

**Case ID: 112****Decision****To** EU Pledge Secretariat

6 November 2025

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

Coca-Cola Spain Instagram Influencer Music Experience

**Complaint**

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

One influencer (@martaa\_diiaz) collaborates with Coca-Cola in a lively Instagram Story promoting the *Coca-Cola Music Experience Festival* in Madrid. In the video, Marta Díaz shares her excitement about the event, talks about her favourite artists performing, and appears smiling and holding a Coca-Cola zero can. The Story ends with a swipe-up link to the Coca-Cola app to buy tickets, merging entertainment, brand visibility, and direct engagement in a fun, youth-oriented way. Promoting this campaign using an extremely popular influencer with a young audience, demonstrates marketing towards younger children, in particular to those under 12.

Use of influencer: The campaign features martaa\_diiaz, a 24-year-old Spanish influencer with around 3.4 million followers. Her energetic personality and popularity among teenagers make her one of Spain's most recognisable young creators. As a relatable and aspirational figure, she reaches a massive youth audience that follows her for lifestyle, music, and fashion content. Her upbeat tone and diary-like storytelling create a sense of peer excitement, encouraging young followers, especially minors, to associate the drink with music, freedom, and youthful energy.

Music and youth culture association: By highlighting her favourite artists and sharing her excitement, Marta taps into the emotional energy of fan communities. The brand becomes part of this shared enthusiasm, aligning Coca-Cola with music, friendship, and collective celebration, core aspects of teenage identity.

**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.

The Coca-Cola Music Experience Festival 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 a specific video by one influencer (@martaa\_diiaz) who collaborated with Coca-Cola in a lively Instagram Story promoting the *Coca-Cola Music Experience Festival* in Madrid. The influencer shares her excitement while holding a Coca-Cola bottle. The story ends with a swipe-up link to the Coca-Cola app to buy tickets to the festival. We respectfully draw your attention to the following:

- Contrary to the position set out in the complaint, this influencer does not appeal to young children. Her content is sophisticated and aspirational, and appeals to our target of 18-24 year olds. This is confirmed by the data, which shows that the main group of her followers consist of 18-24-year-olds. The specific video in question features @martaa\_diiaz (24).

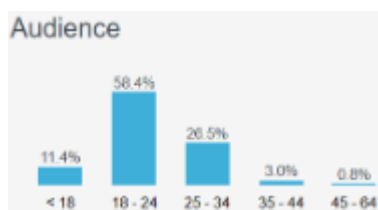


Chart 1: age segmentation for @martaa\_diiaz

- The collaboration is disclosed as paid advertising with the hashtag “#publi” in accordance with Spanish legislation and good marketing practice.
- The story ends with a swipe-up link to the Coca-Cola app where only users 18 and older can enter a competition to win prizes such as tickets to music festivals that have broad age appeal (<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. Rather, we consider it to be aimed at the intended target group of teens and young adults. The video aligns with the influencer’s reputation of producing light-hearted entertainment for her own age group.
- Viewer statistics for the Instagram video (attached) confirms that the largest share of viewers fall in the main category intended, i.e. 18-24-year-olds (56.98%) with smaller but significant viewer segments found in the older adjacent category of 25-34 (23.79%) and much lower engagement with the 13-17 age category (10.47%). In addition, only the social media platforms prohibiting users below the age of 13 are used to amplify the material.

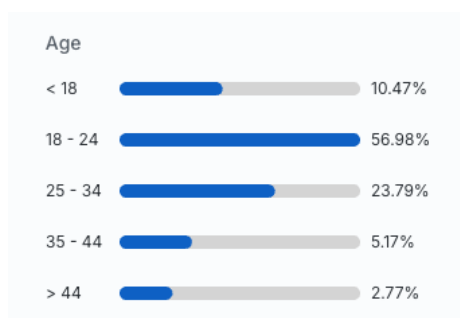


Chart 2: age segmentation for @martaa\_diiaz's Instagram post

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.