



CONSEIL SUPÉRIEUR DE L'AUDIOVISUEL

A large, light blue magnifying glass graphic is centered on the page. The word 'FOCUS' is written in a large, bold, light blue font across the lens of the magnifying glass. The letter 'F' is solid, while the letters 'O', 'C', 'U', and 'S' are outlined. A thin red arc is positioned above the magnifying glass handle, a yellow stepped line is to the right, and a dotted line extends from the bottom of the handle.

# FOCUS

## **POLITICAL ADVERTISING ON SOCIAL MEDIA**

*STUDY OF THE FACEBOOK  
AD LIBRARY FOR SOCIAL, ELECTORAL  
AND POLITICAL CONTENT*

November 2020

Les collections CSA





## Contents

<b>1.</b>	<b>Summary .....</b>	<b>4</b>
<b>2.</b>	<b>Observations from Facebook .....</b>	<b>6</b>
<b>3.</b>	<b>Online political advertising: the state of play .....</b>	<b>9</b>
<b>3.1.</b>	<b>The French and European legal framework .....</b>	<b>9</b>
<b>3.2.</b>	<b>Research and analysis of political advertising .....</b>	<b>12</b>
<b>3.3.</b>	<b>The provision of advertising data: ad libraries .....</b>	<b>14</b>
<b>4.</b>	<b>Description of the Facebook ad library.....</b>	<b>16</b>
<b>4.1.</b>	<b>Access methods .....</b>	<b>16</b>
<b>4.2.</b>	<b>General presentation of the database .....</b>	<b>19</b>
<b>5.</b>	<b>Analysis of Facebook ad library data.....</b>	<b>21</b>
<b>5.1.</b>	<b>Rankings.....</b>	<b>21</b>
<b>5.2.</b>	<b>Thematic analyses.....</b>	<b>26</b>
<b>6.</b>	<b>Analyses of the content of the Facebook ad library.....</b>	<b>32</b>
<b>6.1.</b>	<b>Keyword analysis.....</b>	<b>32</b>
<b>6.2.</b>	<b>Automated message content analysis .....</b>	<b>40</b>
<b>7.</b>	<b>Conclusion .....</b>	<b>45</b>



## 1. Summary

In recent years, political advertising has taken on a new dimension across the world due to the high penetration rates of online content sharing platforms (hereinafter "platforms"). In the US, where several of them originated, production of political advertising campaigns ramps up during election time. These campaigns leverage the powerful targeting capability of the platforms, which allow actors to both address messages to relevant audiences and refine the content of these messages according to certain characteristics of individuals, such as their age. In France, where there are more restrictions, particularly during election periods, political advertising is mainly used by institutions and elected representatives to talk about their actions and promote reforms, as well as by a wide variety of actors with very different motivations and operating methods.

In 2016, the scandal linked to the company Cambridge Analytica highlighted the **need for better regulation of the data used by platforms and advertisers, as well as a need for transparency about the content that can be sponsored**: clear identification of the advertiser and its country of origin, the amount paid for the promotion, the people targeted, etc.

Several **legislative, regulatory and soft law developments** have aimed to respond to these challenges, such as the law to combat information manipulation in France (December 2018), the application of which is monitored by the Conseil Supérieur de l'Audiovisuel (France's Higher Audiovisual Council)<sup>1</sup>. This is the framework for this exploratory report, which provides an **in-depth analysis of the advertising library offered by one of the most popular platforms operating in France**.

After a reminder of the legal framework and a general review of the research work, this report provides a description of the platforms' initiatives in terms of the public availability of ad libraries, which list the ads run on their services. The content of **Facebook's ad library** for France, part of which stands out as addressing "*social issues, elections or politics*"<sup>2</sup>, is then

---

<sup>1</sup> The first report by the Conseil Supérieur de l'Audiovisuel was published in July 2020 (*Combating fake news: the CSA publishes its first appraisal*. 30/07/2020. URL: <https://www.csa.fr/Informer/Toutes-les-actualites/Actualites/Lutte-contre-les-infox-le-CSA-publie-son-premier-bilan>). Another example is the European Code of Practice on Disinformation dated 2018. This is a self-regulatory initiative spearheaded by the European Commission in the form of a document written by the signatories Facebook, Google, Twitter, Mozilla and trade associations representing online platforms, the advertising industry and advertisers. Microsoft joined the initiative last year. As no actor was obliged to sign the code and it is not accompanied by any binding monitoring mechanism, this document still has less normative power than the aforementioned French law.

<sup>2</sup> This is the terminology used by Facebook. (Facebook. *Ad library*. URL: [https://www.facebook.com/ads/library/?active\\_status=all&ad\\_type=political\\_and\\_issue\\_ads&country=FR](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=FR)). The platform also specifies that this categorisation is largely the result of self-reporting by advertisers when they create their campaigns. When scheduling their sponsored posts, advertisers can tick a box to report their ad as being



analysed in detail. This analysis first of all emphasises the high visibility of the adverts run, with **nearly 2 billion impressions in total**. The most active advertisers on these topics are NGOs and the energy and recycling sectors, which address environmental issues. Demographic analyses show that these adverts reach the female population and young adults the most. Some pages also carry out detailed targeting to enable them to reach a specific age group or gender. The analysis also highlights a highly differentiated use of Facebook advertising by the different political movements.

Additional analyses were carried out based on identifying advertising messages that include certain **keywords**: elections, the "yellow vests", pensions, Islamism, the French President, and COVID-19. These analyses have provided a better understanding of the content of adverts linked to themes that may misinform or clearly divide opinion. They show that a wide variety of content exists (political positions, commercial messages, information messages, etc.) and that this content usually does not pose any particular difficulties. However, more problematic messages, far fewer in number, were also identified. Lastly, an algorithm that detects "**toxic content**" was used to identify whether advertisements can be used to convey hateful ideas<sup>3</sup>.

---

about a political, social or electoral issue. Platform users can also flag an ad as falling into such a category, a system that involves the ad in question being subsequently reviewed by a human Facebook moderator.

<sup>3</sup> This analysis has limitations that will be presented in detail below.



## 2. Observations from Facebook

As part of its cooperation with digital platforms, the Council shared the objectives and results of this study with Facebook prior to its publication. The platform's representatives were able to submit their remarks to the Council. The Council took into account the comments it considered relevant in the final version of the report.

It also offered Facebook space in the report to state its position and provide clarifications that the company considered useful, particularly regarding its efforts to combat information manipulation. This can be viewed below:

### **FACEBOOK**

#### **Clarification regarding the Facebook Ad Library**

The Facebook Ad Library went online in France and all EU Member States in March 2019 ahead of the last European elections, after being launched a few months earlier in the United States and the United Kingdom. It came in response to the company's goal to develop new tools to help ensure the integrity of elections around the world.

We have learned a lot from the various elections since 2016, and it is a priority for our company to prevent our platforms from being misused by malicious entities and to prevent any interference in the electoral process. This is why we have decided to increase transparency around any form of political advertising linked to a public interest debate.

In the run-up to the 2019 European elections, we therefore introduced a strict system of specific authorisation for advertisers wishing to circulate sponsored content about politics, elections or a social issue in all European Union countries. For example, to be able to target users in France, all advertising of this type must be scheduled from this same country. Page administrators must provide an identification document that can be verified and confirmed. Advertisers must also indicate who is funding their campaign, in the form of a notice clearly preceded by the words "Funded by", as well as provide their company name and the contact details of the entity funding the campaign in question. As soon as the advert is placed online, this information is made public in a library accessible to all internet users, including those who do not have a Facebook account, at the following URL: <https://www.facebook.com/ads/library>. In this library, for each advert about politics, elections or a social issue, further information is provided to the user. In addition to the elements mentioned above, for each campaign users will be able to see a range for the budget invested in the campaign and an average number of impressions, as well as aggregated and anonymised demographic data on users whom this



advert has actually reached. This can provide a clear picture of the most reached age groups and genders, but also of the regions or cities where the advert was shown.

The ad library ensures advertising transparency by providing a complete and searchable collection of all active ads running on Facebook and Instagram. Meanwhile, adverts about politics, elections or a social issue are archived and kept in the ad library for seven years. The ad library allows you to select ads based on the number of times they have appeared on screen, expenditures, age and gender targeted for each advert.

If an advert is detected that has not gone through the full clearance process, we immediately stop running it and add it to the library with a statement that the advert was run without including a notice. Users can also report ads that should be labelled "Funded by" but are not, or that breach other Facebook advertising policies, directly from the library.

To help those wishing to analyse the library in greater depth, we have also provided an application programming interface (API) that allows, for example, regulators, journalists or researchers to access all available data and therefore increase the accountability of Facebook and advertisers. Users can perform custom keyword searches on adverts stored in the ad library. The API results include advert creation and performance data archived in the ad library. Since its European launch in March 2019, we have enhanced our API so that people can easily access ads from a given country and submit queries about specific advertisers.

Lastly, a third tool supplements the advertising library: the Ad Library Report, available at: <https://www.facebook.com/ads/library/report/>. This is a summary information report on adverts about social, electoral or political issues collected in the ad library. It provides detailed statistics about the adverts in the library. For example, the report shows the total number of adverts and the total amount spent on adverts in the ad library by country, as well as the total amount spent per advertiser, the total amount spent per advertiser per day and the most searched keywords during the last week. Users can view, filter and download the data in a CSV file. The Ad Library Report is useful for those who want to have an overall understanding of the extent of activity in the Ad Library since its launch, with the Advertising Library set to be further used to analyse specific adverts.

Today, over 2 million people worldwide view Facebook's Ad Library every month.

Our ad transparency tools are available in 194 countries and territories and we continue to develop new tools to increase ad transparency. For example, we recently included a new tool that allows users to compare different pages' spending in one click. To prepare for the 2020 US presidential elections, we are also giving users the ability to create a widget to track the expenses of the various candidates and parties in real time.



**Political advertising on social media**  
Study of the Facebook ad library  
for social, electoral and political content

---

We believe that more transparency means, over time, more responsibility – not only for Facebook but also for advertisers. This is why we regularly continue to introduce tools that allow elected officials, candidates for elective office and organisations wishing to participate in public debate to reveal more information about the adverts they run and the people behind them.

Ensuring strict compliance with the rules in this area requires constant work and we are fully committed to maintaining this work. We continue to invest significant resources in both technology development and human resources in order to continue improving our processes and to provide the tools to ensure the greatest possible transparency in the adverts run on our platforms.





### 3. Online political advertising: the state of play

#### 3.1. The French and European legal framework

##### 3.1.1. *In France: the law on countering information manipulation*

**Law no. 2018-1202 of 22 December 2018 on countering information manipulation** states that, during the three months preceding the first day of the month in which national general elections are held (presidential, legislative and senatorial, European and referendums) and until the date on which they are held, operators of **online platforms**<sup>4</sup> whose number of connections on French territory exceeds 5 million unique visitors per month on average per year<sup>5</sup> must provide users with "*fair, clear and transparent*" information on the identity of the advertisers of "*information content related to a public interest debate*". The Conseil Supérieur de l'Audiovisuel (CSA) stated in its **recommendation of 15 May 2019**<sup>6</sup> that public interest includes "*all issues that affect the public to an extent that it might reasonably take an interest in them, that arouse its attention or are of significant concern to it, notably because they concern the well-being of citizens or the life of the community*". Operators are also required to make public the remuneration received in return for this promotion if the amount exceeds €100 excluding tax per piece of content<sup>7</sup>.

As part of their duty to cooperate, the law of 22 December 2018 states that **the CSA monitors the best efforts obligations of the operators concerned**, which can involve "*informing users about the nature, origin and methods of disseminating content and the identity of persons paying remuneration in return for the promotion of information content*". This recommendation specifies that operators of online platforms must distinguish sponsored content from other content, clearly identify the origin of the content and specify the conditions for its dissemination (number of impressions, targeted audience, automatic generation or otherwise of sponsored content, etc.). Within the Council, the "platforms" project team, set up in 2019, is notably responsible for carrying out the work on instructing and monitoring the implementation of the system provided for by the law and the CSA recommendation, and for interfacing with the committee of experts on online disinformation.

---

<sup>4</sup> The definition of platform operators used in the decree implementing the law of 22 December 2018 is the definition contained in article L. 111-7 of the French Consumer Code: "*any natural or legal person offering, on a professional basis, whether for a fee or otherwise, an online public communication service based on: 1° The classification or listing, by means of computer algorithms, of content, goods or services offered or placed online by third parties; 2° Or the connection of several parties with a view to selling a good, providing a service or exchanging or sharing content, a good or a service*".

<sup>5</sup> This threshold was set by the aforementioned decree. Google, Facebook, YouTube, Wikipedia, Instagram, Microsoft, Twitter, Snapchat, LinkedIn and Doctissimo are included in this category.

<sup>6</sup> Recommendation no. 2019-03 of 15 May 2019 of the Conseil Supérieur de l'Audiovisuel to online platform operators as part of the duty to cooperate in countering the spread of fake news.

<sup>7</sup> Decree no. 2019-297 of 10 April 2019 on the information obligations of online platform operators promoting information content related to a public interest debate.



### **Political advertising in France: a very strict framework**

Unlike other Western democracies, **France prohibits a number of communication actions during the pre-election period**. For example, for the municipal elections, the first round of which was held on 15 March 2020, the use of any commercial advertising process for election propaganda purposes has been prohibited since 1 September 2019. This applies in particular to paid listings and the purchase of sponsored links.

From the day before the midnight polls, it is also prohibited to *"disseminate or cause to be disseminated by any means of communication to the public by electronic means any message for the purpose of electoral propaganda"*, even if disseminated without financial compensation<sup>8</sup>.

These obligations, confirmed by case law, were strengthened as a result of the law of 22 December 2018.

### **3.1.2. At a European level: the Code of Practice on Disinformation, the European Commission and the ERGA<sup>9</sup>**

In April 2018, the European Commission defined a **European approach to fighting disinformation**, based on self-regulation. In this framework, in October 2018, a European Code of Practice on Disinformation was signed by Facebook, Google, Twitter, Mozilla, trade associations representing online platforms, the advertising industry and advertisers, and Microsoft since last year. The European Commission<sup>10</sup> includes the European Regulators Group for Audiovisual Media Services (ERGA) in efforts to verify the commitments made, particularly regarding the transparency of political advertising.

The application of the code was covered in **two ERGA reports** published in June 2019 and May 2020<sup>11</sup>. Following an analysis of the signatories' practices in terms of verifying advertising placements and political and engaged advertising, the platforms' efforts in this area were praised, although there was criticism that the ad libraries, which list the campaigns run on their services, *"were not the databases themselves, but a searching tool, with pre-defined filters,*

<sup>8</sup> Vie-publique.fr, Municipales 2020: the rules of the election campaign, page viewed on 4 March 2020. <https://vie-publique.fr/eclairage/24056-municipales-2020-les-regles-de-la-campagne-electorale>

<sup>9</sup> ERGA: European Regulators Group for Audiovisual Media Services. The ERGA brings together the regulators of European Union Member States; its mission is to facilitate cooperation between European regulators and to assist the European Commission in its work, notably on implementing the revised "Audiovisual Media Services Directive" (AVMSD).

<sup>10</sup> Joint action plan of the European Commission and the High Representative of the Union for Foreign Affairs and Security Policy of 5 December 2018 entitled "Action Plan against Disinformation", JOIN(2018) 36 final.

<sup>11</sup> ERGA, [Report of the activities carried out to assist the European Commission in the intermediate monitoring of the Code of practice on disinformation](#), June 2019 and [ERGA Report on disinformation: Assessment of the implementation of the Code of Practice](#), May 2020.



that allow the general public to access data and information that the platforms had previously filtered and organized". The ERGA recommends for its future evaluations of the Code that "unconditioned, unmanaged and unfiltered access to the raw database is needed, containing all the advertisements of the platform (including the political ads, the non-political ads, the ads that have been published in accordance to the new procedures adopted by the platforms and those that have not been published)". Without this, the ERGA considers that "it is difficult to see how any future monitoring would be of value"<sup>12</sup>. The lack of harmonisation, from one platform to another but also from one Member State to another, of the definitions of the terms "political advertising" and "public interest advertising" was also identified as potentially posing difficulties in monitoring the application of the Code.

**The first ERGA report was based on the web interfaces provided by the platforms, as well as on an API<sup>13</sup> in Facebook's case.** The ERGA's analysis focused on the degree of transparency of the information made available to users, for example on the labelling of sponsored content, rather than on the use of the content itself. In the case of the Facebook API study, the ERGA noted that it allowed users to search for "active and non-active ads" and to obtain demographic data related to the "micro-target[ing]" of the latter.

Work to **determine the effectiveness of the process of labelling political adverts** was also to be conducted by the ERGA, based on access to raw data and by comparing data labelled in ad libraries. The goal was to determine the platforms' level of transparency with regard to advertising, especially political advertising. In the case of Facebook, but also Google and Twitter, this access was not provided to the ERGA<sup>14</sup>. However, other entities have tried to gain access, such as the Digital Embassy, the main results of which are presented below.

The ERGA's work showed that it was not possible to verify the completeness of the ad libraries studied, including Facebook's. The work carried out in this study cannot therefore be construed as an analysis of all of the political adverts run on the platform but rather as an exploration of the ad library made available by Facebook, an ad library that is likely incomplete<sup>15</sup>.

---

<sup>12</sup> Ibid, page 19.

<sup>13</sup> Application Programming Interface. This software allows services to be offered to another piece of software via standardised communication standards, for uses as varied as querying a database or managing emails.

<sup>14</sup> The ERGA notes in particular Google's response to its request, which explains that the "systems do not allow this type of database to be built" from all of the adverts run, without labelling.

<sup>15</sup> In May 2020, the ERGA pointed out in its analysis of the Facebook ad library's API and web interface that the data it contains is "insufficient" and that "many political ads in the API could not be found in the platforms and vice versa" ([ERGA Report on disinformation: Assessment of the implementation of the Code of Practice](#), May 2020, page 18, already cited). Meanwhile, Facebook says that it will publish all active ads and archive ads about "social issues, elections or politics" in the web interface of its ad library. As the present study uses access via an API, which only allows the collection of data on this second category of advertising, it should be noted that we cannot be sure all of these campaigns are properly retrieved.



## 3.2. Research and analysis of political advertising

### 3.2.1. Review of the scientific literature

Numerous publications in various fields, particularly academic, administrative and journalistic, have provided insights in recent years into how political actors use advertising resources on social media and on the internet in general.

These include **several surveys conducted in connection with recent elections**, covering both advertising for political purposes and parties' social media presence. In the UK, the Cambridge Analytica scandal had a major impact, prompting a call for close monitoring of political parties' spending in 2019 and the spread of fake news<sup>16</sup>. A German study focused on the breakdown of spending per political party for the European elections, highlighting strategies for targeting the electorate and the "artificial" increase in posts by an extreme right-wing political party (AfD) on social media<sup>17</sup>. In the Netherlands, a study conducted in connection with the 2018 municipal elections revealed the strong influence of the far-right PVV party on social media and the tendency of microtargeting to fragment the political landscape. This document advocates improving information and training for citizens on their rights on the internet (privacy). It also stresses the need to bring more traditional media content to the internet<sup>18</sup>.

An Irish study, based more specifically on examining the ad libraries made available by operators, focused on the **2019 European elections**. The data used for microtargeting is limited to age, gender and location. This work highlights variations in the transparency of the information available depending on the platform, as well as their categorisation of political advertising.

Scientific articles have stressed both the contribution and the limitations of these libraries in the US context, particularly with regard to transparency in advertisers' identities<sup>19</sup>. Based on these databases, one article notes that advertisers with larger budgets relied on detailed, individualised advertising targeting capabilities, while those with smaller budgets relied more on broader, anonymous targeting, for example based on geographical area<sup>20</sup>. Compared to television, which is still the main tool for political communication, platforms like Facebook allow access to communication to smaller actors and with increased targeting capabilities.

<sup>16</sup> "Political micro targeting, fake news and boomer memes... anything to worry about?", 56°insight, November 2019.

<sup>17</sup> Simon Hegelich & Juan Carlos Medina Serrano, "Microtargeting in Germany for the 2019 European Elections", October 2019.

<sup>18</sup> Hazenberg, H., van den Hoven, J., Cunningham, S., Alfano, M., Asghari, H., Sullivan-Mumm, E., ... Turcios, Rodriguez, E. (2018). *Micro-Targeting and ICT media in the Dutch Parliamentary system: Technological changes in Dutch Democracy*.

<sup>19</sup> Edelson, L., Sakhuja, S., Dey, R., & McCoy, D. *An Analysis of United States Online Political Advertising Transparency*. arXiv preprint arXiv:1902.04385, 2019.

<sup>20</sup> Ghosh, A., Venkatadri, G., & Mislove, A. *Analyzing Political Advertisers' Use of Facebook's Targeting Features*.



However, **microtargeting contributes to audience fragmentation and therefore to a less unique political message compared to TV advertising**<sup>21</sup>.

### 3.2.2. Work by the Ambassador for Digital Affairs

On a dedicated website, the French Ambassador for Digital Affairs allows internet users to "check whether political advertising complies with the law"<sup>22</sup> on Facebook, the only source included in this tool via its API. As such, it is suggested to "evaluate the legality of one of the adverts run in France" during the 2019 European election campaign by manually categorising the adverts shown one by one according to their subject matter.

#### Example of an advert proposed for categorisation by the Digital Ambassador:

This initiative is one of the **experiments in combating disinformation** being conducted by the Ambassador for Digital Affairs. As such, to the best of our knowledge, **this report is the first systematic study of the content of Facebook ad library in France.**

<sup>21</sup> Fowler, E. F., Franz, M. M., Martin, G. J., Peskowitz, Z., & Ridout, T. N. *Political Advertising Online and Offline*.

<sup>22</sup> French Ambassador for Digital Affairs, "Checking that political adverts comply with the law", page viewed on 3 March 2020. <https://disinfo.quaidorsay.fr/political-ads/>



### 3.3. The provision of advertising data: ad libraries

At least three social networks<sup>23</sup> provide, in various forms, access to the advertising campaigns run on their services:

- **Google:** available in the US since August 2018 and subsequently in Europe, the Google ad library is accessible via a web interface<sup>24</sup>. It allows users to view data on ad spending by country and by advertiser, as well as to view adverts in their online format. Each advert is accompanied by a form indicating the amount spent and the number of impressions, both in a range rather than in exact figures, as well as the format of the advert. It is also possible to download spreadsheets of data aggregated by geographical area.
- **Facebook:** initially available in an early version in the US and the UK in 2018, the ad library has been available throughout the European Union since March 2019. It takes the form of a web interface and an API that provides access to the advertising campaigns run on the platform's services. For all adverts placed online from 2019 onwards, these interfaces archive those about "*social issues, elections or politics*" for a seven-year rolling period. Adverts that do not fall into this category are removed when they become inactive. The web interface and the API do not provide access to the same data: only adverts labelled as being about "*social issues, elections or politics*"<sup>25</sup> can be viewed via the API, while the web interface allows users to view all adverts, regardless of whether they are labelled as social, electoral or political. Like Google, the ad library provides a great deal of data, but the data on spending and impressions available through the API or the web interfaces for each advert is published as ranges rather than as exact figures<sup>26</sup>.
- **Snapchat:** launched in September 2019, the Snapchat ad library<sup>27</sup> provides access via spreadsheets only to all political and issue ads broadcasted worldwide on its network since 2018. Unlike other platforms, Snapchat shows the exact amount spent by the advertiser for each ad and the number of impressions. The "interests" of the targeted audiences are also accessible<sup>28</sup>.

A cursory exploration of the ad libraries made available by Google and Snapchat showed that these libraries are nowhere near as extensive as Facebook's ad library. Whereas the former

---

<sup>23</sup> Twitter seems to have a link to an ad library, but does not allow the data on these ads to be viewed.

<sup>24</sup> Google. *Political advertising on Google*. URL: [transparencyreport.google.com/political-ads/home](https://transparencyreport.google.com/political-ads/home). Viewed on: 05/10/2020.

<sup>25</sup> Facebook, *Ad Library*, URL: [www.facebook.com/ads/library](https://www.facebook.com/ads/library)

<sup>26</sup> Note that Facebook indicates the exact and total amount spent per advertiser for given periods in the web interface, as well as in a dedicated report (Facebook. *Facebook Ad Library report - France*. URL: <https://www.facebook.com/ads/library/report/>. Viewed on: 05/10/2020).

<sup>27</sup> Snapchat, "Political and Advocacy Ad Library", [www.snap.com/en-US/political-ads/](https://www.snap.com/en-US/political-ads/)

<sup>28</sup> By comparison, Facebook does not provide access to data on targeted audiences but on those who have actually been reached. This perspective can provide a better understanding of a given advert's potential impact.





two allow users to view a few hundred messages about France, several tens of thousands are available from Facebook. Facebook has also been the focus of **specific criticism about political advertising**, particularly concerning the use of users' personal data for micro-targeting purposes, as revealed by the Cambridge Analytica scandal<sup>29</sup>.

**A choice was therefore made to focus on describing and exploring the data available in the Facebook ad library.** These adverts have various types of formats: text content, videos included in the news feed and Instagram stories<sup>30</sup>. **This advertising content is shown by Facebook pages run by entities such as brands and more generally legal entities** (political parties, associations, etc.) and physical persons (candidate in an election, columnist, blogger, etc.). **The pages will therefore be considered as the advertisers of the ads in our analyses.**

This report offers an exploration of this library and has several objectives. First of all, this exploratory work aims to **provide input for the Council's reflections on combating information manipulation.** It also aims to **analyse the extent to which the library can be a source of more general information on the digital advertising market**, which is a key challenge for the audiovisual sector. Exploring the library is also justified within the framework of the **Council's responsibilities in combating hate content on the internet by setting up the Observatoire de la haine en ligne (online hate monitoring centre).** Lastly, using the API of Facebook ad library provides the opportunity to **further the Council's expertise in the use of APIs and mass data processing.**

---

<sup>29</sup> Facebook has since made a number of announcements supporting increased vigilance regarding political advertising. Currently, the platform is implementing identity confirmation and verification and authorisation processes for advertisers, and political ad tagging, as well as providing an ad library in the form of a web interface accessible without a Facebook account and an API, along with a transparency report on this library. (Conseil Supérieur de l'Audiovisuel. Statement made by Facebook as part of the assessment of the application and effectiveness of the measures implemented in 2019 to combat the spread of fake news. 23/04/2020. URL: <https://www.csa.fr/content/download/258815/770659/version/1/file/Facebook%20d%C3%A9claration%20informatique%202019.pdf>).

<sup>30</sup> Facebook stories and adverts on Messenger cannot currently be used for political advertising.



## 4. Description of the Facebook ad library

### 4.1. Access methods

Through its ad library, Facebook provides the ability to search for ads run on the platform by various advertisers (pages). The company presents this tool as *"a comprehensive, searchable collection of all ads currently running from across Facebook apps and services, including Instagram"* and containing *"data on all ads about social issues, elections or politics [...] whether active or inactive"*<sup>31</sup>. The tool consists of **a web interface** and **an API**.

#### 4.1.1. Description of the web interface

The web interface contains a general search engine providing access to all adverts run on *"Facebook products"* and a specific search engine for adverts *"about social, electoral or political issues"*. These are defined by Facebook as: *"made by (or on behalf of), or about a candidate running for public office, a political figure, a political party or advocating for the outcome of an election to public office (...), about any election, referendum or ballot initiative, including 'go out and vote' or election campaigns (...), [about] social issues in the location where the ad is placed (...), [or] regulated as political advertising"*.

The term "social issue" as a sub-category is also defined as including, within the scope of the European Union, the following topics: *"Civil and social rights, the economy, environmental politics, health, immigration, political values and governance, and security and foreign policy"*. It should be noted that Facebook requires a notice to be included in the case of ads with content directly concerning a political, social or electoral issue. However, this notice is not necessary when an advert makes incidental reference to a social issue, as in the case of commercial adverts<sup>32</sup>.

The main search engine ("All Ads") provides access to the various advertisers' publications. As such, the web interface gives access to all ads currently being run. If they are about a social, electoral or political issue, they are kept in the ad library for a seven-year period. Conversely, if they do not meet these criteria, they are withdrawn after they stop being run.

---

<sup>31</sup> Facebook. *Facebook Ad Library*.

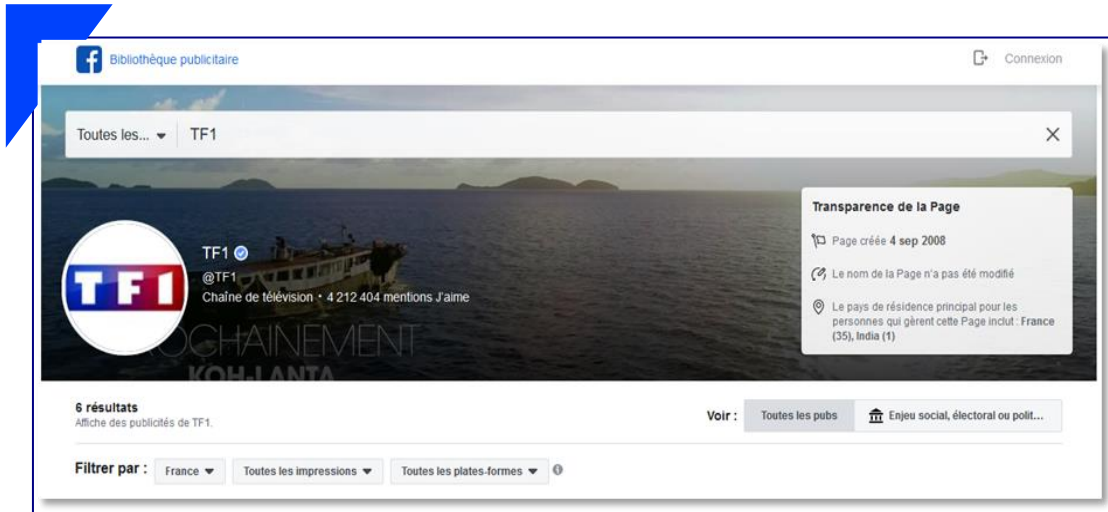
URL:[https://www.facebook.com/ads/library/?active\\_status=all&ad\\_type=all&country=FR&impression\\_search\\_field=has\\_impressions\\_lifetime](https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=FR&impression_search_field=has_impressions_lifetime). Viewed on: 13/03/2020. This therefore includes all sponsored posts by advertisers that are active, with an archive of political adverts inactive from 2019 for a seven-year period from the date of the campaign's launch.

<sup>32</sup> Facebook lists examples for each sub-category of social issues: <https://www.facebook.com/business/help/313752069181919?id=288762101909005>. For example, regarding environmental issues, a message such as *"Fracking destroys our community"* requires a notice, while a message such as *"New smart solar panels can reduce your electricity bill"* do not.





**Example of a query sent to the web interface:**



The results are filtered by country, by impression<sup>33</sup> (last 90 days, last 7 days, etc.) and by platform (Messenger, Facebook, Instagram). The page then shows a list of adverts. For each of them, it is possible to obtain more details, namely when it started to be run, the versions shown, the identification number (ID) and the hypertext link to the publication. In addition to the archiving of advertising creations (graphic aspects), the web interface provides information about the advertiser (including contact details and corporate purpose) and the age, gender and location of the persons the advert actually reached. The interface also provides access to the number of ad impressions and the amount spent (categorised by interval or aggregated by totals per advertiser). Conversely, there is no information on the advertiser's targeting choices (e.g. which category of audience or users' interests have been targeted?).

<sup>33</sup> An impression corresponds to one display of advertising content. This is often the basic pricing unit for display advertising (graphic banners and videos), usually charged at "Cost Per Mille impressions" (CPM).



**Example of an advert as shown  
in the ad library accessible through the web interface:**



#### 4.1.2. Description of the API and its use

Facebook also provides an API to send requests to retrieve data contained in its ad library<sup>34</sup>. This interface can only be used by completing a Facebook identity validation process. This access method was preferred for this study, as it allows automatic and mass collection of the ad library's content.

A request was sent to the API to **retrieve all the data for France in accordance with Facebook's terms of use**, which required several hours' processing time<sup>35</sup>. As it will be detailed below, a second extraction was also performed to identify messages about Covid-19.

The results were then formatted to create a searchable database containing **72,345 ads**. Two seemingly identical adverts (same message) may appear several times in this database if the advertiser has targeted different audiences for each of its messages.

<sup>34</sup> [www.facebook.com/ads/library/api](https://www.facebook.com/ads/library/api)

<sup>35</sup> The extraction was performed on 26 January 2020 and was programmed on the R software.



The database created contains the **following variables**:

- ad\_creation\_time: date the ad was created on.
- ad\_creative\_body: text displayed in the advert.
- ad\_creative\_link\_caption: when an advert contains a link, the text that appears in the link.
- ad\_creative\_link\_description: if an advert contains a link, the text describing the link.
- ad\_creative\_link\_title: title of the link contained in the advert.
- ad\_delivery\_start\_time: the date on which the advert starts to be run.
- ad\_delivery\_stop\_time: date from which the advertiser requested that the advert stop running.
- ad\_snapshot\_url: link of the advert in the archive; the archive provides access to the videos and images of the adverts.
- currency: currency in which the advert is paid.
- demographic\_distribution: demographic distribution of people the advert reaches according to age and gender.
- funding\_entity: name of the buyer of the advert<sup>36</sup>.
- impressions: number of impressions of the advert, provided according to the following ranges < 1,000 people, 1K - 5K, 5K - 10K, 10K - 50K, 50K - 100K, 100K - 200K, 200K - 500K, >1M<sup>37</sup>.
- page\_name: name of the page that acquired the advert
- publisher\_platforms: list of platforms on which the advert was run (Facebook or Instagram)
- region\_distribution: geographical distribution of people reached by the ad
- spend: amount spent on the advert. This amount is provided in ranges (<100, 100 - 499, 500 - 999, 1K - 5K, 5K - 10K, 10K - 50K, 50K - 100K, 100K - 200K, 200K - 500K, > 1M)<sup>38</sup>.

## 4.2. General presentation of the database

### 4.2.1. Aggregated statistics from the database

The adverts saved in the database correspond to a spending between €5.8 million and €21 million. Although this amount is low, it should be compared with the number of message impressions, which is between 1.7 and 2.5 billion<sup>39</sup>.

<sup>36</sup> This data was not used and was intentionally removed from the database by the CSA as part of this study.

<sup>37</sup> For simplicity, the analyses will assume that the number of impressions is in the centre of the range.

<sup>38</sup> For simplicity, the analyses will assume that the amount spent is in the centre of the range.

<sup>39</sup> For subsequent analyses, the boundaries will no longer be shown and we will use the centre of the range for simplicity's sake.

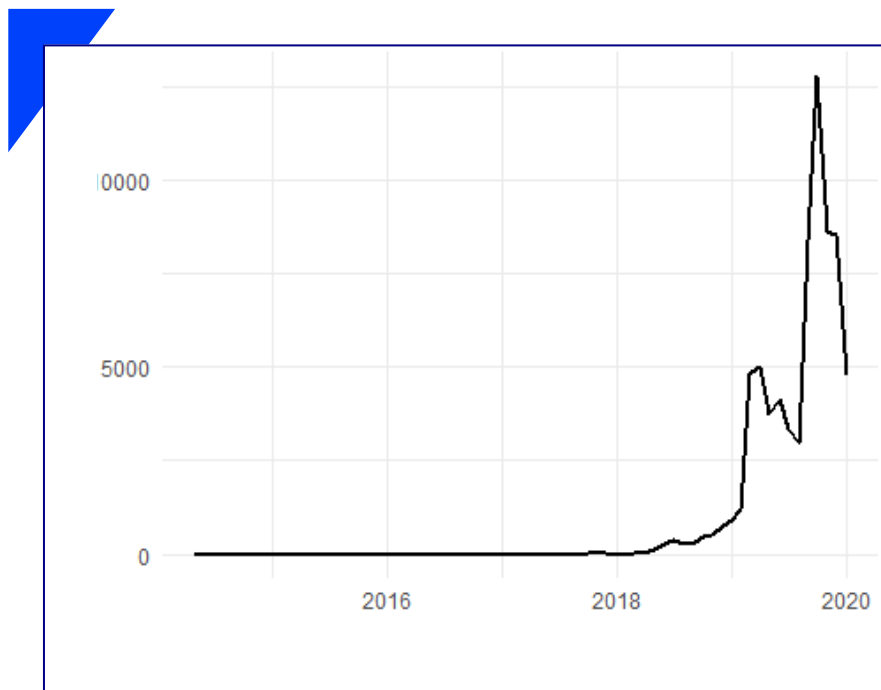


LOWER BOUNDARY OF IMPRESSIONS	UPPER BOUNDARY OF IMPRESSIONS	LOWER BOUNDARY OF SPENDING	UPPER BOUNDARY OF SPENDING	NUMBER OF ADS	NUMBER OF PAGES
1,762,271,000	2,509,457,164	5,836,600	20,998,681	72,345	7,082

#### 4.2.2. Change in the number of messages in the ad library

The adverts available in the library are ads run online from 2019 onwards, implying that some old adverts (dating back to 2015) are included as they were relaunched in 2019. This year coincides with the launch of the tool in its current version, after data was made available in a different format in 2018 in the US and the UK. The platform says on the web interface of its library that all adverts about "social issues, elections and politics", both active and inactive, will be made available for a seven-year rolling period. .

**Number of ads published per month**





## 5. Analysis of Facebook ad library data

### 5.1. Rankings

#### 5.1.1. The main advert payment currencies

The table below shows the ten most common currencies used to make payments for the messages listed in the database:

CURRENCY	NUMBER OF ADS
EUR (euro)	62,019
USD (US dollar)	6,842
GBP (British Pound Sterling)	910
CAD (Canadian dollar)	618
ILS (Israeli new shekel)	468
SEK (Swedish krona)	210
AUD (Australian dollar)	197
CHF (Swiss franc)	164
RUB (Russian rouble)	142
PLN (Polish zloty)	106

The database shows a certain number of ads paid in foreign currency, even though Facebook's rules state that ads about a "social issue, elections or politics" must be paid in euros. However, some adverts paid in a foreign currency may have been temporarily run before being identified as political, social or electoral ads. This phenomenon remains relatively marginal across the database as a whole, but to avoid distorting the analysis, expenditure in currencies other than the euro were reduced to 0 in the following pages concerning the amount of expenditure.



### 5.1.2. Pages running the highest number of ads

The following table lists the 20 most active advertisers (pages) in terms of the number of ads run:

<b>NAME OF THE PAGE</b>	<b>NUMBER OF ADS</b>
Médecins du Monde France	2,208
L'innovation Responsable	1,988
Pousse Pousse	1,617
Eco-Astuce.com	1,582
Mon avis citoyen	1,451
Programme pour la Transition Energétique	1,437
MAIF	1,018
Reforest'Action	957
Comme Avant	954
Epanda	909
Pour l'Éco	715
Devis.io	713
Make.org	657
Les energies pour tous	650
Zéro Déchet France	637
CARE France	632
Greenpeace France	609
SOS Villages d'Enfants (France)	605
Energie-solaire.io	559
Flamingos' Life	547



13 of these pages are commercially oriented and concern in particular the energy transition and recycling. Five are environmental or humanitarian NGOs. Two citizen platforms (Make.org and Mon Avis citoyen) are also included. This breakdown is consistent with the observations of the ranking by amount spent. All of these advertisers are very active in terms of posting and have multiple sponsored posts

### ***5.1.3. Pages with the highest number of impressions***

<b>NAME OF THE PAGE</b>	<b>NUMBER OF IMPRESSIONS</b>
<b>Isolation des combles</b>	22,390,356
<b>Omniium Cultural</b>	20,786,297
<b>2 Min Ecologie</b>	17,694,391
<b>Médecins du Monde France</b>	16,447,396
<b>Pousse Pousse</b>	13,085,192
<b>Programme pour la Transition Energétique</b>	10,976,782
<b>Conseil Solaire</b>	10,033,835
<b>Ekoblue</b>	9,988,811
<b>Zéro Déchet France</b>	9,987,682
<b>Mon énergie solidaire</b>	8,745,436
<b>UNHCR, the UN Refugee Agency</b>	8,647,351
<b>Maplanèteverte</b>	8,617,285
<b>Isolation Maison France</b>	8,524,475
<b>WWF-France</b>	8,191,964
<b>Programme isolation habitat 1 euro</b>	7,491,475
<b>EPP - European People's Party</b>	7,465,472
<b>La Région Occitanie / Pyrénées-Méditerranée</b>	7,383,484
<b>Groupe Identité et Démocratie - France</b>	7,238,461
<b>Epanda</b>	6,579,046
<b>Mon avis citoyen</b>	6,556,275



Rather than the number of ads, the unit of measurement here is the number of times they were shown (number of impressions<sup>40</sup>). The ranking of the 20 pages with the most impressions – between 6 and 22 million impressions – confirms the ranking by number of ads published. However, new NGOs are included such as the WWF and new institutional actors (Occitanie Region, UNHCR), as well as two European political groups: Groupe Identité et Démocratie and the EPP (European People's Party). This inclusion in the ranking is no doubt explained by the fact that, as mentioned above, most of the ads included in the library date from 2019, the year of the European elections. Political groups' expenditure will subsequently be covered in a specific analysis.

#### 5.1.4. Messages that generated the most impressions

message	nombre d'impressions
C'EST OFFICIEL !! L'ÉTAT VALIDE LA PRIME CEE POUR LA PÉRIODE 2019-2020. Vous pouvez isoler :- Combles - Garages - Caves - Murs - Vides sanitaires Et tout cela pour seulement 1€ !!	19 153 404
Le premier coton tige réutilisable 🧻 Utilisez le, lavez le et recommencez Obtenez le vôtre ici 🛒 <a href="https://bit.ly/2o1MD84">https://bit.ly/2o1MD84</a> Obtenez le vôtre ici 🛒 <a href="https://bit.ly/2o1MU84">https://bit.ly/2o1MU84</a> ❤️ Profitez de -50 % et la livraison offerte pendant 24 heures !	9 903 322
Élu innovation écologique N°1 en 2019 🏆 🌱 Produit Zéro Déchet 🌱 Soyez éco-responsables 🌱 🌱 Économisez jusqu'à 75€/kg de café ☕ 🌱 Faites vous plaisir tout en faisant un geste pour la planète et nos générations futures ! 🌱 ⌚ Déstockage aujourd'hui jusqu'à épuisement des stocks ! 🛒 Disponible ici : <a href="http://www.zerodechetfrance.org//InfinityCapsule">http://www.zerodechetfrance.org//InfinityCapsule</a>	9 493 230
European elections are just around the corner. Do you know the issues? As part of the European Parliament's thistimeimvoting initiative, join the debate on Kialo: Should the European Union have its own army?	9 364 928
Propriétaires de maison, vous avez le droit à l'isolation à 1€, sans condition de revenu. L'Etat isole votre sous-sol, votre garage et vos combles pour 1€ seulement	8 524 475
ECO-PRIMES : L'état vous offre 12.000 € pour votre Pompe à Chaleur ! 🏠 Financez votre projet grâce aux aides de l'État. ✅ 70% d'économie sur votre facture d'électricité 🌱 Profitez d'un chauffage optimal et de la climatisation grâce à la Pompe à chaleur réversible ! → Testez votre éligibilité au programme en 30 sec	8 454 393
FR Le financement total de l'isolation de votre maison est pris en charge grâce à la loi POPE, coût : 1€ symbolique Testez votre éligibilité et isolez Combles, Caves, Sous-Sols, Garages et Vides Sanitaires	7 491 475
D'après une étude, le film plastique c'est 1 million de tonnes de déchets par an en France ! Stop aux déchets ! 🌱 Vegan 🌱 Zero déchet 🌱 Bon pour la planète Découvrez les couvercles magiques ici : <a href="https://urlz.fr/9gzz">https://urlz.fr/9gzz</a> <a href="https://urlz.fr/9gzz">https://urlz.fr/9gzz</a>	6 253 950
C'est une annonce sans précédent que vient de faire le ministère de l'Écologie : l'Etat va aider les français à passer à la pompe à chaleur ! Un dispositif qui sera plus musclé selon le gouvernement ! 🇫🇷 FINANCEZ VOTRE POMPE A CHALEUR SIMULATION EN LIGNE REFORME 2019 !	5 607 960
Nous neutralisons la totalité de vos émissions CO2 🌱 12% moins cher que le tarif bleu d'EDF 🌱 Vous plantez des arbres en France, Sénégal ou Haïti 🌱 Sans coupure, changez en ligne en 5 min 🛒 Sans engagement, pas de paperasse, quelques clics 📱 + simple que de changer de forfait téléphonique	5 403 494

The 20 messages that generated the most impressions obtained between 3.6 and 19.16 million. Note that the first post has a particularly high number of impressions compared to the others, with approximately 10 million more impressions than the post in second place. 19 of these are about services (attic insulation, heat pump financing) or manufactured

<sup>40</sup> It should be pointed out again here that the impressions shown are averages, as Facebook indicates ranges rather than exact figures.





products (reusable cotton buds, refillable capsules). None of them are fundamentally political in nature, but some of them could be about "*social issues*".

15 of them have an ecological slant or are about products and services linked to related environmental protection and legislation, including incentive legislation. For example, thermal insulation, heat pumps, waste reduction and recycling are recurring themes.

Among the **messages reported as** being about a social, electoral or political issue, one promotes the US online debate platform Kialo.com, while another highlights a petition about the fate of children living in exile. **Some messages are completely irrelevant**, like an advertisement for the EasyJet airline or an advert for an edition of a highway code. This could be largely explained by the self-reporting by some advertisers, despite their ad not matching the official Facebook definition. However, these self-reports are not subsequently corrected by Facebook.

#### **5.1.5. Pages that generated the most expenditure**

<b>NAME OF THE PAGE</b>	<b>AMOUNT OF EXPENDITURE (€)</b>
European Parliament	1,397,424
Eco-Astuce.com	505,396
Greenpeace France	477,845
Make.org	410,021
European Commission	391,316
L'innovation Responsable	350,606
Le Crédit Malin	321,294
Facebook app	299,998
MAIF	245,091
Rôle Energies	210,023
Isolation des combles	204,656
easyJet	204,408
Médecins du Monde France	195,450
Gouvernement	175,149
Programme pour la Transition Energétique	156,181



---

<b>EU Environment</b>	146,706
<b>CIWF France</b>	132,745
<b>UNICEF France</b>	126,432
<b>Parlement européen en France</b>	123,862
<b>2 Min Ecologie</b>	120,041

---

The 20 pages that spent the most by amount include at least five institutional pages (European Parliament, French government, etc.), four NGO pages, nine pages about commercial offers (attic insulation, easyJet, etc.) and two pages about platforms (Facebook App and Make.org). Note that **9 of the 20 pages concerned are linked to the environment, including both institutional and commercial pages**. Other causes are sometimes less explicit or more general.

The total amounts spent are between €120,000 and €1.4 million. The first page in the ranking, the European Parliament's page, spent more than twice as much as the second page in the ranking. Lastly, the amounts spent by some pages that are not very explicit seem relatively high, such as the €120,041 spent by the "2 Min Écologie" page, which does not appear to be attached to any specific entity.

In general, **these rankings highlight the strong presence of commercial advertisers in the ads**. These advertisers seem to have a content strategy based on terms related to general-interest causes, such as offers for thermal insulation or recycled products.

## 5.2. Thematic analyses

### 5.2.1. Audience demographics

The Facebook Ad Library does not provide information about the demographics of the people targeted by advertisers. It does, however, include information about the people their adverts reach. Analyses show that some pages disproportionately reach certain user categories, suggesting that they have **specific targeting strategies** in place<sup>41</sup>. To analyse these strategies, a sample was created from the last 20,000 advertisements run<sup>42</sup>, restricted to pages with more than 100,000 impressions, which in practice amounts to analysing 317 pages.

---

<sup>41</sup> Audience figures only provide information about the audiences actually reached, rather than the audiences initially targeted by the pages when they developed their campaigns.

<sup>42</sup> This restriction was necessary to facilitate data processing.



The following tables present the pages that disproportionately reached (one category significantly dominating others) certain categories of the population.

**5.2.1.1. Pages that reached 13 to 17-year-olds the most**

<b>NAME OF THE PAGE</b>	<b>NUMBER OF IMPRESSIONS</b>	<b>PERCENTAGE OF MESSAGES REACHING THE CATEGORY</b>
<b>What The FAKE</b>	141,315	84%
<b>Centre francilien pour l'égalité femmes-hommes</b>	138,947	81%
<b>Parlement européen en France</b>	313,522	70%
<b>Collection R</b>	309,829	66%
<b>Jeunes IHEDN</b>	73,297	64%

Interpretation: 84% of the messages on the "What the Fake" page reached individuals aged 13 to 17.

Four of the five pages studied are quasi-institutional initiatives. These include What the FAKE, an information page co-financed by public funds and designed to combat online disinformation, and the "Centre francilien pour l'égalité femmes-hommes", a public body that provides information on equality issues and supports projects related to this subject. The pages of the European Parliament in France and of Jeunes IHEDN, an association that brings together young auditors from the Institut des Hautes Études de Défense Nationale, are also included, along with a commercial page for Collection R, a series of books from the publisher Robert Laffont aimed at teenagers.

**All of these pages have run ads on Instagram, which may help explain the young age of the population reached.**



### 5.2.1.2. Pages that reached 18 to 24-year-olds the most

While the 13 to 17-year-old category is covered by informational political pages, the next category is more targeted by commercial messages:

NAME OF THE PAGE	NUMBER OF IMPRESSIONS	PERCENTAGE OF MESSAGES REACHING THE CATEGORY
<b>Fibii by Wizbii</b>	7,827,242	99%
<b>Région Pays de la Loire</b>	117,040	72%
<b>America mag</b>	331,561	70%
<b>Surfrider Foundation Europe</b>	85,852	70%
<b>L'Oréal Group</b>	313,418	69%

Fibii by Wizbii is a student assistance simulator paired with a start-up that specialises in posting job offers. The second page is run by the Pays de la Loire Region, followed by the literary magazine (mook) America, which features articles on American politics. Next is the page of Surfrider Foundation Europe, an NGO specialising in environmental protection. The last page is the L'Oréal group page.

This breakdown underlines the fact that **NGOs and institutional actors are investing in social media to access a young audience** and deliver messages related to public interest issues.

### 5.2.1.3. Pages that reached the 65+ age group the most

NAME OF THE PAGE	NUMBER OF IMPRESSIONS	PERCENTAGE OF MESSAGES REACHING THE CATEGORY
<b>Les Bons Conseils de la CNM</b>	105,515	52%
<b>Ma Mutuelle Santé Senior</b>	109,153	51%
<b>Action Enfance</b>	952,498	48%
<b>Solidarité et Progrès</b>	53,760	45%
<b>SOS Villages d'Enfants (France)</b>	1,999,229	45%



These pages are run by mutual health insurance companies (Ma Mutuelle Santé Sénior, Les Bons Conseils de la CNM) and NGOs (Action Enfance and SOS Villages d'Enfants). This is consistent with the type of services or campaigns of these actors, which generally target an older audience. The page of the political party Solidarité et Progrès comes in fourth place in this ranking, but with a far lower number of impressions than the other pages.

#### **5.2.1.4. Pages that reached women the most**

<b>NAME OF THE PAGE</b>	<b>NUMBER OF IMPRESSIONS</b>	<b>PERCENTAGE OF ADS REACHING THE CATEGORY</b>
<b>Grace Gift</b>	162,499	100%
<b>Instituto Europeo de Psicología Positiva - IEPP</b>	126,498	100%
<b>Period.studio</b>	517,493	100%
<b>Volunteer World</b>	247,396	99%
<b>WeMoms</b>	512,974	99%

The pages concerned include Grace Gift, a Taiwanese online shop for women's clothing and accessories, Period.studio, an offshoot of online content producer Loopsider that describes itself as "*the new positive, feminist and inclusive community*", and WeMoms, a "*100% mummy and 100% self-help*" social network. More surprisingly, it also includes the page of an Italian personal development institute (Instituto Europeo de Psicología Positiva - IEPP) and the page of VolunteerWorld, a platform containing volunteering opportunities. These two results tend to indicate that these pages adopt a **deliberate strategy of targeting an exclusively female audience**.

#### **5.2.1.5. Pages that reached men the most**

<b>NAME OF THE PAGE</b>	<b>NUMBER OF IMPRESSIONS</b>	<b>PERCENTAGE OF ADS REACHING THE CATEGORY</b>
حفريات	614,999	100%
<b>Titan Power+</b>	375,000	100%
<b>Property2invest</b>	146,373	99%
<b>MAN Truck &amp; Bus France</b>	116,298	97%
<b>CPIC</b>	240,257	94%

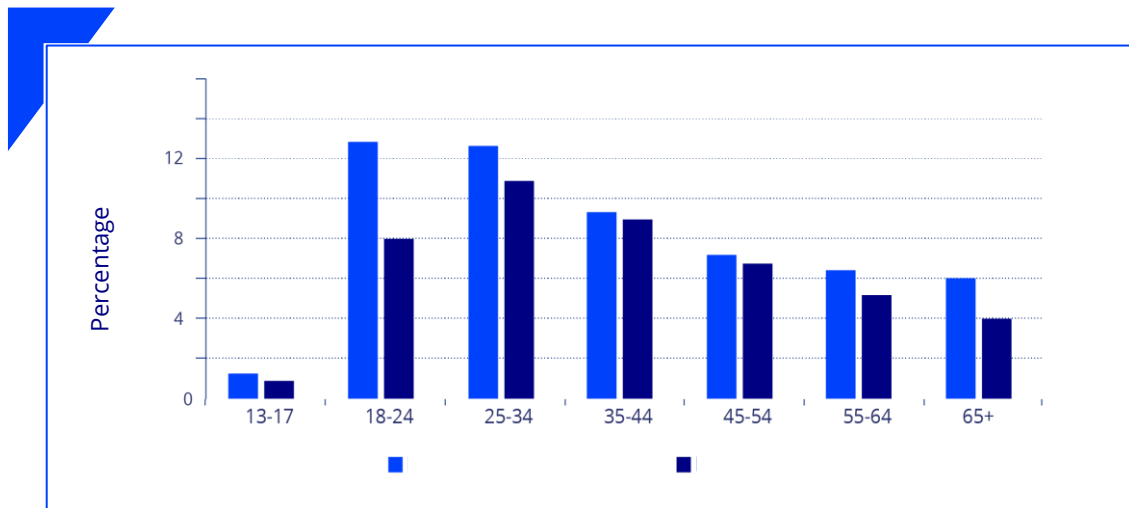


The top results include an Egyptian online media site (Hafryat), a brand of ultra-resistant cables for phone chargers (Titan Power+), a Turkish real estate agency (Property2invest), a vehicle manufacturer brand (MAN Truck & Bus) and an Anglo-Pakistani real estate investment project (CPIC). Lastly, the presence of foreign brands posting messages in a language other than French and not offering goods or services in France raises questions about the **geographical targeting parameters of the campaigns**. It is possible that only a few French users may have been reached by the advert in order for it to be included in the database.

#### **5.2.1.6. General demographic breakdown**

Lastly, the following graph shows the demographic breakdown of people reached by the messages:

**Breakdown of the population reached by the ads by gender and age**



Interpretation: almost 12% of the people reached by the messages are women aged 18 to 24, while around 8% of the people reached by the messages are men aged 18 to 24.

Advertising messages reach women more than men, and young adults (18-34 years old) are the most reached population, while conversely the youngest (13-17 years old) and oldest people are, to a lesser extent, less reached by the messages<sup>43</sup>. This can be explained by the fact that minors are not the main target of the database's advertisers or by the fact that Facebook lays down stricter rules on ads aimed at minors, prohibiting in particular the promotion of products or services with content deemed inappropriate for these users<sup>44</sup>.

<sup>43</sup> Additional analyses could be conducted to categorise all of the pages in the database according to their nature (institutional page, commercial page, etc.) in order to verify the existence of different characteristics in the ads, for example in terms of demographics or volume between the different types of pages. However, this would involve a lengthy process of manually categorising the individual pages.

<sup>44</sup> See the "prohibited content" section of the page on the rules applicable to adverts on Facebook <https://www.facebook.com/policies/ads>



### 5.2.2. *The use of Facebook ads by certain political movements*

The following table shows the number of adverts, the amounts spent and the impressions attached to different political movements in descending order of impressions:

<b>PARTY</b>	<b>NUMBER OF ADS</b>	<b>AMOUNTS (€)</b>	<b>IMPRESSION S</b>
<b>Identité et démocratie</b>	79	50,361	7,238,461
<b>En marche</b>	111	13,145	1,790,445
<b>Rassemblement national</b>	79	6,611	1,219,461
<b>Les Républicains</b>	60	4,671	792,970
<b>Parti socialiste</b>	26	3,287	294,987
<b>Mouvement démocrate</b>	11	545	139,995
<b>Solidarité et progrès</b>	7	347	117,497
<b>Europe écologie</b>	13	644	20,994
<b>Parti animaliste</b>	2	50	17,999
<b>Union populaire et républicaine</b>	7	248	17,997
<b>La France insoumise</b>	9	396	11,996

**Further analysis could be conducted on the strategy of political movements**, for example to identify the audiences more specifically reached by the messages of these movements, to study the content of the messages posted or to understand the periods during which these messages were posted.



## 6. Analyses of the content of the Facebook ad library

The main pages running ads or the most viewed messages (see above) seem to present **few key considerations related to the responsibilities of the CSA, particularly in terms of disinformation and hateful content**. The vast majority of messages are from associations or are commercial in nature. However, previous analyses have focused on the pages that are most active or have the highest levels of spending. Some smaller pages spending lower amounts could run more problematic messages while still having the ability to reach a wide audience. However, with 72,000 messages in the database, manually identifying problematic messages is not conceivable.

Two strategies have therefore been implemented here in order to bypass this technical difficulty. The first consisted of detecting, **through the use of potentially conflicting keywords, problematic messages**, and the second consisted of **using machine learning tools<sup>45</sup> to automatically analyse this content**.

### 6.1. Keyword analysis

The analyses developed in 4. above have made it possible to highlight the most active pages or pages that have adopted particular targeting strategies but do not take into account the diversity of the advertising messages in the Facebook ad library. The following analyses are intended to **present this diversity by targeting developments on more particularly sensitive themes or themes that could potentially constitute a breeding ground for disinformation**. This targeting was achieved by automatically identifying advertising messages containing certain keywords related to these subjects.

#### 6.1.1. Municipal elections (keyword: "municipalities")

All of the messages containing the word "municipal" were initially isolated. These include adverts run by pages linked to political movements active in the **March 2020 elections**.

For example, this is the case with the page *Bien vivre à Bondues*, which published on 25 January 2020 "*Bien vivre à Bondues' is the list led by [...] as part of the municipal elections of 15 and 22 March 2020*", and the pages *Florange Nouvel Horizon*, *CCMA – Collectif des Citoyens Musulmans d'Annecy* and *Alliance Pour Limoges*.

<sup>45</sup> Machine learning is the scientific study of models and algorithms that allow computer programs to perform a task without being explicitly programmed for it. These algorithms use inference mechanisms that detect and utilise associations within training data to achieve a set of goals.

<sup>46</sup> Pursuant to legislation governing the protection of individuals' personal data, all reproductions of messages mentioning information about individuals (last name, first name, telephone number, etc.) have been anonymised by the use of "[...]". Furthermore, the messages have been reproduced as is, including any typos.





### 6.1.2. European elections

The 20 most widely run messages (average impressions of between 350,000 and 750,000) containing the expression "European elections" were posted between 9 and 31 May 2019 and came from a **very limited number of pages**: the European Parliament (European and French pages, institutional), Make.org, Cogito (two debate platforms) and Jam (information media available on Messenger). The goal is to encourage people to vote, either by explaining what is at stake in these elections ("*Choose the future you want. Get involved in the European elections*" on the European Parliament page on 16 May 2019) or by featuring items to help people make a choice ("*Who should you vote for? Take the Cogitest, the compass of the European elections*" from Cogito on 31 May 2019). Note that some adverts were run several times: these are actually different messages, some of which were replicated six times ("*Choose the Europe you want me to grow up in. European Elections, 26 May*" by the European Parliament in France on 9 May 2019).

A significant number of messages are more specifically about **promoting certain values or an electoral list standing in these elections**: this is the case in particular with the messages posted by the pages of the EPP – European People's Party (European People's Party, "*Show us what binds you to Europe! ☐☐ Create your personal to mark the European elections! #ThePowerOfWE*" on 19 May 2019) and the Alliance Anticorrída ("*The European elections are approaching. So vote! Only you can act for animals...*" on 13 May 2019).

There are also three Facebook App ads on the theme of protecting the elections. These promote the resources put in place by the platform to "*protect the European elections*" by "*hunting down disinformation*" and deleting "*fake accounts*" (March and May 2019).

In terms of the currencies used to pay for these adverts, almost all use the euro. Only two adverts were paid for in US dollars.

### 6.1.3. Legislative elections (keyword: "legislative")

Here we find a message from a caterer. This message contains the terms "*ecological transition*" and "*legislative developments*" but only aims to promote ecological measures taken by this business, which may have caused it to be categorised as a message about "*social issues, elections or politics*" by Facebook. The rest of the messages are divided into political adverts as part of campaigns abroad, particularly regarding the elections of representatives of Tunisians abroad in France, but also in Israel, Guinea, Cameroon, Monaco and Mali.



Only a few messages concern France and are run by La République En Marche. We see an MP promoting his parliamentary work on a bill being discussed at the National Assembly, which is not directly related to the June 2017 elections ("*Alsace bill starts its legislative process in the National Assembly today. In this video, I summarise: 🗣️ the outlines of this bill □ the amendments that I will be tabling and the next legislative steps of this legislation*", 18 June 2019).

#### 6.1.4. Yellow vests

More than a hundred adverts containing this phrase are **mostly from news sites** (MSN.fr, Brief.me, Les Jours, La Chronique Agora, Imineo, Face Camera), **yellow vest pages** (Gilets jaunes Dreux 28, whose adverts are no longer accessible), trade unions (Info'Com-CGT), **political figures and parties** (Groupe Identité et Démocratie – France, – [...] Political newspaper – Patriosphère Infos, page of an MP in Seine Maritime) and pages promoting heat pumps, published by Pompe à Chaleur, Économie 2019 and 2 Min Écologie. The categorisation of the latter messages as adverts about "*social issues, elections or politics*" can be explained by the fact that they use the keywords "*yellow vests*", "*government*" and "*politics*". The following table shows some examples of the messages posted:

PAGE	EXCERPT FROM THE TEXT
<b>Groupe Identité et Démocratie - France</b>	"The European Parliament sees Russian RU agents everywhere. Brexit GB? The Russians. Trump us? The Russians. Yellow Vests? The Russians. French FR train strikes? Definitely also the Russians!" See Thierry Mariani's speech.
<b>Mouvement Écologique National &amp; Solidaire</b>	DOWN WITH THE SLAVE TRADERS OF GLOBALISM! STOP THE UPROOTING OF PEOPLES! ENOUGH SOCIAL DUMPING! The Yellow Vests must finally address the issue of illegal immigration and social dumping orchestrated by big capital and globalist networks. Defending French workers and our identity is a priority for any vest worthy of the name. We will not replace the people of France! Reminder of our statement of 23/09/2015 entitled: "Migrants", a provoked exodus
<b>Pompes à Chaleur</b>	💡 Get €10,000 💡 from the Yellow Vests to install a heat pump! ➡ <a href="http://www.pompe-a-chaleur-sans-debourser.com/">http://www.pompe-a-chaleur-sans-debourser.com/</a>



### 6.1.5. Pensions

The social movement against the government's proposed pension reform generated several adverts from **pages linked to trade unions** (Info'Com-CGT, Syndicat de défense des policiers municipaux – SDPM, Union syndicale solidaires, etc.) and institutions, notably the **government** ("*Be a proactive part of your future, give your opinion on the upcoming universal pension system.*", 4 October 2019).

Several political figures, including MPs mostly from the Parliamentary majority, were also active on the subject: (" *Pensions: public workshops in Mesnil-le-Roi, Vésinet and Sartrouville!* ", 10 November 2019). Lastly, political parties also comment on the subject, such as the page "Calais avec les patriotes": ("*Do you want Frexit, to redefine our borders, increase the guaranteed minimum wage by €300 in five years, increase our older citizens' small pensions, stop relocations of our French businesses, protect our jobs, get rid of glyphosate? Then join me!!! [...]*", 9 April 2019).

There is continuity in the media's investment in these themes strongly linked to current events (Brief.me, L'Express). **Commercial pages are not standing on the sidelines**: "Mieux placer votre argent" made 16 sponsored posts on the topic of preparing for retirement ("*Prepare for retirement by planning your investments: SCPI, Pinel law investment, Special pension investment, etc.*", 18 October 2019), while several instances of law firms specialising in employment law are also visible.

### 6.1.6. Islamism and Islamists

These keywords mostly cover adverts from **right-wing extremist pages** such as the seven posts by Global Watch Analysis ("*Islamism: When [...] incites Muslims in France to communitarianism!*" of 12 December 2019) or by Vigilance Halal ("*March against #islamiphobia: the left submits to radical Islamism: resist!!*" of 14 November 2019).

### 6.1.7. Macron

This keyword is included in over 500 messages and is mainly found in **adverts from pages linked to the media** (La Chronique Agora, Brut, Brut nature FR) or to companies selling energy solutions (Aides Energie France 2019). Several adverts by associations are also included: AIDES questions the Head of State about France's contribution to the global fund ("@[1535230416709539:Emmanuel Macron] #CestVotreMissiooon #FondsMondial", 19 September 2019) and Greenpeace France looks at "*the lack of action on the climate*" by Emmanuel Macron in connection with the "affair of the century" on 23 September 2019. **The "En Marche" page is also behind a large proportion of these adverts**, focused on testimonials ("*A tailored baccalaureate with materials that really suit me.*" *Read the story of [...]*, 16 years old, high school student.  *Thanks to Emmanuel Macron and his majority, the daily lives of high school students has been changing for the last two years.*" on 5 July 2019 for example). The aim of



these advertisements is therefore to call on the Head of State or to cite him as the author of a policy that is praised or, alternatively, criticised.

### **6.1.8. Coronavirus**

An additional search was performed using the keywords "**coronavirus**" and "**covid**" on messages run between 23 January and 22 March 2020. After 26 February, Facebook announced a ban on certain advertising content about the coronavirus<sup>47</sup>. 249 pieces of advertising content were identified<sup>48</sup>.

Some sponsored content includes information content (Arrêt sur Images, Brief.me, Juritravail, Curieux), trade union content (Union Professionnelle au Service des Micro-Entrepreneurs, InfoCom-CGT) and content from think-tanks (Institut Montaigne, Fondation Santé des Étudiants de France). Other content is promoted by insurance companies (2A Assurance de l'Adour, Aviva) conveying prevention messages.

#### **Example:**

- "[FREE] Given the large-scale and unambiguous voting by our subscribers since it was shown last night: the programme with [...], and [...] from @CollectInterHop is free. Share without reservation!" Arrêt sur Images

Some content is more related to commercial information, notably from energy providers (Planète OUI), travel agencies (Voyageons-autrement.com), trade fairs (Tokyosalon) and small restaurant chains, particularly to announce that business is continuing or halting during the pandemic.

#### **Example:**

- "At a time when we're all already affected by a virus caught in the web of globalisation and information overload, why not try taking advantage of this to glimpse other realities, other possibilities, other ways of imagining the world. It's always nice to think..." Voyageons-autrement.com

A few messages about the sale of protective masks also appear (delineo.fr, breazzz.com).

---

<sup>47</sup> "We prohibit advertisements that refer to the coronavirus in such a way as to create panic or imply that the products concerned are a cure or prevent contamination" as well as "advertisements and announcements for medical masks" (Facebook. Coronavirus: our first initiatives in France against COVID-19. 12/03/2020. URL: <https://about.fb.com/fr/news/2020/03/protéger-et-informer-nos-utilisateurs-face-au-coronavirus/>. Viewed on: 05/10/2020).

<sup>48</sup> This figure does not take into account the presence of content that is actually prohibited and may have circumvented the company's prohibitions, as Facebook does not prohibit all advertising mentioning the virus.



**Example:**

- "☐ **The most advanced mask for combating pollution and coronavirus ☐ Military filtration technology. To learn more, visit <https://delineo.fr/products/masque>**" - Delineo.fr, 29.02.2020

Institutional actors, mainly in Europe (European Parliament, Council of the European Union), also communicate on the situation.

**Example:**

- "#EUresponse: €47.5 million in emergency EU funding is allowing European researchers to work on urgently needed Covid-19 vaccine development and treatment. More info [🔗 link in bio \(http://epinsta.eu/covid19research\)](http://epinsta.eu/covid19research). #coronavirus #covid\_19" – European Parliament

Lastly, a significant number of messages are political in nature and are about the pandemic crisis. These messages come in particular from association pages (Agir pour la Vie Animale) and interest group pages (La Relève et la Peste, Non au Béton).

**Example:**

- "DURING THE CRISIS, CONCRETING CONTINUES: It is not only the construction of coronavirus treatment centres that the government has authorised, but all types of construction sites. A few days ago, the government only allowed essential business travel. Now it is allowing all types of construction sites. Who are we kidding? The construction lobby has struck again." – Non au Béton

Many adverts contain virulent political content against government action and are published by personal activist pages.

**Example:**

- The Prime Minister, Édouard Philippe, took advantage of the "Saturday night fever" in the midst of the coronavirus epidemic to surreptitiously table article 49.3 at the end of the evening, on Saturday 29 February, which suspends all National Assembly deliberations on the pension reform. After three months of demonstrations and in the face of this underhanded move, opponents of the pension reform could not stop there, in Dijon. In a hurry, they organised a rally on Tuesday evening, 3 March, outside the office of the MP Didier Martin, nicknamed by them: "MP Godillot". The latter belongs to the presidential party La République en Marche. The demonstration, which was due to end outside the prefecture, could not be declared in the required time and the prefect refused to approve the route. In addition, all of the demonstrators who had taken to the street in Rue de la Préfecture were drowned in tear gas. Afterwards,



part of the procession headed towards the city centre. They marched and protested against the use of this article 49.3 on the pension reform, which will only plunge the people a little further into precariousness" - [...]

Among these personal pages, one message in particular contains negative content about China.

**Example:**

- "MADE IN CHINA cn #coronavirus

Didn't anyone ever wonder:

"Why is China the world's leading exporter?"

We bought

Their furniture

Their clothes

Their phones

Their spare parts

(...)

Their mushrooms

Etc. etc.

We wore their copies of the greatest designer clothes

We agreed to have their dentures in our mouths

Etc. etc.

>>>> Yes, it's thanks to US that China has become the country of "ultra production", the FACTORY OF THE WORLD: using dangerous products, pesticides, fakes, harmful mixtures, badly assembled, poor-quality and fragile products, assembly lines, child labour, which is a violation of international law etc. etc.

We have played a key role in this economic development. We have contributed to this destructive consumption chain by importing and consuming Chinese products.

For one reason only: to pay less!!!!

We have destroyed French and European industry, we have contributed to the closure of our Made in France production plants, we have contributed to relocation, we have given them our know-how...

But the Chinese political regime has remained a DICTATORSHIP and has not evolved by becoming the FACTORY of the world, instead it continues to exploit its people... to misuse its resources, to eat badly, to pollute, to destroy the planet, to live in violation of all the laws of nature and human rights! #mangerdelachauvesouris #usineàvirus"

[...]

Quite rarely, there are messages about the municipal elections, the second round of which has been postponed to an uncertain date because of the presidential announcements.



**Example:**

- "The list 'Thurins, let's cultivate our future' thanks you for your trust and for having come in large numbers despite the particularly risky conditions given COVID-19. In this exceptional pandemic climate, our electoral list won 248 votes (22% of the votes cast) against 545 votes for the outgoing list (47.59%), which is by no means representative of an election in a village of 2,216 voters. The big winner of the election of this first round is therefore Abstention. Also, in view of the "State AT WAR" (against the virus) declaration by the President of the Republic and the Minister of the Interior, and measures to protect the citizens leading to the lockdown and the postponement of the second round to mid-June 2020, the list 'Thurins, let's cultivate our future' will be maintained. It remains more determined than ever to move our village in the right direction, in conscience and in truth, to cultivate a better future together. 😊👉👏" [...]

Aside from these ads, which were paid for in euros, other ads run were paid for in US or Canadian dollars, including around thirty pieces of sponsored content defending the Chinese government's action, as in the example below.

**Example:**

- "For the Chinese government, people's safety and health always come first," said Chinese President #Xij Jinping. Watch the video to find out how President Xi has led China's battle against the #coronavirus outbreak. #GuanghuaStudio " - CGTN, China's national media.

On this point, it should be noted that on 4 June 2020<sup>49</sup>, Facebook announced the introduction of a label for media outlets that are under the editorial control of their government. Adverts run by these media outlets will also be labelled. Moreover, these media outlets will not be allowed to run adverts in the US from the summer onwards in order to limit the risks of interference in the US Presidential election.

In conclusion, **of the 249 ads about the coronavirus, most concern the French situation, from the perspectives of prevention, information and also activism.** More unusually, a particularly large investment appears to be coming from Chinese sources to **promote the Chinese government's action** in the fight against the coronavirus.

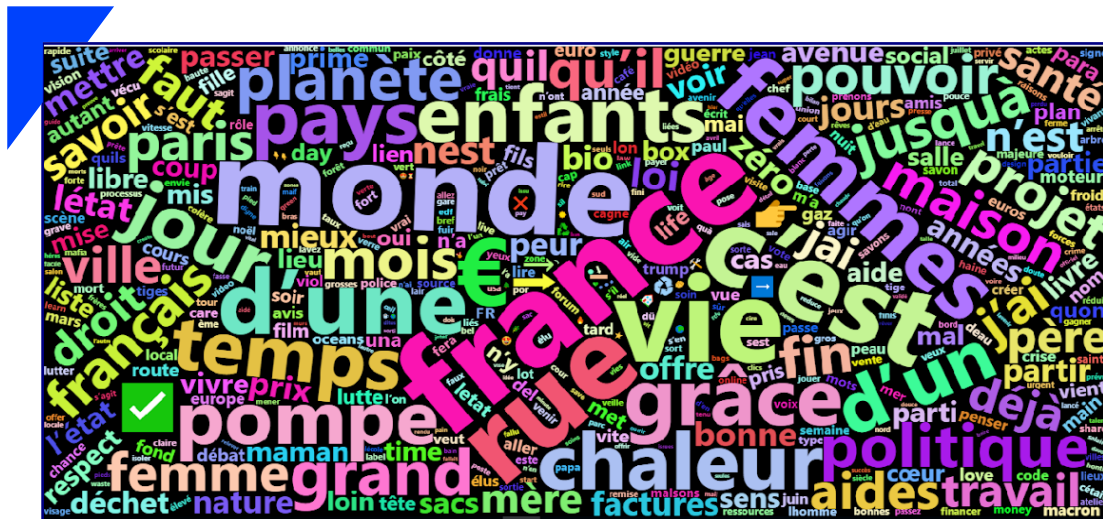
<sup>49</sup> <https://about.fb.com/news/2020/06/labeling-state-controlled-media/>





### 6.1.9. Tag cloud

The following diagram<sup>50</sup> shows the terms most frequently used in the ad library. The size of the word is proportional to how often it appears in the text of the adverts:



The most frequently used terms – including "France", "€", "heat", "politics", "project", "power", "planet" and "pump" - reflect the diversity of the themes of the messages in the database. This contains commercial offers and messages about social issues and the environment.

## 6.2. Automated message content analysis

### 6.2.1. Description of the API used

The second method of content analysis is based on the use of the Perspective API<sup>51</sup>. This is a programming interface developed by Jigsaw, a Google subsidiary, and designed to analyse comments in terms of their potential harmful effect on conversations. These are categorised according to how "toxic" they are, which the API's creators define as "a rude, disrespectful or irrelevant comment that is likely to make you leave a conversation". This "toxicity score" was constructed by asking a panel to categorise on a scale from "very toxic" to "very healthy" content posted on the internet, the resulting database having been used to train a machine learning model. This API is presented as a "protection against harassment on the internet" that can be useful for both moderators and commentators to indicate whether their comments are

<sup>50</sup> The diagram was built in the R software using the wordcloud library.

<sup>51</sup>Jigsaw. *Perspective API (home page)*. URL: <https://www.perspectiveapi.com/#/home>. Also available on GitHub: <https://github.com/conversationai/perspectiveapi/blob/master/2-api/model-cards/English/toxicity.md>









likely to violate the terms and conditions of use of the service used. It is thought to be used by several media outlets as a tool for moderating their comments sections<sup>52</sup>.

The API was therefore not designed for an analysis of problematic adverts and as such has inherent limitations in the construction of the training base and the model itself. In addition, differences in toxicity scores given to sentences according to language have been documented, with, for example, cases in which French content was deemed to be less toxic than English content<sup>53</sup>.

Adverts with a high toxicity score should therefore not necessarily be considered "toxic". The Perspective API will mainly be used to facilitate the automatic identification of a set of adverts for which it is beneficial to conduct a manual analysis.

### 6.2.2. Selective description of the database obtained

The table below lists the French language messages with the highest toxicity score. The closer the score is to 1, the more the message is identified as toxic). These messages, written in a colloquial style in the original versions, have been translated as faithfully as possible.

NAME OF THE PAGE	MESSAGE <sup>54</sup>	"TOXICITY" SCORE
<b>Les Copains Félines</b>	We need to get rid of all these drunkards bored with their sad life once and for all, no wonder there are so many CUCKOLDS	0.77
<b>La Compagnie Très Très Drôle</b>	They're gay and want a child! She's homophobic and a social worker! There's only one solution: Become straight! After the success of Papa(s) tu feras Maman! ["Dad, you be Mum!"] across France and at the Avignon Festival, we're back with a new and even crazier version!	0.75
<b>My Culotte</b>	 Have you heard of menstrual panties?  It's THE zero-waste solution, comfortable and safe during your period!   Ultra-absorbent, it replaces your protection for 12 hours!	0.72

<sup>52</sup> The New York Times, The Guardian and The Economist use or have used this API.

<sup>53</sup> The NGO AlgorithmWatch compared the toxicity scores given by the Perspective API to 198 sentences in English, French and German. According to this analysis, the toxicity scores of the same word differ according to the language: the sentence "My comment might bring something to the debate. This is my story, as a gay man" had a score of 0.30 in English, 0.71 in German but just 0.05 in French. Furthermore, the API would not allow words with modified punctuation to be taken into account, giving the content concerned lower toxicity scores than without these modifications. (AlgorithmWatch. *Automated moderation tool from Google rates People of Color and gays as "toxic"*. 19/05/2020. URL: <https://algorithmwatch.org/en/story/automated-moderation-perspective-bias/>.)

<sup>54</sup> These are full text versions of the adverts studied.



<b>Mchrisfi Model-Fashion</b>	Really!!!! You kill black people yourself!! We don't have love between us, that's why white people don't treat us well!	0.72
<b>Pur Vitaé Wod Nutrition</b>	For a muscular girl you're not so dumb. For a guy with big arms you're not so stupid.	0.72
<b>-[...] Political Newspaper - Patriosphere Infos</b>	The story of French people who work themselves to death, while the taxes help to support migrants. <sup>OBJ</sup> ... Share it!	0.70
<b>La vérité sur l'Arabie Saoudite</b>	Saudi Arabia is trying to manipulate international public opinion and make you think that it's the kingdom of freedom and women's rights. We know that you're liars! Free the women prisoners!	0.70
<b>Halte au Sexisme</b>	4 April 2019, Nantes: She puts a chilli pepper in her daughter's vagina and shaves her head. For neo-feminism it's obvious: only a man could torture his daughter by attacking her vagina. The dirty perverts: Because mothers are women, therefore saints, moved by empathy, understanding, wisdom, self-denial... Whereas men are genetically sadistic and obsessed with sex. Fucking guys, get lost! Except. Because her daughter had sexual relations with a boy, this 44-year-old mother had the brilliant, wonderful idea, expressing the feminist and altruistic maternal quintessence towards a child... to put a chilli pepper in her 14-year-old daughter's vagina and shave her head. The idea was that she wouldn't have any more sexual relations with boys. Not to mention that the teenager had also been hit many times with a belt in a basement. Motherly love is so beautiful! The prosecutor will also point out a societal failure: "If the authorities had acted otherwise, these events would never have occurred: three increasingly alarming reports had been made by the University Hospital Centre to the public prosecutor's office. The president of the tribunal will conclude: "We're beyond violence, we're in a state of abuse." Verdict: a 3-month suspended sentence, deprivation of parental authority, order to take course on "reflection on one's role as a parent". One source: Actu.fi <a href="https://www.sos-misandrie.org/2019.html">https://www.sos-misandrie.org/2019.html</a>	0.70
<b>Save Us Shop</b>	☺Don't let your toothbrush collect dust! 🌿Learn about our bamboo case ☐🌐	0.69
<b>PARTAGE, a French association for international solidarity</b>	Prostitute 🧑‍🚰. Drug dealer 🗡. Soldier 🗡. Criminal 🚬. Slave ☐. 115 million children around the world are unfortunately involved in one of these "trades". We can't allow it! I'm signing, what about you?	0.66



**Avenir de la  
Culture**

HELP US AND SIGN THE PETITION NOW! You and I are not going to let this poor sister down! For [...], this respectable lady, a nun, represents a threat because of her religious habit and he refused her a place in a retirement home! These laymen are the gravediggers of France: too cowardly to put Muslims in their place, they prefer to attack our nuns!

0.66

Among the messages considered to be the most toxic, only a few examples of which are listed in the table above, some are commercial, associative or institutional in nature, and their categorisation in Facebook's ad library as content about a "social issue, elections or politics" does not appear immediately justifiable. For example, the page My Culotte ran an advert on 6 September 2019 that read, " ♀ ☐ Do you know about menstrual panties? ☐ It's THE zero-waste solution, comfortable and safe during your period! ☐ ☐ Ultra-absorbent, it replaces your protection", which is unequivocal. Several messages considered "toxic" are from associations or institutions speaking about a current event and encouraging action, such as the UNHCR, the United Nations Refugee Agency, which posted "The Rohingyas are a stateless Muslim minority in Myanmar. They are fleeing violence, and their numbers continue to grow. Support them!" on 10 October 2019.

The adverts identified by the API as "toxic" that are not included in these exceptions appear to be mostly from **biased pages**, whether about religious topics such as "Halal en danger", which posted "Like if you also don't want to be forced to eat dead meat (haram) in France. Say no to the violation of our religion!" (10 September 2019), hunting with "Les Copains Félines", which shares an anti-hunting petition entitled "We need to get rid of all these drunkards bored with their sad life once and for all, no wonder there are so many CUCKOLDS" on 25 May 2019, and political figures ("The Félix Faure gymnasium in Bry-sur-Marne requisitioned to house 100 illegal immigrants! ☐ ☐ A town less under infrastructure pressure than Bry should have been chosen" by [...] on 11 April 2019).



As such, **the API does identify certain messages containing content that could be deemed problematic.** However, it does flag messages containing terms with a negative connotation but the content of which would be hard to categorise as toxic. Lastly, the API also categorises harmless and notably commercial posts as toxic. Remember that the API was designed to identify comments perceived as toxic in the context of conversations, for example on forums, and that messages that could be seen as "toxic" in a conversation are not necessarily so in the context of adverts. As such, some commercial messages refer to clichés or negative situations that the products these advertisers are offering intend to remedy.

Lastly, the analysis of spending on the adverts rated in the database as being very toxic appears to indicate that **none was given a very large budget.**



## 7. Conclusion

This report is a first exploration by the Conseil Supérieur de l'Audiovisuel of an ad library, more specifically the one made available by Facebook, which was chosen due to the volume of its data. This analysis is an **opportunity to observe the breakdown, in terms of both volume and budget, of political advertising shown on French territory** through this platform.

The exploration highlighted the fact that advertising of a social, electoral or political nature run on Facebook **is a real issue in France**. Despite the limited spending by advertisers on this type of advertising, these ads have in fact led to more than a billion impressions for the platform's users, of whom there are over 39 million in France.

The analysis also provides a better understanding of the **type of actors that use these adverts** and provides an overview of the **characteristics of online campaigns by institutional, associative and political actors**. The analysis also allows us to highlight the **targeting strategies** adopted by certain advertisers.

The Council is also developing an **initial methodology for automatically analysing the content of adverts**. This analysis found a **significant proportion of adverts that have a business purpose**, their inclusion in the ad library appearing to be due to an environmental or regulatory factor). However, the use of specific tools (APIs for detecting toxic content, selection by keywords) also highlighted the diversity of the themes of the messages present and showed the existence of messages of a **real political or electoral nature**, and also made it possible to study the presence of content that might appear to be **problematic**.

Several observers have already noted that **the data made available by Facebook did not allow for an assessment of the exhaustiveness of the ad library** devoted to social, electoral and political content. The work carried out by various stakeholders (the ERGA and the Digital Ambassador in particular) on the issue of exhaustiveness is therefore essential and must continue. The Council notes, however, that transparency alone is not enough and will only produce the expected benefits if the published data is properly mobilised by the various stakeholders to shed light on the content of the published data (whether it concerns the identity of advertisers or the content of adverts). This study is therefore an initial form of this data being mobilised by a regulator. By conducting this exploratory study, the Council intends to encourage other actors, particularly in the academic world, **to continue and further the study of the content of these libraries** with regard to politically motivated and engaged advertising.