

Mark Zuckerberg  
Chief Executive Officer  
Facebook, Inc.  
1601 Willow Road Menlo Park,  
CA 94025  
USA

November 16, 2021

Dear Mr. Zuckerberg,

We are writing to urge you to immediately end all surveillance advertising to children and adolescents, including the use of artificial intelligence to optimise the delivery of specific ads to the young people most vulnerable to them.

Many of us welcomed Facebook's announcement on 27 July, that "*starting in a few weeks, we'll only allow advertisers to target ads to people under 18 (or older in certain countries) based on their age, gender and location*".<sup>1</sup> Given the well-documented concerns among academics, paediatricians and child safety and digital responsibility advocates around the impact of targeted advertising to children, this seemed like a meaningful step forward.

Our optimism redoubled on 30 September when Facebook's global head of safety, Ms. Antigone Davis, testified in front of the United States Senate and said:

*"We have very limited advertising to young people. You can only actually now target a young person based on their gender, age, or location".<sup>2</sup>*

Facebook's proclamations were likely welcomed by both parents and teens, as both groups are extremely concerned about surveillance advertising. A recent Australian poll found that 82% of 16 & 17 year olds have come across ads that are so targeted they felt uncomfortable.<sup>11</sup> Similarly, 88% of US parents believe "the practice of tracking and targeting kids and teens with ads based on their behavioral profiles" should be prohibited.<sup>3</sup>

It now seems Facebook's statements were misleading, to both the public and the Senate.

Recent revelations suggest advertising is being 'optimised' for teens within Facebook, and children's accounts still receive targeted surveillance advertising. New research<sup>4</sup> found that Facebook is using data about children's online behaviour to feed their machine learning enabled 'Delivery System' to optimise targeting in children's feeds.

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<sup>1</sup> Instagram 2021 'Giving Young People a Safer More Private Experience'

<https://about.instagram.com/blog/announcements/giving-young-people-a-safer-more-private-experience>

<sup>2</sup> Rev Transcripts 2021 'Facebook Head of Safety Testimony on Mental Health Effects: Full Senate Hearing Transcript'

<https://www.rev.com/blog/transcripts/facebook-head-of-safety-testimony-on-mental-health-effects-full-senate-hearing-transcript>

<sup>3</sup> <https://accountabletech.org/wp-content/uploads/Accountable-Tech-Parents-Poll.pdf>

<sup>4</sup> Elena Yi-Ching Ho & Rys Farthing 2021 *How Facebook Still Targets Surveillance Advertising to Teen* Fairplay, Global Action Plan, Reset Australia

So while Facebook says it will no longer allow *advertisers* to selectively target teenagers, it appears Facebook *itself* continues to target teens, only now with the power of AI.

Replacing ‘targeting selected by advertisers’ with ‘optimisation selected by a machine learning delivery system’ does not represent a demonstrable improvement for children, despite Facebook’s claims in July. Facebook is still using the vast amount of data it collects about young people in order to determine which children are most likely to be vulnerable to a given ad. This practice is especially concerning, given ‘optimisation’ might mean weight loss ads served to teens with emerging eating disorders or an ad being served when, for instance, a teen’s mood suggests they are particularly vulnerable.

This sleight of hand has not gone unnoticed. On 5 October 2021, whistleblower Ms. Frances Haugen stated:

*“I’m very suspicious that personalised ads are still not being delivered to teenagers on Instagram, because the algorithms learn correlations. They learn interactions where your party ad may still go to kids interested in partying, because Facebook almost certainly has a ranking model in the background that says this person wants more party-related content”.*<sup>5</sup>

Children are more susceptible to the pressures of marketing, less likely to recognise paid-for content, and less likely to understand how data is used for these purposes than adults.<sup>6789</sup> Increased commercial pressures on children can lead to materialism, parent-child conflict<sup>10</sup> and life dissatisfaction.<sup>1112</sup> Ever more personalised, ever more optimised advertising to children has the capacity to amplify these harms. As Facebook’s own marketing material suggests:

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<sup>5</sup> Rev Transcripts 2021 ‘Facebook Whistleblower Frances Haugen Testifies on Children & Social Media Use: Full Senate Hearing Transcript’ <https://www.rev.com/blog/transcripts/facebook-whistleblower-frances-haugen-testifies-on-children-social-media-use-full-senate-hearing-transcript>

<sup>6</sup> Matthew Lapiere, Frances Fleming-Milici, Esther Rozendaal, Anna McAlister & Jessica Castonguay 2017 ‘The Effect of Advertising on Children and Adolescents’ *Pediatrics*, 140 (2) S152-S156; [doi:10.1542/peds.2016-1758V](https://doi.org/10.1542/peds.2016-1758V)

<sup>7</sup> Laura Owen, Charlie Lewis, Susan Auty, Moniek Buijzen 2012 ‘Is Children’s Understanding of Non-Traditional Advertising Comparable to their Understanding of Television Advertising?’ *Journal of Public Policy Mark* 32(2):195–206 [doi.org/10.1509/jppm.09.003](https://doi.org/10.1509/jppm.09.003)

<sup>8</sup> Beatriz Feijoo, Simón Bugueño, Charo Sádaba & García-González, ‘Aurora Parents’ and Children’s Perception on Social Media Advertising’ *Comunicar* 2021 vol. 29, n. 67 [doi.org/10.3916/C67-2021-08](https://doi.org/10.3916/C67-2021-08)

<sup>9</sup> Sandra Calvert 2008 ‘Children as Consumers: Advertising and Marketing’ *Future Child* Spring 18(1):205-34. [doi.org/10.1353/foc.0.0001](https://doi.org/10.1353/foc.0.0001)

<sup>10</sup> Moniek Buijzen, Patti Valkenburg 2003 ‘The Effects of Television Advertising on Materialism, Parent-Child Conflict, and Unhappiness: a Review of Research’ *Journal Applied Developmental Psychology* 24(4):437–456 [doi.org/10.1016/S0193-3973\(03\)00072-8](https://doi.org/10.1016/S0193-3973(03)00072-8)

<sup>11</sup> Amani Al Abbas, Weifeng Chen & Maria Saberi 2019 ‘The Impact of Neuromarketing Advertising on Children: Intended and Unintended Effects’ *Annual PwR Doctoral Symposium* 2018–2019 <https://knepublishing.com/index.php/Kne-Social/article/view/5187>

<sup>12</sup> Adrian Furnham & Barrie Gunter 2008 *Children as Consumers: A Psychological Analysis of the Young People’s Market* Routledge, London

*“The delivery system uses machine learning to improve each ad's performance.... Each time an ad is shown, the delivery system's predictions of relevance become more accurate. As a result, the more an ad is shown, the better the delivery system becomes.”*<sup>13</sup>

If this is the case, advertising for children is in reality even more personalised on Facebook, Instagram and Messenger.

This optimisation relies on the significant extraction of personal data from children for uses that are not in their best interests. We believe this violates international guidance around children's rights, as described in the UN General Comment No.25 (2021) on Children's Rights in Relation to the Digital Environment, which stipulates that countries should:

*“Prohibit by law the profiling or targeting of children of any age for commercial purposes on the basis of a digital record of their actual or inferred characteristics, including group or collective data, targeting by association or affinity profiling. Practices that rely on neuromarketing, emotional analytics, immersive advertising and advertising in virtual and augmented reality environments to promote products, applications and services should also be prohibited from engagement directly or indirectly with children”.*<sup>14</sup>

Facebook's 27 July announcement was a tacit acknowledgement of the harm caused to children from invasive, manipulative, surveillance-based advertising. It said, in part:

*“We already give people ways to tell us that they would rather not see ads based on their interests or on their activities on other websites and apps, such as through controls within our ad settings. But we've heard from youth advocates that young people may not be well equipped to make these decisions. We agree with them, which is why we're taking a more precautionary approach in how advertisers can reach young people with ads”.*<sup>15</sup>

As youth advocates ourselves, we want to be abundantly clear: Shifting the ability to target teens from advertisers to algorithms does nothing to abate the harms of surveillance, and further erodes Facebook's integrity on these matters. **We urge you to reveal the full detail of how teens receive optimised, targeted ads and to commit to end this practice altogether. Anything less would be inconsistent with the “more precautionary approach” claimed in your announcement.**

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<sup>13</sup> Facebook nd 'About Ad Delivery'

<https://www.facebook.com/business/help/1000688343301256?id=561906377587030>

<sup>14</sup> United Nations Committee on the Rights of the Child 2021 *General Comment No. 25 (2021) on Children's Rights in Relation to the Digital Environment* Paragraph 42

<https://www.ohchr.org/EN/HRBodies/CRC/Pages/GCChildrensRightsRelationDigitalEnvironment.aspx>

<sup>15</sup> Instagram 2021 'Giving Young People a Safer More Private Experience'

<https://about.instagram.com/blog/announcements/giving-young-people-a-safer-more-private-experience>

Sincerely,

Fairplay

Global Action Plan UK

Reset Australia

5Rights Foundation, UK

Accountable Tech

Adfree Cities, UK

Africa Digital Rights' Hub, Ghana

Alcohol Justice\*

Amnesty International USA

Berkeley Media Studies Group

Canadian Centre for Child Protection Inc.

Center for Digital Democracy

Children and Screens: Institute of Digital Media and Child Development

Coalition For Women In Journalism

Common Sense

Consumer Federation of America

Consumer Federation of California

CyberSafeKids

Data Privacy Brasil Research Association

Defend Democracy

Electronic Privacy Information Center (EPIC)

Exposure Labs, The Creators of The Social Dilemma

Fair Vote, UK

Fight for the Future

Foxglove, UK

Friends of the Earth

Global Witness, UK

Instituto Alana, Brazil

International Association for Steiner Waldorf Early Childhood Education

Irish Council for Civil Liberties

#jesuislà, France

Log Off Movement

Me2B Alliance

National Center on Sexual Exploitation

Obligation inc.

Parent Coalition for Student Privacy

Peace Educators Allied for Children Everywhere (P.E.A.C.E., Inc.)

Parents Television and Media Council

ParentsTogether

Peter Tatchell Foundation

Privacy International (PI)

Ranking Digital Rights

Stop Funding Heat  
Stop Predatory Gambling and the Campaign for Gambling-Free Kids  
Tech Transparency Project  
The Signals Network  
UltraViolet  
Waldorf Early Childhood Association of North America

\*Indicates organizations that signed on after the initial publication of this letter on Nov. 16