

Case ID: 104**Decision****To** EU Pledge Secretariat

6 November 2025

From EASA Secretariat**Description**

Mondelez Oreo Bulgaria Minecraft Influencer

Complaint

The complainant filed a complaint regarding marketing practices by Mondelez Oreo in Bulgaria, attaching screenshots of the advertising piece with additional comments:

The post features two influencers (@instantfreaks & @stefiex1) in a collaboration with Oreo and Minecraft, one of the most popular games among children and teenagers, 20% of players are under 15. The Minecraft brand brings with it strong child appeal through its blocky visuals, playful world-building, and widespread recognition among young audiences. The visual style of the video (bright, animated, colours, dynamic) reinforces its child appeal. The promotion of this marketing campaign with influencers popular with young people, demonstrates marketing towards younger children, including those under 12.

Use of influencers: The content is highly relatable and inspirational for children and teenagers, who are likely to identify with influencers of a similar age, as well as young Minecraft fans. Both influencers have a significant following (198k combined), amplifying the reach of the campaign among young audiences.

Child-friendly narrative: The partnership is framed as an “*exciting adventure you can dive into*”, which positions Oreo consumption as part of a fun, immersive gaming experience. The tone of the description is playful, inviting, and directly appealing to the curiosity of children.

Gamification and interactive elements: The campaign encourages children to visit the website (*oreo.eu*) to discover how they can win rewards. This introduces an interactive layer (entering codes, exploring online) that blends gaming culture with product promotion, a strong marketing technique for younger audiences.

Advertiser's response

Mondelez provided the following information as an answer:

Use of Influencer

The collaboration with @instantfreaks and @stefiex1 was part of a broader promotional campaign promoting a collaboration with Oreo and Warner Bros – the creators of Minecraft the Movie (not Minecraft the game). The campaign was targeted at 18+ on digital platforms. Prior to engagement, both @instantfreaks and @stefiex1 were carefully vetted based on data confirming that the overwhelming majority (over 75%) of their audience was aged 18 and above. They are a sketch comedy couple that are popular with an older audience.

Platform, Content and Audience Considerations

Instagram enforces a minimum user age of 13 years, and in addition to this, our marketing activities on this platform are designed for an 18+ audience. The audience of both influencers has been thoroughly checked

by our agency on our behalf, and our marketing team to ensure an appropriate audience. No paid amplification or targeting parameters were used that could have specifically directed the content toward audiences under 13.

Creative Review

All content developed by the influencers was subject to review by our marketing and Legal teams before publication. The post represents a comic sketch format which is widely and commonly used in Bulgaria by comic actors and influencers, both on internet and TV platforms with an audience of +16. The scene represents a parody of a teenager (16+) and is not something that a child under 13 would identify with.

Child-friendly narrative:

The tone and description of the post was in no way appealing to children under 13. Children under 13 years of age would not understand the concept of the comic sketch, nor would they have a general understanding of the script. It would not particularly be liked or be appealing by its messaging.

Gamification and interactive elements:

The post did include gamification elements which was linked to the entry mechanic of the Oreo x A Minecraft Movie consumer promotion, and not from the gameplay of Minecraft (the game), but rather Oreo.eu website, where the campaign was held and aim of the influencers was to show the website and the process of registration on it. The promotion was only available to 16+ for entry (in line with local Bulgarian legislation for participation). The game was inspired by Minecraft the Movie and based on the portals within the Movie itself and was not based on Minecraft the game. Finally, there is no suggestion in the post that children should purchase or consume the product. Indeed, it is very clear in the sketch that the one who has purchased the product is the parent, not “the teenager” (who was visibly over 13 years old) and no consumption of the product was shown in the sketch. We trust that this response demonstrates that this content complied with the EU Pledge requirements and our diligence, good faith, and ongoing commitment to responsible food and beverage marketing. We remain at your disposal to provide any further information or clarification you may require

EU Pledge commitment

EU Pledge members commit either to:

- Only advertise products to children under the age of 13 years that meet the common EU Pledge Nutrition Criteria; or
- Not to advertise their products at all to children under the age of 13 years.

The above policy covers marketing communications for food and beverage products that are primarily directed to children under 13 in covered media.

Marketing communications means paid advertising or commercial sales messages for food and beverage products, including marketing communications that use licensed characters, celebrities, influencers, and movie tie-ins primarily appealing to children under 13. Company- owned, brand equity characters are not covered by the policy.

Primarily directed to children under 13 means advertising in measured media where 30% or more of the audience is under 13 years of age. Where adequate data are unavailable, companies will consider other factors as appropriate, which may include the overall impression of the advertising, actions taken to restrict child access and the target demographic based on the company’s media plan.

Covered media means the following vehicles: TV, radio, print, cinema, online (including company-owned websites and company-owned social media profiles), DVD/CD-ROM, direct marketing, product placement, interactive games, outdoor marketing, mobile and SMS marketing. Packaging, in-store and

point of sale as well as forms of marketing communications which are not under the direct control of the brand owner, such as user- generated content, are not covered by this policy.

Decision

The complainant informed us that they did not wish to proceed with the case. As a result, the matter is considered resolved and will be closed. It will not be submitted to the panel of experts for further review.