

**Case ID: 111****Decision****To** EU Pledge Secretariat

6 November 2025

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

Coca-Cola Spain Instagram Influencer Competition

**Complaint**

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

The story shows lifestyle influencer @andreagarte serving dinner in her home with 2 friends with a can of Coca Cola zero, and consumes the product on her couch; she promotes a contest where followers can win prizes.

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 story is posted by lifestyle influencer Andreagarte with around 667k followers. As a relatable lifestyle figure, she appeals strongly to young audiences, especially teenagers and young adults who follow her content for inspiration in daily life.

Competition and rewards: The story explains a game/contest where followers can earn points through Coca-Cola and win prizes (5 shopping carts worth €250 each). Such reward mechanisms strongly attract young audiences, making them more likely to purchase products to participate. The contest is framed in a simple and accessible way (earn points, win prizes), lowering barriers for participation, including for younger followers.

And in another example, on the same campaign:

The story shows 20-year-old lifestyle influencer @paulisls sitting on her bed holding a can of Coca Cola zero explaining how she rewards herself after exams with the beverage; she promotes a contest where followers can win prizes. The promotion of this marketing campaign with an influencer popular with young people, demonstrates marketing towards younger children, in particular to 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 story is posted by lifestyle influencer paulisls with around 195k followers. As a relatable lifestyle figure and a very young influencer at only 20, she appeals strongly to young audiences, especially teenagers and young adults who follow her content for inspiration in daily life.

Child-friendly format and relatability: The influencer frames Coca-Cola as part of her exam celebration ritual: after finishing an exam, she rewards herself with “simple pleasures” like drinking Coca-Cola. This ties the product directly to student experiences, a context appealing to adolescents and young people. She explains her exam went better than expected, then shares that she celebrated with a Coke before a long nap. Story format is casual, personal, and diary-like, just a young student sharing her day, which can be especially influential for teens.

Competition and rewards: The story explains a game/contest where followers can earn points through Coca-Cola and win prizes (5 shopping carts worth €250 each). Such reward mechanisms strongly attract young audiences, making them more likely to purchase products to participate. The contest is framed in a simple and accessible way (earn points, win prizes), lowering barriers for participation, including for younger followers.

### 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, those local rules or guidelines for marketing products to children that are applicable, in this case, the PAOS Code (Co-regulation code for the advertising of food products and beverages directed at minors to which the company is adhered in Spain). Coca-Cola wishes to emphasize that it exercises due care to ensure that all its marketing activities are always in compliance with the relevant laws, company policies and industry pledges. And under these premises, it carries out the design and execution of all its marketing campaigns, including those conducted through influencers.

The “Little Wins” campaign went live in Spain in March 2025. The campaign has been adapted to the Spanish market and includes local social media influencers as part of the marketing activities.

The campaign is at Gen Z (ages 18 to 25) and Millennials (ages 25 to 43). All influencers in this campaign have been chosen specifically for their appeal these two audience segments. 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 young adult category, with some followers on either side of that segment. 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 two video stories by two influencers (@andreagarte and @paulisls) both rewarding themselves after little everyday wins: The first one after preparing dinner for her friends and the second one after exams. Both videos invite followers to participate in a contest to win 5 shopping carts worth €250 each. We respectfully draw your attention to the following:

- Segmentation statistics showing that the main group of both influencers’ followers consist of 18-24 and 25-34 -year-olds. The specific video in question features @andreagarte (28) and @paulisls (21). The video also features @victormelida (33), who is the partner of @andreagarte.

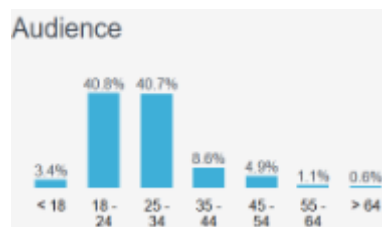


Chart 1: age segmentation for @andreagarte

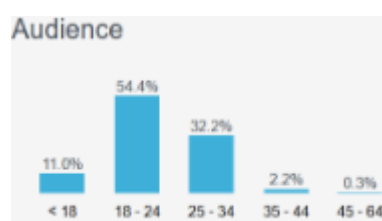


Chart 2: age segmentation for @paulisls

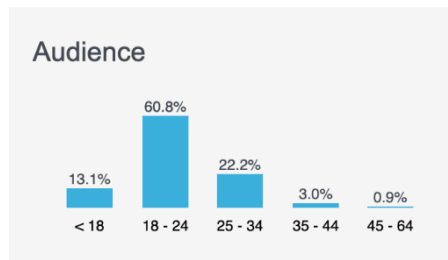


Chart 3: age segmentation for @victormelida

- The posts include a link to the Meals promotional website (<https://www.coca-cola.com/es/es/offerings/promocion-meals>) where only users 16 and older can enter a competition to win prizes such as cinema tickets and amusement parks that have broad age appeal. Participation by individuals aged 13 to 17 is permitted solely with parental or guardian consent, in accordance with the app's terms and conditions (<https://app.coca-cola.com/tos/ES/>).
- 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 13, which is the age threshold applied voluntarily by the Spanish soft drink advertisement board. Both videos refer to occasions of adult people (dinner with friends and university exams, given the age of @paulisls). Also, the prize of the contest is targeted to adult population and not children under 13 years of age, who do not shop in supermarkets.
- We consider the content to be aimed at the intended target group of teens and young adults. Viewer statistics for the Instagram Stories (attached) confirms that the largest share of viewers fall in the main category intended, i.e. 18-24-year-olds (41.72%) with a significant viewer segment found in the older adjacent category of 25-34 (33.68%) and very insignificant segment found in the 13-17 age category (4.87%). In addition, only the social media platforms prohibiting users below the age of 13 are used to amplify the material.

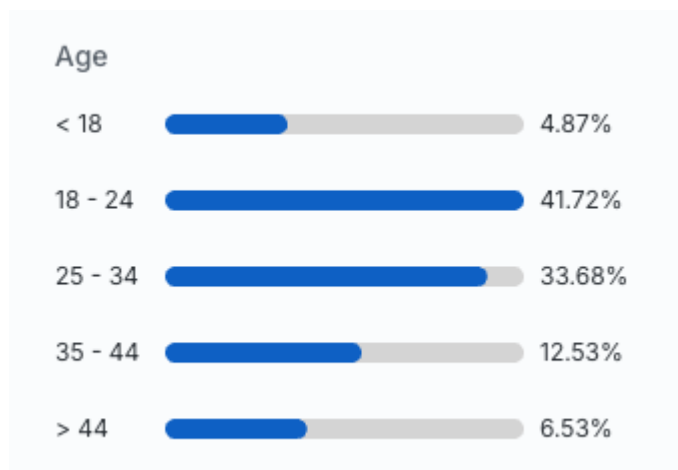


Chart 4: age segmentation of audience from the Instagram Stories

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.