



Broadcasting Authority of Ireland

**Report on compliance with BAI codes by
non-Irish licensed TV services 2015-2016**

October 2017

1. Introduction

This is a report to the Minister of Communications, Climate Action and Environment (DCCA) on the extent to which television broadcasters regulated in other EU Member States, with broadcasts wholly or mainly directed at Irish audiences, comply with the Broadcasting Authority of Ireland's broadcasting codes.

The requirement for this report is set out in sections 28(5) and (6) of the Broadcasting Act 2009 ("the Act"), as follows:

(5) The Compliance Committee shall review on an ongoing basis the extent to which the television broadcasts of broadcasters under the jurisdiction of another Member State which are wholly or mainly directed towards audiences in the State comply with broadcasting codes, in particular the codes referred to in section 42(2)(g) and (h).

(6) The Compliance Committee shall each year make a report to the Minister in respect of the matters in subsection (5).

The BAI reviewed compliance in this regard for 2015 and 2016 and this report provides the results of its analysis. The scope of the review is set out in section 2, followed by an outline of the approach and methodology employed by the BAI to undertake this work. Section 3 describes how the BAI's approach was applied to select a sample of broadcasters and identify areas of the broadcasting codes to focus on in the review. Finally, the review results and conclusions are presented in section 4.

2. Scope, Principles and Methodology

The review is concerned with commercial content broadcast in the time period beginning on 1st January 2015 and ending on 31st December 2016.

Thirty-nine (39) television broadcasters come within the scope of this review by virtue of having broadcasts wholly or mainly directed at audiences in Ireland whilst regulated in EU jurisdictions outside of Ireland.¹ These services aired commercial content that was directed at Irish audiences in the form of opt-out advertising. Their programme schedules are common to all jurisdictions in which the services are broadcast and are not directed specifically at Irish audiences. Consequently, it is just the BAI codes that deal with commercial content that are relevant to this review: the BAI *Children's Commercial Communications Code (August 2013)* and the *General Commercial Communications Code (August 2013)*.² (These codes give expression to section 42(2)(g) and (h) of the Act.)

In 2010, the BAI's Compliance Committee established three principles to provide a structure and focus for undertaking this review on an ongoing basis. The legislative requirement for the review is quite general in nature and, if applied to its fullest extent, could potentially cause a significant strain on the BAI's compliance resources. The principles agreed by the Compliance Committee provide a

¹ Alibi, At The Races, Challenge, Channel Four Ireland, Channel Four Ireland +1, Comedy Central (Irl), Comedy Central +1, Comedy Central Extra, Dave, Discovery (Irl), Discovery ID (Irl), E Entertainment, E4, E4 +1, Film 4, Gold, More 4, MTV, MTV Music, Nick Jr, Nick Jr Too, Nickelodeon, Nicktoons, Pick, Sky 2, Sky Atlantic, Sky Living, Sky Living +1, Sky News (Irl), Sky One, Sky Sports 1, Sky Sports 2, Sky Sports 3, Sky Sports 4, Sky Sports 5, Sky Sports News HQ, TLC, Universal Channel Irl, W.

² The BAI published a revised *General Commercial Communications Code* that came into effect on 1st June 2017. The monitoring undertaken for this report was against the Code that was in effect at the time of the broadcasts.

mechanism for focussing the review on obtaining valuable information in areas of importance and/or high risk rather than using a catch-all approach.

The three principles are as follows:

(1) Principle of exclusion/prohibition

It is reasonable to infer from the legislation that a key purpose of the review is to identify differences in regulation between EU jurisdictions. The review may focus then on areas of the broadcasting codes where Ireland has more restrictive rules than the jurisdictions in which the broadcast services are regulated.

(2) Principle of societal sensitivities/concerns

The review shall take cognisance of matters of concern to the public in Ireland that are dealt with in the broadcasting codes, e.g. alcohol advertising.

(3) Principle of risk/protection

Cognisance shall be given to the regulation of in-scope broadcasters in other EU jurisdictions and the mechanisms available to the public to make complaints under those regulatory regimes, in particular, in relation to the protection of children.

Informed by the above principles and previous practice, the following methodologies were employed:

Desk research - to identify the broadcasters in scope and the jurisdictions in which they are regulated, identify the key differences in regulation between Ireland and those jurisdictions and the availability of complaints mechanisms, and identify from existing research the areas of concern for Irish audiences. This informs the selection of a sample of broadcasters and the areas of the codes on which to focus the review, about which more detail can be found in section 4 below.

Monitoring content – to record, view and analyse content recorded from a selected time period for each broadcaster from a sample of the 39 eligible broadcast services.

Analysis of advertising logs – to review and analyse the advertising logs from a selected sample of broadcasters against the areas of the codes that set scheduling and quantitative limits on advertisements.

3. Selecting focus areas of Codes and sample broadcasters

Focus areas of the Codes

The review focussed on the following areas of the Codes:

- Cosmetic treatments and services
- Slimming treatments, products and services
- Betting services
- Fortune tellers, psychic services, etc.
- Alcohol
- HFSS Foods
- Products aimed at under-6 audience

In the case of alcohol, this includes monitoring against the *Alcohol Marketing, Communications and Sponsorship Codes of Practice*³ (“the AMCMB’s Code”), a self-regulatory code for broadcasters and other advertising platforms that, among other things, sets out quantitative limits on alcohol advertising.

The focus areas of the Code were selected by applying the three principles outlined in section 2 and examining equivalent regulation in the UK, reviewing the BAI’s own research/knowledge of public concerns and identifying areas of non-compliance in previous reviews of this nature.

All broadcasters coming within the scope of this review are regulated by Ofcom in the UK and are subject to the codes and rules of Ofcom. The rules in relation to the content of advertising are set out in the UK Code of Broadcast Advertising (“BCAP Code”)⁴ and an independent body, the Advertising Standards Authority (UK), handles complaints from the public in relation to the BCAP Code. In broad terms, the provisions of the BCAP Code are more expansive and detailed than the equivalent BAI codes, however, there are specific areas where Irish regulation imposes comparatively stricter restrictions on certain products and services. This includes rules in relation to commercial communications for alcohol, cosmetic treatments and services, betting and fortune tellers and psychic services.

Research undertaken by the BAI in its 2014/5 review of the *General Commercial Communications Code* (GCCC) revealed relatively few instances of the public being offended or believing themselves misled by commercial communications, however, people had slightly higher levels of feeling offended or misled for certain products/services. Excluding those products/services that are required to comply with regulation or codes of practice of other authorities, these included: slimming products, betting services, fortune tellers and psychics, and alcohol. In relation to the BAI’s *Children’s Commercial Communications Code* (CCCC), commercial communications for foods that are high in fat, sugar and salt (HFSS foods) generated widespread interest from the public, civil society groups and commercial organisations when rules were introduced in 2013.

Finally, previous reviews of non-Irish licensed TV services identified instances non-compliance with rules for commercial communications for products targeted to the under-6 audience, particularly toys. The key area of non-compliance was not including the required spoken statements in relation to products being sold separately or requiring batteries.

Sample of broadcasters

Employing the practice of previous reviews and applying the principle of risk/protection, a sample of 12 broadcasters were selected for monitoring using the following criteria: audience share, content type/genre and target audience demographics. The sample is comprised of broadcasters with higher audience shares and, taken together, the sample offers a diversity of content (e.g. sports, news, entertainment, etc.) and targets a range of audiences (e.g. young adults, children, all adults).

The broadcasters selected for monitoring were:

1. Channel Four Ireland
2. Sky One
3. Sky News (Irl)
4. E4
5. Sky Sports 1 (Irl)

³ <http://asai.ie/wp-content/uploads/Alcohol-Codes-of-Practice-2008.pdf>

⁴ <https://www.asa.org.uk/codes-and-rulings/advertising-codes.html>

6. Comedy Central (Irl)
7. Discovery (Irl)
8. At the Races
9. Nickelodeon
10. Challenge
11. MTV
12. Sky Living

For each broadcast service, three 24-hour periods of output between the dates of 30th September 2016 and 24th October 2016 were recorded, with one 24-hour period monitored in full and spot checks carried out on the other days. For 2015, the advertising logs of two 24-hour periods for each broadcaster were analysed. This approach is based on the principle of risk whereby the issues of non-compliance identified in the most recent report for 2014 were regarded as not significant. Consequently, the approach outlined above for 2015 and 2016 was deemed appropriate.

4. Review results and conclusion

The review found that opt-out advertising broadcast on non-Irish licensed TV services was broadly in compliance with the BAI's GCCC and CCCC and there were no issues arising in relation to the AMCMB's Code for alcohol advertising.

There was a total of 35 instances of commercial communications that infringed on the Codes; 7 of those in relation to the GCCC, with 28 infringing on the CCCC. A detailed list of these is appended to this report. As shown in the table below, a key issue emerging is commercial communications for products aimed at children under 6 years not stating the onscreen warnings orally. For the GCCC, the most common issue was commercial communications for betting services that included content deemed to be an encouragement to bet. The other two areas of infringement pertained to (1) the inclusion of an exaggerated claim in relation to a medical treatment/service (laser eye surgery) and (2) not indicating when batteries are required in commercial communications for products aimed at children under 15 years.

Code	Code Section	No. infringing content
GCCC	8.2 Medicines, Medical Treatments, Products and Services and Cosmetic Treatments and Services	1
GCCC	8.8 Betting Services	6
CCCC	6. Inexperience and Credulity - State onscreen warnings	26
CCCC	6. Inexperience and Credulity - Indicate when batteries are required	2
	Total	35

In relation to the focus areas of the Codes as identified in section 3 above, there was overall compliance with the provisions pertaining to cosmetic treatments and services, slimming treatments, products and services, fortune tellers, psychic services, alcohol and HFSS foods. No infringements were identified in any of these areas, as shown in the table below.

Focus areas of Codes	No. infringing content
Cosmetic treatments and services	0
Slimming treatments, products and services	0
Betting services	6

Focus areas of Codes	No. infringing content
Fortune tellers, psychic services, etc	0
Alcohol	0
HFSS Foods	0
Products aimed at under-6 audience	28

When the figures are broken down by each broadcaster in the sample (see table below), 28 of the 35 instances of identified infringements occurred on Nickelodeon. This is unsurprising given the 28 infringements are of the CCCC and Nickelodeon is a channel dedicated to children's programming and its commercial communications are largely aimed at children. It is worth noting here that the infringements correspond to individual advertisements and not to every instance they were broadcast; the 28 advertisements were frequently broadcast more than once across the monitored day.

The table also shows an infringement of the betting services rules on Sky Living, Sky News (Irl) and Sky One. It should be noted that this was the same advertisement aired across the three Sky services.

Broadcaster	GCCC	CCCC	Total	Breakdown
At the Races	0	0	0	n/a
Challenge	0	0	0	
Channel Four Ireland	3	0	3	Section 8.2, Rule 4 - Exaggerated claim about a medical treatment Section 8.8 - Promotional offers for betting services (x2)
Comedy Central (Irl)	0	0	0	n/a
Discovery (Irl)	0	0	0	n/a
E4	1	0	1	Section 8.8 - Reference to quick winnings as encouragement to bet
MTV	0	0	0	
Nickelodeon	0	28	28	Section 6, Rule 9 - Did not state warnings orally (x26) Section 6, Rule 5 - Did not indicate when batteries are required (x2)
Sky Living	1	0	1	Section 8.8 - Reference to price as encouragement to bet
Sky News (Irl)	1	0	1	Section 8.8 - Reference to price as encouragement to bet
Sky One	1	0	1	Section 8.8 - Reference to price as encouragement to bet
Sky Sports 1 (Irl)	0	0	0	n/a
Total	7	28	35	

The EU Audiovisual Media Services Directive sets standards for television regulation across the European Union and it makes provision for a Member State to escalate non-compliance with its broadcasting codes with other regulators, in circumstances where it considers that a broadcaster regulated in one jurisdiction and targeting citizens in another jurisdiction is undermining local regulation.

The BAI's review of non-Irish licensed television services availing of opt-out advertising in Ireland indicates broad compliance by those services with the BAI's broadcasting codes. However, the issues in relation to betting services are of concern to the BAI because these advertisements are effectively encouraging audiences to bet, which is not permitted by the GCCC. The BAI is also concerned about

the absence of oral messages on children's advertising for products and services of particular interest to those under the age of six, in particular, because this issue was evident in previous reviews of this nature. It should be noted that this issue has also arisen in monitoring Irish television services in the past, though more current data is required for accurate comparison.

The BAI will raise the issues of non-compliance with Ofcom and request that they inform its regulated broadcasters of our findings. No further escalation is warranted given the overall level of non-compliance is not significant. It is recommended that cognisance is given to this report's findings in the review undertaken next year and comparative data for Irish television services is gathered in relation to the relevant key issues raised here.

Appendix
Results of monitoring non-Irish licensed TV services against BAI Codes

Broadcaster	Date(s)	Time(s)	Code	Code Section	Code Rule/Principle	Advertisement	Infringing content
Channel 4 Ireland	22/10/2016	11:55	GCCC	8.2 Medicines, Medical Treatments, Products and Services and Cosmetic Treatments and Services	4. Commercial communications shall not contain the unwarranted and indiscriminate use of such words as "safe", "without risk", "harmless", or terms of similar meaning. In addition, exaggerated claims are not permitted, in particular, through the selection of testimonials or other evidence unrepresentative of the effectiveness of medicines, medical treatments, products and services and cosmetic treatments and services.	Optilase	Included the exaggerated claim "you get perfect eyesight..." in connection with eye surgery.
Channel 4 Ireland	22/10/2016	14:19	GCCC	8.8 Betting Services	Commercial communications that seek to promote services to those who want to bet are acceptable. Commercial communications of this nature may contain the address of the service provider and factual descriptions of services available but shall not contain anything which could be deemed to be an encouragement to bet. Information detailing special offers, discounts, inducements to visit any betting establishment (including on-line), references to betting odds available or any promotional offer intended to encourage the use of services of this nature are not permitted.	Ladbrokes	Included a promotional offer intended to encourage the use of the service: "If the starting price is bigger than the price you've taken, we won't just match it, we'll boost it. Every race, every day".

Broadcaster	Date(s)	Time(s)	Code	Code Section	Code Rule/Principle	Advertisement	Infringing content
Channel 4 Ireland	22/10/2016	14:32 14:38 15:23	GCCC	8.8 Betting Services	Commercial communications that seek to promote services to those who want to bet are acceptable. Commercial communications of this nature may contain the address of the service provider and factual descriptions of services available but shall not contain anything which could be deemed to be an encouragement to bet. Information detailing special offers, discounts, inducements to visit any betting establishment (including on-line), references to betting odds available or any promotional offer intended to encourage the use of services of this nature are not permitted.	Paddy Power	Included a promotional offer intended to encourage the use of the service: "...money back as a free bet if your horse finishes second to the SP favourite in all races at Doncaster today and at one meeting every day this month". "...money back as a free bet if your horse finishes second to the SP favourite at all races at one meeting every day this month".

Broadcaster	Date(s)	Time(s)	Code	Code Section	Code Rule/Principle	Advertisement	Infringing content
Sky One	07/10/2016	00:10 00:28 01:03	GCCC	8.8 Betting Services	Commercial communications that seek to promote services to those who want to bet are acceptable. Commercial communications of this nature may contain the address of the service provider and factual descriptions of services available but shall not contain anything which could be deemed to be an encouragement to bet. Information detailing special offers, discounts, inducements to visit any betting establishment (including on-line), references to betting odds available or any promotional offer intended to encourage the use of services of this nature are not permitted.	Lottoland.ie	Includes reference to price which is deemed to be an encouragement to bet: "With us, the Euromillions is still just €2. Play online now at lottoland.ie".
Sky News (Iri)	08/10/2016	21:56	GCCC	8.8 Betting Services	Commercial communications that seek to promote services to those who want to bet are acceptable. Commercial communications of this nature may contain the address of the service provider and factual descriptions of services available but shall not contain anything which could be deemed to be an encouragement to bet. Information detailing special offers, discounts, inducements to visit any betting establishment (including on-line), references to betting odds available or any promotional offer intended to encourage the use of services of this nature are not permitted.	Lottoland.ie	Includes reference to price which is deemed to be an encouragement to bet: "With us, the Euromillions is still just €2. Play online now at lottoland.ie".

Broadcaster	Date(s)	Time(s)	Code	Code Section	Code Rule/Principle	Advertisement	Infringing content
Sky Living	04/10/2016	01:5301:4103:47	GCCC	8.8 Betting Services	Commercial communications that seek to promote services to those who want to bet are acceptable. Commercial communications of this nature may contain the address of the service provider and factual descriptions of services available but shall not contain anything which could be deemed to be an encouragement to bet. Information detailing special offers, discounts, inducements to visit any betting establishment (including on-line), references to betting odds available or any promotional offer intended to encourage the use of services of this nature are not permitted.	Lottoland.ie	Includes reference to price which is deemed to be an encouragement to bet: "With us, the Euromillions is still just €2. Play online now at lottoland.ie".
E4	02/10/2016	22:54 23:09	GCCC	8.8 Betting Services	Commercial communications that seek to promote services to those who want to bet are acceptable. Commercial communications of this nature may contain the address of the service provider and factual descriptions of services available but shall not contain anything which could be deemed to be an encouragement to bet. Information detailing special offers, discounts, inducements to visit any betting establishment (including on-line), references to betting odds available or any promotional offer intended to encourage the use of services of this nature are not permitted.	Poker Stars	Includes reference to winnings in a short timeframe which is deemed to be an encouragement to bet: "You could win up to a million dollars in just 5 minutes". Text tag: "Win up to \$1,000,000 today".
Nickelodeon	10/11/2016	05:58	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Paw Patrol Patroller (3+ years)	Did not state orally that additional vehicles and figures are sold separately.

Broadcaster	Date(s)	Time(s)	Code	Code Section	Code Rule/Principle	Advertisement	Infringing content
Nickelodeon	10/11/2016	05:58	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Paw Patrol Roll Patrol (3+ years)	Did not state orally that batteries are required.
Nickelodeon	10/11/2016	06:09	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Sylvanian Families Treehouse (3+ years)	Did not state orally that additional sets are sold separately.
Nickelodeon	10/11/2016	06:10	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Playmobil Advent Calendar (4-10 years)	Did not state orally that products are sold separately and batteries are required.
Nickelodeon	10/11/2016	06:11	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Playmobil Porche (4+ years)	Did not state orally that batteries are required.
Nickelodeon	10/11/2016	06:29	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Northern Lights Elsa Doll (3+ years)	Did not state orally that batteries are not included.
Nickelodeon	10/11/2016	07:56	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	TMNT Skateboarding Mikey (4+ years)	Did not state orally that batteries are not included.
Nickelodeon	10/11/2016	07:57	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Flair Grossery Gang (5+ years)	Oral statement that sets and items are sold separately was played too quickly to be understandable.

Broadcaster	Date(s)	Time(s)	Code	Code Section	Code Rule/Principle	Advertisement	Infringing content
Nickelodeon	10/11/2016	09:12	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Paw Patrol Zoomer Marshall (3+ years)	Did not state orally that batteries are required.
Nickelodeon	10/11/2016	09:29	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Little Tikes My First Flyer (4+ years)	Did not state orally that batteries are not included.
Nickelodeon	10/11/2016	09:56	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Hot Wheels Ultimate Garage (5+ years)	Did not state orally that batteries are not included.
Nickelodeon	10/11/2016	09:57	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Thomas & Friends Minis Motorised Raceway (3+ years)	Did not state orally that products are sold separately and batteries are not included.
Nickelodeon	10/11/2016	10:28	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	My Little Pony Crystal Empire (3+ years)	Did not state orally that products are sold separately and batteries are required.
Nickelodeon	10/11/2016	11:15	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Sylvanian Families Beechwood Hall (3+ years)	Did not state orally that products are sold separately and batteries are not included.
Nickelodeon	10/11/2016	11:57	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Octonauts Gup-K Vehicle (3+ years)	Did not state orally that batteries are not included.

Broadcaster	Date(s)	Time(s)	Code	Code Section	Code Rule/Principle	Advertisement	Infringing content
Nickelodeon	10/11/2016	13:58	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Trolls Coronation Pod (4+ years)	Did not state orally that additional products are sold separately and batteries are not included.
Nickelodeon	10/11/2016	15:26	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Frozen Jewellery Box (3+ years)	Did not state orally that batteries are required.
Nickelodeon	10/11/2016	16:29	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Ghost Hunt Game (5+ years)	Did not state orally that batteries are sold separately.
Nickelodeon	10/11/2016	17:11	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Thomas & Friends Trackmaster Sky High Bridge Jump (3+ years)	Did not state orally that products are sold separately and batteries are not included.
Nickelodeon	10/11/2016	17:14	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Num Nums Lip Gloss Truck (3+ years)	Did not state orally that products are sold separately.
Nickelodeon	10/11/2016	17:29	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Playmobil Tree House/Hospital (4+ years)	Did not state orally that products are sold separately and batteries are required.
Nickelodeon	10/11/2016	17:57	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Playmobil Space (4+ years)	Did not state orally that products are sold separately

Broadcaster	Date(s)	Time(s)	Code	Code Section	Code Rule/Principle	Advertisement	Infringing content
							and batteries are required.
Nickelodeon	10/11/2016	18:26	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Soggy Doggy Game (4+ years)	Did not state orally that batteries are not included.
Nickelodeon	10/11/2016	20:58	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Alien Mission Evolution (5+ years)	Did not state orally that batteries are required and aliens only appear in googles.
Nickelodeon	09/11/2016	23:30	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Disney Princess Royal Dreams Castle (3+ years)	Did not state orally that adult assembly required and products sold separately.
Nickelodeon	11/11/2016	08:57	CCCC	6. Inexperience and Credulity	9. State orally any on-screen messages or small print in order to ensure that children of this age understand the message. U/6	Fur Real Friends Torch (3+ years)	Did not state orally that batteries are not included.
Nickelodeon	10/11/2016	16:12	CCCC	6. Inexperience and Credulity	5. Clearly indicate when batteries are required for the operation of the product and whether these are supplied with the product. U/15	Og on the Bog game (5+ years)	Did not indicate that batteries are required and are not included.
Nickelodeon	10/11/2016	17:11	CCCC	6. Inexperience and Credulity	5. Clearly indicate when batteries are required for the operation of the product and whether these are supplied with the product. U/15	Zoomer Chimp (5+ years)	Did not indicate that batteries are required.