ELECT CHECK 2019

A REPORT ON POLITICAL ADVERTISING ONLINE DURING THE 2019 EUROPEAN ELECTIONS

FuJo
THE INSTITUTE FOR FUTURE MEDIA & JOURNALISM

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ÚDARÁS CRAOLACHÁIN NA hÉIREANN | BROADCASTING AUTHORITY OF IRELAND

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A REPORT ON POLITICAL ADVERTISING ONLINE DURING THE 2019 EUROPEAN ELECTIONS

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BAI FOREWORD

The harmful impact of communications via social media platforms on democratic debate has been a focus of concern in recent years particularly around elections and referenda. Policy makers and regulators, nationally and internationally, were not equipped within their remits to respond adequately to these challenges as they emerged. However, developments such as the EU's 2018 Audio-Visual Media Services Directive (AVMSD) demonstrate that this concern is now being addressed. The BAI is actively involved in discussions about how these new frameworks should operate as the Authority seeks to play its part in supporting its Vision of an Irish media landscape that reflects and shapes who we are.

While the global scale of social media platforms, and the complex nature of the communication that they facilitate, presents new challenges, the experience gained in regulating traditional media remains relevant. In this context social media can be viewed as an evolution of the media landscape which can be addressed by adapting existing tools, such as content monitoring and complaints handling, as well as developing new ones. The BAI's experience in regulating political advertising is a relevant example here. This reality is also reflected in the revised 2018 AVMSD and the Code of Practice on Disinformation (the Code) that is the focus of this research report.

The Code emerged as an initiative at an EU level to address concerns about disinformation. The related Action Plan published on December 5th 2018, requested the assistance of the European Regulators Group for Audio-visual Media Services (ERGA) in monitoring the implementation of this Code and the BAI is playing a lead role in this regard. The BAI chairs the ERGA Sub-Group leading this work and is working with partners nationally to develop and implement the required monitoring methodologies. The initial focus has been on political advertising during the 2019 European Election campaign and the ERGA Report on this was published in June 2019. Research conducted by the Institute for Future Media and Journalism (FuJo) at Dublin City University (DCU), and commissioned by the BAI, was the Irish contribution to the ERGA Report. The BAI has an established relationship with FuJo in the context of our statutory requirement to publish research relating to plurality of the media and this report is the latest such publication. I would like to commend the team at DCU for the quality and clarity of their work especially given the timeframes and constraints involved. Further work on monitoring the implementation of this Code is underway and will be addressed in a future report.

Positively, this report indicates that Facebook, Google and Twitter proactively engaged with commitments under the Code in relation to transparency of political advertising during the 2019 European Elections in Ireland. However, it is equally clear that the overall objectives underpinning these commitments were not achieved in Ireland. As the researchers' state "…inconsistency across the three companies results in a systematic lack of transparency and comprehensive understanding of political and issue-based advertising online". This outcome reflects the overall experience in the other European countries that participated in the ERGA monitoring process. While disappointing on one level, the outcome illustrates the scale of the task presented in implementing the requirements in the 2018 AVMSD. The BAI and other stakeholders have put forward ideas on how to address implementation of the AVMSD in submissions published in July 2019. The Authority looks forward to engaging positively in future debates on this matter and hopes this report can be a useful information source in this regard.

Michael O'Keeffe
Chief Executive
Broadcasting Authority of Ireland

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DCU FUJO FOREWORD

Online advertising offers an effective means of reaching target audiences so it is unsurprising that it is now integral to any modern, political campaign. However, the lack of transparency presents significant risks and challenges and could potentially undermine the integrity of the electoral process. The European Commission's Code of Practice on Disinformation is a welcome step towards securing transparency in online political advertising.

As the effectiveness of the Code can only be ascertained though careful monitoring, the work of the European Regulators Group for Audiovisual Media Services (ERGA) and the Broadcasting Authority of Ireland (BAI) is invaluable. FuJo was delighted to partner with the BAI to implement the monitoring process for Ireland during the European elections. Our findings indicate that the digital platforms have much room for improvement if they are to comply with their commitments under the Code.

This work complements FuJo's broader interest in tackling online disinformation and the regulation of political advertising. Last year, FuJo made a submission to the Department of the Taoiseach's 'Public Consultation on Regulation of Online Political Advertising in Ireland'. The FuJo submission identified three key recommendations: first, the establishment of the Electoral Commission as outlined in the Programme for Partnership Government and recommended by the Interdepartmental Group on the Security of Ireland Electoral Process and Disinformation; second, the establishment of a searchable repository of online political advertising, which includes information about adverts (source, source location, content production, costs) and their distribution (channels, target audience, use of data); and third, enforcing a requirement to include imprints on all online political advertising to indicate who is responsible for creating the material.

In addition, as the coordinator of the European Commission funded project Provenance, FuJo is leading a team of computer scientists, media scholars, and psychologists to develop tools that will help citizens identify online disinformation and manipulative strategies. Disinformation, we believe, is a complex problem that requires multiple responses. No single action is sufficient. In addition to the current work of the The Code of Practice, ERGA and the BAI, there is much to do in terms of advancing national regulation around political advertising and promoting digital and media literacy.

We are grateful to the BAI for their support and to all those in DCU who contributed to this research.

Dr Jane Suiter,
Director
DCU Institute for Future Media and Journalism

EXECUTIVE SUMMARY

In April 2019 European Regulators Group for Audiovisual Media Services (ERGA) established a research project covering 13 member states to monitor the political advertising archives established by Facebook, Google and Twitter prior to the European elections in May 2019. This work was undertaken to support the European Commission in monitoring the implementation of the commitments made by Google, Facebook and Twitter under the self-regulatory Code of Practice on Disinformation. The platforms advised ERGA to rely on the online libraries or archives of adverts that were made publicly available ahead of the elections.

This report summarises the data and key findings in relation to the monitoring of these archives conducted in Ireland by the Institute for Future Media and Journalism at the request of the Broadcasting Authority of Ireland. The data consisted of 1,554 political advertisements from four archives – Facebook's Ad Library (280); Facebook's Ad Library Report (1,091), Twitter's Ad Transparency Centre (88); and Google's Ad Transparency Report (95) – during the period April 18th 2019 to May 24th 2019.

As outlined in the report, ERGA identified a set of nine questions to assess the extent to which each platform disclosed relevant information about political advertising. Only six of these questions could be answered by using the political advertising archives provided by Facebook, Google and Twitter. To answer those six questions, adverts were monitored for the presence of the following information: (i) whether the advert was paid for; (ii) who paid for it; (iii) if it carried a disclaimer stating that it was a political or issue-based advert; (iv) information on micro-targeting options; and (v) spending information.

We found that 1. The level of transparency was mixed. In the majority of cases studied both Facebook and Twitter provided a disclaimer on the immediate image of the advert that advised it was related to social issues or politics. Google however, although hosting the adverts on a webpage entitled 'political adverts in the European Union' did not provide any individual disclaimers on the immediate images of the adverts. In relation to the disclosure of payer information, both Facebook and Google made this clear in the majority of cases whilst Twitter required the researcher to click through various links to subsections of the ad details pages in order to obtain this information. 2. Overall, we found that micro-targeting information was available in all cases but that it was limited to geography, gender and age. We were unable to assess whether other targeting options were available to the advertisers (such as special interests or political persuasion). 3. We found that all platforms labelled individual adverts as sponsored and the sponsor name was present in the plurality of adverts as was the disclaimer with the exception of Google. Although each platform adopted a different approach to classifying and labelling relevant adverts. 4. Across all three platforms the majority of adverts clearly contained the sponsor's name, however Facebook demonstrated some inconsistency here with a portion of the adverts analysed omitting sponsor information. 5. We found that all adverts carried some spending information, but that much information was presented in almost meaningless brackets and/or in aggregated form. 6. Overall, we found that only Facebook labelled any adverts as issue-based. However, we found examples of issue-based adverts on Facebook that were not clearly labelled. Neither Twitter nor Google made efforts to identify issue-based adverts. The issues addressed in this report are elaborated on in more detail in the accompanying essays. [1]

INTRODUCTION

Over the past few years, elections and referendums have been marred by disinformation and a lack of transparency around political campaigning. In response, the European Commission adopted a Communication on "Tackling Online Disinformation: a European Approach"[2] in April 2018, which proposed the development of a self-regulatory code of practice for online platforms and the advertising industry. The Code of Practice on Disinformation was published in September 2018. Signatories - including Facebook, Google and Twitter - committed to "ensuring transparent, fair and trustworthy online campaign activities ahead of the European elections in spring 2019" [3].

Signatories to the Code are required to report on their progress in addressing five key issues: *(1) Scrutiny of ad placements* (aimed at demonetising online purveyors of disinformation); *(2) Political advertising and issue-based advertising* (aimed at making sure that political adverts are clearly identified by the users); *(3) Integrity of services* (aimed at identifying and closing fake accounts and using appropriate mechanisms to signal bot-driven interactions); *(4) Empowering consumers* (aimed at diluting the visibility of disinformation by improving the find-ability of trustworthy content and by making it easier for users to discover and access different news sources representing alternative viewpoints); and *(5) Empowering the research community* (aimed at granting researchers access to platforms' data that are necessary to continuously monitor online disinformation).

The European Regulators Group for Audio-visual Media Services (ERGA) is the body tasked with supporting the European Commission in monitoring the implementation of the Code. To do so, 13 National Media Regulators agreed to participate in an ERGA led project to monitor the implementation of the Code on a national basis. Ireland's National Media Regulator, the Broadcasting Authority of Ireland (BAI), commissioned the Institute for Future Media and Journalism at Dublin City University to implement monitoring of the political advertising archives provided by Facebook, Google, and Twitter.

Initially, ERGA requested platforms to submit a raw and unfiltered database of all adverts published on their platforms over the course of a week for researchers to analyse (supporting commitment 1, 2 and 5 above). However, none of the platforms fully complied with this request. Instead, they advised the ERGA to rely on the online libraries or archives of adverts that were made publicly available ahead of the elections. These archives are discussed in greater detail below. In summary, Facebook provided an Ad Library essentially an interactive database, accessible via an API[4]. Later, Facebook provided an Ad Library Report but it was not accessible via an API and displayed inconsistent information when compared to the initial Ad Library. Following the elections, Facebook provided access to a CSV report with limited fields. The information provided was not consistent across these archives.

Twitter provided a Transparency Center, a web page that could be accessed using a web browser. It contained the promoted tweets of the previous seven days and provided a label to signify that the content was promoted and political as well as a link to information about the sponsor of the adverts, the number of impressions they received, and the amount paid.

Google provided a Transparency Report, a reasonably transparent and accessible archive that could be filtered. Information was also provided in the CSV format. While most of the required information was present, it was not presented in a format that was conductive for real-time monitoring.

The inadequacy of these archives was highlighted in reports by Mozilla[5] and the Office of the French Ambassador for Digital Affairs[6]. Both reports identified substantial problems with data access and the consistency and presentation of information. Our findings, as elaborated below, concur with these views.

Moreover, the commitment to provide transparency on political advertising only applied to the European elections. However, in Ireland the European elections on May 24th 2019 coincided with other polls including local elections, a referendum on divorce arrangements, and three plebiscites on directly elected mayors and thus these also appeared in the archives.

[2] https://ec.europa.eu/digital-single-market/en/news/communication-tackling-online-disinformation-european-approach
[3] https://ec.europa.eu/digital-single-market/en/news/roadmaps-implement-code-practice-disinformation
[4] API stands for Application Programming Interface. Throughout this report, it refers to a publicly available web-based interface that returns data in response to a request.
[5] https://blog.mozilla.org/blog/2019/03/27/facebook-and-google-this-is-what-an-effective-ad-archive-api-looks-like/
and https://adtransparency.mozilla.org/eu/log/
[6] https://disinfo.quaidorsay.fr/en/facebook-ads-library-assessment.

CONTEXT

RESEARCH QUESTIONS AND DATA AVAILABILITY

Research Questions

ERGA identified a common set of nine questions to assess the extent to which each platform disclosed information to identify those funding political advertising; the volume of political advertising; the targets of advertising; and the amount spent.

Specifically, the questions concerned the following:

1. What is the degree of transparency of the political and issue-based advertising?

2. Is the platform adopting appropriate and efficient measures to enable users to understand why they have been targeted by a given advertisement?

3. Is the platform adopting appropriate and efficient measures to ensure that political ads are clearly distinguishable and are readily recognisable as a paid-for communication or labelled as such?

4. Is the sponsor's identity publicly disclosed?

5. Are the amounts spent for the political ads publicly disclosed (at least in price ranges)?

6. What progress has been made on the commitment to publicly disclose "issue-based advertising"? Have platforms provided a definition of issue-based ads and complied with it?

7. Are the definitions of political ads and issue-based ads adopted by the platforms consistent with requirements set out in the legislation of the NRA's Member State?

8. Is the "registration/ authorisation" procedure for advertisers of political ads effective? How effective is the process to identify, and remove or re-label political adverts that did not meet the verification requirements?

9. Is the archive presented in a user-friendly manner (e.g. is it searchable and analysable) and does it contain all the required information as defined in questions 2, 4 and 5?

Data Availability

To address these questions, researchers had to rely on the information provided by the platforms through the advertising archives. Only six of ERGA's questions could be answered by monitoring the four archives. Consequently, the Irish monitoring assessed adverts for the presence of the following information: (i) whether the advert was paid for; (ii) who paid for it; (iii) if it carried a disclaimer stating that it was a political or issue-based advert; (iv) information on micro-targeting options; and (v) spending information.

ERGA underlined the need for meaningful access to advertising databases that would enable election monitors to measure the scale and analyse the character of campaign advertising in each member state. To this end, ERGA[7] identified an ideal set of data points for each advert including: *(a)* unique identifier of the advertisement; *(b)* name/identification of the advertiser; *(c)* location of the advertiser; *(d)* nationality of the advertiser; *(e)* language of the advertisement; *(f)* type of advertiser (political party, candidate, campaign, foundation, company, private citizen); *(g)* in case of political ad, the name of the political entity (i.e. political party or candidate) that benefits from the advertisement; if the beneficiary is a candidate, his/her political party should be identified as well; *(h)* date in which the advertisement was published; *(i)* date in which the advertisement stopped being published; *(j)* country where the advertisement is published (this item should allow ERGA to filter the results Country by Country, thus making it possible for the various NRAs to carry out their monitoring activities autonomously); *(k)* target groups to which the advertisement is directed (age, gender, geographic location….); and *(l)* amount paid (at least in ranges) for the advertisement. While ERGA identified the above as an ideal set of data points, it recognised that points (a), (b), (g), (j), (k), and (l) should be present at a minimum.

Thus, a key issue was whether the archives provided this information and, if so, whether it was accessible in a format conducive to data analysis such as a downloadable file or via APIs on the online portals. In other words, it was necessary for monitors to be able to extract all necessary data-points on all adverts in a specific region. In its evaluation of the advertising databases, Mozilla underlined the technological requirements: "To do this [monitoring] work effectively there must be fully functional, open APIs that enable advanced research and the development of tools to analyse political ads targeted to EU residents. This requires access to the full scope of data relevant to political advertising, and that access must be provided in a format that allows for rich analysis. Tools provided often lack the necessary data or, due to limited functionality, do not allow for analysis"[8]. However, none of the social media platforms provided sufficiently comprehensive access to the required information nor to well-described API that would allow access to the information.

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[7] http://erga-online.eu/wp-content/uploads/2019/06/ERGA-2019-06_Report-intermediate-monitoring-Code-of-Practice-on-disinformation.pdf
[8] https://blog.mozilla.org/blog/2019/03/27/facebook-and-google-this-is-what-an-effective-ad-archive-api-looks-like/

DESCRIPTION OF THE ARCHIVES AND DATA ACCESS

Definitional Variances
Across the Archives

In the absence of clear guidelines regarding the definition of political and issue-based advertising, each platform developed its own definitions. Facebook did not differentiate between issue-based and political advertising. All adverts were labelled under the same heading: 'About social issues, elections or politics'. Neither Google nor Twitter made efforts to identify issue-based adverts. As a result, it was not possible to measure the extent of their efforts regarding issue-based advertising during the campaign and the use of different definitions has the potential to create confusion. In this context, it is helpful to outline how each platform generally defines political and issue-based advertising and how this was applied during the European elections.

Facebook

Facebook has specific policies regarding advertising about social issues, elections, or politics.[9] These policies outline Facebook's approach to ensuring political content is compliant. Facebook places the main responsibility for honest disclosure with the advertiser. Facebook's process for advertiser approval states that "the advertiser must provide proof of identification and have a Facebook Advertiser ID." It also states that: "ads that are identified as being related to politics will be added to the Ad Library, along with all active ads. If an ad running without a 'Paid for by' disclaimer is reported and subsequently reviewed to be related to politics, it will be disapproved and added to the Ad Library[10]". In terms of issue-based advertising, Facebook provides a list of topics that will be considered issue-based advertising. The initial list of top-level issues that required authorisation and labelling included: immigration; political values; civil and social rights; security and foreign policy; economy; and environmental politics. Regarding the removal of adverts, in some cases there is a record of removed adverts in the Ad Library database, which state that the advert was removed for breach of policy. However, it is not clear if there is a full record of all removed adverts.

Twitter

Twitter defines political adverts using three criteria: (i) adverts that advocate for or against a candidate or political party; (ii) adverts that appeal directly for votes in an election, referendum, or ballot measure; and (iii) adverts that solicit financial support for an election, referendum, or ballot measure. If an advert meets any of these criteria, Twitter requires the full disclosure of payer information. Failing to disclose this information constitutes a breach of the terms of service, the penalty for which can be the removal of the advert or the possible suspension of the payer's account. In addition, "political campaigning ads may only be promoted via the use of Promoted Tweets and In-Stream Video Ads" and political advertisers must register and provide a range of additional information and undergo verification checks.

Twitter adopted more specific definitions of political adverts with regard to the European elections including: adverts purchased by a European or national political party; adverts purchased by a candidate registered with their corresponding national electoral authority; or adverts that advocate for or against a clearly identified candidate or party for European elections[11]. Regarding issue-based advertising, Twitter states that "issue advocacy is allowed globally except in France. In the US, advertisers must be certified and meet additional criteria". Because of the lack of labelling of issue-based adverts, it is difficult to establish the extent to which the platform was being used by political actors. Twitter defines issue advocacy as "Ads that refer to an election or a candidate, or Ads that advocate for or against legislative issues of importance[12]". Twitter's examples of issue-based adverts are outlined in their policy document in the US where issue-based adverts are permitted provided the advertiser is certified. Twitter states "issues covered under the policy include, but are not limited to abortion, civil rights, climate change, guns, healthcare, immigration, national security, social security, taxes, and trade".[13] Adverts carrying political campaign issues could be circulated in Ireland, and it is not clear to what extent this is shaping political discourse. Because of the lack of labelling and the absence of a comprehensive database of adverts, it is not possible to establish the extent to which Twitter was used to promote issue-based topics during the election campaign.

Google

Google defines political advertising as political content for "political organisations, political parties, political issue advocacy or fundraising, and individual candidates and politicians"[14]. Google aims to "support responsible political advertising", and like Facebook places the onus on the advertiser "to comply with local legal requirements, including campaign and election laws and mandated election "silence periods," for any geographic areas they target". For the European elections, political adverts were defined as adverts concerning a political party, or a current elected officeholder or candidate for the EU Parliament. Google notes that "election ads don't include ads for products or services, including political promotional merchandise like t-shirts, or ads run by news organisations to promote their coverage of political parties, EU Parliament campaigns, candidates, or current elected officeholders". Election adverts in the EU could only run if the advertiser was verified: "Google requires that all election ads contain a disclosure identifying who has paid for the ad. For most ad formats, Google will automatically generate a 'Paid for by' disclosure, using the information provided during the verification process. The disclosure will display the name of the entity that paid for the ad to users who see the ad. For some ad formats and features, it's the advertiser's responsibility to include in-ad disclosures in EU election ads".

[9] https://www.facebook.com/policies/ads/restricted_content/political

[10] https://www.facebook.com/business/help/2405092116183307

[11] https://business.twitter.com/en/help/ads-policies/restricted-content-policies/political-content/political-campaigning-advertising-policy-FAQs.html

[12] https://business.twitter.com/en/help/ads-policies/restricted-content-policies/political-content.html

[13] https://business.twitter.com/en/help/ads-policies/restricted-content-policies/political-content/issue-ads-policy-FAQs.html

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

METHOD

DATA COLLECTION AND MONITORING

The monitoring process accessed data from four sources - Facebook's Ad Library[15] ; Facebook's Ad Library Report[16] ; Twitter's Ad Transparency Centre[17] ; and Google's Ad Transparency Report[18] - ahead of the European Election (i.e. from April 18th 2019 to May 24th 2019, polling day in Ireland[19]). The following outlines the processes and steps implemented to interrogate each of the political advertising archives provided by the platforms. The differences between the interrogation methods and steps highlight the significant issues around comprehensively investigating the commitments of the platforms to transparency. The text below refers to the platforms' reports, links to which are all footnoted above.

Facebook Ad Library and Ad Library Report

Facebook's adverts could be accessed in two main ways: either by visual interrogation of the web interface or via an API. The aggregated data was published in the form of reports. The Ad Library Report was a web page containing dynamic tables and, later, a downloadable CSV file. It could not be interrogated via an API.

Facebook's Ad Library facilitated keyword searches but did not offer complete regional information when the keyword search concerned a region. For example, by using the keyword 'Ireland' it was not possible to see all of the political adverts distributed in Ireland, only a partial sample of political or issue-based adverts. Political or issue-based adverts were signified with a label stating "related to politics or issues of importance"[20]. Facebook's Ad Library also labelled adverts with the page it appeared on, the payer name and the dates from which it ran; although, these labels were not always present. As noted elsewhere[21], the documentation for this API is incomplete.

Within the Ad Library database the adverts were grouped by the advertiser that published them. There were three fields to filter those pages: Filter by time range; Filter by country; and Search by advertiser. In addition, the spending could be visualised by location (by Irish county).

Fully labelled adverts were displayed with a series of labels including the 'status' of the advert which signified if it was actively running; the 'page' where the advert was posted and linked back to; the 'text' of the advert; the 'disclaimer' indicating that the advert is about political or social issues; and 'payer information' to signify that the content was paid to be boosted and who paid for it (see Figure 1).

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[15] https://www.facebook.com/policies/ads/restricted_content/political

[16] https://www.facebook.com/ads/library

[17] https://www.facebook.com/ads/library/report/

[18] https://ads.twitter.com/transparency

[19] https://transparencyreport.google.com/political-ads/region/EU?hl=en
We began on April 18 2019 as prior to that date some media platforms adjusted the reporting.

[20] https://newsroom.fb.com/news/2019/03/ads-transparency-in-the-eu/

[21] Ambassador for Digital Rights France [ADRF] (2019) Facebook Ads Library Assessment.
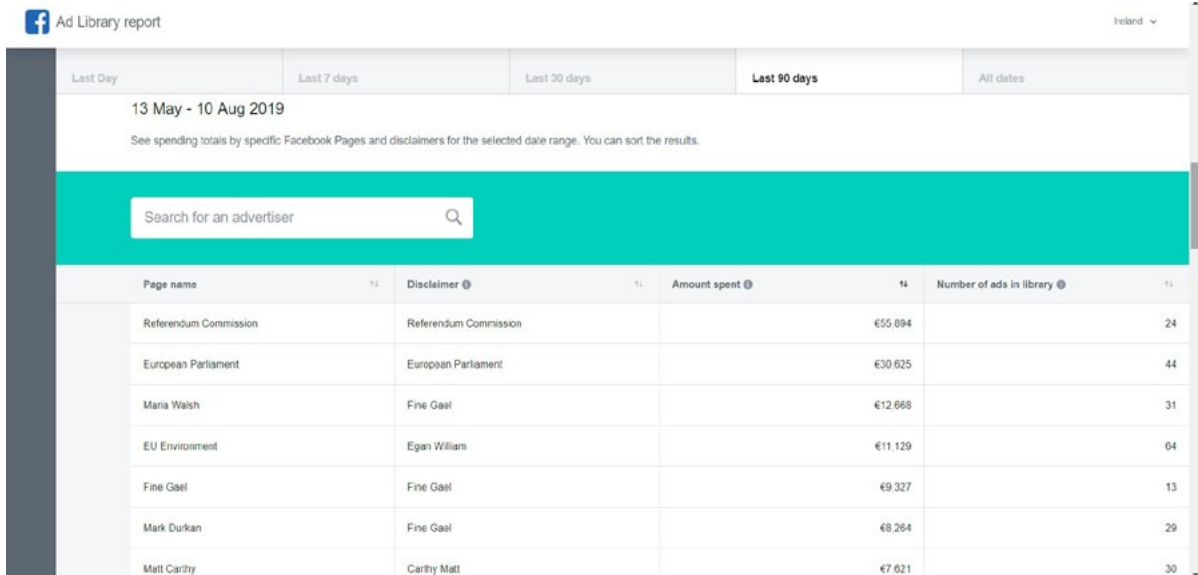Available at https://disinfo.quaidorsay.fr/en/facebook-ads-library-assessment

Figure 1. Facebook Ad Library Interface - adverts with all information

While Facebook's Ad Library stated that it contained all adverts, when a search was conducted, only adverts which were political and issue-based adverts were retrievable. Furthermore, without having access to the complete set of words used by all advertisers, a user cannot retrieve the full set of political adverts from the Facebook Ad Library API. Using Facebook's Ad Library API, this research adapted python scripts to collect a weekly record of Facebook's inactive adverts in the Ad Library. The API was used to extract as many data points as was available regarding the adverts including the page where it was posted, whether it carried a disclaimer, whether the sponsor information, spending and micro-targeting information was provided.

In mid-May Facebook added a report function: the Ad Library Report. The Facebook Ad Library Report could not be interrogated via an API. The Ad Library Report provided an additional layer of information, where certain pieces of information were aggregated and presented visually. It offered regionally filtered lists of all advertisers over different periods of time (one day, one week, one month, 90 days), the total number of adverts placed by an advertiser, and total spend by advertiser as well as a link to advertiser pages in the Ad Library with a list of all adverts placed by that advertiser. There was a new option (added after the Irish elections) that provided a CSV report with the following limited fields: Page ID, Page Name, Disclaimer, Amount Spent, and Number of Ads in Library.

Interrogating the Ad Library Report was a laborious process and was prone to errors, including failed page loading. Of course, direct comparison with the Ad Library extract (via the API) was not possible as there was no unique advert identifier provided.

Figure 2. Facebook Ad Report Interface

A review of Facebook's Ad Library Report compared to the information found via searching "Ireland" in the Ad Library indicated that there were more adverts presented in the Ad Library Report than in the Ad Library via search term Ireland. However, as noted, the Ad Library Report does not offer API access and while it does provide two CSV files for download, these contain aggregate information on advertisers rather than presenting information on each individual advert which is largely meaningless for election monitoring purposes. The collecting of advert information via the Ad Library Report was achieved by a writing a bespoke python script. The script initially opened the Ad Library Report page for Ireland and interrogated the listing of adverts presented over the past 90 days. The scrape script opened each advertiser link and then progressed through each advert on that page. Reaching the end of each advertiser page, the script returned to the Ad Library page for Ireland (showing total adverts for the past 90 days) and proceeded to the second advertiser on the page. The script continued to loop through all adverts this manner, until it was determined that the principal advertisers of interest were all fully interrogated (this was achieved by checking how many adverts were posted for each advertiser; where the number dropped to one – that is one-off advertising by individuals - was not included as it would have been computationally complex).

Google Transparency Report

On May 2nd 2019, Google released a Google Transparency Report , an online database, to show voters who purchased European Election adverts on Google and how much money was spent. This allowed access to a Google hosted online database of political adverts from verified accounts and provided CSV files of the advertising material which can be downloaded via the Ad Transparency Report. There are six different files that require reorganisation to understand the spend, targeting options, and number of adverts within each region. In this case, the Google data was collected after polling day to ensure that there was a full record of what it contained before May 24th 2019. However, not all the information is provided. CSV files downloaded in June contained more information than a copy of the csv file downloaded on May 25th 2019. While individual adverts were listed in one file, the total spend by advertiser was listed in another. Micro-targeting information on Europe was not contained in the CSV file provided. It is important to note that these approaches are structurally limited, as noted by Mozilla[22] in their recent analysis of the Facebook, Twitter and Google ad libraries APIs. Mozilla concluded that the access provided is more limited than is required for comprehensive transparency, and analysis.

Google introduced a two-step verification process for placing political advertising on its platforms. This verification process aimed to establish the validity of the organisation or person the advert concerns as well as the validity of the payer's information. Such information was to be made publicly available for all that featured "a political party, or a current elected officeholder or candidate for the EU Parliament"[23]. The Ad Transparency Report lists all the adverts distributed in a region by approved advertisers and was easily searchable in that regard. Google accounts that advertise are listed and labelled by region. Advert labelling was achieved by listing the adverts on a page labelled 'political advertising on Google' with a link to a page labelled as 'Political Advertising in the European Union'. However, when visiting an advertiser's page all content by that account was listed but the adverts were not immediately clear. Additionally, micro-targeting information was not provided on the advert's webpage, rather it is provided in a CSV file that can be downloaded by users.

The web page displayed all the amounts and details of the adverts, which could be filtered easily. However, it presented the data in six different files which was not conducive to the needs of election monitors and, at times, was incomplete. Table 1 below lists the files provided by Google and whether information for Ireland was listed. While Google's 'Creative Stats' file offered a lot of information about the adverts, the micro-targeting information was provided in a separate file. This meant that researchers had to cross reference adverts between different files to see if micro-targeting information or spending information was available. It also did not flag issue-based advertising and it did not provide spending per advert. Because of the lack of issue-based labelling and the absence of a comprehensive database of adverts, it was not possible to establish the extent to which Google was used to promote political issues during the election campaign. Further, while most of the required information was present, it was not presented in a format that was conductive for real-time monitoring. Google did not label issue-based adverts. In this regard, Google did not meet the necessary commitments of providing transparency regarding adverts on political issues.

Figure 3. Google Transparency Report Interface

[22] https://adtransparency.mozilla.org/eu/log/

[23] https://transparencyreport.google.com/political-ads/region/IT?creative_by_advertiser=region:IT;q:Salvini; start:1553040000000;end:1558310400000;spend:;impressions:;type:;sort:3&lu=creative_by_advertiser

CSV FILES	IRELAND PRESENT	NOTES
Advertiser Stats	Yes	3 entries, giving the aggregate spend for advertisers targeting Ireland.
Advertiser Weekly Spend	No	
Campaign Targeting	Yes	77 ads detailed targeting provided
Creative Stats	Yes	86 individual adverts with links, payer reach, time
Geo Spend	Yes	Total spend for the region since March 21, 2019
Top Keywords	No	

Table 1. Files Available from Google Ad Transparency Interface

Twitter Ad Transparency Centre

Twitter introduced a process of registration for political advertisers in Australia, the EU (for the European Parliament elections), India and the US that required anyone seeking to place an election campaign advert to provide documentation to demonstrate their legitimacy and to make the payer and beneficiary names publicly available. Initially, Twitter adverts appeared as posts on the website and carried a label stating that the advert was promoted and 'political' (see Figure 4). Regarding issue-based adverts, Twitter did not implement a registration process or require that labelling or payer identification be made available. As such, the extent to which political campaign issues were promoted on Twitter was unclear.

Twitter provided access to adverts via the Ad Transparency Centre and offered API access. It could be accessed using a web browser, no account required. Twitter stated it would only contain the promoted tweets of the previous seven days but at times adverts were still visible after seven days. The Ad Transparency Centre database was substantially problematic for election monitoring because it was not possible to see all of the adverts by political actors in Ireland. In order to find adverts, researchers had to develop a list of political actors that *could* advertise and check if each advertiser had placed an advert, as opposed to being able to find Irish political adverts through a single, simple search. As a result, there was no way for monitors to collect a comprehensive database of election adverts for analysis. In terms of individual political adverts, Twitter provided some information such as the name of the account promoting the advert, the payer and the aggregate amount of the advert-spend. By clicking through for additional details on individual adverts, it was possible to obtain information regarding the performance of the advert (see Figure 4).

Figure 4. Twitter's Ad Transparency Centre Interface

Twitter's Ad Transparency Centre was challenging to gather comprehensive data from. A python script was written to scrape the Twitter Transparency databases using each candidate's and political party's Twitter handle as a keyword search term. (See Appendix B). Advertisers are listed and users must search for a specific advertiser to get details on the adverts placed. It is not presented as a calendar of adverts over a set time or by region. In this case, it is necessary to scrape the details of adverts from a list of Twitter handles or keywords to establish which advertiser accounts have boosted posts in the past week. The Twitter handles of all political parties, party leaders and individual candidates in the European Elections with Twitter accounts were listed and searched. This approach constitutes a limitation to our capacity to verify if all adverts have been collected.

It should be noted that, because the facility to identify adverts operates via search term only, many adverts could not be identified, and the sample is possibly non-comprehensive (for the list of relevant Twitter handles, see Appendix A). Additionally, Twitter only facilitates access to adverts placed in the last seven days, rather than a whole month, and so data collection was required to take place at the same time once a week.

Data Collection

The collected data consisted of 1,554 political advertisements broken down as follows: Facebook's Ad Library (280); Facebook's Ad Library Report (1,091); Twitter's Ad Transparency Centre (88); and Google's Ad Transparency Report (95).

	EXTRACTION METHOD	TOTAL ADVERTS	ADVERTS CODED
Facebook Ad Library	API	399	280
Facebook Ad Library Report	Scrape (Python script)	1,091	1,091
Twitter Transparency Centre	Scrape (Python script)	88	88
Google Transparency Report	CSV file download	95	95

Table 2. Overview of data from each archive

Data Monitoring

The Institute for Future Media and Journalism tasked three coders to manually code the adverts. Coders were assigned to Twitter, Google and all three coded adverts from the Facebook Ad Library (280) and Facebook Ad Report (1,091). Each platform was manually assigned categories related to the presence or absence of details on the adverts extracted from databases via APIs, Python scripts and CSV downloads. These were comprised of:

- Disclaimers - a label on an advert that stated that it was political or issue-based.
- Payer - provision of the name of the individual or organisation that paid for an advert.
- Micro-targeting – provision of details of the age, gender, location demographics to whom an advert was distributed.
- Sponsored – a label on an advert that clearly signifies that the content is paid to be promoted.
- Spend - provision of details of how much a payer spent either in brackets or in aggregate.
- Currency – provision of details of the currency which an advert was paid in.
- Issue – a label on an advert that signifies that it might be issue-based.

Coders examined the spreadsheets extracted via the APIs, Python scripts and CSV downloads and compared individual records to what was available in the online databases. In this regard, some inconsistencies between what was extracted and what was available online emerged. For example on Facebook, coders noted occasions where individual adverts were labelled online as having run multiple times but only one advert was recorded in the extracted spreadsheets, these were recorded as one advert. However, ideally, details on each time an advert was run would be provided. There were also cases where the extracted spreadsheet did not provide the name of payer but this information was available when the online database was examined. As such, where the information was made available, either in the extracted databases or in the online libraries, coders recorded that the relevant labels or details were present. In addition, the three coders coded 20 adverts in common from Facebook's Ad Library achieving an intercoder reliability result of 100% agreement on all categories. The three coders coded 20 adverts in common from Facebook's Ad Library and achieved an intercoder reliability result of 100% on all categories.

ERGA identified nine research questions to assess the extent to which each platform disclosed relevant information about political advertising. Only six of these questions could be answered by using the political advertising archives provided by Facebook, Google and Twitter. To answer those six questions, adverts were monitored for the presence of the following information: (i) whether the advert was paid for; (ii) who paid for it; (iii) if it carried a disclaimer stating that it was a political or issue-based advert; (iv) information on micro-targeting options; and (v) spending information. Table 3 outlines the methodological approach to monitoring.

ERGA QUESTION	RELEVANT DATA PARAMETERS		
1. What is the degree of transparency of the political and issue-based advertising?	Disclaimer Present Y/N	Payer Name Y/N	
2. Is the platform adopting appropriate and efficient measures to enable users to understand why they have been targeted by a given advertisement?	Gender Y/N	Geographic Details Y/N	Age Y/N
3. Is the platform adopting appropriate and efficient measures to ensure that political ads are clearly distinguishable and are readily recognisable as paid-for communication or labelled as such?	Sponsored Y/N	Paid Ad Y/N	Disclaimer Y/N
4. Is the sponsor's identity publicly disclosed?	Disclosed Y/N	Sponsor name Y/N	
5. Are the amounts spent for the political ads publicly disclosed (at least in price ranges)?	Spend Y/N	Spend per advertiser Y/N	
6. What progress has been made on the commitment to publicly disclose "issue-based advertising"? Have platforms provided a definition of issue-based ads and complied with it?	Issue definition Y/N	Issue- based disclaimer? Y/N	Specific Issue label? Y/N

Table 3. Methodological Approach

FINDINGS

The following findings are presented in reference to the common set of research questions identified by ERGA. As noted, it was only possible to address six of the nine questions using the information provided in the political advertising archives.

RQ1. What is the degree of transparency of the political and issue-based advertising?

This question was addressed by identifying whether an advert carried a disclaimer stating that it was a political advert and whether it provided information about the entity that paid for the advert. Overall, we found that Facebook and Twitter provided disclaimers in the plurality of cases but Google did not. Facebook also made the payer clear in the plurality of cases as did Google.

We found several discrepancies between the information extracted from Facebooks Ad Library (API access) and the Ad Library Report (no API access). For example, at times there were more adverts listed for an advertiser than appeared in the Ad Library. For example, more adverts were listed for advertiser Andrew Doyle than appeared on his page. In one case, an advert from April 22nd 2019 to April 26th 2019 that ran without a sponsor name and disclaimer was not collected by either method. However, it appears on the Ad Library archive.

	DISCLAIMER PRESENT		PAYER NAME PRESENT		TOTAL ADS
	YES	NO	Yes	No	N
Facebook Ad Library	237	43	239	41	280
Facebook Ad Library Report	1,039	52	1,037	54	1,091
Twitter Ad Transparency Centre	88	0	88	0	88
Google Ad Transparency Report	0	95	95	0	95

Table 4. All Platform Payer and Disclaimer Labels
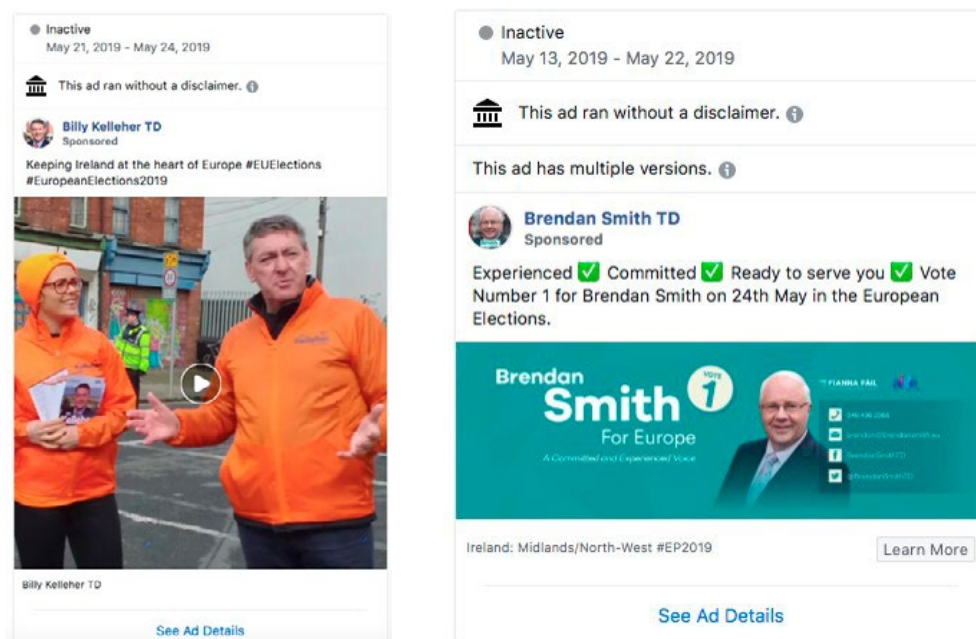
Figure 5. Ad without sponsor name or disclaimer

Google does not appear to place a label on adverts that signifies that it is political or issue based. While the adverts are hosted in an online database of 'political adverts', it is not labelled on the advert itself, as seen by users. Although the political party as the payer is clear. By comparison, both Twitter and Facebook present individual adverts with a disclaimer or label. Twitter provided disclaimers and information on payers on all adverts.

RQ2. Is the platform adopting appropriate and efficient measures to enable users to understand why they have been targeted by a given advertisement?

This question was addressed by identifying the number of adverts that carried labels for micro-targeting information. Three targeting categories were coded: geography, age, and gender. Overall, we found that micro-targeting information was available in all cases but that it was limited to geography, gender and age.

	GEOGRAPHIC DETAILS	GENDER	AGE	TOTAL ADVERTS
Facebook Ad Library	280	280	280	280
Facebook Ad Library Report	1,091	1,091	1,091	1,091
Twitter Ad Transparency Centre	88	88	88	88
Google Ad Transparency Report	95	95	95	95

Table 5. Overview of micro-targeting details (geographic location, gender and age)

In all adverts in the Facebook Ad Library, Facebook offered age, gender and geographic distributions. However, it was not clear whether these were the only options offered to political or issue-based advertisers. For example, in creating an advert on a Facebook page, it is possible to select age, gender and locations to micro-target but also to choose detailed targeting options where it is possible to type in a keyword such as "right-wing politics" or "environment" and match users who have liked the page to the selected interests.
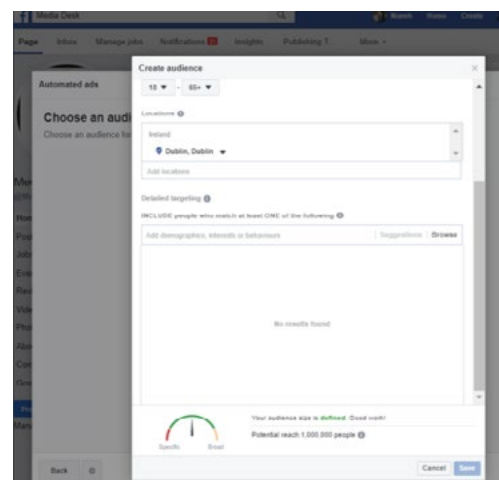
Figure 6. Facebook portal for selecting additional micro-targeting options

While Google did provide the micro-targeting information in a CSV file, it did not offer this information on the advert or on the advertiser's page. Nor does it provide the top keywords used for the region either on webpages or via a CSV file. Table 5 shows a good record, but it must be understood in the context of the challenges in accessing, filtering, organising and analysing it in the first instance. Additionally, a comparison between the CSV file and the adverts in the archive - using individual advert identifiers - identified four adverts online that were not included in the CSV file provided.

In all cases the age and gender data were provided on adverts, but in contrast, micro-targeting options provided were not clear. Google states that the location is Ireland but does not provide a 'by county' breakdown but this may not have been offered to advertisers as an option. Again, in this case, it is not clear what micro-targeting options were offered to political advertisers and if all options are disclosed. Moreover, Twitter defines this information as "the demographics of the audience the advertiser actually reached with this campaign", rather than the options selected.

RQ3. Is the platform adopting appropriate and efficient measures to ensure that political ads are clearly distinguishable and are readily recognisable as a paid-for communication or labelled as such?

This question was measured by establishing the number of adverts that carried (i) a label to say that it is an advert or sponsored (as opposed to a post , tweet or vlog for example); (ii) the name of the sponsor; and (iii) a disclaimer that states the advert is political or issue-based. We found that all platforms were good on labelling adverts as sponsored and the sponsor name was present in the plurality of adverts as was the disclaimer although it was not wholly consistent. Specifically, the sponsored label was present in 100 percent of adverts on the Facebook Ad Library, Facebook Ad Library Report, Twitter's Ad Transparency Centre and Google's Ad Transparency Report. The name was present in 85 percent of adverts in the sampled Facebook Ad Library, 95 percent of adverts on the Facebook Ad Library Report, 100 percent of adverts on Twitter's Ad Transparency Centre and 100 percent of adverts on Google's Ad Transparency Report. A disclaimer stating that an advert was political or issue-based was found in in 85 percent of adverts on the Facebook Ad Library, 95 percent of adverts in the Facebook Ad Library Report, 100 percent of adverts on Twitter's Ad Transparency Centre and 0 percent of adverts on Google's Ad Transparency Report.

|	LABELLED AS SPONSORED	SPONSOR NAME PRESENT	DISCLAIMER PRESENT	TOTAL ADVERTS
Facebook Ad Library	280	239	237	280
Facebook Ad Library Report	1,091	1,037	1,039	1,091
Twitter Ads Transparency Centre	88	88	88	88
Google Transparency Report	95	95	0	95

Table 6. Transparency across the archives

RQ4. Is the sponsor's identity publicly disclosed?

This question was answered by establishing the number of adverts that carry the name of the payer. We found that this was largely the case but that Facebook's record was more mixed than the other platforms. All adverts in Twitter's Ads Transparency Centre and Google's Transparency Report provided a named sponsor. However, Facebook's databases were not as consistent. In the data extracted from both the Ad Library and the Ad Library Report, the results were mixed. In most cases, where an advert carried a disclaimer, the payer's name was present. Often, when the disclaimer was absent so too was the payer name. When the data from the Ad Library extracted via the API was examined, we found 41 cases in which adverts were labelled only as 'sponsored' and the payer's name was not given. In the larger sample of adverts, extracted from the Ad Library Report, we found 54 adverts did not carry the sponsor name. Additionally, there was no evidence of these adverts being removed or of penalties imposed for the breach. In only one case was an advert found to be removed and it is not clear why.

In addition, we found four adverts in Google's online library that were not identified in the CSV file made available by Google for download. Three adverts in Facebook's data could not be found in the online library to validate labels.

	YES	NO
Facebook Ad Library	239	41
Facebook Ad Library Report	1,037	54
Google Transparency Report	95	0
Twitter Ads Transparency Centre	88	0

Table 7. Payers Identity across platforms
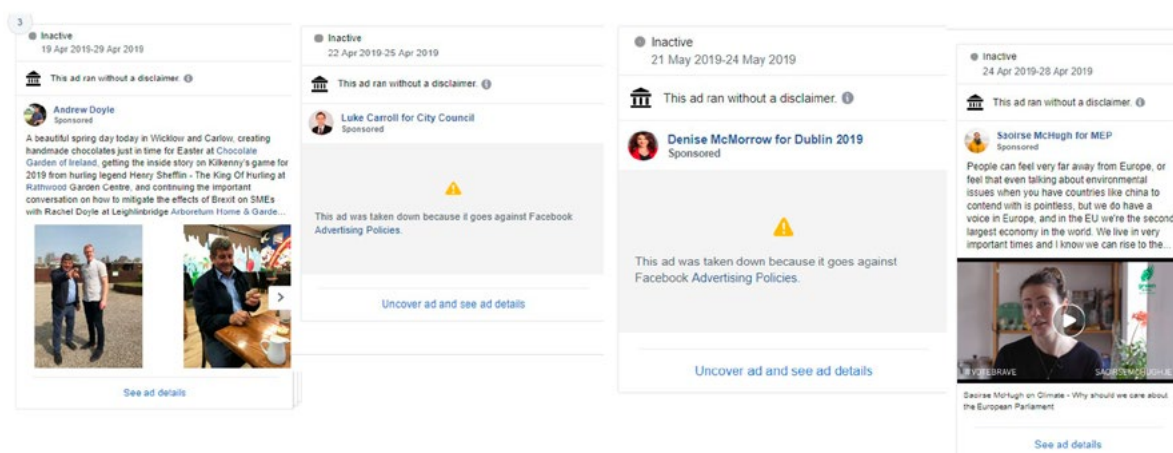
Figure 7. Facebook Ad Library: examples of adverts with missing labels

RQ5. Are the amounts spent for the political ads publicly disclosed (at least in price ranges)?

This question was answered by establishing the number of adverts that carried spending information. Overall, we found that all ads carried some spending information.

	YES	NO
Facebook Ad Library	280	0
Facebook Ad Library Report	1,091	0
Google Transparency Report	95	0
Twitter Ads Transparency Centre	88	0

Table 8. Provision of spending in brackets or aggregate provided by platforms?

	YES	NO
Facebook Ad Library	280	0
Facebook Ad Library Report	1,091	0
Google Transparency Report	0	0
Twitter Ads Transparency Centre	88	0

Table 9. Provision of details of the currency which an advert was paid in
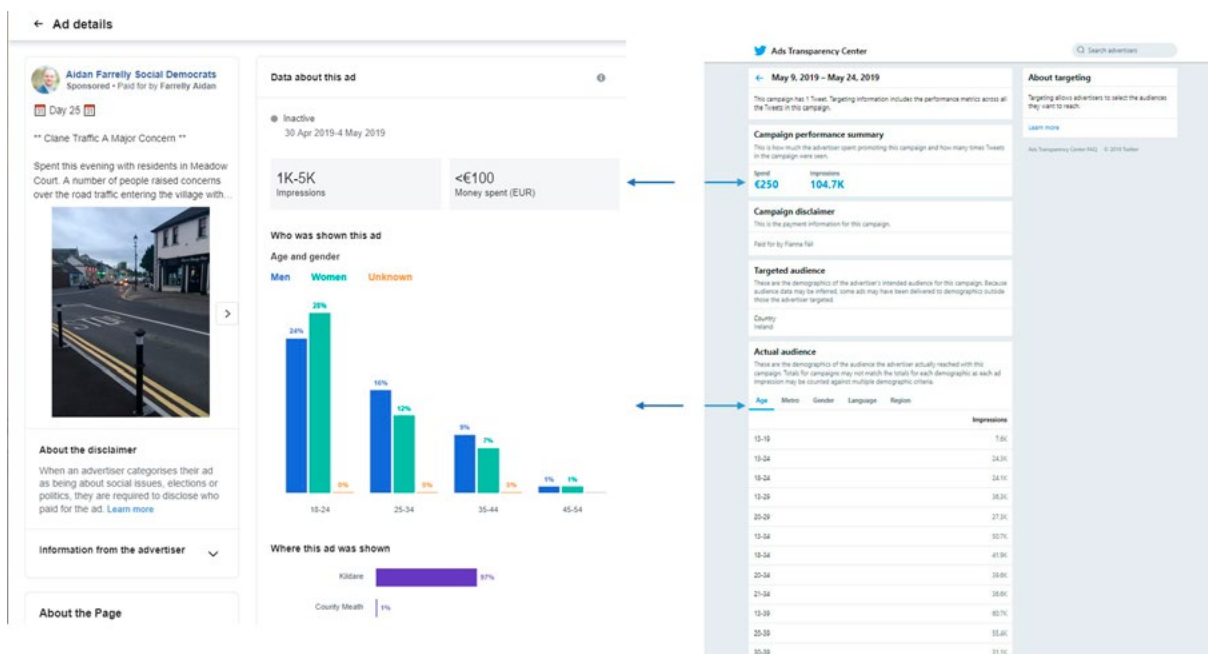
Figure 8. Facebook Ad Library presentation of demographic targeting

Facebook offered two ways of reporting spend. In the Facebook Ad Library, the individual adverts were listed with spend range brackets. These were large brackets, ranging, for example from €1-€99 to €100-€499. It was not clear if an advertiser spent €5 or €90, €101 or €498. Additionally, there were adverts in the database that were labelled as being paid for in American Dollars (8 adverts) and Sterling (2 adverts). This raises a question about how many advertisers are resident outside the state.

The Facebook Ad Library Report offered other spending information that could be downloaded as two CSV files. One file listed the advertiser, an aggregate value of how many adverts had been placed since the library went live in March, and the total an advertiser has spent. The second file listed the spend per county in Ireland. On Advertiser pages, Facebook offered weekly aggregates of spend, invariably grouped in some way. Spend per advert was not provided. Both Twitter and Google provided an amount for the total an advertiser spent and how many adverts were provided, but not the spend per advert.

RQ6. What progress has been made on the commitment to publicly disclose "issue-based advertising"? Have platforms provided a definition of issue-based ads and complied with it?

This question was answered by establishing the number of issue-based ads that could be identified, and whether there was a label for a specific issue. Overall, we found that only Facebook labelled any ads as an issue-based ad and we found examples of issue-based adverts that were not clearly labelled.

	LABELLED AS ISSUE	DISCLAIMER PRESENT	DISCLAIMER ABSENT	NO OF AD LABELLED	SPECIFIC ISSUE LABEL
Facebook Ad Library	Either/or	237	43	Unclear	0
Facebook Ad Library Report	Either/or	1,039	52	Unclear	0
Twitter Ads Transparency Centre	No	0	NA	0	0
Google Transparency Report	No	0	NA	0	0

Table 10. Issue based advertising across platforms

Below are two examples of adverts from the Facebook Ad Library that seem to fall into the area of issue-based advertising, but some were removed and others were not. In the absence of more details from the company it is not clear why these ads are presented as they are. Figure 9 presents a screenshot of a Focus Ireland advert that was taken down. The advert addresses the issue of homelessness. It is not clear which of Facebook's five issue topics this advert falls under or what exact policy violation caused it to be taken down. Figure 10 presents a screenshot of a Protect Life advert that references abortion and an advert from the religious group the Legion of Mary. These adverts were not removed. Again, it is not clear which Facebook issue these adverts might fall under. Such adverts reveal the lack of transparency regarding why some adverts that do not carry appropriate labels are removed while others are not.
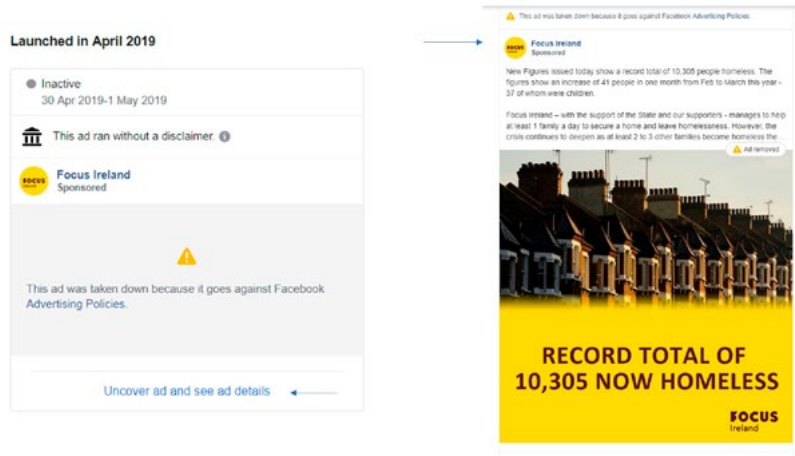
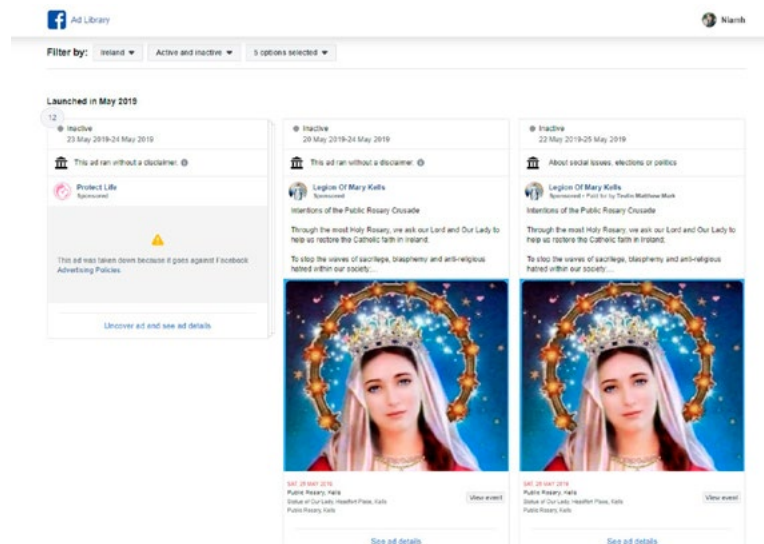**Figure 9. Focus Ireland Ad that was taken down**

Figure 10. Examples of issue-based advertising that references abortion and an advert from a religious group
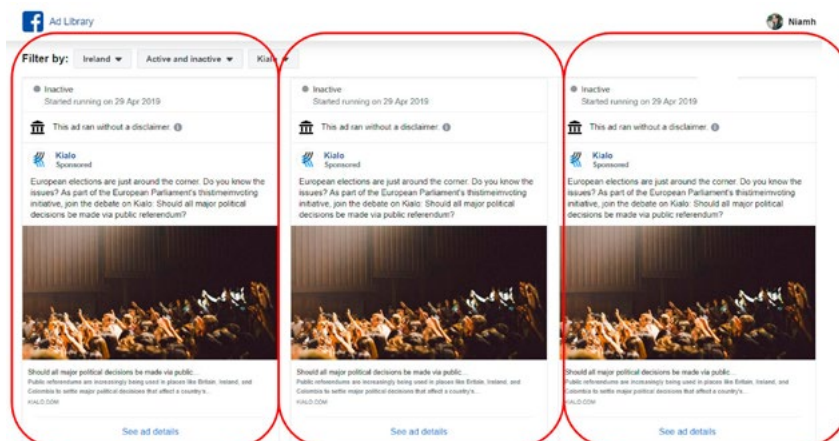

Figure 11. Example of Kialo Ad where disclaimer and payer name were absent

CONCLUSION

Conclusion

The databases interrogated for this study provided some information on political adverts, both individually and in aggregate. However, substantial issues emerged such as the ambiguities with regard to the full extent of all of the political adverts published during the time period and inconsistencies in identifying and labelling issue-based adverts. With regard to the nine research questions set out by ERGA, it is evident that the data gathered for this study yields negative or highly ambiguous answers for most of them.

Specifically, in relation to **RQ1**, 'what is the degree of transparency of the political and issue-based advertising?', we found Facebook provided the most transparent information with the majority of adverts clearly labelled with a disclaimer and payer information. However this information was not uniform across all of their adverts in the dataset. Twitter provided a disclaimer across all of their adverts but the gathering of payer information was not easily accessible. Google did not provide any individual disclaimer on their adverts, but payer information was present. This inconsistency across the three platforms resulted in a systematic lack of transparency and impeded a comprehensive understanding of online political and issue-based advertising.

We also found mixed results for **RQ2** on whether the platforms adopted appropriate and efficient measures to enable users to understand why they have been targeted by a given advert. The only targeting information made available was in relation to geography, age, and gender. It is not clear what other attitudinal or micro-targeting possibilities were available to advertisers. Thus, the targets of adverts can see the demographics that were exposed to adverts on their social media feeds (rather than an explanation as to why adverts appeared on their own timeline).

RQ3 asked whether the platforms adopted appropriate and efficient measures to ensure that political adverts are clearly distinguishable and are readily recognisable as a paid-for communication or labelled as such. Here, we looked at whether the sponsor's name was visible and whether the advert was marked as sponsored. In general, this did appear to be the case. However, Google did not supply a clear disclaimer on the image of an advert, but provided this information elsewhere. Twitter did not provide the name of the payee on the immediate image of the advert but required clicks to establish.

RQ4 asked whether the sponsor's identity was publicly disclosed. We found that this was largely the case but that Facebook's record was more mixed than the other platforms. All adverts in Twitter's Ad Transparency Centre and Google's Transparency Report provided a named sponsor. However, Facebook's databases were not as consistent.

RQ5 asked if the amount spent on political advertising was publicly disclosed (at least in price ranges). We found that almost all adverts carried some spending information but that it tended to be reported as a total over a period of time or in large brackets, rather than spend per advert.

RQ6 asked what progress has been made on the commitment to publicly disclose issue-based advertising. Overall, we found that only Facebook labelled any adverts as issue-based. However, they did not clearly distinguish them from political advertisements in their labelling. We also found examples of issue-based adverts that were not clearly labelled. We found evidence of adverts being taken down without clear reasoning while others continued to be circulated without any appropriate disclaimers. As such, that there is still much progress to be made in defining and regulating issue-based advertising in an effective manner.

To be able to answer this question properly, ERGA would benefit from a specific (written) explanation of the "registration/authorisation" procedure adopted by each platform to distinguish the political adverts, with reference not only to the electoral period but also to adverts that have been published before the electoral period and that could be still active during the campaign. This is a particularly important issue: since in some cases the procedures adopted by the Code's signatories to label the political adverts were adopted after the electoral campaigns in some EU Member States had already started, political advertisements had already been published on the platforms and could not be labelled as such. It is important, therefore, to understand how the platforms handled these cases to ensure the transparency of political adverts published before the adoption of the labelling procedure.

RQ7 questioned whether the definitions of political advertising and issue-based advertising adopted by the platforms is consistent with requirements set out in the legislation of the NRA's Member State. Here, we note that there is no statutory definition of political advertising in Ireland. Section 4 of the BAI's General Commercial Communications Code (GCCC)[24] outlines the commercial communications that are prohibited including 'commercial communications that are directed towards a political end...'. There is a general prohibition on political advertising on broadcast media and case law has evolved in relation to the types of material that is covered. The different definitional frameworks adopted by the platforms were not specific to Ireland and these only related to the 2019 European Elections. As case law on political advertising is not specific to an individual poll it would not be consistent with the approach adopted by the platforms.

The remaining questions - **RQ8** concerning the effectiveness of "registration/ authorisation" procedure for advertisers and **RQ9** concerning the user-friendliness of the archives and the provision of all the required information - are discussed below in reference to each archive. Facebook's Ad Library API was accessed via a standard HTTP GET request. However, authentication must be provided with all such requests. A key issue with the API is that the search parameters and endpoints are not well documented and so it is not always clear what responses will be received by the user. The Facebook Ad Library Report was not accessible via an API which is a serious limitation. Only the overall information of the advertisers is shown. In order to access the individual ads, scraping is required to open each advertiser, filter by status (active / inactive) and select the adverts type (all / political) and is thus and insufficient to answer all questions.

Twitter provided a Transparency Center, a web page that can be accessed using a web browser. It stated it contained the promoted tweets of the previous seven days and provided a label to signify the content was promoted in the format of 'Promoted (political)' but with a link to the information about the sponsor of the adverts, the number of impressions they received, or the amount paid. Google provided a Transparency Report, a reasonably transparent and accessible archive that could be filtered, information was provided in CSV format. While most of the information monitors needed was present, it was not presented in a format that was conductive to real-time monitoring.

It must be recognised that by signing up to the Code of Practice on Disinformation, and engaging with the European Commission and ERGA in relation to monitoring its implementation, the platforms are volunteering to support democratic participation, electoral transparency and external oversight of their activities in this regard. The transparency tools provided by the three companies examined in this study do provide useful information for individual users regarding the demographics that are seeing adverts on their social media feeds (rather than an explanation as to why adverts appeared on their own timeline) and most of the time users can see who paid for an advert.

The transparency of online political advertising is a significant concern because online platforms have become a key means of accessing news and information. The influence of online platforms in Ireland is detailed in the 2019 Reuters Digital News Report Ireland[25] It found that some 67 percent of people use digital media as their main source of news and 53 percent use social media as a main source of news.

Further, these databases have significant limitations with regard to transparency and user-friendliness. As noted above, the basic requirements of electoral monitoring are that monitors should be able to measure the scale and pervasiveness of advertising within a region, identify ***all of*** the adverts that are political, or issue based, identify the payees, the beneficiaries of adverts, and what micro-targeting options were selected by political advertisers. Critically, media monitors need to be confident in the data that they are using. This report finds that by using the transparency tools provided by Google, Facebook and Twitter, it is not possible to be wholly confident that the libraries capture and report all political and issue-based adverts, all of the payer information, and that all political adverts were appropriately labelled as such. While Google, Facebook and Twitter have made substantive efforts to support the integrity of elections by the provision of publicly available advertising libraries, much more is required to facilitate effective media monitoring of digital political advertising and campaigning.

[24] https://www.bai.ie/en/revised-bai-general-commercial-communications-code-comes-effect/

[25] Kirk, N. Culloty, E., Kearns, C. and Suiter, J. (2019), Digital News Report Ireland 2019. Institute for Future Media and Journalism and Broadcasting Authority of Ireland: Dublin. Available: https://fujomedia.eu/digital-news-report-ireland-2019/

ESSAYS

The Need for Better Access to Data about Social Media Adverts in Political Campaigning

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Since the US Presidential re-election of Barack Obama in 2012, social media platforms have become yet another forum where elections are fought. The strategies needed to use platforms like Facebook, Google, Twitter and others, are fairly straightforward. Candidates prepare messages as text, image, video or a combination, choose who they wish to see those messages by specifying demographic criteria like gender, age group, geographic location, and others, and then pay for their adverts to run.

This is just like conventional advertising for any product or service except for two major differences: firstly, the adverts are targeted at a very fine-grained level, almost to the individual, and secondly the adverts themselves can be refined and personalised by varying the message, the images, the colours used, even the accents used in spoken dialogue, all done automatically. Fine-grained targeting with personalised advertisements is a marketer's dream and politicians have now caught on to the potential this offers during election campaigns. The result is that elections and referenda now know the effectiveness of advertising on social media, because it can be highly personalised and targeted thus it is effective and worthwhile.

There is nothing actually wrong with the micro-targeting of personalised adverts except when it breaks rules. We now know that Cambridge Analytica helped target people on Facebook with personalised advertisements based on predicting personalities from online behaviour in both the 2016 US Presidential election and the 2016 EU referendum in the UK.

What was wrong in this instance was that the model used to predict personalities was based on data illegally gathered from user profiles of millions of users. That particular loophole has been addressed and in theory it should not happen again.

Recent progress in an AI technique known as generative adversarial networks (GANs) shows that we can now generate fake videos, or speech, to a quality that is almost indiscernible from the real thing. Fake videos - known as deepfakes - can impersonate a person's gestures, movements, voice and intonation and can have the subject saying anything the producer wants. The technology to do this is now publicly available for anyone with modest programming skills to use. Deepfake technology used in political election campaigns has not happened yet but it's just a matter of time, or perhaps it is already happening but we haven't discovered it yet.

Yet, just because it is possible to generate a fake video, that doesn't make it a bad thing. One could imagine multiple deepfake videos being generated to deliver multiple variations of a message, tweaked and tailored in personalised ways, just like multiple variations of conventional social media messages are generated. Equally one could imagine deepfake videos of political opponents being generated and used in negative social media campaigning. This is what makes monitoring social media spending in political elections so important, covering how many adverts, who is paying for them, what the adverts contain and who they are targeted at, at both the individual and aggregated levels.

Some social media companies have started to publicly declare advertising spend in political campaigns. Since March 2019 Facebook has a publicly accessible and searchable report on all active advertisements, who is placing them and how much they are spending on them. This report describes that service and similar offerings from Google and Twitter.

While this is welcome it does not go far enough because of the huge volume of adverts, both in number and in number of variations. For example, we know that as of June 2019 the "Trump Make America Great Again" Committee, one of US President Trump's re-election agencies, spent over $1M per week on Facebook alone with 129,740 different adverts, and that was before his re-election campaign was officially launched. In the UK, the Conservative Party launched 554 versions of the same advert

on Facebook welcoming Boris Johnson as the new Prime Minister in the week after his election. The sheer number of advert variations on Facebook alone is overwhelming and the present configuration of access to those adverts, updated weekly and in ways described earlier in this report, is inadequate in order to allow anyone to get to grips with it and monitor the whole advertising landscape in a meaningful way. Thus, it is left to investigative journalists or concerned citizens to monitor individual adverts by digging in and trawling through them.

Trying to monitor, for example, the 129,740 unique adverts Donald Trump's re-election campaign has used up to the end of June 2019 is thus impossible at the moment. The way to use the Facebook active adverts report is to query or download it to find individual advert material which might be offensive, and then report it. However, by the time we find such adverts they are up to a week out of date and we are searching through individual adverts. The scale of the advertising must be matched with an active access resource that is more frequently updated, possibly in real time, and allows access at aggregated as well as individual levels.

The case for real time updating is made by simply pointing at advertising using conventional media. When a political advert appears on radio or TV or on billboards or the sides of buses, we see and hear it in real time, so why not likewise with social media advertising?

The case for accessing aggregated advert data is more challenging but just as important. For more realistic monitoring of adverts in political campaigns we need to use data mining and pattern detection so that the monitoring isn't just about each individual advert to each individual viewer, which might or might not be offensive, but also addresses patterns of adverts across patterns of users. This way we have a better chance of detecting deepfake videos when they are used in negative social media campaigns or even worse, when they are used to impersonate political opponents.

The challenges here include issues to do with competitors and competition. Appropriate aggregation of advert data which preserves anonymisation and competitor advantage, can be worked out and agreed with the social media platform providers and the "sweet spot" between effective monitoring and keeping company data private, this can be found by agreement.

At present, we have a form of cold war between social media advertisers in political campaigning and those trying to monitor what is being advertised, but the advertisers have all the advantages, all the tools, and all the resources while tools the monitors have are useful for monitoring on only a minor scale.

Regulating Political Advertising in the Digital Era

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This essay is concerned with the regulation of political advertising online in order to ensure the integrity of elections. It asks what political and digital media entities will need to be considered and the questions that regulation will need to address. This report highlights the continued lack of clarity regarding the scale and nature of online political advertising. Recent elections and referenda have been undermined by the large-scale manipulation of the digital environment, where most voters now get their news and political information.

Given the examples of elections and referendums marred by questions of disinformation and manipulation, a range of digital media and advertising companies have committed to the Code of Practice on Disinformation. Each have submitted regular reports on efforts to address issues such as bots, transparency in funding digital campaigns, and the promotion of problematic content. This report and the wider work of ERGA as well as reports by Mozilla and the Office of the French Ambassador for Digital Affairs offer more clarity as to what specific information is required by election monitors to ensure they can appropriately investigate to uphold the public interest.

This report clearly shows the need for enhanced transparency from digital media companies. One of the core challenges of this, and related research, was that it was limited to analysing only the adverts the companies defined as political. It was not possible to systematically analyse a complete database of adverts to establish what may have been omitted and to understand why. This is a critical blind spot in the transparency efforts by digital media companies. While the political advertising archives help address some issues, they leave others unaddressed and point to new areas in need of further investigation.

The time has come to initiate more focused discussions about what this regulation should look like and to establish what information we should compel political organisations and social media companies to disclose. While some of the social media companies offer some information on political advertising, Irish national regulatory structures could address a wide range of issues. This and be achieved by requesting political parties, campaigners and donors to disclose detailed information on how they advertise online. Moreover, the evident challenges posed by the varying approaches to classifying political and issue-based advertising by just three social media companies underlines the need for a standardised approached across social media companies if election media monitoring is to be achievable.

Given the ease of creativity afforded by digital software, one of the first challenges that any national regulators will have to consider is what exactly constitutes political advertising online? In the analogue era, it was easier to define. For example, the Broadcasting Authority of Ireland (BAI) have clear guidelines[26] on what constitutes a political broadcast. But in the digital era paying for political advertising can take on many forms, such as paying companies or employing ad content specialists, to paying for editing an image or bots to liking a post on website like 'Fivrr'.

Facebook and Google between them own a substantial number of the top ten social networks in Ireland, but ads were placed on other platforms such as Spotify. And there are a range of other platforms where ads can be placed and more will no doubt emerge and many social networks have not agreed to the Code of Practice on Disinformation. This indicates another structural blind-spot. European-wide voluntary regulation would need to be supported by national measures compelling political organisations to be appropriately transparent.

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[26] https://www.bai.ie/en/media/sites/2/dlm_uploads/2018/09/Rule27_ElectionGuide_vFinal_English.pdf

The responsibility to uphold the integrity of elections and choose who gets to participate in political campaigns via these platforms lies with governments. But states arbitrating on what should be available in the digital public sphere is highly problematic. On one hand, such measures leave too much authority in the hands of the state with implications for democracy. And on the other, the slow instructional process of legislation and policy development makes is undesirable. However, a powerful arbiter is one that is independent of both state and private entity, that can mediate between the two while holding both to account and can act in the public interest.

Addressing social media and providing more information to ERGA

Neither Google nor Twitter labelled issue-based advertising at all over the election period, and their political advertising archives did not offer enough insight to ensure electoral integrity in this regard. Given that voting patterns can indicate the centralisation of certain issues, such as environmental issues or immigration, it is necessary for countries to establish who is buying advantage for their political messages. Issue-based adverts were most likely to run without a disclaimer and without the payer information on Facebook. This indicates that these types of adverts are the most vulnerable to coordinated manipulation. In the current format, it is not possible to establish if online advertising is being used to manipulate public perceptions of issues, or political parties and candidates that do or do not support such issues. This is precisely what we need to know.

We also found that Facebook, Google and Twitter tend to present some information in aggregated form or as a summary when what is required is more detail. For example, spending information tends to be reported as a total over a period, rather than spend per advert, which would facilitate a better understanding of increases and decreases in spends before and during elections. To meet the commitment to ensure electoral integrity requires improvement on the degree of transparency on a number of areas. All three platforms should provide information in such a way that allows election monitors to easily establish the volume of advertising over a defined period. This includes detailed information on the pages that adverts appear on, who funds them, and the issue-based adverts labelled with the specific issue of importance. Additionally, this information should be provided in a format that is easily analysed from a number of perspectives.

What we can do nationally to supplement EU codes?

While Facebook, Google and Twitter have made some efforts to enhance transparency regarding political advertising, Irish national regulators and political parties could do substantially more to codify and produce suitable information regarding their production, purchase and distribution of advertising online. In the case of the European elections in Ireland, this report found that often the sponsors of adverts were primarily political parties or candidates. However, there were many examples of names and entities paying for political adverts that had no apparent connection to the beneficiary. This poses a question for regulation to consider: who should be allowed to pay for advertising?

The production and services required to effectively produce high quality content for social media and the investment in services to enhance the reach of adverts across platforms can be substantive. Regulation needs to consider whether there should be a requirement for political organisations to disclose the spending on content production and distribution. There is an urgent need for the Standards in Public Office Commission to set clear guidelines regarding who may pay for advertising (party candidates, official accountants, communications managers or any party member?) and the disclosure of names and amounts spent on content creation and distribution.

The Irish national regulator, where possible, should require more detailed disclosure of a political party's or candidate's campaign spending including a list of all digital and analogue platforms: how much has been spent per advert; for how long was the advertising scheduled to run, and how much was spent on content creation; were micro-targeting options used to either target or exclude demographics; and how many official political party, local branch and candidate pages are on different social media platforms? By requiring more detailed information from political parties, regulation will also facilitate better identification and the ability to address national and international malicious actors.

Ireland is a small media market where it is challenging to sustain individual and independent monitoring initiatives. Considering this, the best approach may be through collaborative networks of interdisciplinary monitors, researchers, fact-checkers, investigators, and open-source intelligence (OSINT) groups with a public face that can engage in best practice for public interest communication.

Other markets - for example, in the UK, USA and across Europe - have a number of public interest institutions (such as NGO initiatives, independent fact-checking and verification organisations, media monitoring and research groups) already in operation. In the UK the Digital, Culture Media and Sports Committee's report into Disinformation and Fake News[27] was pivotal in securing further transparency from Facebook regarding political advertising during the Brexit Referendum in 2016. Such initiatives are regarded as vital public resources and essential part of the digital infrastructure required for democratic societies. However, recognising that this is a smaller media market, to tackle problems that arise in the information ecology, pooling expertise and skills in an independent project can be of benefit.

The desire and ability to evade the regulation or measures introduced by social media companies limits the effectiveness of such efforts. Where regulation presents a barrier, malicious actors develop ways to overcome them. Something that can respond to new problems in a meaningful way must be implemented. To address the fast evolution of evasion techniques, and to monitor the practices of malicious actors, a range of safety nets that uphold the quality of the information environment should be developed. *Ad hoc* volunteer efforts cannot achieve what is required to comprehensively address the range of problems that are developing in the digital environment.

In Ireland, there is a pressing need to develop a media monitor that can combine the skills and expertise needed to address these problems such as OSINT, fact-checking and verification source tracking, image and video manipulation expertise, emerging technologies such as blockchain. For too long now research and industry has recognised that regulation is needed, it is high time to start discussing what specifically this might look like and ensure that it, above all, works best for the public.

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27 https://www.parliament.uk/business/committees/committees-a-z/commons-select/digital-culture-media-and-sport-committee/inquiries/parliament-2017/fake-news-17-19/

APPENDICES

Appendices

Appendix A: Twitter Keywords

Fine Gael

Fianna Fáil

Sinn Féin

Labour Party

Solidarity–People Before Profit

Independents 4 Change

Green Party

Social Democrats

Aontú

Workers and Unemployed Action

Human Dignity Alliance

Renua

Workers' Party

Republican Sinn Féin

Kerry Independent Alliance

Communist Party of Ireland

Socialist Party

Socialist Workers Network

Direct Democracy Ireland

Éirígí

Fís Nua

Housing Rights and Reform Alliance

Identity Ireland

Irish Democratic Party

National Party

United People

Catholic Democrats

Irish Republican Socialist Party

Irish Socialist Network

Party for Animal Welfare

Saoradh

Christian Solidarity Party

Irish Freedom Party

Deirdre Clune MEP (Fine Gael)

Seán Kelly MEP (Fine Gael)

Andrew Doyle TD (Fine Gael)

Malcolm Byrne
(Fianna Fáil, Wexford county councillor)

Billy Kelleher TD (Fianna Fáil)

Liadh Ní Riadh MEP (Sinn Féin)

Shelia Nunan (Labour)

Mick Wallace TD (Independents4Change)

Grace O'Sullivan (Green Party senator)

Adrienne Wallace
(Solidarity/People Before Profit)

Jan Van de Ven (Direct Democracy Ireland)

Peter O'Loughlin (Identity Ireland)

Breda Gardner
(Independent Kilkenny county councillor)

Diarmuid O'Flynn (Independent, anti-bailout campaigner)

Liam Minehan (Independent, farmer)

Theresa Heaney (Independent, homemaker)

Colleen Worthington (Independent, homemaker)

Mairead McGuinness MEP (Fine Gael)

Maria Walsh (Fine Gael, former Rose of Tralee)

Brendan Smith TD (Fianna Fáil)

Anne Rabbitte TD (Fianna Fáil)

Matt Carthy MEP (Sinn Féin)

Dominic Hannigan (Labour)

Saoirse McHugh (Green Party)

Cyril Brennan (Solidarity/People Before Profit)

Michael O'Dowd (Renua)

Patrick Greene (Direct Democracy Ireland)

Luke 'Ming' Flanagen MEP (Independent)

Peter Casey
(Independent, former presidential candidate)

Dilip Mahapatra (Independent, doctor)

Dr. Fidelma Healy Eames
(Independent, former Fine Gael senator)

Olive O'Connor (Independent, health advocate)

Hermann Kelly (Independent, founder Irexit Freedom to Prosper)

Gemma O'Doherty (Independent, campaigner)

Ben Gilroy (Independent, anti-eviction activist)

Aisling McNiffe (Independent, carer)

Frances Fitzgerald TD (Fine Gael)

Mark Durkan (Fine Gael, former SDLP leader)

Barry Andrews (Fianna Fáil)

Lynn Boylan MEP (Sinn Féin)

Alex White (Labour)

Clare Daly TD (Independents4Change)

Ciarán Cuffe (Green Party, Dublin City councillor

Gary Gannon
(Social Democrats, Dublin City councillor)

Eílis Ryan
(The Worker's Party, Dublin City councillor)

Gillian Brien
(Solidarity/People Before Profit)

Rita Harrold
(Solidarity/People Before Profit)

Alice Mary Higgins
(Independent, current Senator)

Appendix B: Advertiser details provided by companies and the respective questions they can address

Facebook

Facebooks Ad Library data can be interrogated using their API, which offers some information (From Facebook) and can be enhanced with a human coder (From Coder). This can be collected every week. The data are available from the pilot interrogation plus a check from a human coder to address the categories that are not provided by the social media companies.

From Facebook	From Coder	EGRA Q	Reference
	ID		Document ID
	Election	Q6	This records the election that the adverts, aiming to record three elections, Local, European, Referendum, however where an advert is for an issue, it is marked as 'issue' or Party adverts in general 'party'.
	Candidate		This records the name of the candidate who is being advertised
Page		Q1	This records the page that the advert is placed on, it can be an individual councillor or MEP's page, or a party page.
	Location of Payer		Where is the location of the payer, this is established whereby an Irish political party is paying it is marked as based in Ireland. However, where payment is in foreign currencies, there is a need to source trace the advertiser to establish this location. In the case of Ireland this is fractional so far but necessary to record.
Payer		Q4	This records the name of the person who paid for the advert as labelled, where a person is not identified. Facebook will record it as 'Sponsored.'
	Party		This is to record the name of the party the candidate is a member of, or 'independent' if not part of a party.
	Link		A copy of the link to the advert on the library.
	Topic Issue		If there is an issue central to the advert record, it is recorded here. Topics Issues include Housing, Environment, Migration, Messages that are a call to vote for the candidate are recorded as 'elect', advertisements for events are coded as 'events.'
Spend		Q5	Records the price range in the brackets that adverts are labelled - any boxes in red and UK Sterling and any in orange are US Dollars.
Impressions			Records the impression range in the brackets that adverts are labelled with.
Disclaimer		Q1.Q2	This records whether the ad ran with a disclaimer that it is a political or issue-based advert.
Start		Q1.Q2	This is the date that adverts started running.
End		Q1.Q2	This is the date the advert ended running.
Micro Location		Q2	This records the locations where the adverts are labelled as having been distributed.
Micro Gender		Q2	This records the gender of users that the adverts are labelled as having been distributed to.
Micro age		Q2	This records age limits that the adverts are labelled as having been distributed. These are recorded as the age groups under a certain mark, -35, -44,
Instagram			This records whether the adverts were on Instagram.

Multiple Versions			Facebook facilitates advertiser to run multiple version of the same advert, maybe with slightly different text. This records whether the adverts are a one-off or part of multiple ads as well as what version of the ad it is.
Removed			This records whether the advert was removed from Facebook
		Q1	Answered through a combination of Qs 2,4,5,6
		Q3	Suggest the use of Crowdtangle
		Q7	Qualitative interviews
		Q8	Qualitative interviews
		Q9	Qualitative interviews

Twitter

Twitter Ads Transparency Center data can be scraped using a list of the respective twitter handles that boost posts, this can be collected on a weekly basis. The data available from the pilot scrape plus a check from a human coder to address the categories that are not provided by the social media companies.

From Twitter	From Coder	EGRA Q	Reference
	Doc ID		Document Id for records
	Election	Q6	This records the election that the adverts address, aiming to record three elections, Local, European, Referendum. There should be no issue-based adverts, but in the event, where an advert is for an issue it is marked as 'issue' or Party adverts in general 'party.'
Username		Q1	This records the page that the advert is placed on, it can be an individual councillor or MEP's page, or a party page
Tweet		Q2	This records the content of the Tweet
Retweets		Q2	This records the number of Retweets
Likes		Q2	This records the number of likes
Start date		Q1	This is the date that adverts started running
Credit card holders name		Q4	This records the full name provided by the payer (it should be the same name as on the credit card)
Total spend		Q5	This records the amount spent on the advert/post-boost.
Link URL			
	Topic Issue	Q1	If there is an issue central to the advert record, it is recorded here. Twitters issues current are "abortion, civil rights, climate change, guns, healthcare, immigration, national security, social security, taxes, and trade."
	Location of Payer	Q1	Where is the location of the payer, this is established whereby an Irish political party is paying it is marked as based in Ireland. However, where payment is in foreign currencies, there is a need to source trace the advertiser to establish this location. In the case of Ireland this is fractional so far but necessary to record.
	Candidate	Q1	This records the name of the candidate who is being advertised
	Party	Q1	This is to record the name of the party the candidate is a member of or 'independent' if not part of a party.

		Q3	Suggest the use of data from other monitors
		Q7	Qualitative interviews
		Q8	Qualitative interviews
		Q9	Qualitative interviews

Google

The Google Transparency Report offers six CSV files with a series of data points that can be used to answer some of ERGA's questions. Detailed in the respective column.

From Google	From Coder	EGRA Q	Reference
google-political-ads-creative-stats.csv		Q1.Q2.Q5,	This file contains the information for political ads that have appeared on Google Ads Services.
Fields:			
Ad_ID			Unique id for a specific political ad.
Ad_URL			URL to view the political ad in the political Advertising on Google
Ad_Type			The type of the ad. Can be TEXT, VIDEO or IMAG
Regions			The regions that this ad is certified for or was served in.
Advertiser_ID	Q1.Q2		ID of the advertiser who purchased the ad.
Advertiser_Nam.	Q1.Q2		Name of advertiser
Date_Range_Start			First day a political ad ran and had an impression.
Date_Range_End			Most recent day a political ad ran and had an impression.
Num_of_Days			Total number of days a political ad ran and had an impression.
Ad_Campaigns_List			IDs of all political ad campaigns that included the ad.
Impressions			Number of impressions for the political ad. Impressions are grouped into several buckets: ≤ 10k, 10k–100k, 100k–1M, 1M–10M, > 10M.
Spend_USD	Q5		[DEPRECATED] This field is deprecated in favour of specifying the lower and higher spend bucket bounds in separate Spend_Range_Min and Spend_Range_Max columns.
Spend_Range_Min_USD	Q5		The lower bound of the amount in USD spent by the advertiser
Spend_Range_Max_USD	Q5		Upper bound of the amount in USD spent by the advertiser
Spend_Range_Min_EUR	Q5		Lower bound of the amount in EUR spent by the advertiser
Spend_Range_Max_EUR	Q5		Upper bound of the amount in EUR spent by the advertiser
Spend_Range_Min_GBP	Q5		Lower bound of the amount in GBP spent by the advertiser
Spend_Range_Max_GBP	Q5		Upper bound of the amount in GBP spent by the advertiser

Google-political-ads-advertiser-stats.csv	Q1. Q2. Q5. Q4. Q6	This file contains information about advertisers who have run a political ad on Google Ads Services with at least one impression.
Fields:		
Advertiser_ID	Q1.Q2. Q4	Unique ID for an advertiser certified to run political ads on Google Ads Services.
Advertiser_Name	Q1.Q2	Name of advertiser.
Public_IDs_List		List of public IDs used to identify the advertiser, if available.
Regions		The list of regions where the ads of this advertiser were served
Elections	Q6	The list of elections that this advertiser participated in based on the regions
Total_Creative		Total number of political ads the advertiser ran with at least
Spend_USD	Q5	Total amount in USD spent on political ads by the advertiser.
Spend_EUR	Q5	Total amount in EUR spent on political ads by the advertiser.
Spend_INR -	Q5	Total amount in INR spent on political ads by the advertiser.
Spend_BGN	Q5	Total amount in BGN spent on political ads by the advertiser.
Spend_HRK	Q5	Total amount in HRK spent on political ads by the advertiser.
Spend_CZK -	Q5	Total amount in INR spent on political ads by the advertiser.
Spend_DKK	Q5	Total amount in CZK spent on political ads by the advertiser.
Spend_HUF	Q5	Total amount in HUF spent on political ads by the advertiser.
Spend_PLN	Q5	Total amount in PLN spent on political ads by the advertiser.
Spend_RON	Q5	Total amount in RON spent on political ads by the advertiser.
Spend_SEK	Q5	Total amount in SEK spent on political ads by the advertiser.
Spend_GBP	Q5	Total amount in GBP spent on political ads by the advertiser.
Google-political-ads-advertiser-weekly-spend.csv	Q1.Q2. Q5.Q6	**This file contains the information for how much an advertiser spent on political ads during a given week.**
Fields:		
Advertiser_ID -	Q1.Q2. Q4	Unique ID for an advertiser certified to run political ads on Google Ads Services.
Advertiser_Name -	Q1.Q2	Name of advertiser.
Election_Cycle	Q6	[DEPRECATED] This field is deprecated in favour of the Elections column in google-political-ads-advertiser-stats.csv. It will be deleted sometime after July 2019.
Week_Start_Date		The start date for the week where spending occurred.
Spend_USD -	Q5	The amount in USD spent on political ads during the given week by the advertiser.

Spend_EUR		Q5	The amount in EUR spent on political ads during the given week by
Spend_GBP		Q5	The amount in GBP spent on political ads during the given week by the advertiser.
Google-political-ads-campaign-targeting.csv		Q1.Q2.Q4	This file contains the information related to ad campaigns run by advertisers.
Fields:			
Campaign_ID		Q1.Q2.Q4	Unique ID for a political ad campaign.
Age_Targeting			Age ranges included in the campaign's targeting.
Gender_Targeting		Q2	Genders included in the campaign's targeting.
Geo_Targeting_Included			Geographic locations included in the campaign's targeting.
Geo_Targeting_Excluded			Geographic locations excluded from the campaign's targeting.
Start_Date			Start date for the campaign.
End_Date			End date for the campaign.
Ads_List			List of Ad_IDs for the campaign.
Advertiser_ID		Q1.Q2.Q4	ID of the advertiser who purchased the ad.
Advertiser_Name		Q1.Q2.	Name of advertiser.
google-political-ads-geo-spend.csv		**Q5**	This file contains the information for how much is spent buying political ads on Google Ads Services. The data is aggregated by Congressional district.
Fields:			
Country			The country where political ads were served, specified in the ISO 3166-1 alpha-2 standard code. For example "US" for the United States.
Country_Subdivision_Primary			The primary subdivision of the country where political ads were served, specified by the ISO 3166-2 standard code. For example: "US-CA" for California state in United States.
Country_Subdivision_Secondary - The name of the secondary subdivision.			The name of the secondary subdivision. The name of a US congressional district.
Spend_USD		Q5	Total amount in Currency spent on political ads in this region.
Spend_EUR		Q5	Total amount in Currency spent on political ads in this region.
Spend_INR		Q5	Total amount in Currency spent on political ads in this region.
Spend_BGN		Q5	Total amount in Currency spent on political ads in this region.
Spend_HRK		Q5	Total amount in Currency spent on political ads in this region.
Spend_CZK		Q5	Total amount in Currency spent on political ads in this region.
Spend_DKK		Q5	Total amount in Currency spent on political ads in this region.

Spend_HUF	Q5	Total amount in Currency spent on political ads in this region.
Spend_PLN	Q5	Total amount in Currency spent on political ads in this region.
Spend_RON	Q5	Total amount in Currency spent on political ads in this region.
Spend_SEK	Q5	Total amount in Currency spent on political ads in this region.
Spend_GBP	Q5	Total amount in Currency spent on political ads in this region.
google-political-ads-top-keywords-history.csv	**Q2**	This file contains the information for the top six keywords on which political advertisers have spent money during an election cycle. This data is only provided for US elections.
Fields:		
Election_Cycle -	Q2	[DEPRECATED] This field is deprecated in favor of the Region and Elections field. It will be deleted some time after July 2019.
Region -	Q2	The region where advertisers used these keywords.
Elections	Q2	The elections during which these keywords were used.
Report_Date	Q2	The start date for the week where the spending was reported.
Keyword_1	Q2	Keyword with the most spend by advertisers for political ads
Spend_USD_1	Q2	Total spend in USD for Keyword_1.
Keyword_2	Q2	Keyword with the next most spend by advertisers for political ads
Spend_USD_2	Q2	Total spend in USD for Keyword_2.
Keyword_3	Q2	Keyword with the next most spend by advertisers for political ads
Spend_USD_3 -	Q2	Total spend in USD for Keyword_3.
Keyword_4	Q2	Keyword with the next most spend by advertisers for political ads
Spend_USD_4	Q2	Total spend in USD for Keyword_4.
Keyword_5	Q2	Keyword with the next most spend by advertisers for political ads
Spend_USD_	Q2	Total spend in USD for Keyword_5.
Keyword_6	Q2	Keyword with the next most spend by advertisers for political ads
Spend_USD_6 -	Q2	Total spend in USD for Keyword_6.