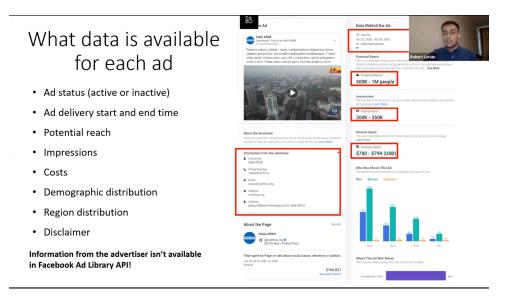


## Elections and Online Political Ads Monitoring Case Study: Civil Network OPORA

As use of social media globally has increased, political campaigns have shifted time and resources to utilizing this digital space to reach citizens. Social media platforms provide political contestants easy access to a large audience, and allow microtargeting that makes advertising extremely effective in reaching specific users. The move to online campaigning has been further compounded by the COVID-19 pandemic that largely shut down in-person campaign activities in many countries that held elections during the public health crisis. However, voter outreach on social media, in particular political advertising, presents new challenges to electoral transparency, accountability, and political discourse. In most countries, online political advertising is not adequately or specifically regulated in the legal framework as part of the broader campaign finance regime, and

the policies. transparency initiatives, and definitions for political, electoral, and social issue advertising differ widely across social media platforms, and are frequently changing. Meanwhile, microtargeting remains an effective tool for delivering political ads based on specific demographics, creating an information different environment where populations are exposed to very different political content and allows advertisers to spread false, misleading, or harmful narratives



with limited oversight or accountability as some microtargeted advertising is never seen by mainstream audiences. These dynamics complicate how election observers can safeguard electoral integrity, particularly in the pre-election period, and may require new and adjusted methodologies to track political finance and online campaigning.

Such was the case in Ukraine, which has seen Facebook use increase in recent years as citizens turn to the platform to read, share, and digest political information. It is no surprise that as citizens turn their attention to the social media platform, political information and advertising would follow suit. Between Ukraine's 2019 parliamentary elections and its 2020 local elections, spending on political ads on Facebook tripled from approximately \$2 million to more than \$6 million. With this large increase in online political advertising comes a series of complexities around election integrity, which include: political finance transparency, information integrity, how legal frameworks address online political advertising, uneven policies and information transparency between platforms and countries, and how to hold platforms and political actors accountable.

**Ukraine's Citizen Network OPORA**, a Kyiv-based non-partisan civil society organization (CSO), sought to better understand the political advertising environment on Facebook and assess its impact on key electoral integrity principles. OPORA has a deep expertise in election monitoring and advocacy that began in 2007. This includes observing all stages of the electoral process from the pre-election period to election day and through the tabulation of results, and successfully advocating for electoral reforms to bring Ukraine's election framework in line with international democratic standards. As the election information environment has moved online, so have OPORA's monitoring techniques, including analyzing disinformation, networks of pages, political advertising, and inauthentic, coordinated behavior on Facebook.

**Facebook Political Ads Monitoring**: OPORA began monitoring online political advertising ahead of Ukraine's 2019 presidential election when Facebook first made available its Political Ads Library on March 18, 2019, less than two weeks before the election's first round. The CSO continued to monitor using Facebook's Political Ads Library, Report, and API during and between the 2019 parliamentary elections and 2020 local elections. OPORA's monitoring methodology included the following: 1) understand whether ads served to discredit political actors or spread false/misleading information; 2) analyze who placed the ads and what currency was used to pay for them in order to know if the advertiser is a candidate or party, other politically-engage entity, or anonymous, and if the source is domestic or foreign; 3) track coordinated inauthentic behavior based on advertiser information and ad content; 4) compare official political finance reports submitted by political contestants with advertising costs from Facebook; 5) monitoring political advertising and online discourse during the electoral silence period; and 6) continue monitoring beyond election periods to build capacity, refine methodologies, and better understand the advertising landscape and it changed around an election.

Candidate	Provisional spending on political advertising on Facebook (from - to, UAH)	Advertising costs on the Internet according to the final financial statement (UAH)	Party	Number of ads	Provisional costs, UAH	Costs for online ads according to the final financial statements, UAH	D
Volodymyr	934,000 - 9,227,000	259,197	"Holos"	529	7,740,652	6,168,632	
Zelenskyi			European Solidarity	328	6,716,419	6,499,325	
Petro Poroshenko	2,432,700 - 10,692,000	1,199,900	Power of Law	63	4,361,622	0	
Yuliya Tymoshenko	877,500 - 3,340,000	1,018	All-Ukrainian Union "Batkivshchyna"	78	2,375,121	0	
Yuriy Boyko	459,000 - 3,526,000	156,700	Servant of the People	560	1,774,188	334,900	2
Anatoliy Hrytsenko	310,500 - 1,496,000	2,392,743	Shariy Party	1,641	1,653,700	2,993,014	
Oleksandr Shevchenko	1,903,500 - 7,252,000	7,650,000	Opposition Platform - For Life	2,398	1,515,898	0	

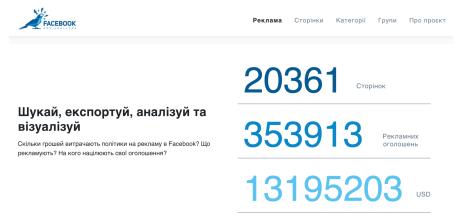
Parliament Election 2019

## President Election 2019

**Key Findings**: Based on its monitoring during and between three election cycles spanning March 2019 through October 2020, OPORA collected and analyzed extensive information about political advertising on Facebook in Ukraine. Between the election campaign for the July 2019 parliamentary election and October 2020 local elections, spending on political ads on Facebook increased from \$2 million to more than \$6 million underscoring the increased use of online political advertising. By monitoring during inter-election periods, OPORA discovered that the advertisers, number of ads, and expenditures on Facebook ads changed from before the local election campaign began in August 2020 to during the campaign period. In July 2020, prior to the official start of the campaign, the largest advertisers were primarily famous individuals and media companies

who spent between \$212,000 and \$328,000 on approximately 10,800 ads.<sup>1</sup> While just in the month of August, the largest political advertisers became political parties and candidates who spent between \$425,000 and \$576,000 on approximately 20,900 ads. In comparing the official campaign finance reports submitted by political contestants to the election administrators with political advertising expenditures reported in the Facebook Political Ads Report, OPORA also discovered underreporting by all major political contenders. Moreover, OPORA uncovered political advertising on Facebook that targeted voters the day before and on election day, <u>violating the electoral silence period</u>. Unfortunately, enforcement mechanisms for breaches of the campaign and political finance regulations pertaining to social media are weak and violators proceed with impunity as they increasingly spend money to place ads online.

**Outcomes**: The main way to systematically analyze political ads on Facebook is by using the Political Ads Library API, which is not publically Facebook available. While did eventually implement the (Political) Ad Library Reports for Ukraine, it only includes total spending by advertisers and lacks specific information about ad targeting in terms of demographics and geography. OPORA built its Facebook Ads Analyzer to systematically organize,



analyze, and make publicly available key information about political advertising on Facebook to increase transparency and public oversight of the election process. OPORA discovered that because the onus of declaring Facebook ads as political is on the advertiser, many political ads are not declared as such, do not include the "Paid for by" disclaimer, and are omitted from the Political Ads Library. In response, the CSO developed a <u>public awareness campaign</u> for citizens to report political ads without disclaimers to Facebook as well as prepared materials for political contestants on how to properly declare and publish political ads on Facebook. Moreover, because information about the advertiser itself is not available through the API, this information has to be monitored and analyzed manually. In doing so, OPORA uncovered coordinated inauthentic behavior that it reported to Facebook, which subsequently removed three pages and 50 accounts from the platform. Finally, based on its extensive monitoring, analysis, and reporting, OPORA successfully advocated for electoral reforms related to campaign finance disclosures in Ukraine, which led to the inclusion of a line item for social media advertising on disclosure forms for all political competitors ahead of the country's 2020 local elections. Not only does this improve political finance transparency, but allows regulators and independent monitors to hold political actors accountable for all their campaign spending, including on the ever increasingly used social media platforms.

Lessons Learned and Areas for Ongoing Advocacy and Reform: OPORA's two years of Facebook political ads monitoring experience has not only deepened the organization's expertise as a leader in the electoral process observation space, but has led it to note a number of key takeaways and areas for further reform from this experience:

<sup>&</sup>lt;sup>1</sup> Facebook provides a range of spending for paid advertising on its platform, not exact figures.

Reforming the legal framework and bolstering oversight mechanisms to incorporate online campaigning	The legal framework's regulation of campaign financing, especially political advertising, often lags behind reality. This is especially true with the advent of online political advertising that allows campaigns to more efficiently target audiences with their political narratives (whether true or not). Advocacy to ensure election regulations better match reality is important to bolster transparency and accountability. The legal framework can be further improved by strengthening enforcement mechanisms for campaigning violations, such as online campaigning during silence periods or for underreporting online advertising spending. Building the knowledge and capacity of political finance and electoral complaint oversight bodies who may be unfamiliar with the digital advertising landscape will further strengthen accountability in the election process.
Addressing gaps in political disclosure requirements	Because political ads must be self-disclosed, the responsibility is on the advertiser to disclose that the content of the ad is political, and for the independent monitors and users to police the platform for non-disclosed ads. To address this, OPORA developed its public awareness campaign "How to Help Advocate for Legality of Political Ads in Social Media?" to help users report unmarked political ads that breach Facebook's political advertising rules. While Facebook uses algorithms to try and detect non-disclosed ads, these are imperfect, making accountability difficult and decreasing the transparency of online political advertising.
Urging improvements to platform transparency tools and policies	Facebook has taken considerable efforts to strengthen its transparency initiatives and policies around political advertising, but there is more that can be done to ensure greater accountability and transparency in election processes as users (voters, political contestants, etc.) increasingly use the platform to share, discuss, and advertise political messages. Some of these efforts can include: improving the granularity of data provided through the Political Ads Library, Report, and API on spending, reach, and microtargeted audiences; creating unified policies for where and when transparency initiatives will be available rather than doing so on an ad hoc , and sometimes last-minute, basis; proactively combating false and misleading information, especially around elections, to remove the onus for identifying coordinated, inauthentic behaviour on independent monitors; and improving compliance with electoral regulations, such as respecting silence periods.
Monitoring between elections	One of OPORA's most important lessons learned is to continue monitoring beyond the electoral period. There are two main reasons for this: 1) continued monitoring helps to further build capacities and refine monitoring methodologies to improve monitoring efforts for future elections; and 2) inter-election monitoring improves understanding of the online political advertising environment to better identify how an election changes the environment in terms of actors, costs, reach, audience, and other indicators.



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