



Position Statement on ePrivacy Regulation

Coalition for Audience Measurement

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Context

Earlier this year, the European Commission proposed a wide-ranging revision of the ePrivacy Directive following a successful adoption of the General Data Protection Regulation. These efforts, part of Europe's Digital Single Market initiatives, aim to ensure Europe leverages and benefits from the digital revolution whilst fostering an operating environment that protects individual citizens and safeguards their privacy.

The proposed ePrivacy Regulation will have a significant impact on the ability, as an ecosystem of sectors and actors that produce audience measurement and/or use its aggregated outputs to measure audience traffic flows, actual media consumption, set the value of media brands and channels, and enable fair and transparent subsidy allocation based on independent figures.

This statement seeks to ensure that in the process of legislating, Europe does not unintentionally hinder or damage the production and use of audience measurement tools in Europe. Audience measurement is an essential indicator of the health of Europe's media landscape, and current and future trends that may impact it. It is crucial to ensure Europe's media sector can effectively compete with its global competitors.

Audience measurement has a long and proven track record in safeguarding individual rights and privacy. In addition - and as with the General Data Protection Regulation – our sector supports efforts by the European Union to establish a consistent, comprehensive and clear legal framework to govern activities of the digital economy. Accordingly, we support the decision to propose transitioning the ePrivacy Directive to a Regulation and encourage legislators to secure maximal alignment of requirements between Regulation 2016/679, the General Data Protection Regulation, and its ePrivacy counterpart.

Nonetheless, the proposals currently contained in the proposed ePrivacy Regulation raise many concerns for the audience measurement sector, particularly the distinction made between first-party and third-party audience measurement as defined in Article 8. This distinction does not reflect the current or indeed future operating realities of the media ecosystem, nor do the exemptions set out in the draft Regulation sufficiently facilitate the conduct of and legal certainty for producers and users of aggregated audience measurements.

Key recommendations

We recommend amending Article 8 and its corresponding Recital 21 to ensure that audience measurement conducted by both first and third parties can continue to take place, whilst providing the necessary safeguards to mitigate any actual and perceived privacy risks facing individuals.

- We welcome the European Commission's proposal to introduce an audience measurement exemption as proposed in Article 8(1)(d)
- We welcome the willingness of shown, for example, by MEPs Marju Lauristin and Axel Voss to improve the proposal and recommend achieving a compromise amendment.
- More specifically, we support MEP Voss' amendments to Article 8(1)(d) to reference audience measurement in general, rather than exclusively web audience measurement, as audience measurement is not just used to measure audiences on Internet browsers. The term web audience measuring might create unnecessary legal uncertainty for audience measurement, as was echoed by the Article 29 Working Party in its recommendation to expand the permitted uses cases covered by the exemption¹. However, it is important to underline that audience measurement may include measuring the reach of an information society service as described by MEP Voss' proposal, but it should not be reduced to this.
- We also support MEP Lauristin's proposed safeguards to Article 8(1)(d) as proportionate. The proposed safeguards will ensure the audience measurement purpose is respected by all stakeholders. It would be useful to ensure that the introduced terms are given appropriate definitions or clarifications to add appropriate legal certainty i.e. "scientific purpose", "independent web analytics agency" and we are very happy to assist with this process.
- Two safeguards have been proposed limiting the exemption to cover only that which is "technically necessary" and on the condition no personal data is made accessible to any other party. Whilst we understand the motivation, it is important to note that technically necessary introduces a degree of subjectivity that may lead to lengthy disputes during the implementation phase. We therefore would support reverting to the original proposal which speaks only of necessary. Additionally, the condition as to the accessibility of personal data, we believe is already sufficiently governed by the General Data Protection Regulation and the Charter for Fundamental Rights and it suffices only to refer to the obligations derived from those fundamental rights.
- We recommend amending Article 8(1)(d) to enable actors operating on behalf of the provider of the information society service to carry out audience measurement. Many information society services prefer to delegate these tasks to a third party to ensure there is quality assurance and independence or where they are not sufficiently technically competent to conduct it themselves.

We propose and strongly recommend that Article 8(1)(d) is amended as follows to create an ideal operating environment for the ecosystem:

"If it is necessary for ~~web~~ audience measuring, provided that such measurement is carried out by, or on behalf of, the provider of the information society service requested by the end-user",

¹ Article 29 WP Opinion 01/2017 on the Proposed ePrivacy Regulation adopted on 4 April 2017, point 25

About the Coalition for Audience Measurement

Our coalition brings together leading global and European associations representing the interests of stakeholders providing or using audience measurement to ultimately finance and deliver media-driven information society services to the public. These measurements are not used to directly target individuals and are instead used by decision-makers to improve services, measure performance, and inform innovation and decision-making. The coalition aims to facilitate informed public discourse on legislative initiatives and policy-making impacting on the audience measurement ecosystem. We welcome any opportunities to support the co-legislators in their important work.

Our coalition comprises the following associations:

AGOF

AGOF is the central German association for neutral online audience research. As an association of the main German online publishers and sales houses AGOF online research result (digital facts) is the currency for German online advertising. It provides a neutral and statistic audience research system for internet usage. Audience measurement and research is necessary to provide information on the usage and acceptance of online services for the whole public online market. The goal of the scientific analysis is to provide independent, verifiable data to build a trustworthy currency for online usage.

EBU

The European Broadcasting Union (EBU) is the world's leading alliance of public service media. We have 73 Members in 56 countries in Europe, and an additional 34 Associates in Asia, Africa and the Americas. Our Members operate almost 2,000 television and radio channels together with numerous online platforms. Together they reach audience of more than one billion people around the world, broadcasting in more than 120 languages. The EBU operates Eurovision and Euroradio services.

EFAMRO

EFAMRO represents the interests of market, social and opinion research in Europe. Its members are national trade associations for research businesses across 14 countries.

EFAMRO's objectives are to represent the common interests of its members at European and international level ; maintain and improve the reputation of market, opinion and social research to the public; develop and establish international quality standards for market, opinion and social research; develop, maintain and enforce international professional principles and rules which are mandatory for the members of the Federation; combat unfair trading and support members and other national associations in the field of market, opinion and social research by providing corresponding information and services.

ESOMAR (Coordinator)

ESOMAR is the global voice of the research, analytics and insights community, speaking on behalf of over 4900 individual professionals and 500 companies who provide or commission research, analytics and insights in more than 130 countries. All community members agree to uphold the ICC/ESOMAR International Code.

Together with national and international research associations, we set and promote professional standards and self-regulation for our sector and elevate the value of research, analytics and insights in illuminating real issues and bringing about effective decision-making.

News Media Europe

News Media Europe is the voice of the progressive News Media Industry in Europe, comprising over 2200 news brands in print, online, television and radio. The industry is committed to fostering a free, independent and pluralistic media landscape in Europe. Independent news media requires a heavy investment in journalism and this is dependent upon, and financed through, advertising revenue, which in the digital world is reliant on an understanding of its audience.

WAN IFRA

The World Association of Newspapers and News Publishers was founded in Paris by survivors of the World War II clandestine press of France and The Netherlands. Today, 72 national associations of newspaper publishers from 67 countries are our members, giving to WAN-IFRA the privilege to represent more than 18,000 publications, 15,000 online sites and over 3,000 companies.

The association set out in 1948 with the triple objective of seeking international commitments and guarantees to safeguard freedom of expression, of ensuring the renewed availability of the means of newspaper production, and of creating a new dialogue and exchange of information and ideas between representatives of the newspaper community world-wide. Our broader mission has largely remained the same, with a clear focus on all issues that benefit from the unique international perspective that WANIFRA's global membership provides. According to the statutes, the principle that underlines our work is the following: "The basic conviction of WAN-IFRA is that free and independent newspapers and a free and independent news publishing industry play an indispensable role in maintaining free societies and promoting human rights."

Introducing the audience measurement ecosystem

Audience measurement has been with us for nearly 65+ years, it has been used to measure audiences on radio and television channels and has now evolved to capture the proliferation of new channels offered by digital technology. Through its history, audience measurement has enabled us to determine the proportion of users using a channel or seeing a piece of content enabling various stakeholders to legitimately measure and report popularity, traffic flows to and from sources, or the effectiveness of content placement.

Website owners and those financing the Internet (digital economy) require, like traditional media channels, precise and independent audience measurement to be able to measure the relevance and effectiveness of a variety of content, as well as to improve the web experience of users. Additionally, accuracy is a key consideration to combat fraud and assign a realistic valuation of web traffic and consequently media investment. These are critical parts in the functioning of the Internet and therefore crucial to facilitate a successful Digital Single Market.

Numerous stakeholders, ranging from website owners to media platforms use audience measurement. The number of independent actors - separate from leading and known American brands – that can institute and establish these measurements has steadily decreased, as this information has increasingly been concentrated with brands which are able to leverage a first-party advantage.

Why is audience measurement important?

Audience measurement is an unsung hero of the digital economy. Nearly all information society providers and those who finance them use audience measurement as a vital tool to understand better traffic flows and the performance of content place and service provision and in turn use this information to inform their strategies and development plans.

The objective of audience measurement is not to track individuals or to target them, but rather aggregates individual user behaviour to establish realistic measures. This ultimately enables the ecosystem and indeed society to benefit from vital insights that allow for the setting of fair and competitive pricing for content placement, helping inform government bodies setting media policies, and for making informed choices to optimize the quality of the service's distribution and improve diversity of media offering.

These measures are established by various stakeholders who have a long track record of manipulating data sets to produce aggregated outputs in full respect of accepted international standards for data protection and privacy, and responsible data collection and use.

Without these measures, national audio-visual or competition regulatory bodies, and statistical public institutions seeking to promote effective national media diversity would lack important sources of insights. Additionally, media organisations at large would not be able to provide independent measurements of the size of their audience, its composition, and thereby proving their comparative value to their partners.

Advertisers would not be able to trust media platforms about the effectiveness of their ad placements thereby reducing trust between key actors of the consumer-facing digital economy. Website owners would not be able to reliably track the performance of their website designs and content placement strategies preventing them from securing revenue to finance their websites' operations.

Who produces audience measurement and uses audience measurement?

Research and Analytics Providers

Research and analytics providers have a long tradition in producing audience measurements and providing them in an aggregated format that enables decision-makers to take decisions based on verified and independent statistics. These statistics are often derived using a variety of collection methods. These include using data provided by panel members who consent to their viewing habits being tracked, and census data using cookies and similar technologies to establish the representativeness of the panel members. These two data sources are calibrated between each other to ensure the aggregated measurement reports provided to clients of audience measurements are accurate.

Many research and analytics providers subscribe to established self-regulation schemes that enable panel members and passive participants to enforce their rights. These are built on established international standards set forth by the ICC/ESOMAR International Code and national codes across many EU countries. These providers have also proactively provided education content to the public to increase awareness of data collection practices through initiatives such as the Research Choices programme².

Media organisations

To carry out audience measurement, media organisations frequently outsource work to research and analytics providers based on contractual agreements.

While TV and radio audience measurement based on statistically-representative panels and samples remains important, the media industry is currently evolving towards a more holistic approach which involves measurements for all types of content (text, video, audio, etc.) across platforms, formats and devices. As such, data enables broadcasters to capture various types of usage that leave a digital footprint, such as clicks on or within a given website, app or media player, launch of a stream, pausing or stopping. TV set-top boxes and connected TVs also offer a valuable source of data for audience measurement. This kind of data is often called “return-path data”.

Media organizations are developing advanced ‘hybrid’ audience measurement models which combine different types of data from different sources. Depending on their needs, they may prefer the audience measurement technique offered by a given technology provider for the whole market, or choose to use different solutions.

Advertisers

For advertisers, the ability to have access to independent, verified audience measurement is critical to measure both the effectiveness of the content being placed on broadcasters’ channels, but also to ensure that fair pricing is being charged for the placement of the content. Independent audience measurement helps to build trust and confidence in all of the stakeholders of the ecosystem thereby enabling more usage of all channels availability and consequently advertising spend. It is this spend which continues to be

² Available online at <http://researchchoices.org>. It offers educational content about passive audience measurement and online research more generally that is applicable to most research providers. It offers an independent contact point for members of the general public who are concerned, wish to opt-out, or wish to lodge a complaint against one of the participating companies.

one of the leading sources of revenue keeping the internet free to use for all end-users. Audience measurements used by advertisers may help inform advertising strategies, but it is not the audience measurements themselves which drive or enable automated targeted advertising.

National Governments

National governments and political parties are also using audience measurement, both in order to evaluate whether public interest messaging is reaching the right audiences, but also in order to determine the funding levels of the national media landscape. Audience measurement is therefore one of the indicators that determine which channels get the most public funding on the basis of their ability to attract and retain the largest audience figures. Many governments rely on independent audience measurement to ensure that public funding is being used effectively and that broadcasters are reporting accurate audience share figures for their programming.

Real and perceived privacy risks and how do we mitigate them?

Audience measurement respects the fundamental rights and freedoms of individuals including the individual's right to privacy. Safeguards are built in to address various real and perceived privacy risks. Audience measurement is different to and is distinct from advertising.

Audience measurement's essential ingredient is traffic behaviour which is collected by technologies like research and analytics cookies and other similar tools. These are the easiest technologies to use without intruding or interfering with the normal browsing activities of the end-user.

However, as personal details of individuals are contained in those tools, it is recognised that privacy risks do exist. This information is theoretically capable of being surreptitiously intercepted or accessed by unauthorised parties or being misused for purposes other than strict audience measurement such as singling out for individual targeting purposes. Considering this, stringent measures are put in place to ensure that both the severity and likelihood of any such risks to individuals are fully considered and minimised.

The information contained in these individual cookies is of low economic value to industry sectors, as it is the analysis and the aggregation of the individual data points which provides the insight into traffic flows. Essentially it is of use only for the service providers and their stakeholders who use the information at a macro-level in an aggregated and thus anonymised format. Accordingly, the privacy risk and likelihood of any adverse impact on the individual is low.

The aggregated information is complemented with a second data point, that of panel users who have consented to have their behaviours more richly recorded for the purposes of audience measurement. It is this information that will serve as the basis of further analysis, rather than the information collected passively for the purposes of establishing the census against which the panels' own data can be weighted.

Safeguarding individual rights is built on both full legal compliance and best practice ethical approaches by the stakeholders in the audience measurement ecosystem. All participants in the process put in place organisational and technical measures to mitigate against risks. These include:

- Purpose limitation – Audience measurement data is not used to advertise directly to individuals or to re-identify individuals. These requirements on limitation of use are reflected in contractual arrangements.
- Aggregation - Audience measurement organisations use what is commonly referred to as aggregation which provides summary statistics of individuals' information published at a group level. By releasing only aggregated reports featuring these groups within research findings, the risk of re-identification is limited significantly.
- Pseudonymisation - Another technique organisations commonly use is hashing, or indeed other forms of pseudonymisation, using random unrelated values to change information associated with a specific browser in such a way that it is difficult to link the pertinent information back to any individual.

- Encryption - Other techniques are used to encrypt the data sets with access codes that are provided only to professional and trained researchers. Alternatively, pseudonymised identifiers are removed altogether from datasets only leaving behind the aggregated information for audience measurement purposes.

As set out above all stakeholders will at a minimum utilise and apply appropriate techniques to any personal data collected in order to maintain individuals' privacy along with all the proportionate organisational security measures implemented at the company level to ensure there is no unauthorised access of the data. Individual organisations will also use a variety of other methods to provide additional layers of security and protection.

Compliance with these techniques is verified by self-regulation schemes like those enforced by ESOMAR and EFAMRO on research actors. This requires a clear distinction between audience measurement activities and other activities, and offers members of the public a mechanism to complain against subscribed companies leading to thorough investigations and if necessary the issuance of public reprimands or exclusion. Leading media operators work primarily with organisations that subscribe to these codes and standards precisely because of the effectiveness of these mechanisms.

What is the impact of the ePrivacy proposals?

The proposed Commission draft of the ePrivacy Regulation seeks to impose a greater use of consent, in line with the definition of consent under the General Data Protection Regulation, on a wide variety of electronic communications. Policymakers anticipate that by imposing consent, users will be able to exercise far more control on what their personal data will be used for. Recognising that for the purposes of establishing measurements, websites need to be able to count all incoming and outgoing flows, the European Commission has proposed that web audience measuring be granted an exemption from these consent requirements. The Commission proposal limits this exemption exclusively to the provider of the service requested by the end-user, i.e. a first-party use.

First party vs third party advantage

Whilst understanding the need to establish safeguards so that the exemption proposed for audience measuring does not create unintended loopholes, the first-party exemption does not reflect the operating realities for audience measurement. Only a few mainly US-based service providers can offer a first-party service. Most service providers are instead using a trusted supplier to provide these audience measurements on their behalf, offering the same safeguards and guarantees as a first-party service even if the provider might not be known to the end-user. By creating a distinction between first and third party, the legislator would create a situation with an exclusive advantage to those service providers able to offer a first-party service whilst harming fair competition for smaller third-party suppliers specialising in audience measurement. This has been acknowledged in the Article 29 Working Party Opinion³ which also referenced that the audience measurement exemption may be defined too narrowly to provide a real benefit for all who need to use the measures. Audience measurement, as outlined previously is, in respect of third-party suppliers, a well-regulated sector ensuring that regardless of the provider, the confidentiality and privacy safeguards designed to protect the end-user are both present and actively enforced.

User experience

Without considering the third-party relevance for audience measuring, the proposal would lead to a major impact in the user experience of browsing on online services, as each use of audience measurement outside of a first party would necessitate consent, thereby adding to the 'consent fatigue' the proposal aims to alleviate. As every online service measures their audiences, it will mean that end-users will be faced with incessant requests to provide consent when a service provider has elected to use a third party. As this is the case for a significant portion of content providers, this impact should not be underestimated and may lead once again to the creation of the dread "cookie pop-up" wall that most data subjects don't read.

Decrease in the precision of measurements

To provide precise measurements, it is important for audience measurers to be able to compare the information provided by consented panels with the actual observed internet traffic flows. It is this calibration which makes audience measurement a trustworthy and trusted source of information that is then used for setting strategies, pricing and subsidies for content providers and media platforms. The proposals, if implemented today, would lead to a decrease in our ability to provide precise measurements that provide a trusted and accepted benchmark that the entire ecosystem relies on.

³ Article 29 Working Party Opinion 03/2016 on the evaluation and review of the ePrivacy Directive

Audience measurement goes beyond simply measuring web audiences

The use of the term web audience measuring would indicate a limitation to traditional traffic flows using the Internet. This may prove, in future, to be a term that is not future proof, therefore we recommend that the term audience measuring be used rather than limiting it to web audience measuring. Regardless of the use case, all audience measurement is governed by the same restrictions and safeguards as those detailed in this position statement.

Recommended amendments by the Coalition

Our associations, representing all sides of the independent audience measurement ecosystem, recommend making several amendments to Article 8(1)d in order to address the concerns we have detailed in our position statement, and to ensure that the text retains the safeguards that are necessary prerequisites to mitigate privacy risks.

Our amendments therefore seek to encompass audience measuring, not exclusively web audience measuring, and seek to enable measurement organisations commissioned by the provider of the service to continue to benefit from their trusted partners, noting that these providers operated to accepted global professional standards.

Original Article 8(1)d	Coalition Amended Article 8(1)d
If it is necessary for web audience measuring, provided that such measurement is carried out by the provider of the information society service requested by the end-user.	If it is necessary for web audience measuring, provided that such measurement is carried out by, or on behalf of , the provider of the information society service requested by the end-user.

Further taking into account amendments proposed by MEPs Marju Lauristin and Axel Voss, the following amendments could also be envisaged noting the Coalition’s preference for the amendment to the Commission’s proposal suggested above.

Lauristin Amended Article 8(1)d	Coalition Amended Lauristin Article 8(1)d
(d) if it is technically necessary for web audience measuring of the information society service requested by the user , provided that such measurement is carried out by the provider, or on behalf of the provider, or by an independent web analytics agency acting in the public interest or for scientific purpose; and further provided that no personal data is made accessible to any other party and that such web audience measurement does not adversely affect the fundamental rights of the user;	(d) if it is technically necessary for web audience measuring of the information society service requested by the user , provided that such measurement is carried out by the provider, or on behalf of the provider, or by an independent web analytics agency acting in the public interest or for statistical or scientific research purposes; and further provided that no personal data is made accessible to any other party and that such audience measurement does not adversely affect the fundamental rights of the user;

Voss Amended Article 8(1)d	Coalition Amended Voss Article 8(1)d
d) if it is necessary <i>in order to measure the reach of an information society service desired by the end-user, including measurement of indicators for the use of information society services in order to calculate a payment due.</i>	(d) if it is necessary <i>in order to measure the reach audience of an information society service desired by the end-user, including measurement of indicators for the use of information society services in order to calculate a payment due.</i>

Our Coalition is very willing to discuss with co-legislators how best to amend the text to address their concerns whilst ensuring that media measurement, an important societal and business activity, can continue to serve its crucial role supporting and enhancing the EU digital economy.

Contact details

AGOF

AGOF (Arbeitsgemeinschaft Online Forschung e.V.) is the central German association for neutral online audience research. As an association of the main German online publishers and sales houses AGOF online research result (digital facts) is the currency for German online advertising. It provides a neutral and statistic audience research system for internet usage. Audience measurement and research is necessary to provide information on the usage and acceptance of online services for the whole public online market. The goal of the scientific analysis is to provide independent, verifiable data to build a trustworthy currency for online usage.

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EBU

The European Broadcasting Union (EBU) is the world's leading alliance of public service media. We have 73 Members in 56 countries in Europe, and an additional 34 Associates in Asia, Africa and the Americas. Our Members operate almost 2,000 television and radio channels together with numerous online platforms. Together they reach audience of more than one billion people around the world, broadcasting in more than 120 languages. The EBU operates Eurovision and Euroradio services.

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EFAMRO

Founded in 1992, EFAMRO represents the interests of market, social and opinion research in Europe. Its members are national trade associations for research businesses. We represent over 1000 research businesses in 14 countries, accounting for 31% of the global research industry, or €7.46 billion. For further information on EFAMRO and its activities, contact Michelle Goddard, Director of Policy and Communication.

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ESOMAR (Coordinator)

Founded in 1948, ESOMAR gathers nearly 5000 professionals and over 500 companies worldwide providing or commissioning research, including public and academic bodies. For further information on ESOMAR and its activities, contact Kim Smouter, Head of Public Affairs and Professional Standards.

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News Media Europe

News Media Europe (NME) represents European publishers worth over 12 billion euros and nearly 2200 titles both on printing and digital platforms. NME's national members include Belgium (Flanders), Cyprus, Denmark, Estonia, Finland, Hungary, The Netherlands, Norway, Ireland, Spain, Sweden, and United Kingdom. News Media Europe is the association of news publishers who fully embrace today's digital revolution – which ultimately represents the future of the press and news media sector.

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WAN IFRA

The World Association of Newspapers and News Publishers was founded in Paris in 1948 by survivors of the World War II clandestine press of France and The Netherlands. It was created by newspaper publishers from eight countries: Belgium, Denmark, France, Great Britain, Holland, Luxemburg, Sweden and Switzerland. Today, 72 national associations of newspaper publishers from 67 countries are our members, giving to WAN-IFRA the privilege to represent more than 18,000 publications, 15,000 online sites and over 3,000 companies. For more information on our activities contact Elena Perotti, Executive Director Public Affairs and Media Policy

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