

POLICY PAPER

Ready or Not

HOW PREPARED ARE ADVERTISING LIBRARIES FOR THE DSA?

The Digital Service Act (DSA) requires all VLOPs and VLOSEs to provide a public access point where users can retrieve information about online advertising published in the previous year. Some platforms already host a searchable database available to the public, researchers, and journalists. To identify best practices and implementation gaps, the status quo of existing ad libraries was analyzed.

Ad libraries are important to increase safety and transparency for social media users because they enable public scrutiny and accountability by providing comprehensive information on advertisements, including their content, target audience, and funding sources.

Legal Background

The Digital Service Act (DSA)¹ requires very large online platforms (VLOPs) and very large online search engines (VLOSEs) to provide public access to an advertising library. This enables the monitoring and investigation of emerging threats associated with the proliferation of online advertising. This policy paper aims to assess the extent to which existing ad libraries align with the requirements of the DSA and identifies areas where gaps remain.

The DSA mandates that the following information be made available in the ad library:

- **Content:** Including the name of the product, service or brand
- **Advertiser:** The advertiser and the natural or legal person who paid for the advertisement, if different from the advertiser
- **Runtime:** The period during which the ad was displayed
- **Target metrics:** Whether one or more specific groups of recipients were targeted and, if so, the main targeting parameters used to include or exclude specific audiences
- **Recipients reached:** The total number of recipients reached, broken down by Member State for the target group(s)
- **Commercial communications:** Influencer and branded content must also be visible in the ad library

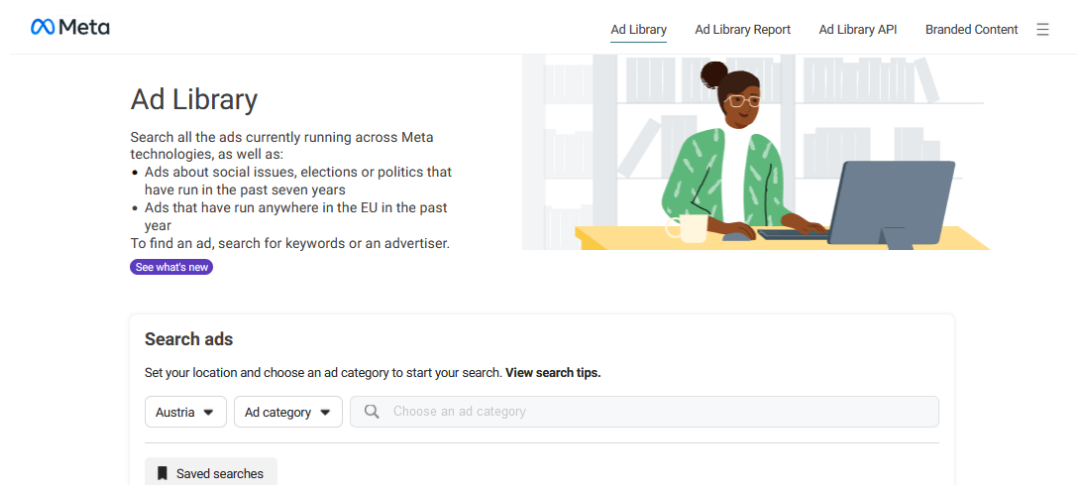


Figure 1: Screenshot of the Meta Ad Library. Users can limit the search on the country in which the ad is displayed, the ad category, and a specific search term. Screenshot 25.06.2024.

A Closer look at the Meta Ads Library

In 2019, Meta launched the Ads Library as a free research tool. It can currently be used to research Instagram and Facebook ads via a web repository or an API. A separate database, with significantly less information, displays branded content as required by the DSA.

The Meta Ads Library promises to enhance transparency and accountability for users by providing comprehensive access to detailed information about all advertisements running across Meta's platforms. This includes information about the content, targeting parameters, and funding sources associated with each advertisement.

The Meta web repository is open to the public. However, access to the API is restricted to Facebook users who have successfully created a developer account and been approved by Meta. Additional identity and location verification is required to analyse political advertising data. To gain a better understanding of the existing ad libraries, an analysis was conducted of the search options within the Meta Ads Library and the provided metrics.

Ad Search

Meta allows for a combined search including the following parameters:

- **Location:** Where is the ad displayed?
- **Ad category:** Countries outside the EU distinguish between „All Ads“ and „Issues, Elections or Politics“. Within the EU, ads are also categorised as „Property“, „Jobs“ and „Loans“.
- **Search box:** It is possible to search for advertisers or keywords that appear in the ad text, image or video transcript. After entering the first few letters of an advertiser's name, one can choose from a list of suggestions.
- **Saved searches:** Previous searches can be saved and re-run with just a few clicks.

Search Results

The search results can be filtered and show a variety of information on the individual ads. The information provided on the individual ad includes the library ID, activity status, runtime, platforms, whether the ad has multiple versions, and the content including media type of the advertisement (text, image, video, link). Additionally, filter options are available. Users can filter according to language, advertiser, platform (Facebook, Instagram, Audience Network, Messenger), media type (image, video, etc.), activity status, and impressions by date.

Further ad details are also provided, in accordance with the DSA, including:

- **European Union transparency criteria:** EU ad audience (targeted groups based on country, region, city, gender, age), EU ad delivery (total reach and reach by the audience metrics. This metric is an estimate and describes the number of accounts that have seen the ad at least once).
- **About the advertiser:** Links to the advertiser's Facebook and/or Instagram account (including followers) and displays the self-description in the „more info“ section.
- **Beneficiary and payer**
- **Other metrics:** If the ad is classified as „issues, elections or politics“ additional information is required including information about the advertiser (phone number, email address, website, address), funding (amount spent on the individual ad, as well as the amount spent last week, and the total amount spent), estimated impressions (total impressions and impressions by location, gender, age).
- **Reason for removal:** For ads removed due to violations, the reasons for removal are displayed.

A Comparative Analysis

How do different ad libraries perform in comparison? An analysis of web repositories according to DSA criteria shows that the implementation of ad libraries is currently very uneven.

Ad libraries often fall short on transparency by failing to provide complete, easily accessible, and understandable information about the specific targeting criteria and funding sources behind each advertisement.

As it is the task of the European Commission to supervise VLOPs and VLOSEs, the responsible general directorate should investigate and enforce these new DSA obligations.

Meta laid the Groundwork

Meta offers a comprehensive insight into the advertisements published on Facebook and Instagram. However, there are still limitations and opportunities for improvement. Researchers and journalists rely on the API for in-depth and semi-automated analysis. Therefore, the most crucial action is to remove the access restrictions to the Meta-Ads-API.

A test conducted by the Mozilla Foundation has demonstrated that search results are not always in alignment with the advertisements that are actually visible in the feed.² Our research revealed instances where ads were listed as inactive or offline in the Ad Library, despite being visible while scrolling through Instagram. It is evident that adjustments are necessary, particularly in light of the DSA requirement that the minimum required ads information be shown in real time. In addition to advertising by political parties or election advertising, the definition of political advertising also encompasses „social issues.“ A more in-depth analysis could be achieved with a more narrow and precise definition of political advertising.

It is essential to implement an effective navigation system within the web repository. One potential solution is to provide filtering options, which would enable users to more efficiently search and sort through the repository's vast amount of data. Additionally, a sorting option based on reach could further enhance the repository's usability.

	Public access	Content	Ad Entities	Runtime	Target metrics	Reached recipients	User interface Functionality
AliExpress	●	●	●	●	●	●	●
App Store	●	●	●	●	●	●	●
Bing (Microsoft)	●	●	●	●	●	●	●
Booking.com	●	●	●	●	●	●	●
Google (Google Search, Google Play, Google Maps, Google Shopping, Youtube)	●	●	●	●	●	●	●
LinkedIn	●	●	●	●	●	●	●
Meta (Facebook, Instagram)	●	●	●	●	●	●	●
Pinterest	●	●	●	●	●	●	●
Snapchat	●	●	●	●	●	●	●
Tiktok	●	●	●	●	●	●	●
X	●	●	●	●	●	●	●
Zalando	●	●	●	●	●	●	●

Figure II: Ad libraries in comparison and which features have been implemented; yellow: minimal implementation, red: central functions/information missing, green: good practice implementation.

To improve usability and transparency, ad libraries should undergo significant improvements in their user interfaces, search functionality, and clarity on ad performance metrics.

In order to achieve this, the EC – as foreseen in in Art 39 (3) DSA – issue guidelines on the structure, organisation and functionalities of the repositories, such as recommendations for better explanations and definitions of figures, enhanced search capabilities, and greater transparency on targeting metrics and advertiser identities.

Bad Practice: Amazon Store, X & AliExpress

Given the absence of a web-based ad library, the Amazon Store was not subjected to analysis in this section. Amazon provides an API that requires an Amazon Developer Account, thereby limiting public access.

Similarly, the ad repository on social media platform X (formerly known as Twitter) is also limited. The results are only available in a CSV format, with one CSV file per advertiser. This format is not conducive to rapid analysis, often hindering detailed analysis and research. Journalists and researchers can only access the data via the paid API, with prices starting at \$ 42.000 for enterprise use.

AliExpress can be criticized mainly for the presentation of results and the lack of detail in the results. The interface is not user-friendly. For example, only by hovering can one can see information about the recipients reached. There is no detailed information about the content of the ad, the person who paid for it, or the target audience.

Major Gaps & Areas For Improvement

The areas with the greatest need for improvement across all analyzed libraries are the user interface, search functionality, and information on ad performance. While most advertising libraries provide information on reach or impressions, some even providing a breakdown of these metrics by EU country, these metrics are not easily accessible, neither do they offer understandable explanations. The lack of definitions of the figures also leads to a lack of comparability between platforms.

In order to comply with the objective of ensuring a safe, predictable, and trusted online environment for users, it is recommended that tooltips or links be provided in close proximity to the relevant information, thus eliminating the need for users to search for definitions. This approach should be applied to all key indicators. Furthermore, the search functionality should enable users to search for both keywords and advertisers, and should allow for the filtering and sorting of results.

It is also worth noting that some ad libraries do not display targeting metrics at all. Furthermore, it is not uncommon for ad libraries to only indicate that an ad has been targeted, for instance, by age, but not by which age. Additionally, there is a dearth of transparency regarding the entities that comprise ads on certain platforms: In many cases, the identity of the advertiser is not disclosed at all.

List of Ad Libraries

- AliExpress: <https://www.aliexpress.com/p/ad-search-page/index.html>
- Amazon Store API: <https://advertising.amazon.com/API/docs/en-us/guides/ad-library/get-started>
- App Store: <https://adrepository.apple.com/>
- Booking.com: <https://www.booking.com/ad-repository.de.html>
- Google: <https://adstransparency.google.com>
- LinkedIn: <https://www.linkedin.com/ad-library>
- Meta: <https://www.facebook.com/ads/library/>
- Microsoft: <https://adlibrary.ads.microsoft.com/>
- Pinterest: <https://ads.pinterest.com/ads-repository/>
- Snapchat: <https://adsgallery.snap.com/>
- TikTok: <https://library.tiktok.com/ads/>
- X: <https://ads.twitter.com/ads-repository>
- Zalando: <https://www.zalando.be/ads-repository/>

References

- [1] Regulation - 2022/2065 - EN - DSA - EUR-Lex' <https://eur-lex.europa.eu/eli/reg/2022/2065/oj> [accessed 11 June 2024].
- [2] Full Disclosure: Stress Testing Tech Platforms' Ad Repositories', Mozilla Foundation <https://foundation.mozilla.org/en/research/library/full-disclosure-stress-testing-tech-platforms-ad-repositories/> [accessed 11 June 2024].

This Project has been funded by the Austrian security research programme KIRAS of the Federal Ministry of Finance (BMF).

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Finanzen

 **Bundesministerium**
Arbeit, Soziales, Gesundheit
und Konsumentenschutz



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