

**Case ID: 106****Decision****To** EU Pledge Secretariat

6 November 2025

**From** EASA Secretariat**Description**

Coca-Cola Portugal Instagram Influencer

**Complaint**

The complainant filed a complaint regarding marketing practices by Coca-Cola in Portugal, attaching screenshots of the advertising piece with additional comments:

A popular influencer (@faffapix) with over 1.1 million followers opens his empty fridge and afterwards welcomes his mother who arrives with a pasta dish and Coca-Cola zero. The promotion of this marketing campaign with an influencer 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. The influencer has a significant following (over 1 million followers), popular with many adolescents, amplifying the reach of the campaign among young audiences.

Family-friendly narrative: This family-oriented narrative is simple, humorous, and child-friendly, easily understood by young viewers. It frames Coca-Cola as part of a comforting, caring gesture from a parent, which strongly appeals to emotions of warmth, security, and belonging – craved by a young audience.

Child-friendly communication style: Use of emojis, light humour, and casual tone make the post easily digestible for younger audiences. The video's short, entertaining reel format fits with the viewing habits of children and teens, including those under 12.

**Advertiser's response**

Coca-Cola provided the following information as an answer:

Coca-Cola places great importance on its compliance toward the EU Pledge as well as its own Global Responsible Marketing Policy and, of course, the national regulations for marketing products to children, in this case, Law No 30/2019, which restricts advertising towards children under 16 of foods and beverages high in energy, salt, sugar, saturated and trans fatty acids, implemented via Article 20-A of the Advertising Code in Portugal. Coca-Cola wishes to emphasize that it exercises due care to ensure that all of its marketing activities are always in compliance with the relevant laws, company policies and industry pledges.

The "Little Wins" campaign went live across Europe, with influencers selected from specific markets to lead the campaign. A selection of influencer-led creatives was used in a Paid Social advertising campaign managed through Meta Ads Manager, with targeting including Italy (where the influencer is based) and Portugal (with this ad was viewed).

The campaign as a whole is aimed at Gen Z (ages 18 to 25) and Millennial (ages 25 to 43) audience. All lead influencers in this campaign have been chosen specifically for their unique content creation skills and appeal to both Gen Z and Millennial audiences. The viewer statistics of the influencers have been vetted, and the influencers were chosen with the intent to reach an older audience on the basis of age demographics provided by CreatorIQ audience analytics. As a result, the largest viewership segment of each influencer falls well within the 18-24 and 25-34 age bands, with some followers in older segments. Both the influencer agency and the Coca-Cola team preview the related videos, posts, and other social media activities of the influencers to ensure continued compliance with brand and regulatory standards.

The complaint concerns a specific video of a popular influencer, @faffapix, facing an empty fridge - an experience familiar to many adults living independently. His Italian grandmother (“Nonna”) arrives with lasagna and Coca-Cola, playing on the cultural stereotype of Nonnas who love to feed their grandchildren, soundtracked with music designed to make the moment feel like a “small win”. We respectfully draw your attention to the following:

- Segmentation statistics showing that the main group of their followers consist of 18-24-year-olds. The specific video in question features a 29-year-old, and an actress playing Nonna (who is over 50).

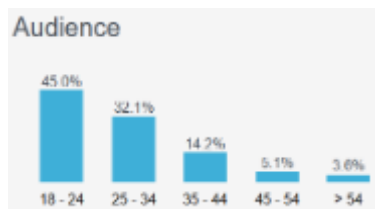


Chart 1: age segmentation for @faffapix (Source: CreatorIQ)

- We have reviewed the content carefully and assess that the video and posts, including subject matter and visual elements, are not aimed primarily at children under the age of 16, which is the age threshold applied by law in Portugal and Italy. The humour and warmth of the content come from adult experiences of independence, nostalgia, and family traditions. The creative intent and message are clearly aimed at an adult audience, not children.
- The use of emojis and casual tone is a common practice in social media and cannot be related with a specific age group.
- We consider the content it to be aimed at the intended target group of millennials and the problems they face when moving out of home. The video aligns with the influencer’s reputation of producing light-hearted entertainment for their own age group as the problem being highlighted (running out of food) is something that can only happen when you move out of the family home.
- The creative was used in a Paid Social campaign which served ads only to users aged 18 or over. Reach statistics for the creative used in three ad setups confirms that largest share of viewers falls into the 65+ age category (37.09%), followed by 35–44-year-olds (21.69%) and 25–34-year-olds (6.93%), where the Millennials audience sits.

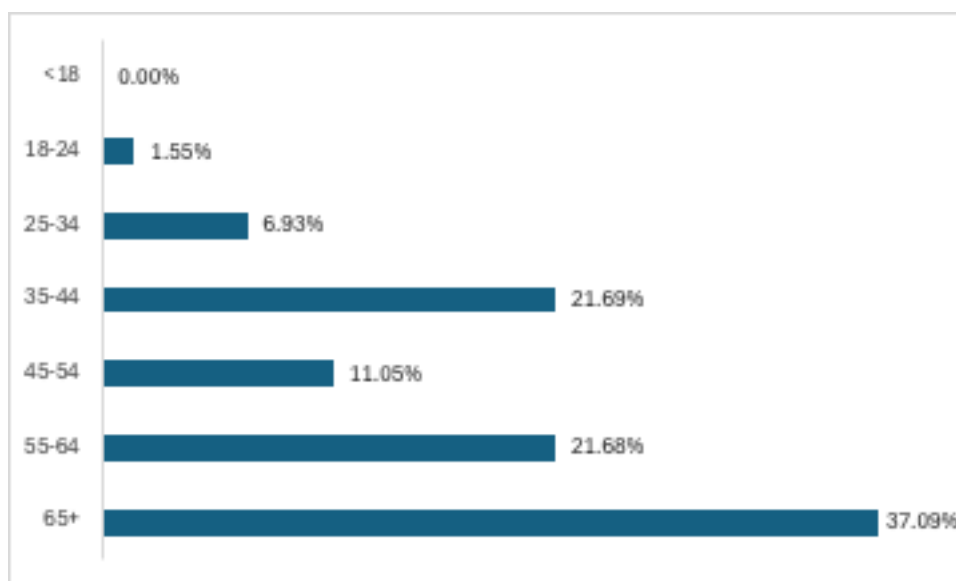


Chart 2: age segmentation of impressions delivery

Based on the information and evidence shared, we assess the activation and content to be compliant with the EU Pledge. We would like to reiterate our strong commitment to the EU Pledge.

### **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.