

WHY FACEBOOK'S AD LIBRARY TOOL FALLS

SHORT AND WHAT IT CAN DO TO FIX IT

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Why Facebook’s Ad Library tool falls short and what it can do to fix it

A test of Facebook Ad Library functionalities

This publication was created as part of the *Financing of Online Political Advertising. An Overview of Transparency and Accountability Risks* project of Transparency International.

This publication was produced with the financial support of the European Union.



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Thanks to: Linda Kunertová, Lucia Vilimovská, Jana Stehnová, Sofie Valová

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Why Facebook's Ad Library tool falls short and what it can do to fix it

Although Transparency International Czech Republic (TI) has monitored political campaigns on Facebook (FB) for a long time, up until this point we lacked the tools to accurately evaluate a campaign's transparency. The launch of the Facebook Ad Library tool brought a new opportunity to truly understand and analyse the cost and financial management of campaigns. Before this tool was introduced we could only speculate about these costs. However, through using the tool we have found that its limitations and gaps are so wide, that it is effectively useless at accurately tracking political advertising spending and activity.

For one, the FB pages of political parties and movements can circumvent the tool, making it difficult to see all political advertisements for a specific campaign. Second, current payment methods allow political parties and movements to prevent oversight by supervisory institutions. In this report, we will take a closer look at these issues.

Why this matters

Social networks are run by private companies, that make their money from running personalized advertising for a fee. Political parties have the right to disseminate their views, suggestions and visions in the form of paid advertising. So it might seem that, in principle, everything is alright, and the study of political advertising on social networks unnecessarily challenges these two rights (i.e. the right to sell advertising space and the right to buy political advertising) without providing fundamentally new information.

Unfortunately, the opposite is true. In [this](#) article we show how the infamous Facebook campaigns successfully "broke into" democratic systems, partly due to Facebook's non-transparent nature.

We would like to draw attention to the insidious way in which advertising tools on social networks can circumvent laws governing the rules of political campaigning, and above all, how they deceive voters.

The biggest risk of political advertising is a situation where the recipient are unaware that they are being targeted by political advertising based on personal information they shared with the social network. Yet, this is exactly today's reality, where social networks exploit their users' personal data, while hiding this exploitation from them.

Facebook Ad Library

Based on guidance from the European "[Code of Practice on Disinformation](#)", social network operators and the largest search engines are required to introduce several tools to make advertising, especially political ones, more transparent. Unfortunately, for the time being this is only self-enforced.

Thanks to negotiations at the European Commission, we have tools in the Czech Republic, as well as in other EU countries, to identify political advertising, including the costs associated with the advertising since 2019. (FB spreads the Ad Library functions to other regions currently.)

Facebook's Ad Library is one of the best tools for making political advertising on social networks more transparent, as [comparative studies show](#). It is the most consistent and detailed register of political advertising, which, even in terms of careful processing, exceeds the actions of [Google](#) and [Twitter](#).

This is revolutionary because until 2019 one could only speculate about the frequency and cost of political advertising on FB. We wrote about it [here](#). With this tool, the actual advertising spending of political parties is verified through Facebook.

However, at this point we must ask:

Does the Ad Library encompass all the sites and profiles that political parties' paid advertising spans?

Facebook's proclamation

Facebook's [statement](#) is clear: "The Ad Library contains all active ads that run on Facebook products. We want to prevent interference in elections. Transparency is a priority for us, which is why we have created the Ad Library. It provides additional information on advertising related to social issues, elections or politics, whether in terms of spending, outreach, or funding. We archive these ads for seven years." (Let's add that interested parties also obtain an API Ad Library, where you can search for political ads using keywords, for example.)

Our desire for proof of action rather than empty rhetoric - practical exercise No. 1

The detection of paid posts using commonly available marketing tools for FB shows that many political advertisements (in the form of a post on the wall of political profiles) escape inclusion in the Ad Library. For example, consider the number of paid posts captured on the pages of several political profiles between April 1, 2020, and April 22, 2020, compared to ads from the Ad Library (AdLib) for the same period.

The "Discrepancy" column highlights posts that can be found on Facebook page walls but not in Facebook's Ad Library of respective pages - these posts vary in terms of content and occurrence.

FB advertisements 1.4.-22.4.2020	Paid posts on profiles/pages (Source: Socialbakers)	AdLib (Source: Facebook)	Discrepancy (between FB AdLib and Socialbakers)
Andrej Babiš	2	3	2
Pirate Party	4	7	3
ODS	14	35	9
ČSSD	14	24	0
KDU-ČSL	25	30	5
STAN	13	15	4
TOP09	7	4	4
Václav Klaus Jr.	3	1	2

Advertising for selected FB profiles. Using Facebook Ad Library and Socialbakers, edited by Ondřej Čákl.

These ads' political content is usually quite clear. They are visible to virtually all FB users (unless they are banned or blocked). They are not marked as sponsored on the walls of their Facebook pages, but in reality some of these posts are still sponsored which makes it difficult to understand what Facebook considers a sponsored vs. an organic post. For this reason, it is not possible to evaluate accurately how much exactly the political parties spent on their advertising content.

The amount of these "unregistered" posts (and their ratio to the "registered" ones) vary considerably. For example, a zero for the ČSSD (Social-democratic Party) party means that all their

paid posts on the "wall" of the page are simultaneously listed in the Ad Library. What appears "on the wall" also goes "into the feed". So we know their advertising costs are accurately listed.

The opposite approach in the given period is represented, for example, by ODS (Civic Democratic Party) posts – many public ones are promoted, but they are not in the Ad Library, although it contains twenty other advertisements. In other words, their publicly available advertising is probably different from what goes only to individual "feeds" in terms of content. (This is not an exceptional situation, as evidenced by the [study](#) above.)

It should be noted that this deceptive activity on behalf of political parties and their profiles is not necessarily deliberate or conscious. We have yet to find out possible reasons for why these posts are not in the Ad Library.

Visibility of political advertising

Importantly, it has been shown that the Ad Library doesn't contain all political ads. So our second question is:

Why doesn't Ad Library contain all the political ads that Facebook advertisers pay for?

The answer is surprisingly simple and results from how a paid message on Facebook, or *according* to Facebook, becomes political advertising.

The initial identification of whether a post promotes a political subject is up to the post's creator; and the declaration is voluntary. This is followed by a check, not always just robotic, by Facebook. If the result of the first or second of these levels concludes that the advertisement is political, then it will be in the Ad Library under "Advertising on a particular issue, elections or politics". In summary, unless it is evaluated as a political advertisement, it will not be included there.

"Concerning social issues, elections or politics"

The goal of the Ad Library is to show the page's total advertising cost concerning social issues, elections, or politics. This is how FB names what we call political advertising. So if you are the administrator of a Facebook page that focuses on the sale of clothing, then this measure will probably not affect you.

However, if you want to promote messages that fall into Facebook's definition of "social, political, election-related", you must have your identity verified and your paid advertising will be reviewed by Facebook itself.

If you are a registered and verified administrator of, for example, the page of a politician or political party or non-governmental organization that deals with the public interest (such as TI), you will always be involved in labelling, or controlling of advertising.

When a user creates a sponsored post, usually in the FB Business Manager tool, a statement about whether their post is about social issues, elections, or politics is automatically presented to them. Nevertheless, the user can decide to "take chances", not mark the post and hope that the control by Facebook will evaluate the post as "innocent" and they can start advertising their post immediately.

The catch is that it will not appear in the Ad Library in the section "Advertising related to social issues, elections or politics" but in the section "All ads", where it will remain visible only as long as the ad is active. It will disappear after the sponsorship expires and you will no longer be able to find it. In addition, you don't see the estimated cost of advertising or targeting in this section.

Note that currently, the detection of a user's "politically exposed" posts on FB is unreliable and time-consuming. FB often evaluates even advertising that is not political as politically sensitive.

Conversely, even if it is related to, among other things, politics and the user does not claim it as such, and FB rejects it, then the user still has the opportunity to convince Facebook controls in the chat that their post is not political. If the user succeeds, then their ad can run unmarked.

Practical exercise No. 2 – Examining TI in the Ad Library



TI profile in the Facebook Ad Library | source: [Facebook](#)

[TI CZ](#) is an anti-corruption NGO and we are registered on Facebook as a non-governmental organization / non-profit organization. We are also a verified site (we have a so-called blue badge). That is why our advertising is subject to the **same FB controls** that apply to political parties, movements and politicians. For this reason, we were able to test on ourselves how accurate the current post detection system is.

For posts that relate to social issues, politics or elections, we check this "choice" when publishing them. However, not all of our posts are devoted to politics, elections or social issues. Therefore, you will not find all of our promoted posts in the Ad Library, only the active ones. From April 2019 to April 2020, we spent 126,358 CZK on advertising on FB, but in the Library for the same period you will find another amount: 67,366 CZK and the corresponding promoted traceable contributions "concerning politics". This also confirms that in theory it is possible to hide political advertising on FB (although of course our organization does not take advantage of this loophole).

Assuming political profiles will carry out apolitical advertising is naïve of Facebook

Facebook evaluates the political exposure of each post separately. Thus, even with the official profile of a political party, according to this logic, a check must be made as to whether each of the posts relate to social issues, elections or politics. If FB deems a post on behalf of a political party as *apolitical*, then the paid contribution will not be displayed in the Ad Library section. This reasoning is naïve, because even seemingly apolitical posts will naturally be used to promote a political parties' agenda and profile.

So let's summarize why Facebook's Ad Library doesn't accurately reflect the amount of political ads that advertisers pay for:

The process of identifying a post's political relevance begins with the client/user who has a voluntary right to mark the post as "Concerning social issues, elections or politics". Following that is a

check on behalf of Facebook that has unequivocal vulnerabilities, as its identification can be "reversed" at the request of the client. Which allows several paid political messages from the Ad Library to be claimed as *apolitical*. This unfortunately leads to a lack of financial transparency in how much was spent on political posts in total.

Facebook's controls favour those who do not label their advertising as political and who try to "push" their content through Facebook's controls as quick as possible. This is the easiest way for a political party and movement to bypass Facebook's Ad Library tool. Thus, ordinary users, journalists or supervisory institutions lose the opportunity to get an accurate overview of the cost and the nature of the content that political parties and movements promoted on Facebook.

How to work and not to work with Ad Library data

Even if advertisers were completely honest and the content was evaluated flawlessly so that the Ad Library would accurately contain all existing political advertising, our third question would be:

Does the Ad Library accurately show spending on the ads it keeps track of?

The Library lists two aggregated sets of data in the header: the site's expenses since the launch of the Ad Library itself and the expenses from the last seven days. This seems perfect, if you don't need to understand the data. If one needs to understand it, they have a problem again because it is impossible to select a time range for this data.

Therefore, it is impossible to choose for which seven days the amount is stated. The time-envelope shifts every day and is always "two days behind now". Therefore, this information is never fully up to date or traceable. The same applies to expenses visible from the beginning of the Library's operation.

A clear list of ads results from certain filtering options. In addition, you can see all the targeting options and results, including a breakdown of how much money FB charged for targeting each version. Therefore, it seems that the shortcomings in the above-mentioned aggregated statements could be "caught up" by listing the amounts issued manually for the selected period. However, this is not the case. There is a second, more fundamental problem.

Ads that were launched earlier and those that were launched within the selected period, but continue after it, are also seen, but the exact amount spent on them within the period only, is unclear. Therefore, the aggregate amount cannot be checked or later calculated by the sum of all individual payments for advertisements in the given period. In summary, the only solution would be for FB to allow the aggregate amount to be determined for an arbitrarily adjustable period.

As demonstrated, the transparency of political advertising spending on FB is an extremely complicated issue, but in short, FB still enables individual advertisers to not put their cards on the table, making FB complicit in the lack of transparency.

If not Facebook, who then?

If Facebook doesn't perform a reliable check, let's ask our last question:

Can the financing of a political campaign on FB be overviewed by a state-authorized entity for the public's interest?

Let us be clear, we are not asking for the legality and legitimacy of such authority, because in the Czech Republic there is such an authority. The [Office for Supervision of Political Parties and Political Movements](#) (ÚDHPSH) can and should supervise the financing of political advertising through their FB profiles of parties (and in fact does so).

However, we wonder whether carrying out this task accurately is technically even possible given Facebook's current control system.

We ask this because if the answer is no, it would mean that Facebook would be an ideal tool for circumventing Czech electoral laws relating to political advertising. These laws set campaign spending limits in our country. Their enforcement, in turn, depends on the ability to prove that a party, movement, or any campaigner has spent more on advertising than they should. If the spending on FB could be hidden, it would make it impossible to monitor these spending limits.

Is it possible to accurately report FB political advertising spending to supervisory institutions? Practical exercise No. 3

The third fundamental question is whether it is realistic to expect each paid advertisement to be reported to supervisory institutions. Each Facebook page has its administrators (private Facebook accounts or profiles of third parties such as advertising agencies). These administrators can place advertisements on the official political parties' and movement's pages. It is important to note that one private FB account can manage multiple FB pages and thus also advertise on them.

By default, when preparing an ad, a user chooses which page and which post to promote, and then they declare the advertiser, whether the page itself is a private profile or an advertising agency profile. The account is assigned with a payment method, or the card of the sponsor (there can be several cards), from which Facebook transactions take place, based on which the company subsequently issues an invoice.

However, if a user chooses to be the advertiser of given page, then FB will issue an invoice in the name of that private or agency FB profile, not in the name of page, which actually emitted the promoted ad.

In other words, ads on the FB page can be paid from different accounts with different credit cards and their billing in the Facebook Business Manager tool is then also separate. If a user enters and pays for an ad on a page from a private account, then that ad will not appear in that page's Ad Library. Transactions and invoices within the Facebook Business Manager are divided according to the advertiser, which is seemingly correct at first glance. However, this leads to our last concern:

The supervisory institution's instructions should in theory help, however, they lack the proper tools to properly carry out their task:

When an institution such as ÚDHPSH wants to get an overview of how much political entities have spent on advertising and during what timeframe (in terms of political parties' and movements' official FB pages) they use their carefully crafted [instructions](#), which explain how to monitor how much was spent on advertising and who spent it. However, these instructions do not take into account the loopholes mentioned in this report, which enables political parties and movements to circumvent the statutory budget limits for electoral campaigns.

Consequently FB pages of political parties and movements can circumvent the Ad Library, making it difficult to see all political advertisements for a specific campaign. Second, current payment methods allow political parties and movements to prevent oversight by supervisory institutions. In this report, we will take a closer look at these issues.

Summary

Facebook is seemingly improving the transparency of political marketing and advertising on its platform. However, it still has a long way to go. Given the nature of the company's product and its 2.5 billion monthly active users, the company needs to take responsibility for its extensive political influence, and actively anticipate and tackle the dangers its platform poses to the integrity and transparency of democratic elections.

The Ad Library does not accurately reflect all political ads that run on Facebook products. At best, it shows only those voluntarily marked and active.

Facebook pages of political parties and movements can bypass the Ad Library by not identifying their advertising as "related to social issues, elections or politics".

The detection of a "politically exposed" posts on FB is not reliable.

Methods in which FB advertising costs are calculated and payments are made prevent effective monitoring by supervisory institutions.

Statutory budget limits for electoral campaigns can be circumvented on Facebook, and as a result a significant amount of money can be spent in a non-transparent way.

In order to be able to serve as a tool for making political advertisements more transparent (i.e. to enable anyone to compile a realistic picture of campaign financing on FB, not only to tell users individually how the advertisement is targeted at them), the Ad Library will need to undergo several improvements.

Transparency International's Recommendations

From TI CZ's point of view, advertising for political actors should be set as political automatically, i.e. "relating to social issues, elections or politics" without giving the administrator of its FB page a choice.

Payment for FB advertising services for political entities should only be allowed from bank accounts that supervisory institutions (i.e. ÚDHPSH) have access to.

The Ad Library tool should be more user-friendly by enabling users to search and gain access to the data they are looking for, instead of solely providing access to limited and confusing numbers that give an unclear advertising picture.

In the future, the transparency of political advertising on social networks will have to be addressed systemically and preferably centrally, for example within the EU.

One of the proposals that TI supports is to set up a central register of all (including social issues) advertising at the European level.

Further reading

Pavel Havlíček, Jiří Rajtr: [Digital political advertising in the Czech Republic](#). AMO.CZ 2020 – Comparative study of the quality of tools for archiving political advertising. The first of its kind in the Czech Republic.

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Transparency International –
Česká republika, o. p. s.,
vedeného u Fio banky, a. s.
(pobočka banky na Praze 1)
je 2100385154/2010

This publication was produced
with the financial support
of the European Union.



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