting and amplification. Arcom will follow the development of this draft text in 2022, both at national level and in the framework of the European Regulators Group for Audiovisual Media Services (ERGA).*"[18]

Regarding the fight against information manipulation, Law 2018-1202[19] requires platforms to create a reporting mechanism which should be accessible and visible to users and to deploy additional measures, for example in favour of the transparency of their algorithms.

On its website, ARCOM details the measures taken by the platforms for the elections, using platform-cards[20]. Overall, these measures are divided into four main areas:

- information about the elections;
- platforms' records on the promotion of information content related to a debate of general interest;
- information about the work of fact-checkers;
- awareness raising and citizenship education.

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[15] https://www.youtube.com/user/normanfaitdesvideos
[16] https://www.tf1info.fr/politique/second-tour-de-la-presidentielle-2022-la-periode-de-reserve-s-impose-aussi-sur-youtube-2217596.html
[17] Rapport annuel 2021 du CSA, page 109
[18] Rapport annuel 2021 du CSA, page 129
[19] https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000037847559
[20] https://www.arcom.fr/vos-services-par-media-internet-et-reseaux-sociaux/lutte-contre-la-manipulation-de-linformation-en-periode-electorale-les-mesures-prises-par-les-plateformes-en-ligne/mesures-prises-par-les-plateformes-relatives-la-periode-electorale

ARCOM also provides an article about the 2022 presidential elections[21] which links directly to the communications of the platforms.

[21]https://www.arcom.fr/vos-services-par-media-internet-et-reseaux-sociaux/lutte-contre-la-manipulation-de-linformat ion-en-periode-electorale-les-mesures-prises-par-les-plateformes-en-ligne/mesures-prises-par-les-plateformes-relativ es-la-periode-electorale

Platforms' regulations

Meta

Meta defines political advertising[22] according to four criteria:

" Ads about social issues, elections or politics are:
- *Made by, on behalf of or about a candidate for public office, a political figure, a political party, a political action committee or advocates for the outcome of an election to public office; or*
- *About any election, referendum or ballot initiative, including "go out and vote" or election campaigns; or*
- *About social issues in any place where the ad is being published; or*
- *Regulated as political advertising.*"

The definition further specifies that an advertisement is paid for by a **funding entity** which must pass an advertising approval process including validation of their identity. Moreover, *"these ads must have a disclaimer with the name and entity that paid for the ads. If an ad runs without a disclaimer, it'll be paused, disapproved and added to the Ad Library, until the advertiser completes the authorisation process."*[23]

Meta distinguishes **funding entities** from **publishing entities for** an advertising campaign: **funding entities** are the entities paying Meta for the campaign, while publishing entities are pages that display the advertising campaign.

Google

Google defines political advertising — or election ads[24] in the EU as ads representing:
- a political party, a current elected representative or a candidate for the European Parliament ;
- a political party, a current elected official or a candidate for elected office in an EU Member State, e.g. members of a national parliament and directly elected presidents

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[22] https://www.facebook.com/business/help/167836590566506?id=288762101909005
[23] https://www.facebook.com/business/help/167836590566506?id=288762101909005
[24] https://adstransparency.google.com/political?political=&region=FR

- a question put to the vote in a referendum, a campaign group for a referendum, or a call for a vote in connection with a national or regional referendum on sovereignty issues

In a similar fashion as on Meta platforms, advertisers wishing to run political advertisements must apply for validation by providing evidence of "*eligibility to run election advertisements in the area concerned*" and "*proof of identity*".

Google also precise that "*Only the following criteria may be used to target election ads*:

- *Geographic location (except radius around a location)*
- *Age, gender*
- *Contextual targeting options such as: ad placements, topics, keywords against sites, apps, pages and videos*
- *All other types of targeting are not allowed for use in election ads.*"[25]

Snapchat

Snap.Inc "*strive[s] to create a safe, transparent and trusted platform for [their] users.*"[26] Its advertising library for 2022 consists of a CSV file with 12 different pieces of information about each ad, including a link to it, the amounts spent and the entity funding it.

Snapchat defines political advertising (referred to as "political ads") as "E*lection-related ads include ads about candidates or parties for public office, ballot measures or referendums, political action committees, and ads that urge people to vote or register to vote.*" or "*Issue or advocacy ads are ads concerning issues or organisations that are the subject of debate on a local, national, or global level, or of public importance. They include ads about abortion, immigration, the environment, education, discrimination, and guns.*"[27]

Notes: for a better understanding in this report, ads considered by platforms to be "about a social, electoral or political issue" for Meta or "election ads" for Google or Snapchat's "political ads" are referred to in this text as "political ads".

By "advertisement" the authors mean any content that has been the subject of a financial exchange between a platform and a publisher or funder to promote content.

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[25] https://support.google.com/adspolicy/answer/6014595
[26] https://www.snap.com/en-GB/political-ads
[27] https://www.snap.com/fr-FR/ad-policies/political

Advertising by political parties during the presidential campaign

Political parties deliberately running political advertisements

Several parties ran or funded ads that raised questions about compliance with the ban on political advertising covering the six months prior to the campaign, and the tightening of the ban during the reservation period.

Zemmour's party, *Reconquête*, began running political ads on 12 March 2022. These ads raise questions as they did not directly promote their candidate, but rather invited people to join the party, claiming that "*100,000 French people have already joined Reconquête. Join the party.*"

During the period from 17 to 22 March, the *Reconquête* Facebook page was the biggest publisher in terms of spent budget of sponsored political content on Meta associated with Zemmour's candidacy. The first ad campaign ended on 24 March, and resumed a week later using the same narrative. It ran 14 ads, with this number gradually decreasing until the campaign ended on 8 April, two days before the first round – and the beginning of the reservation period.

Reconquête was asked about these ad campaigns back in December 2021, but in an interview with *France Inter*[28] Christophe Pichon and Christian Naux, lawyers specialising in electoral law from the Cornet-Vincent-Segurel law firm, argued that the French Electoral Code is specific to ads used for electioneering purposes. Pichon argued that "*Whereas here, it's talking about joining the party, so it's not electioneering but promoting the party. […] We're not saying 'vote for Éric Zemmour, but 'join the party'.*"

Meanwhile, on 1 March, when 22vlalapub was launched, four ads were active on the *Rassemblement National*'s party's page. The campaign stopped on 10 April, the date of the first round of voting, and resumed the following day until the day prior to the second round of the presidential election. The narrative called for people to support the party by making a financial donation, stating that it is "*tax deductible*"

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[28] France Inter, 23 December 2021, "La diffusion de publicités sur Facebook par le parti d'Eric Zemmour est-elle autorisée ?" - "*Is the publication of ads on Facebook by Eric Zemmour's party allowed?*"

Of the 41 political advertisements on Snapchat in France, 30 of them were either from the French government or the Ministry of Solidarity and Health. 87% of these ads are campaigns encouraging people to vote in the presidential or legislative elections, for a total amount of around **83,500 euros**.

Parties which funded political advertising for other entities to display

La République en Marche! (LREM) appeared as the funder of adverts for the page "La France aux urnes", rather than as a publisher of political advertising. Several ad campaigns on this page encouraged people to go and vote, and in particular to vote by proxy if they were away from their polling station on the day of the election. This approach raises questions given that individuals voting by proxy were more likely to be sympathetic to Emmanuel Macron's platform[29]. The page "La France aux urnes" openly described itself as "run by La République En Marche! to promote voting in elections". The data collected as of 9 May show that **LREM spent over 200,000 euros on political ads between 6 February and 6 May 2022** and was the political party that spent the most on political ads on Meta during the studied period.
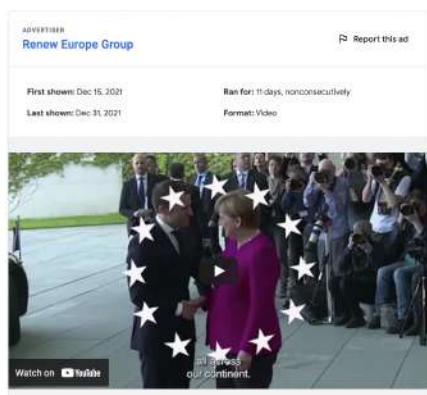
The Renew Europe parliamentary group, of which LREM is a member, also ran a self-promotional advertising[30] campaign categorised as political by Google for over 6,000 euros. This campaign was publish between 15 and 31 December 2021 on YouTube and highlights President Macron and his privileged position in European Union politics.

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[29] Le Monde, 2 April 2022, "Sur Facebook, la République en marche et ses publicités un peu trop bien ciblées" - "On Facebook, the 'République en marche' ads are a bit too accurately targeted".
[30]https://adstransparency.google.com/advertiser/AR15478156412080619521/creative/CR14675060887086170113?political=&region=FR

Other entities that display political ads and contribute to candidates' visibility

In addition to the space occupied by parties or the media, Meta has listed a significant number of pages ran by various personalities or entities whose ads have been categorised as political. Whether they are activists, local elected officials, citizens, Meta has become a playground for them. Not only they express but also they also sponsor and put forward their political opinion in order to call for a vote. Beyond the messages, which are rather varied (see examples below), these ads contribute to the privileged visibility and greater exposure (through its status as a paid ad) of political speech on the platforms.

In the political ads identified, some contains a positive narrative towards the Past President (*France en Arabe, Mouvement Européen France*) while others are very critical of him (*The Truth, N'oubliez pas de vivre, Les amis d'Yves Montenay, Soutien Mami florence gilet jaune, Charles-Henri Gallois*, president of "*Génération Frexit*").

The same phenomenon of opposition can be found about the *Rassemblement National*, with open support (like *Antoine Villedieu*) or marked opposition (*Jacques Soncin*)

Antoine Villedieu
Sponsored · Paid for by Antoine Jean Yves Villedieu-Rota
ID: 295371882769797

En place à la foire de Saint Loup Sur Semouse pour distribuer les propositions de Marine Le Pen, un accueil formidable de la part des usagers, aucun doute la dynamique est bien de notre côté

les 10 et 24 avril, votez Marine

#Marine2022 #MarinePrésidente #SansLui #MLaFrance

Clément Galante
Sponsored · Paid for by Clement Pierre Marie Galante
ID: 983829912242764

Rejoignez moi pour la Reconquête!
Abonnez vous !

Jacques Soncin
Sponsored · Paid for by Jacques Claude Henri Soncin
ID: 524267202437562

EMPECHER LE RASSEMBLEMENT NATIONAL DE S'EMPARER DES MANETTES DES INSTITUTIONS DE NOTRE PAYS !

Depuis le 10 avril, les militants des divers partis de gauche, au lieu de préparer les deux échéances à venir, s'étripent pour savoir lequel a eu tort. On peut toujours refaire l'histoire. Mais les faits sont là et ils sont têtus. Aucun parti de gauche ne s'est qualifié pour le second tour. Mon avis, que je ne développerai pas, c'est que...

Marine Le Pen avec un suprêmaciste Lituanien fasant le signe de ralliement des suprêmacistes blancs

Jacques Soncin
Media/news company
Send messa...

Stéphane Peu
Sponsored · Paid for by Stéphane Peu
ID: 998073364171865

[M. ZEMMOUR, LA SEINE-SAINT-DENIS N'EST PAS UN PAILLASSON]

Sur le plateau de LCI, j'ai relayé la colère des habitantes et habitants de la Seine-Saint-Denis qui ne supportent plus d'être insultés par les déclarations d'Éric Zemmour.

Il ne se passe pas une journée sans que ce haineux d'extrême-droite ne nous point...

DIRECT LCI 11:39
Stéphane Peu : Député PCF de Seine-Saint-Denis
PROPOS SUR ZEMMOUR : JADOT, LA SURENCHÈRE ?
PÉCRESSE/BALLADUR "Elle est sincère et authentique, je suis persuadé qu'elle a trouvé en elle la force pour convaincre les Français" (É. Balladur)

Stéphane Peu
Politician
Send messa...

Another content categorised as political by Google this time, is the advertising campaigns of the Agir MP Thomas Gassilloud[31], who invites people to contact him for a "*chat in video conference*" or even to call him on his phone number.

[31] https://adstransparency.google.com/advertiser/AR03484198966550069249?political=&region=FR

Mainstream media as publishers of political advertisements

Check First's analysis of advertisers shows that the media accounts for 16% of advertisers running ads classified as political in the Meta library.

The *Mediapart* and *Libération* cases

Mediapart[32] regularly appeared among the biggest funders and publishers of political ads in the Meta Ad Library. Of all the ads listed in 22vlalapub.fr during the entire analysis period, *Mediapart* accounted for 14% of the content. The categorisation of political content is not solely an issue for the online platforms, since the Commission nationale de contrôle de la campagne électorale (National Commission for Oversight of the Electoral Campaign, CNCCEP) has flagged up *Mediapart* content[33] that may be in breach of article L49 of the Electoral Code prohibiting "*the dissemination of any message that could be linked to electoral propaganda*".
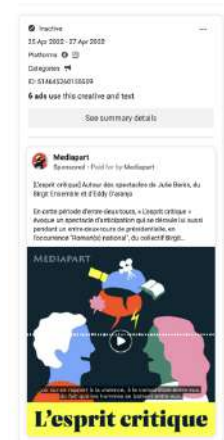
Further research shows that Meta seems to categorise all of *Mediapart's* advertisements as "*about social issues, elections or politics*" although this is not actually always the case.

Google is treating *La Société éditrice de Mediapart* in a similar way. It was also identified as a publisher of political advertisements[34] by the platform for promoting an excerpt from the documentary "*Sexual violence: Éric Zemmour is accused by eight women*"[35], published on YouTube and promoted from 8 to 9 March for a budget of between 0 and 50 euros. The other two advertisements categorised as political

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[32] https://www.mediapart.fr/. Mediapart is "a digital, participatory and independent newspaper, without advertising or subsidies, and which lives only from the support of its readers."
[33] https://twitter.com/cnccep/status/1512831049751011336
[34] https://adstransparency.google.com/advertiser/AR03020195301462900737?political=&region=EU
[35] https://adstransparency.google.com/advertiser/AR03020195301462900737/creative/CR13308792620126830593?political=&region=EU

are the promotion of content produced by Mediapart[36], or an invitation to subscribe to the media[37].

Libération[38] is also listed as one of the most important publishers of political advertising about the candidates with 125 ads (1% of the content observed on Meta), all candidates and themes combined. The newspaper received a comparable treatment to *Mediapart*, with content categorised as political even though it was not always related to the current campaign.
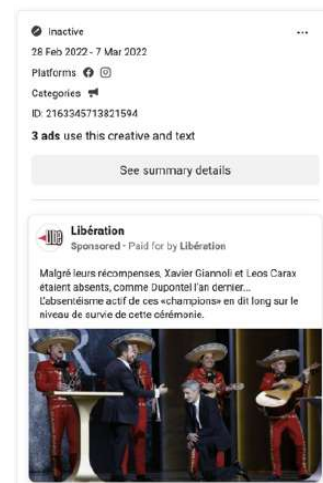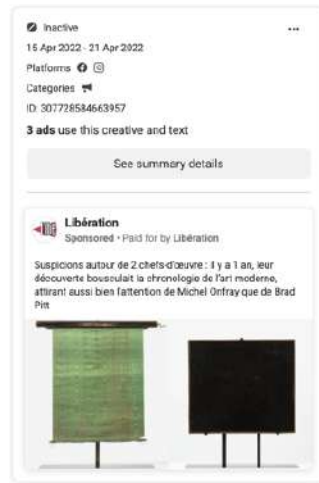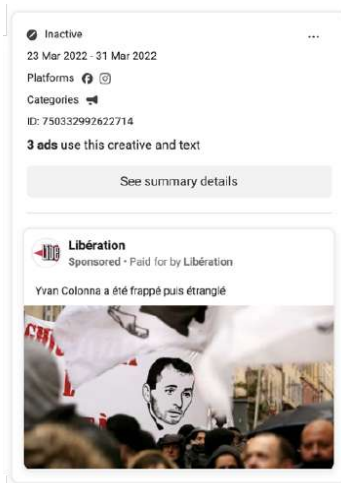
[36]https://adstransparency.google.com/advertiser/AR03020195301462900737/creative/CR05104389685778579457?political=&region=EU
[37]https://adstransparency.google.com/advertiser/AR03020195301462900737/creative/CR15508545951399673857?political=&region=EU
[38] https://www.liberation.fr/. Libération is a daily newspaper in France, founded in Paris by Jean-Paul Sartre and Serge July in 1973 in the wake of the protest movements of May 1968.

Other mainstream media remained under the platforms' radar

There is a difference in the way platforms flagged political ads issued by different media organisations. Other media entities than *Mediapart* and *Libération* publishing political ads do not see them flagged as political by the platforms even though some of these contents are clearly related to the presidential election or the candidates.

On Meta, this is the case for *Le Monde*[39] for example
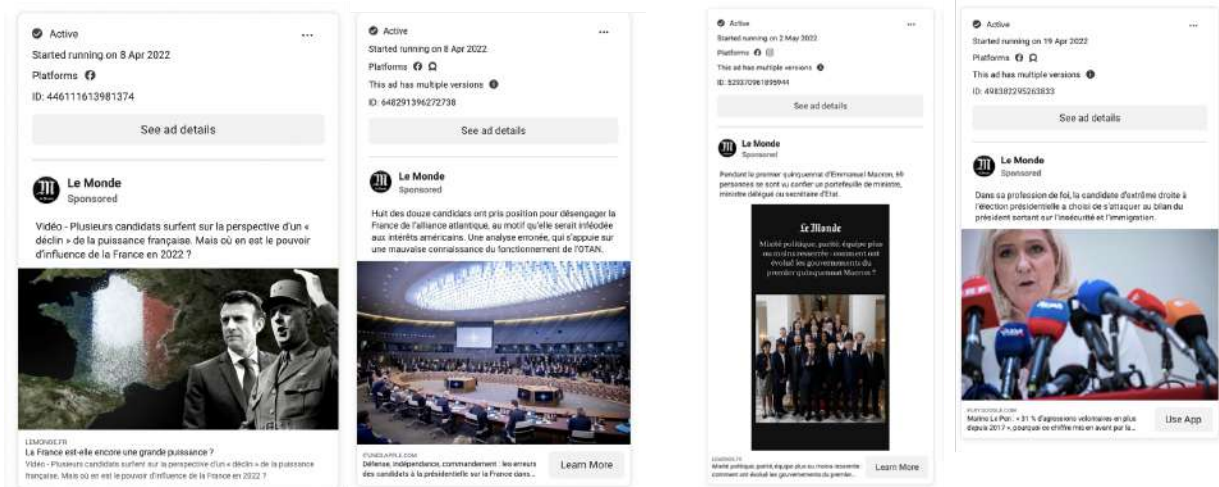
But also for *Le Parisien*[40]

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[39] https://www.lemonde.fr/en/
[40] https://www.leparisien.fr/

Some content from *L'Obs*[41] is not categorised as political by Meta and Google. The media sponsored at least 15 ads linked to a candidate or a party.
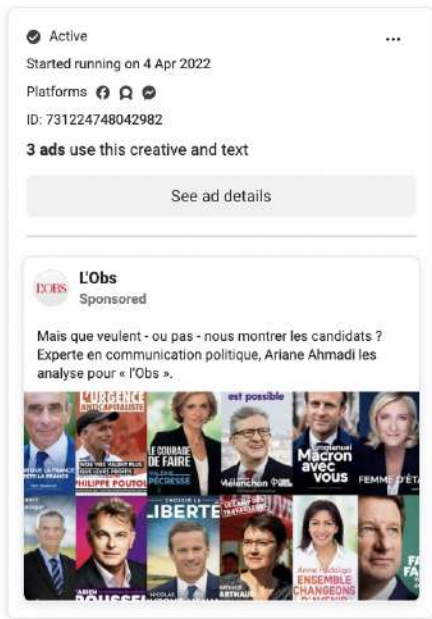
A similar case is observed for *L'Express*[42]:

[41] https://www.nouvelobs.com/
[42] https://www.lexpress.fr/

The TV channel *TF1*[43] also sponsored content about the presidential election on YouTube, which was not considered as political advertising

⏸ 100 jours avec Nicolas Dupont-Aignan - Le Journal …

Compatible Chromecast. Programmes en qualité HD.

`Annonce` https://www.tf1.fr/

VISITEZ LE SITE ↗

⏸ Jean-Luc Mélenchon et la France Insoumise 2.0 -…

Compatible Chromecast. Replay sans coupure pub.

`Annonce` https://www.tf1.fr/

VISITEZ LE SITE ↗

⏸ 2022 : interview de Nathalie Arthaud - Journal de 20…

Programmes en qualité HD

`Annonce` https://www.tf1.fr/

VISITEZ LE SITE ↗

As well as *TV5 Monde*[44]

🆃🆅🅅 Présidentielle française : Nicolas Dupont-Aignan rall…

Suivez toute l'actualité en temps réel et en vidéo avec TV5MONDE Info

Toute l'information   JT international   Le JT Eco   Le 64'

`Annonce` https://information.tv5monde.com/

VISITEZ LE SITE ↗

🆃🆅🅅 Portrait : Jean Lassalle, le berger de la politique

Suivez toute l'actualité en temps réel et en vidéo avec TV5MONDE Info

Toute l'information   JT international

`Annonce` https://information.tv5monde.com/

VISITEZ LE SITE ↗

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[43] https://www.tf1.fr/
[44] https://www.tv5monde.com/

This double standard raises the issue of the granularity of the categorisation of political advertising content by platforms. Some mainstream media organisations promoting their content dealing with politics, clearly mentioning the names of candidates or parties, seem to escape the labelling of "*political advertising*". Other media outlets see their content categorised as political even though it does not necessarily meet the known criteria for political advertising.

UFOs around the political campaign

Apart from political parties, their candidates and the media, other actors were identified during the data collection. This last category of publishers and funders of advertisements provides food for thought on the nature of their classification by Meta and Google as publishers of political content.

Excessive representation of associations and NGOs as publishers of political ads

NGOs, associations or think tanks account for a significant proportion of sponsored content considered political by the platforms: on Meta, 28% of political ad distributors are NGOs or associations according to the classification established by Check First. This group appears among the actors who do the most advertising "*about social issues, elections or politics*".

On Meta's platforms, Oxfam France[45] published 214 political advertisements over the study period, ahead of the Institut Montaigne[46] (147 ads).

Among the entities that published more than 100 ads over the period studied, we find Mes Soutiens - Médecins du monde (Mes Soutiens[47] is, according to the description of its Facebook page, "an online petition platform that brings together users and organises sponsored campaigns for associations"), Greenpeace France[48] and Care France[49] have 101 and 100 ads respectively. Just behind, UNHCR France[50] has 95 ads and Amnesty International France[51] has 78.

Most of these ads are related to the war in Ukraine and call for support for the actions of associations in favour of the Ukrainian population.

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[45] https://www.facebook.com/OxfamFrance
[46] https://www.facebook.com/institutmontaigne/
[47] https://www.facebook.com/MesSoutiens/
[48] https://www.facebook.com/greenpeacefrance
[49] https://www.facebook.com/CARE.France
[50] https://www.facebook.com/UNHCRfrance/
[51] https://www.facebook.com/amnestyfr

A similar phenomenon can be observed on Google's transparency centre: a significant proportion of ads categorised as political relate to campaign themes and social issues, rather than directly to presidential candidates. Foundations, NGOs and associations are also very numerous in the category of political publishers on Google:

Example with Care France:

Annonce · https://www.carefrance.org/ ▾

Changement climatique - CARE France

Découvrez les Actions de CARE France Contre le Changement **Climatique**. 94...

Nos actions · Faire un don · Qui sommes-nous ?

Or La Cimade

Annonce · https://www.lacimade.org/droit-asile/asile ▾

droit d'asile - Un droit ultime pour tous

Retrouvez notre combat pour L'accès au **droit d'asile**.

Nos missions · Droit d'asile · Devenez bénévoles · Soutenez la Cimade

Comedians at the heart of political advertising content?

Le couple parfais pour la france ▯

Kelly Duchuc and Haroun, two comedians whose ads are considered political, regularly appear in Meta ads library. Kelly Duchuc is a webseries[52] character played by Lucie Fabry. She embodies an influencer who mentions political figures in her sketches and makes fun of her character but does not vividly criticise presidential candidates, parties or any other topic related to politics.

As for Haroun's sponsored publications, 24 of them are classified as political by Meta. Most of it is actually a sponsored video of a sketch in which he explains that he will not do a show about the presidential elections as he did in 2017. While he ironises in the first sentence of the sketch that the increase in petrol prices, the yellow vests and the pandemic happened during Emmanuel Macron's term, the content of the sketch focuses mainly on other topics.

Compared to content displayed on a dozen pages[53] of other comedians, it seems that few of them sponsor publications.

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[52] https://www.allocine.fr/personne/fichepersonne-908915/biographie/
[53] Searches on : Vérino, Florence Foresti, Marine Baousson, Bérengère Krief, Sophie-Marie Larrouy, Thomas Wiesel, Paul Taylor, Paul Mirabel, Marina Rollman, Guillaume Meurice, Bun Hay Mean, Pierre-Emmanuel Barré, Tanguy Pastureau

Ghost entities and inauthentic behaviour

The flagging of political advertisements still seems perfectible, given the different standards of classification of advertisements by media entities or the over-representation of NGOs and associations in the category "*political content*". In 2020, a study by the CSA identified inconsistencies in Facebook's categorisation of political ads[54] and France's Ambassador for Digital Affairs developed an experimental tool to check whether online political ads complied with the law.[55]

In the context of 22vlalapub, other ads categorised as political caught our attention, either because of the unusual behaviour of its authors or the lack of transparency about it.

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[54]CSA, November 2020, Political Advertising on Social Media: study of the Facebook Ads Library for social, electoral and political content.
[55]See the experimental tool developed by the French Ambassador for Digital Affairs's team: https://disinfo.quaidorsay.fr/political-ads/
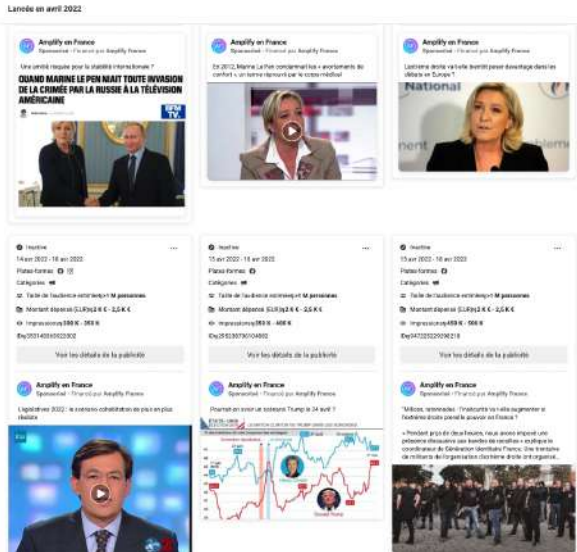
Amplify en France[56] was one of the most intriguing ad publishers of this presidential campaign. The total amount of its expenses listed by Meta was 66,263 euros, the largest total on Meta's list between 1 March 2022 and the second round of the presidential election. The page was created on 29 March 2022 and presents itself as a current affairs website. However, the page's Facebook profile links to a website[57] with limited content, which appears to have been deactivated as of 2 June 2022.

The *Amplify en France* page featured 24 publications, 8 of which mentioned Marine Le Pen. These were the ones that gathered the most impressions (between 600-700,000 impressions per ad compared to an average of 40-45,000 impressions for the others). Among the contents highlighted, an interview[58] of a member of the dismantled organisation "Génération identitaire", or worrying headlines such as: "A massive recession threatens France again"[59], "Is the French economy on the brink of collapse?"[60]

Its Facebook page regularly shared news articles and posts, several times a day, since its creation, but it last published on 25 April 2022.

Another blurred piece of information is that the phone number associated with the page, used to be accepted on Meta as a political advertiser, refers to a sophrology office. This number is associated with a person whose connection to *Amplify in France* seems unclear.

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[56] https://www.facebook.com/Amplify-en-France-103256579016125/

[57] https://www.amplifyfrance.org/

[58] https://www.facebook.com/ads/library/?id=947225229298218

[59] https://www.facebook.com/ads/library/?id=391835196092078

[60] https://www.facebook.com/ads/library/?id=2846124072348281
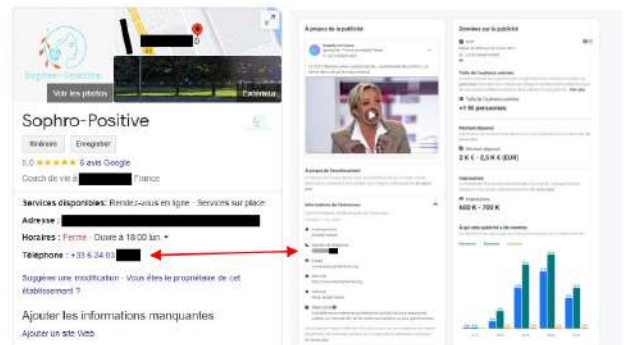
Immopotam

Immopotam[61] is a real estate agency that appears to have adopted a strategy of increasing its commercial visibility by linking current issues to its activities.

The advertiser has chosen to buy advertising space with positions or quotes from candidates related to housing or real estate in order to attract visitors to its website, which includes a so-called news section. However, the site is clearly intended to promote the company's business activities.

Institut National de l'Audiovisuel

The French *INA*[62] (National Institute for Broadcasting) promoted a series of audiovisual productions (entitled "ADN"), identified as political advertising, where they invite most of the candidates to react to archives that were uncomfortable or contrary to their current political positioning.

10 of the 12 candidates were interviewed in the series and the tone varied according to the candidate. While Éric Zemmour was confronted with his choice to vote for François Mitterand in the 1981 and 1988 presidential elections, Marine le Pen and Nicolas Dupont-Aignan were confronted with their favourable comments towards Vladimir Putin. Jean Lassalle was asked to react to former accusations of sexual harassment. Nathalie Arthaud was asked about her differences with the historical figure of her own party: Arlette Laguiller.

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[62] https://www.facebook.com/Ina.fr/
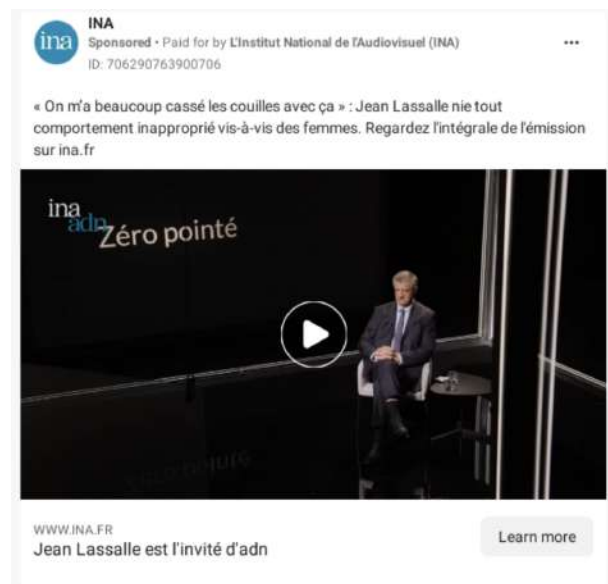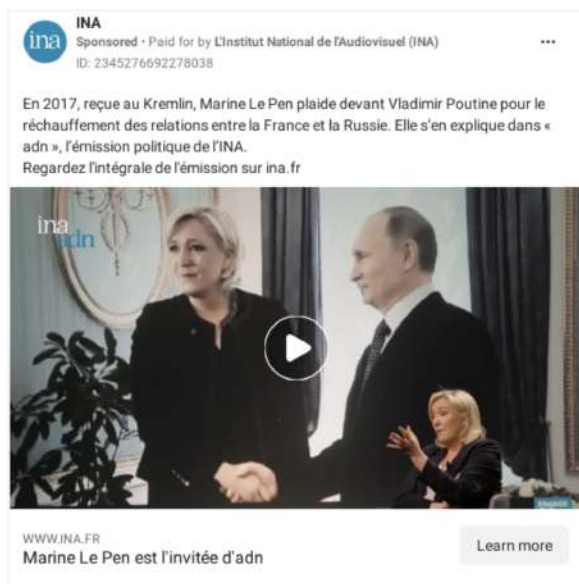
That's Y Media

That's Y[63] sponsored content was solely about Marine Le Pen. The page published three advertising campaigns focusing only on the *Rassemblement National* candidate. The page did not run any other ads (whether or not they were flagged by Meta as political) on other candidates in the French presidential election.
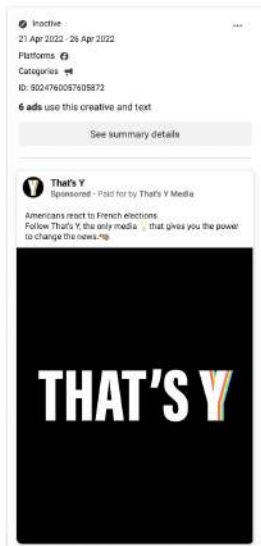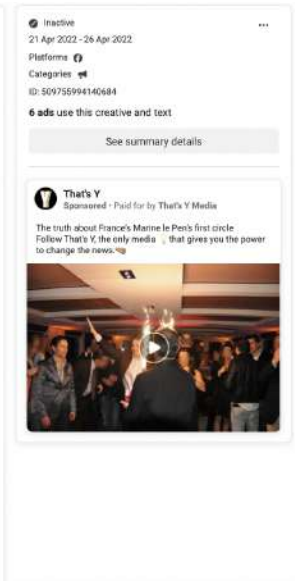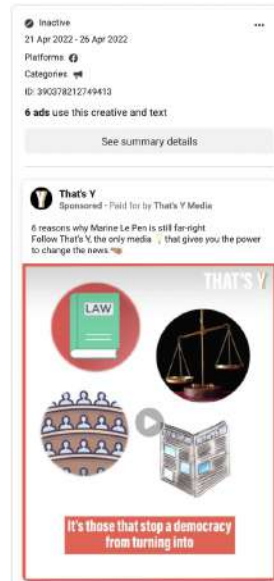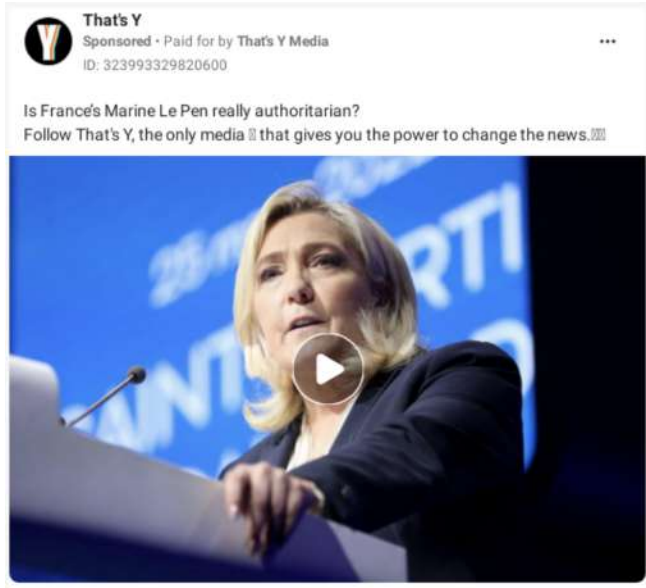
In this ad -a video "*Americans react to French elections-*"[64] the first sentence is : « *I think a lot of people here don't believe that someone like Le Pen can become president* » . In fact, it is a video in which the (American) protagonists warn the French people about the danger of Marine Le Pen coming to power, with many comparisons with Donald Trump's mandate.

Ichtus

Ichtus[65] introduces itself as a Catholic association. They promote videos generally unfavourable to Emmanuel Macron and take up points from the programmes of Marine le Pen and Éric Zemmour without directly quoting them[66].

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[65] https://www.facebook.com/IchtusBase49/
[66] https://fb.watch/cVNAfCly37/

Fondation du Pont-Neuf

The *Fondation du Pont-Neuf*[67] describes itself as "*a private research centre whose objective is to conduct scientific studies and contributions on the various fields of governmental and political activity, drawing on conservative thought*". Its advertisements showed an over-representation of ads favourable to Éric Zemmour.

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[67] https://www.facebook.com/fondationdupontneuf/

Affiches parisiennes

Affiches parisiennes[68] is a legal newspaper with a news section on its website. During the election campaign, most of the ads purchased promoted articles quoting Emmanuel Macron, regularly in a favourable light.

[68] https://www.facebook.com/AffichesParisiennes/

Union Syndicale Solidaires

The *Union Syndicale Solidaires*[69] (a French union) ran several advertising campaigns hostile to Marine Le Pen's accession to the Elysée Palace between the first and second rounds.

[69] https://www.facebook.com/UnionSolidaires/

O.A.B.A. - Œuvre d'Assistance aux Bêtes d'Abattoirs

The *O.A.B.A*[70] claims to be the "*1st association in France protecting farm animals for 60 years, recognised as a public utility*". Its ads are categorised by Meta as political, although they do not always appear to be.

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[70] https://www.facebook.com/OABAofficiel/

Thierry Paul Valette

In this analysis, we have been able to show that, generally, a funder has only one associated publisher on Meta. However, one funder makes an exception: *Thierry Paul Valette*[71].

He presents himself as "*cofounder of the Yellow Vests Citizens*" *on* LinkedIn[72] and finance ads for his *think tank Terrademos,* as well as for the *ISDDH-Institut de surveillance de la démocratie et des droits humains* (Democracy and Human Rights Monitoring Institute)

Alliance Vita

Alliance Vita is an "*association of the pro-life movement in France, militating mainly against abortion and euthanasia*".[73]

In our monitoring of Google ads mentioning the names of political figures, we found that *Alliance Vita* had run about ten ads with the names of presidential candidates. In June 2022, the associated link[74] was to a site referring to the 2017 presidential election.

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[73]https://www.ledauphine.com/societe/2022/02/24/la-loi-qui-simplifie-le-changement-de-nom-de-famille-ne-fait-pas-l-unanimite
[74] https://elections.alliancevita.org/

Conclusion: despite efforts at transparency, the categorisation of political advertising remains risky

The question of categorising political advertising remains tricky despite attempts of definitions and regulation by European Union, French law or platform's texts.
Some have tried to tackle the issue of categorisation and definition by analysing exclusively the narrative content of advertisements, such as Jules Rostand, Marion Seigneurin, with the collaboration of Sprint JE, under the coordination of Christine Balagué in their barometer of online advertising[75] :

"Critical texts distinguish four categories of political advertisements:

- *political discourse: advertisements in this category are in the service of a candidate, a party or a specific theme on which their discourse is oriented. This can be direct funding that respects the formal requirement of campaign neutrality, as in the case of La République en Marche (sheet 1), or indirect funding, in which the advertiser supports the propagation of the candidate's discourse;*

- *Social advocacy: this category refers to associations and institutions appealing to the electorate of presidential candidates to publicise their cause. These advertisements are characterised by an appeal to all, or at least a variety of, candidates. The advertiser targets people according to socio-demographic characteristics that they believe are close to them, as does the association One on Poverty (sheet 2);*

- *public rumour: these are advertisements that put forward information that is not referenced, or put into context or perceived in a critical way. These advertisements fall into a grey area close to disinformation, marked in particular by the propagation of conspiracy theories, as was the case with the Sum of Us association (sheet 3);*

- *Commercial logic: advertisements aimed at supporting an economic model make up this last category. These are mainly advertisements financed by actors in the public debate, from the main media (see sheet n°6 on Libération) to certain film producers, whose activity is built around the political situation. More generally, this category includes advertisements that use the campaign to benefit a commercial activity."*

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[75] https://www.goodintech.org/barometre-publicite-politique-campagne-electorale-2022.html

This allows for a new type of categorisation of political advertising on social media.

Whether analysing textual content by keywords, by speech, or by time period, attempts to categorise political advertising appear to have limitations, given the inaccuracy of these designations highlighted throughout this report.

Meta, Google and Snapchat are the only platforms that apply transparency standards to political ads. However, the libraries of the latter two are not very readable, as they are communicated as large CSV files. The size of the Google file (several thousand lines) prevents it from being opened by most users who do not have the appropriate tools.

Nevertheless, during the period of this study, Google opened a library[76] to access this data in a more fluid way. The categorisation of these advertisements can nevertheless be improved.

The inadequacy of the platforms' classification was established in a 2021 study by researchers from KU Leuven and New York University[77], who showed that Facebook incorrectly evaluated up to 83% of the ads deemed political by the researchers.

The ads that ran during the French presidential election were no exception, and despite attempts to regulate them by Meta platforms and by law, some parties continued to run or fund political advertising directly or indirectly, ignoring these recommendations or existing laws.

Even within different categories of actors (such as the French media), Meta's categorisation of ads proves complicated, leading to an over-representation of Mediapart and Libération's content in the ad-spreaders - an over-representation that is distorted by the many media that escape the platform's categorisation.

Moreover, in their annual declaration to ARCOM, the platforms were strongly criticised for their lack of detail. Although the platforms analysed have put in place initiatives in favour of the transparency of their data, in particular through the implementation of advertising libraries, these initiatives have their limits.

On the Meta side, the API made available to researchers does not always provide all the data for an ad (missing fields) and the data filtering possibilities are insufficient (impossibility to search by funder, for example). The choice of format for certain data, such

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[76] https://adstransparency.google.com/political?political=&region=US
[77] https://nieuws.kuleuven.be/en/content/2021/the-identification-of-political-ads-on-facebook-often-goes-wrong

as ranges of advertising expenditure instead of the actual cost of advertising campaigns, or the choice of not disclosing targeting data upstream of campaigns (the data opened up are only those of the results) limit the possibilities of analysis.

Although Google opened their European advertising transparency centre during the presidential campaign, there are also improvements to be made. To access the "raw" data, one has to download a set of very large CSV files containing millions of rows and dozens of columns, making analysis difficult. In addition, some data is also missing.

Finally, platforms must apply the notion of transparency in the broadest sense of the term, i.e. even for content that is no longer visible. During our analysis, we were confronted with ads that were deactivated by Meta and by Google. This deactivation without the possibility of accessing any archive makes it impossible to analyse these ads and their content a posteriori, even though they had a place on the platforms for some time.

Recommendations

1. Establishing a clear definition of political advertising

This report has shown that there are different definitions of what qualifies as political advertising, whether at the level of European or national regulations, or depending on the platform. A European definition of political advertising, to be applied by platforms on a mandatory basis, will ensure common criteria for all platforms and equal treatment under the law. This common definition should also make it possible to list political advertisements on platforms that claim not to contain them (Twitter, TikTok, etc).

2. Define a standard for the presentation of political advertising data common to all platforms that allow political advertising

This standard will ensure the readability of advertising libraries and will allow the analysis of advertisements according to precise criteria. It should enable everyone to obtain the information (already required in European legislation) on political advertising, in an easily accessible and usable environment.

3. Ensuring transparency of suppressed advertising

Data on deleted political advertisements should be searchable and subject to the same transparency and readability criteria as existing advertisements.

4. Respecting set-aside periods under national law

Where national legislation provides for a period of prohibition of political advertising prior to an election, funders, publishers and platforms should ensure that they respect or enforce this law.

Appendix

Methodology

22vlalapub is an ad monitoring tool focused on political candidates and their parties in relation to the 2022 French presidential election. The tool watched ads ran on Meta, Snapchat and Google platforms. The website is still up at https://22vlalapub.fr and lets users browse daily data through a date picker.

Meta

For each candidate, 22vlalapub offers an analysis of their personal Facebook page, ads ran on their party's page, ads mentioning the candidate's surname and ads mentioning the candidate's party's name. A list of recurring campaign topics is also analysed by way of a keyword list.

The analysis period ran from 28 February to 6 May 2022[78].

Data was collected every hour during the analysis period from the Meta Ad Library, using its API[79]. This tool is described as follows by Meta: "*The Ad Library application programming interface (API) allows you to perform customized keyword searches of ads stored in the Ad Library. You can search data for all active and inactive ads about social issues, elections or politics. It helps to be a little familiar with programming to use an API. For a simpler research solution, you may want to start with our Ad Library Report.*"

For each ad insert, a screen capture is stored by Check First. This image is recorded in a database and associated to the following data point as provided by Meta:

- Creation date
- Ad's text body.
- Link presented in the ad.
- Description of the link presented in the ad.
- Title of the link presented in the ad.
- Timestamp of beginning of ad campaign

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[78] Data collection was not possible on the day of 30/03/2022 and is not represented in the study
[79] https://www.facebook.com/ads/library/api
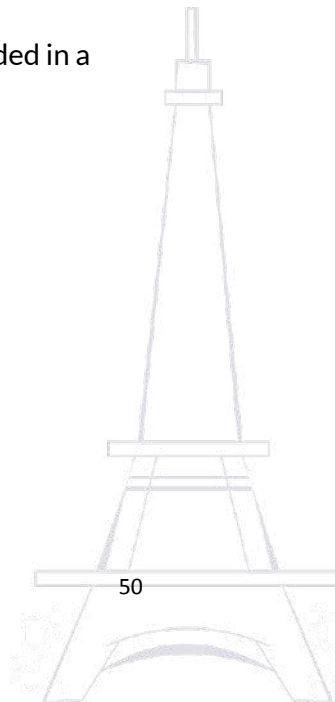
- Url to a representation of the ad.
- Name of the founding entity.
- Ad language.
- Id of page.
- Name of the page.
- Meta platforms on which the publishing entity is present.
- Committed budget bracket.
- Internal Meta id for the publishing entity.
- Geographical distribution of the ad (by French administrative subdivision according to the nomenclature in place until 2015 - 27 regions).
- Demographic distribution of the ad by age and genre.

Data is stored in the JSON format in Check First's database.

Ads were manually categorised by researchers to facilitate the understanding of the way Meta determines which ads are political ads. The following classification was made for ad inserts:

1.   Is the message related to a candidate or their party?
☐   Yes
☐   No

2.   Does the message refer to the election directly?
☐   Yes
☐   No

3.   Is the message in favour of (10) or in opposition(0) to the candidate?

For funding and publishing entities, categorisation was made according to the following questions:

1.   Is the funding entity…
☐   Private
☐   Public

2.   To which category does the funding entity belong?
☐   Media
☐   NGO
☐   Company
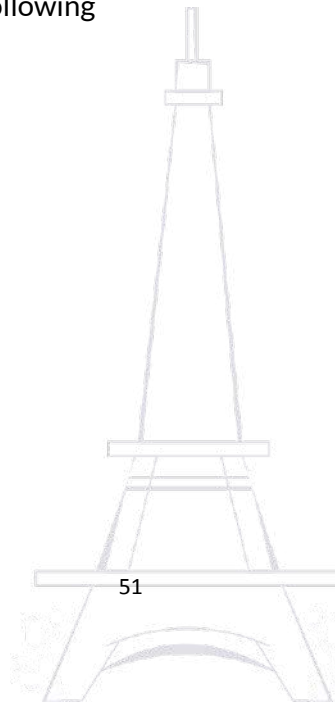
□   Public Service
□   Individual
□   Political Party
□   Other
□   I don't know

3.   Is the publishing entity French?
□   Yes
□   No

4.   If not, from which country ?

These questions were used in order to classify ads and identify their funders and publishers, as well as for statistical purposes.

Google

Google only allowed access to their political ad library through the publication of a 12 GB set of CSV files. Due to the size of this archive, its processing was automated to extract information about funding and publishing entities in relation with the French presidential campaign.

The archive was analysed by way of a PHP script, reading each line one by one and processing data contained in the files *google-political-ads-creative-stats* and *google-political-ads-geo-spend.* Our analysis concluded that no other file from the archive contained data about France..

The processed files contained the following data points:

```
[0]  => Ad_ID
[1]  => Ad_URL
[2]  => Ad_Type
[3]  => Regions
[4]  => Advertiser_ID
[5]  => Advertiser_Name
[6]  => Ad_Campaigns_List
[7]  => Date_Range_Start
[8]  => Date_Range_End
[9]  => Num_of_Days
[10] => Impressions
[11] => Spend_USD
[12] => First_Served_Timestamp
```

```
[13] => Last_Served_Timestamp
[14] => Age_Targeting
[15] => Gender_Targeting
[16] => Geo_Targeting_Included
[17] => Geo_Targeting_Excluded
[18] => Spend_Range_Min_USD
[19] => Spend_Range_Max_USD
[20] => Spend_Range_Min_EUR
[21] => Spend_Range_Max_EUR
```

Before analysis, a localisation filter was applied to retain only ads targeted in France.

User simulation and automated ad collection

Along with data collection from the Meta, Google and Snapchat ad libraries, Check First proceeded to an automated data collection of ad content, simulating users on Google Search and Youtube.

Check First wrote user simulation programs enabling data collection while browsing google.fr and youtube.fr. Search terms were automatically entered into these websites' search bars and presented ads were collected.

These programs written in the Python language used the selenium and beautiful soup libraries. They were executed from a machine located at a residential address in Paris. Simulated users were not logged into an existing Google account and cookies were not stored, allowing for neutral data collection.

As the search results were displayed in the browser and if ads were detected by the program, the following routine was executed:

- Capture of the title, text body, name of the advertiser and ad url.
- Screenshot of the ad and storage within the above metadata

This user simulation allowed the collection of 3,555 ads during the analysis period from Google Search and YouTube.

Ads were in part de-duplicated automatically using an image comparison technique. De-duplication however was not perfect and was achieved through a manual process thereafter to ensure better results and qualitatively assessing which ads were political. The process was completed to prepare the presentation of said ads in this report.

SnapChat

SnapChat also offers to download a CSV file in which political ad content is listed. A filter for the region "France" was applied. A total of 41 ad inserts were listed. 38 different data points are available for each of them.
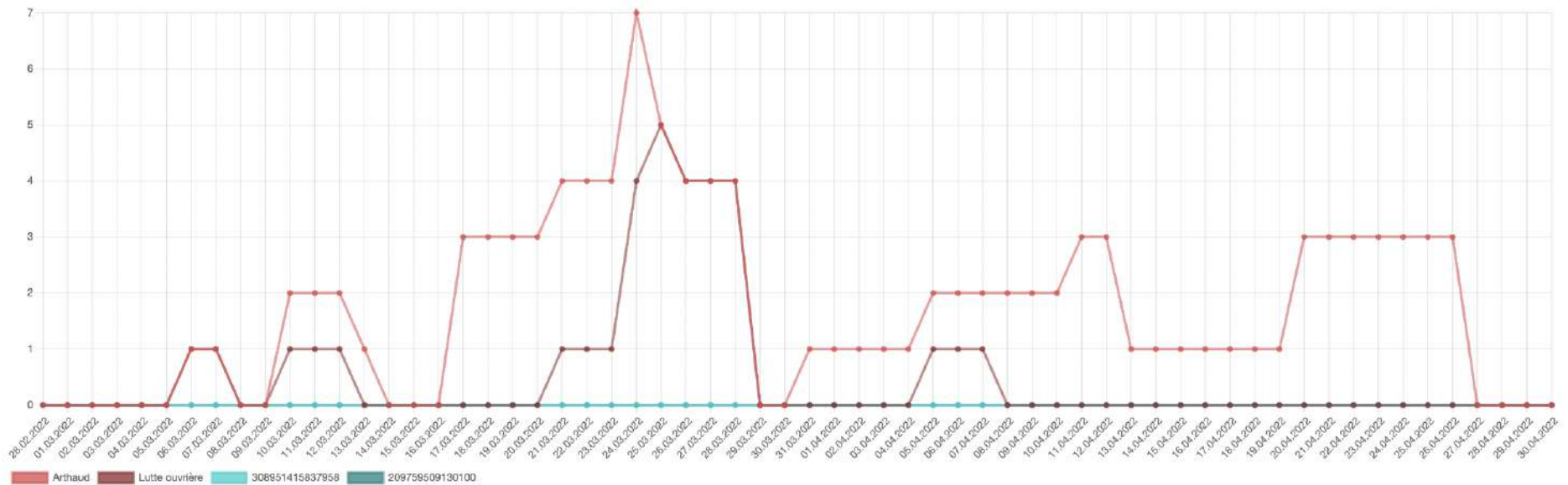
Ad distribution by candidate on Meta

Charts show on a timeline the evolution of the number of political ads associated with the following, respectively:
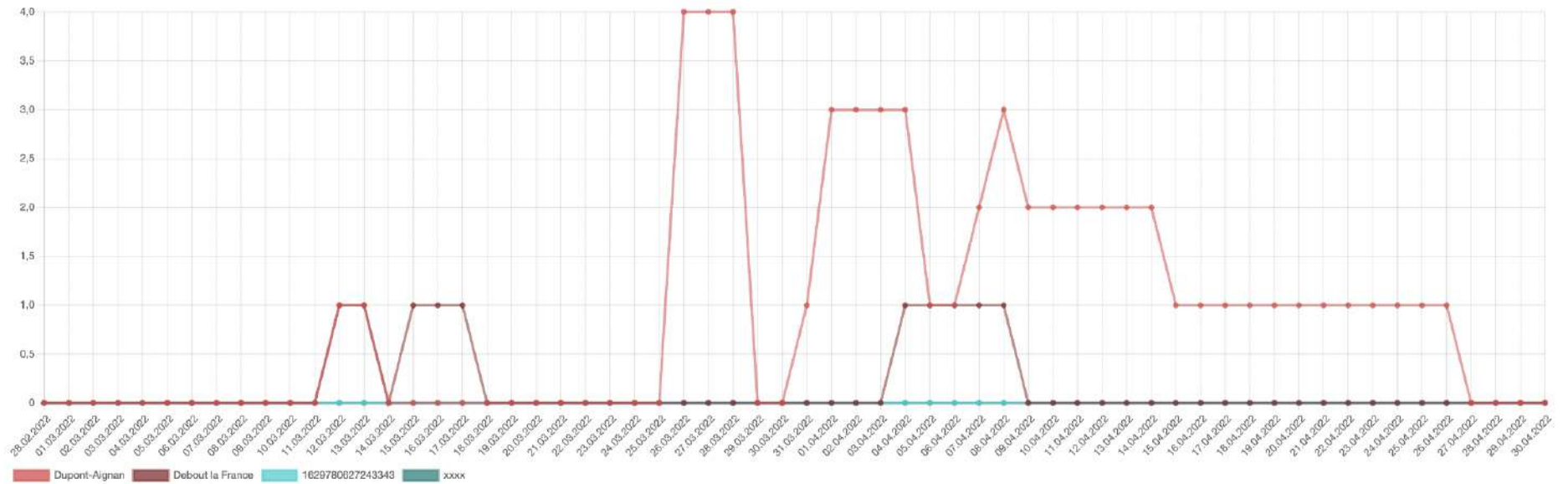
- A search on the candidate name.
- A search on the candidate's party name.
- Ads run on the candidate's official page.
- Ads run on the candidate's party official page.

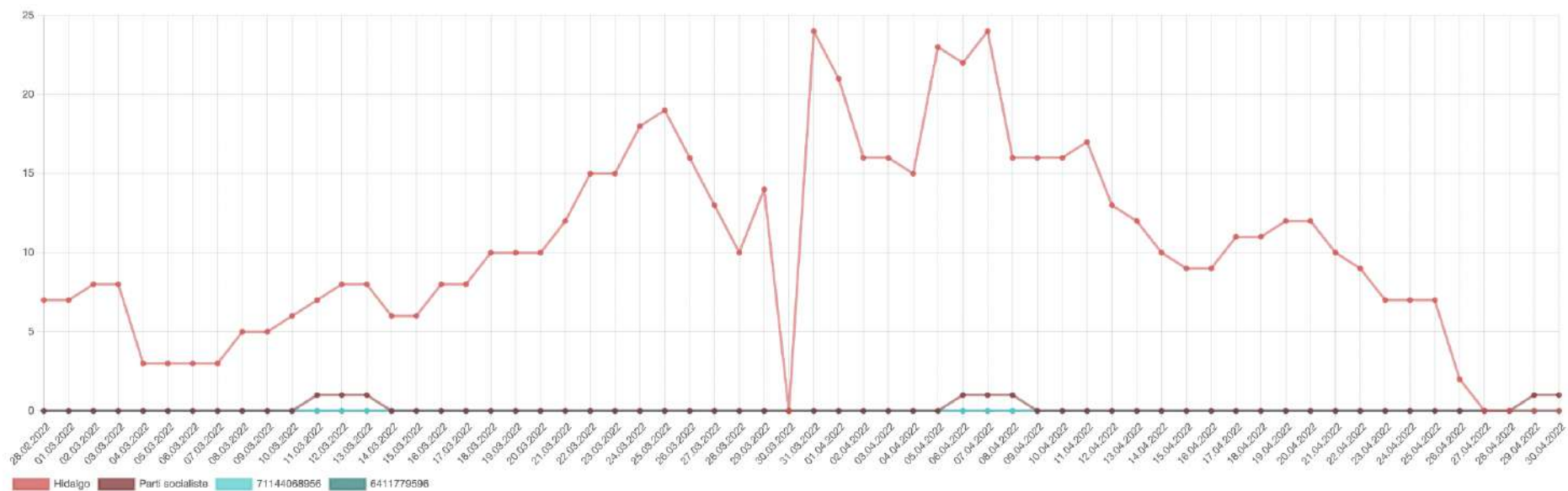Note : data collection could not be achieved on 30 March.
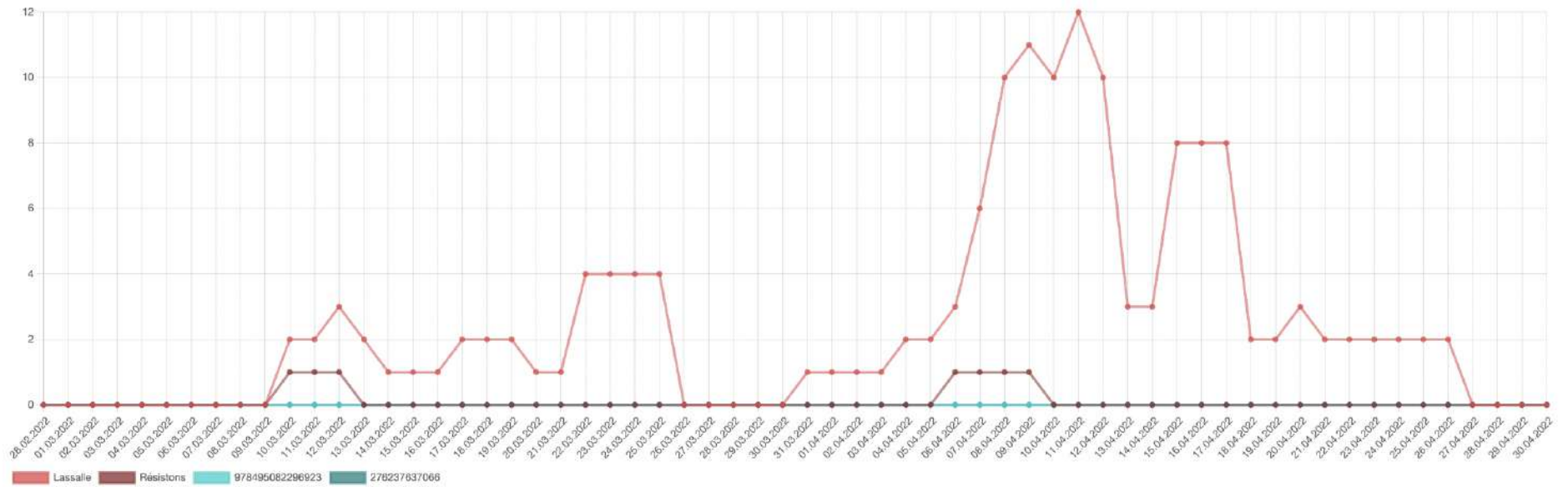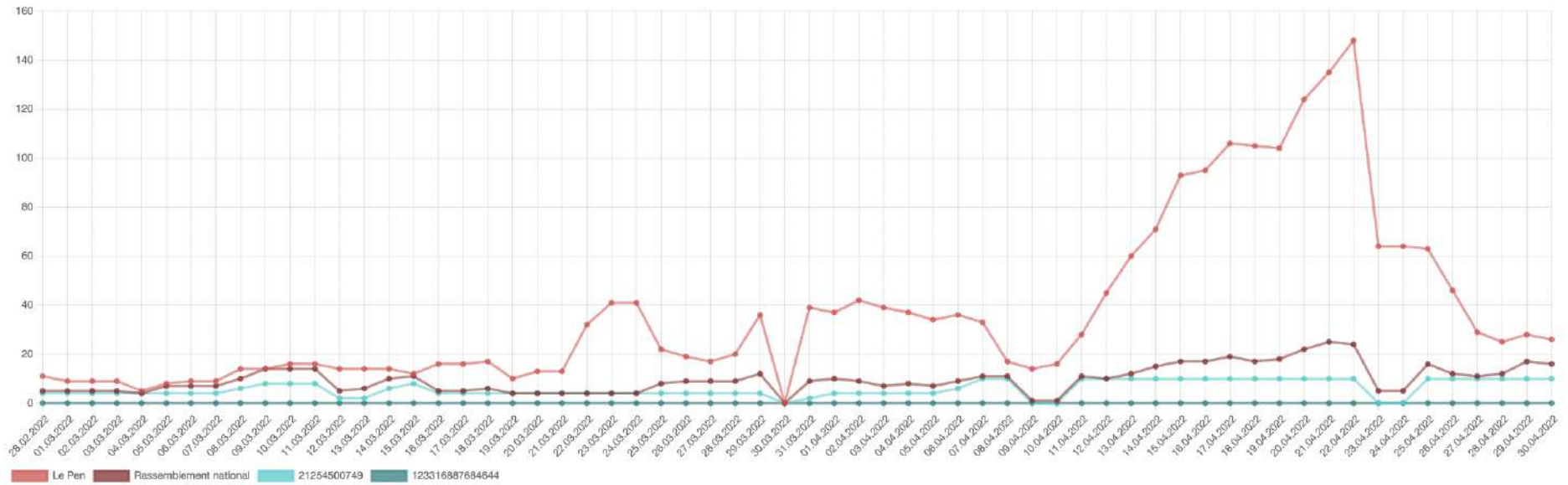
Nathalie Arthaud

Nicolas Dupont-Aignan

Dupont-Aignan | Debout la France | 1629780027243343 | xxxx

Anne Hidalgo

Yannick Jadot

Jean Lassalle

Légende: Lassalle · Résistons · 978495082296923 · 276237637066

Marine Le Pen
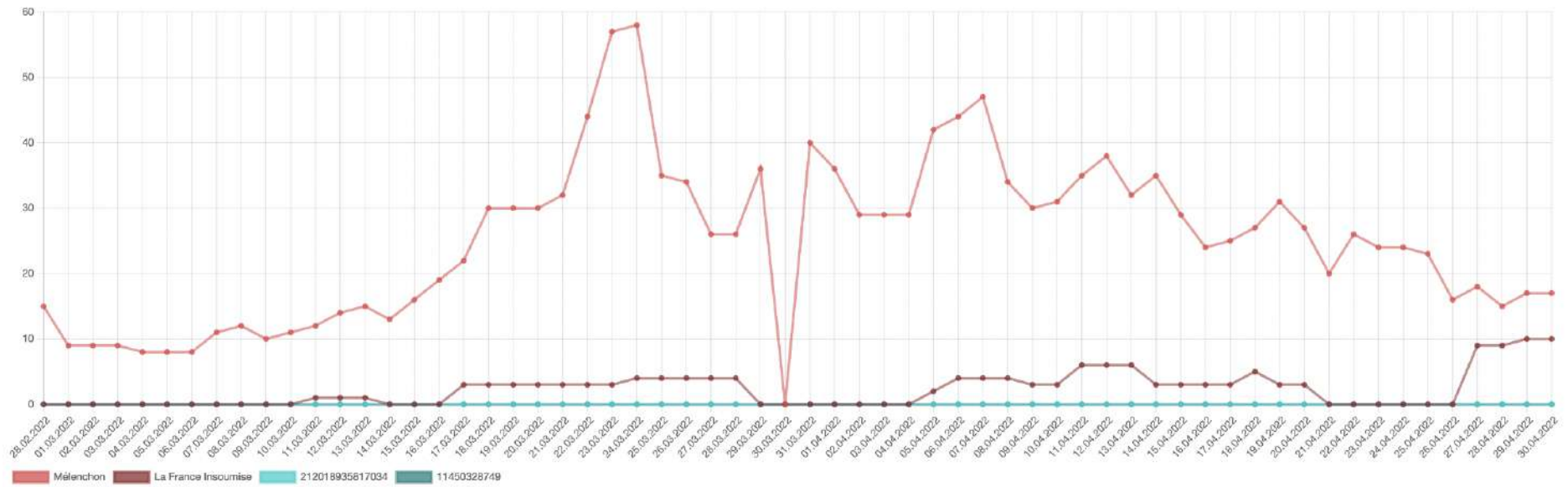

Legend: Le Pen | Rassemblement national | 21254500749 | 123316887684644

Emmanuel Macron
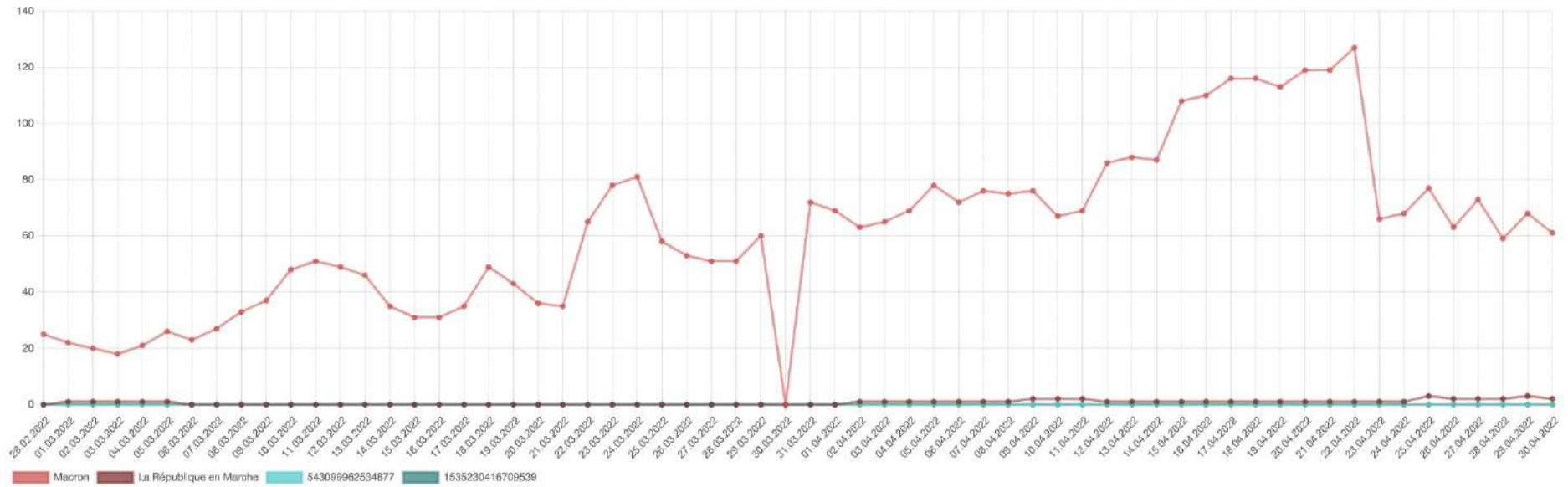
Jean-Luc Mélenchon

Philippe Poutou

Poutou · Nouveau Parti anticapitaliste · 60709923222 · 180203352032870
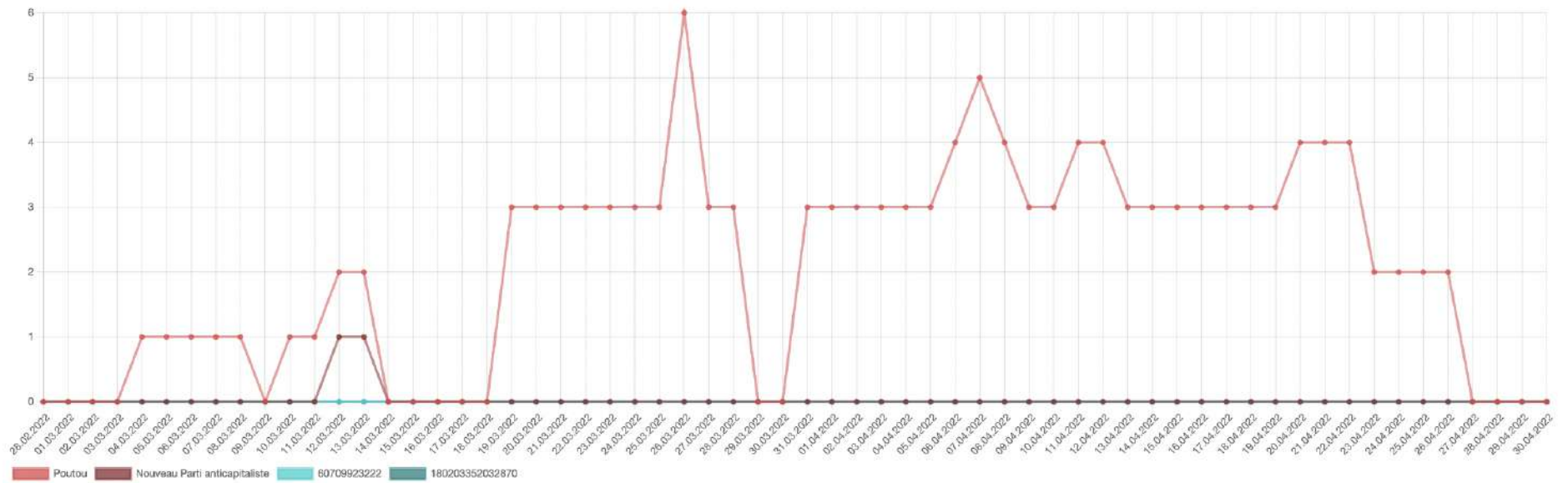
Valérie Pécresse
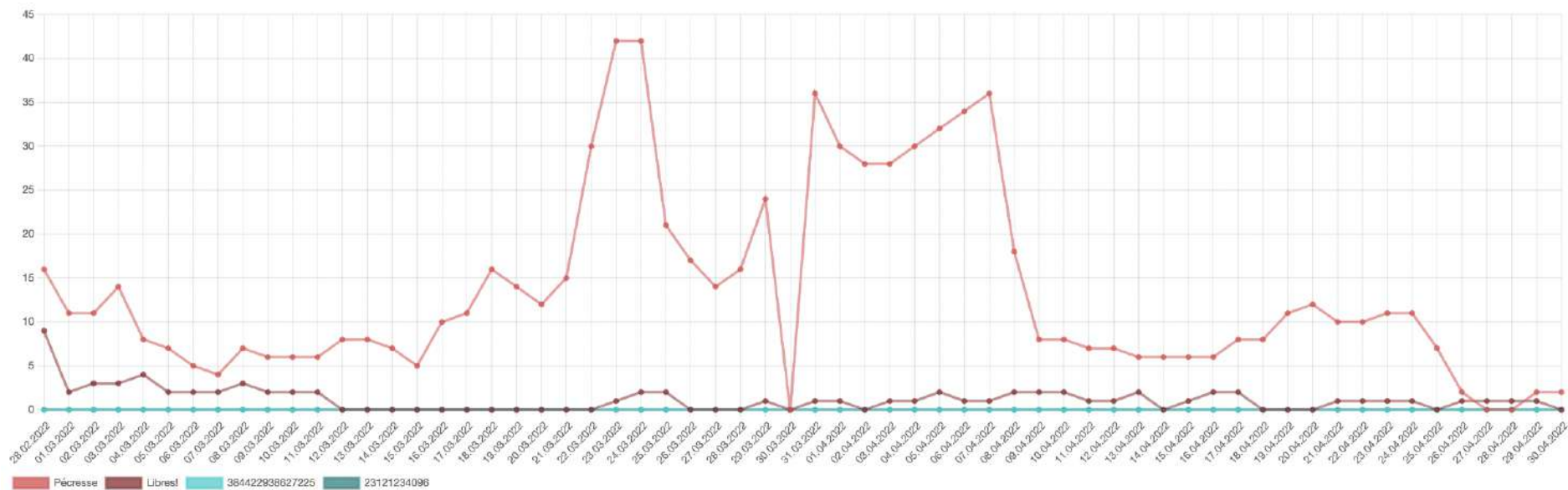
Fabien Roussel

Éric Zemmour

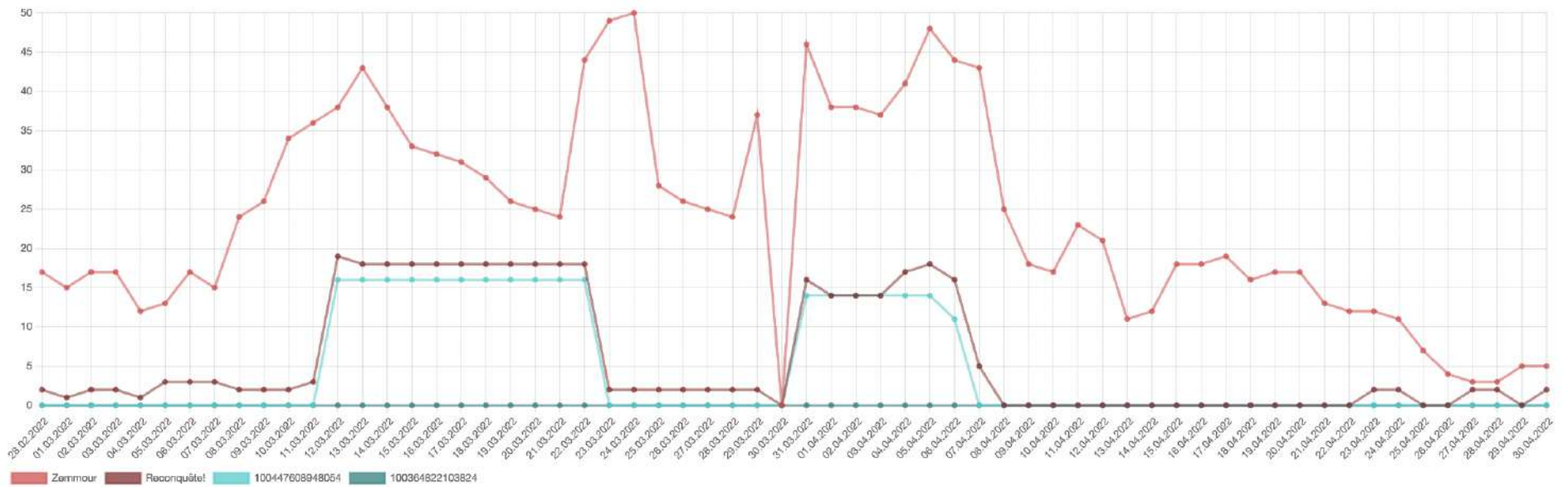Légende : Zemmour · Reconquête! · 100447608948054 · 100364822103824
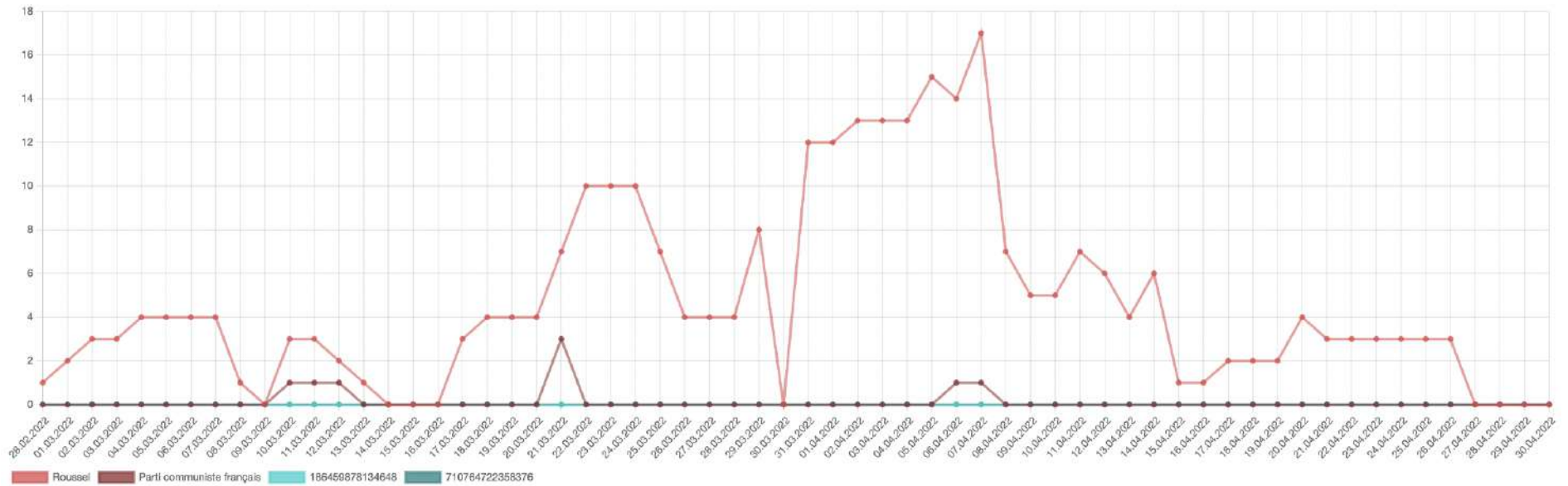
List of publishing entities on Meta

Mediapart
Actu-Juridique.fr
Prométhée
referendum-ue.org
CroissancePlus Grandir Ensemble
Libération
EFFICYCLE
ottmarsheimoise.fr
AJC Paris
Pour l'Éco
Un Peuple, le film
Sumofus en français
ELOI
Programme pour la Transition Energétique
Dis-leur
L'Echo du Mardi
France Fraternités
ifaw
UNFPA
Fondation du Pont-Neuf
Info'Com-CGT
Rassemblement National
Technikart Magazine
L'Association Des Bascos
Le Journal de la Corse
Sainte-Hermine
ImmoPotam
Fraternité générale
Neo
Arnaud Levitre
France En Arabe-فرانس بالعربي
Disons-le - Radio Méga
AUNIS TV
Mondafrique

Haroun
Réseau Action Climat
Programme Octave
Université Numérique de La Réunion
ePresse
Anvita - Association nationale des villes et territoires accueillants
Charly photos Dijon
Parti Radical Moselle
Ichtus
SOS LAON - Association
Je donne du sens
TÊTU
La Vie
Ceux qui tiennent la laisse
Thibaud Choplin
Cuisine 16
O.A.B.A. - Oeuvre d'Assistance aux Bêtes d'Abattoirs
Antoine Villedieu
Revue Mission
The Truth
Le vote blanc
Alternatives économiques
Amplify en France
Déb'Acteur
UMIH Vaucluse
Union Syndicale Solidaires
Nicolas Ferretto-Reggi Conseiller municipal d'opposition Carcès
Terre-net
La Kube
Toi + Moi pour un monde meilleur
Pour La Planète
NOWU France
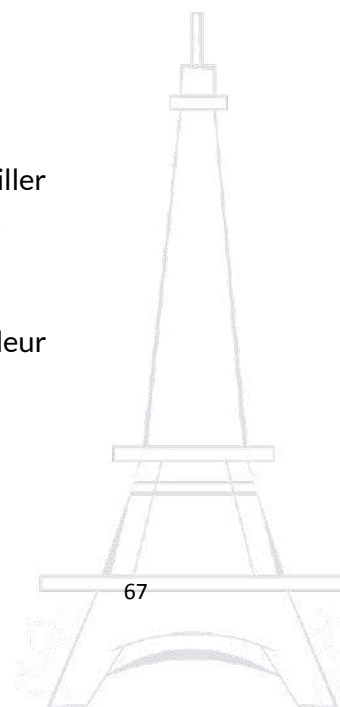
En Vrai Auvergne
Asepef Alumni
Clément Galante
Institut Montaigne
Happydemics
Votre voix compte
Revue Esprit
François Alfonsi (Officiel)
Var Actu
Centre Mondial de la Paix
Ozurne
Jour2Fête
Les films qui font débat
V.O. Le cinéma indépendant
Pollers
UPF - Union du Peuple Français -
Mouvement Gaulliste et Républicain
RECONQUÊTE
Callvin Condom Collector
Affiches Parisiennes
ZIST
Debout La France 3ème
Circonscription du Nord
Elhdaka
Kelly Duchuc
U2P - Union des entreprises de
proximité
Réinventons Maubeuge
Cafeyn FR
INA
Purpoz
Greenpeace France
Tribune Côte d'Azur

Nouvelles ukrainiennes
Jacques Soncin
Mouvement Européen France -
Gironde
Rouge Direct
Le Clairon de l'Atax
Pour la France
Soutien Mami Florence gilet jaune
Le Vénissian
ICI Toilettes
France 2
That's Y
Zappy Djez à la flûtz
Les Amis d'Yves Montenay
HomeSenior
RamiHassoun.officiel
Thilo Hane Humanesens
Bastide Niel
WorkFlo and Co
N'oubliez pas de vivre
Grande chancellerie de la Légion
d'honneur
Mon épargne et moi
JDD
ISDDH : Institut de surveillance de la
démocratie et des droits humains
La Société Française des Monnaies
AOC
Vienne.TV - Production
Audiovisuelle.
Haut et Court

Ad distribution by publishing entity on Meta
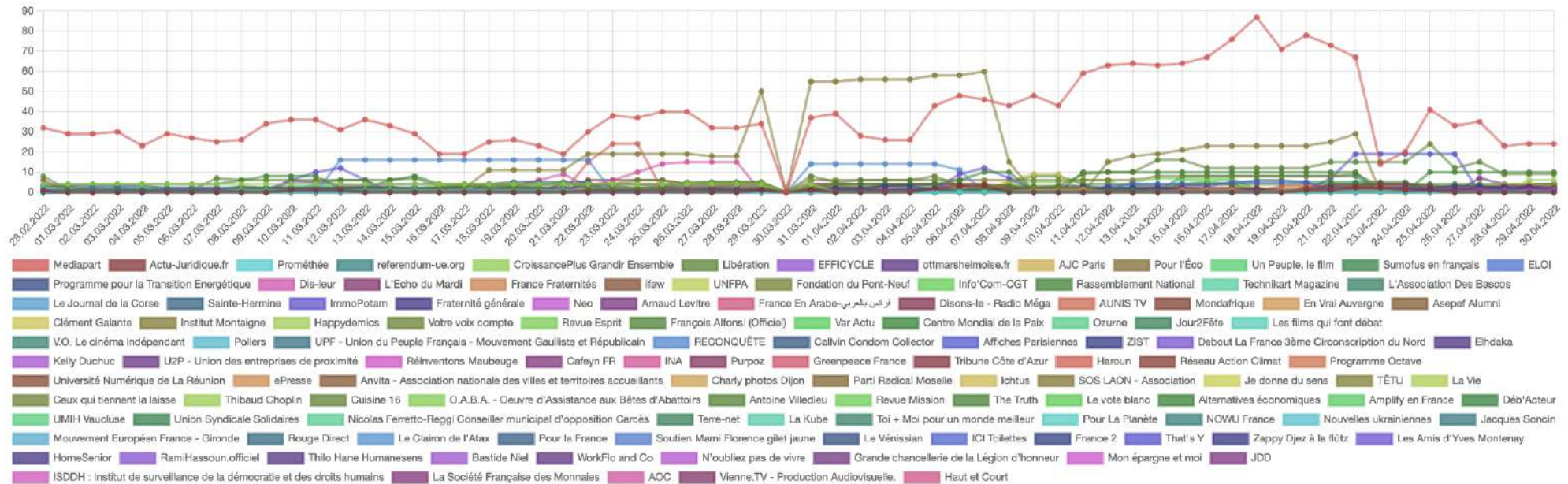
List of financing entities on Meta

Mediapart
Actu-Juridique.fr
Alexandre Nicholas Goyon-Guillaume
Gilles André Garçon
CroissancePlus
Libération
EFFICYCLE
ottmarsheimoise.fr
AJC Paris
Pour l'Éco
KMBO
SumOfUs
eloi
Transition Energie
Olivier Paul Marc Schlama
David Christophe Renaud Pellet
France Fraternités
ifaw
UNFPA
Fondation du Pont-Neuf
Info'Com-CGT
Rassemblement National
Technikart Magazine
Gachen Bernard
Le Journal De la Corse
Mairie de Sainte-Hermine
ImmoPotam
Fraternité Générale
NEO.TV
Arnaud Gaetan Armand Levitre
France en arabe
Quentin Frederik Franck Javelas
AUNISTV
Nicolas Beau
L'Association des Étudiants Péruviens en France

Mourad El Glaa
Réseau Action Climat
DANONE
NAWAR PRODUCTIONS
TOUTABO / EPRESSE.FR
Anvita - Association nationale des villes et territoires accueillants
Bertrand Chambarlhac
Michèle Jacqueline Cenzato Leucart
Ichtus
Jean-Jacques Roger Simon
Je donne du sens
têtu·
Malesherbes Publications
Ceux qui tiennent la laisse
Thibaud Robert Marie Choplin
Frédéric Marty
OABA
Antoine Jean Yves Villedieu-Rota
Revue Mission
Céline Alexandra Dorphin
Elliot Romain James Clarke
Alternatives Economiques
Amplify France
Déb'Acteur
UMIH 84
Union Syndicale Solidaires
Nicolas Aurélien Jean Ferretto-Reggi
Votre voix compte
Jean-François Nguyen
Destin Commun
France Télévision
PPC Advertising
Jacques Claude Henri Soncin
Francois Jacques Marcel Adoue

Clement Pierre Marie Galante
Institut Montaigne
Happydemics
Votrevoixcompte
Revue Esprit
FAlfonsi
Var Actu
Centre Mondial de la Paix, des libertés et des droits de l'Homme
Ozurne
Jour2Fête
LUCKYTIME
Pollers
Christophe Chastanet
Reconquête!
Callvin SARL
Affiches Parisiennes
Zaka Mael Karl Toto
William Dupont
Abdelaziz Ould Ali
Lucie Fabry
U2P - Union des entreprises de proximité
Jean-pierre Rombeaut
Cafeyn
L'Institut National de l'Audiovisuel (INA)
Parlement & Citoyens
Greenpeace France
TRIBUNE COTE D'AZUR

Collectif Rouge Direct contre l'homophobie dans le sport
Jean Michel Noel Cordier
Eric Dörr
Regis Munoz
PCF Vénissieux
Urban Services
France Télévisions
That's Y Media
Nicolas Jean-Paul Ludwicki
Yves Montenay
HelloViager
Rami Hassoun
Thilo Hane
Bastide Niel
WorkFlo and Co
THOMAS REMI MARIE
Thomas,Rémi,Marie DEBESSE
Grande chancellerie de la Légion d'honneur
Natixis Investment Managers
JDD
Thierry Paul Valette
Société Française des Monnaies
AOC
Vienne.TV
Luckytime
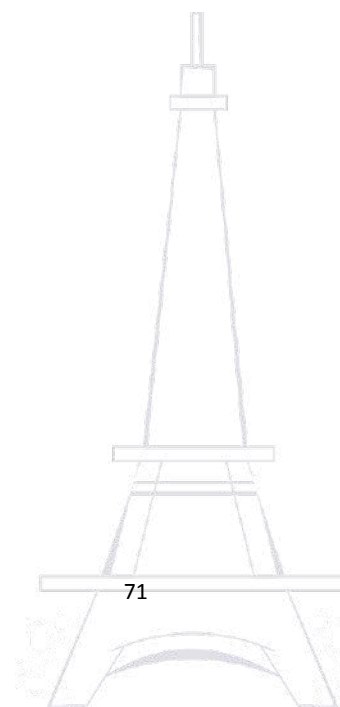
Ad distribution by funding entity on Meta