



Australian Influencer Marketing Council

ACCC DIGITAL PLATFORMS ENQUIRY  
REPORT ON SOCIAL MEDIA 2023

**AiMCO SUBMISSION**

SEPTEMBER 29, 2022

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## ACCC DIGITAL PLATFORM SERVICES INQUIRY – MARCH 2023

### REPORT ON SOCIAL MEDIA SERVICES

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#### About AiMCO – The Australian Influencer Marketing Council

The Australian Influencer Marketing Council was formed in 2019 by the Audited Media Association of Australia (AMAA) when it was approached by the Australian advertising fraternity for assistance with best practice for influencer marketing. Since then, it has grown to be a member based alliance of one hundred businesses from across the influencer marketing spectrum.

AiMCO's aim is to foster a united voice of industry professionals to elevate trust and transparency, provide guidance, knowledge, and advocacy to this thriving marketing sector.

Through AiMCO's Best Practice Working Group, the organisation established AiMCO's Influencer Marketing Code of Practice in July 2020, the first of its kind in the world, and has worked to support its implementation across the industry.

#### AiMCO's Principles

1. Elevate Industry Trust – through a commitment to transparency and accountability
2. Industry best practice – advocate best practice through developing industry agreed standards
3. Industry leadership – champion industry awareness and education

Only certain areas of the ACCC Report on Social Media are pertinent to influencer marketing, hence we have responded only to these questions. Areas of focus for AiMCO in this submission are added beneath the question in this document.

#### **ACCC Key Issues**

##### **(a) Overview of supply to social media services in Australia**

##### **(ii) Supply of advertising on social media platforms to advertisers**

*Social media platforms also provide a medium for image and video advertising (including live-stream video advertising). Australia is considered to represent the fifth largest social media advertising market globally,<sup>38</sup> reflecting the willingness of Australian businesses and advertisers to engage with social media platforms. IAB Australia estimates the Australian online advertising market to be valued at \$13 billion in 2021, with display advertising accounting for \$5.1 billion.<sup>39</sup>*

*The ACCC specifically invites views in relation to the use of social media platforms for online advertising including display advertising (including sponsored posts) and influencer advertising. We also invite views on trends in the use of social media for these use cases of advertising, including changes in consumer behaviour, new entry or expansion, and technological change or innovation.*

#### **Questions for market participants**

##### **ACCC Q 9) Which platforms are the most significant social media platforms in Australia for advertising? To what extent do advertisers rely on social media platforms as a medium or mode for advertising?**

AiMCO's member companies are active primarily across the major social media platforms of Instagram, Facebook, Pinterest, Snapchat, TikTok and YouTube however many are actively also exploring new platforms such as BeReal to understand the emerging advertising opportunity. AiMCO's members have confirmed Instagram as their most important social media platform, but also that TikTok has emerged as a fierce competitor in the space along with the more traditional platforms of YouTube, Facebook, Snapchat, Twitter and the other platforms.

**ACCC Q 10) Is advertising on social media platforms differentiated with advertising on other platforms or websites? Does the availability of different types of advertising on social media platforms (such as display, influencer and sponsored posts), or different audience categories, impact advertisers’ use of social media platforms compared to other platforms or websites?**

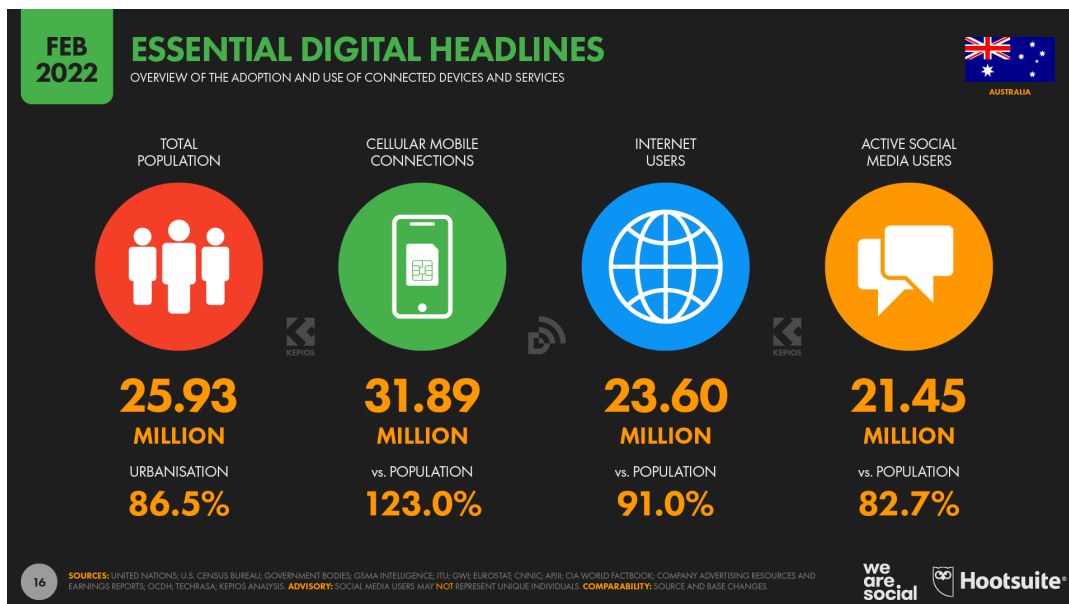
AiMCO represents companies engaged in influencer marketing, with regard to this segment of the advertising industry the different types of ad formats do impact the use of a particular platform.

The emergence and subsequent growth in TikTok, both from a consumer aspect and an advertiser point of view, is indicative of this. Video formats, ease of use, creator preference and potential virality ultimately have an impact on the selection of channel both by consumers and by the marketer.

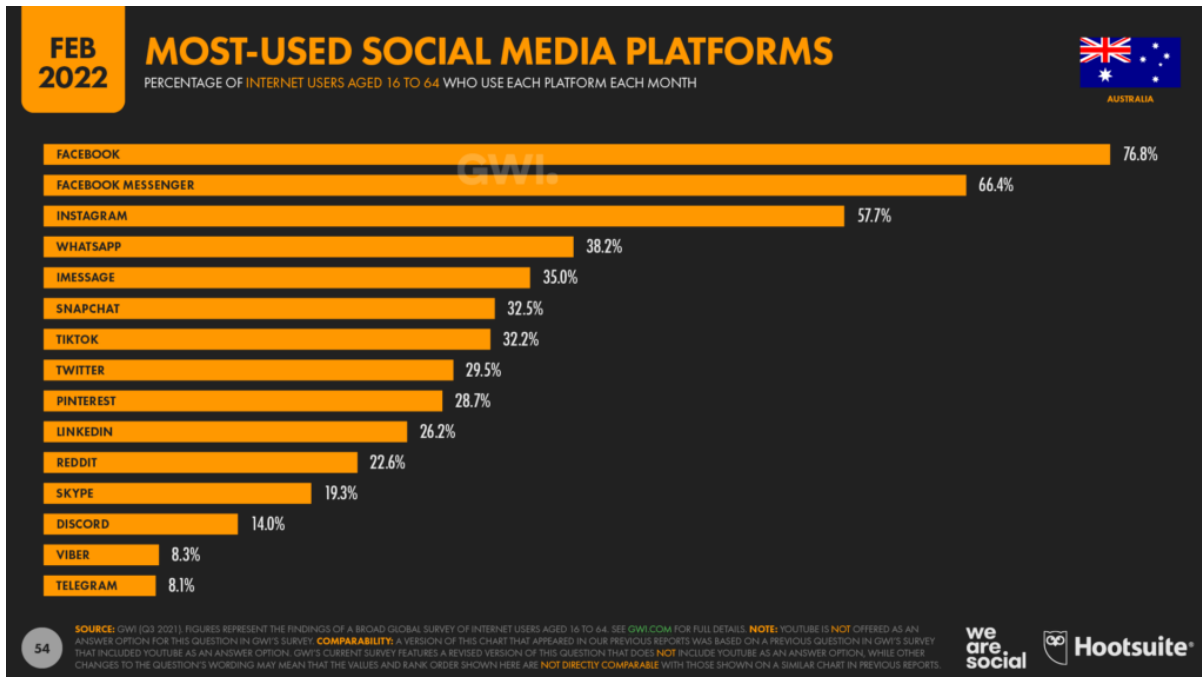
Growth and shifts in audience profile is also a key driver of advertiser uptake of a particular social platform, with this increasingly influenced by the type of content e.g. TikTok’s video content trending younger than IG or FB.

The report Digital 2022 Australia: Online Like Never Before – a report by We Are Social and Hootsuite reports:

- By the end of 2021, 82.7% of Australians were active on social media, an annual growth of nearly 1 million users. As time spent on social media increased to 1h and 57m per day it became the second most popular media activity for Australians after watching television.
- This increase was driven primarily by TikTok, now a social media staple of 32% of the 16-64 age set. Australian TikTok users scroll through the app for 23.4 hours per month – a whopping 40% jump since the beginning of 2021. Meanwhile, the Facebook – Meta – properties either stalled or shrunk their social growth: Instagram grew 3% while Facebook and Whatsapp dropped 3% and 4% respectively.



Source: <https://wearesocial.com/au/blog/2022/02/digital-2022-australia-online-like-never-before/>  
 TikTok grew considerably during the pandemic. This wasn’t enough to knock Facebook from its throne with 76.8% of social media users still hopping on, it’s still the most used platform in Australia, followed by Facebook Messenger in silver position with 66.4% and Instagram taking home the bronze with 57.7%.  
 TikTok now sits comfortably at #8, beating out Twitter, Pinterest and LinkedIn. And it’s close behind Snapchat and imessage.



Source: <https://wearesocial.com/au/blog/2022/02/digital-2022-australia-online-like-never-before/>

### ACCC Q 11) Does advertising through social media represent a significant portion of advertising spend by Australian businesses?

Currently there are no figures that define the proportion of online advertising spend that relates to social platforms. This is something that should be addressed.

- IAB's Online Advertising Expenditure Report\* for the financial year ended June 2022 reported the total online advertising market was valued at \$13.9 billion (a 22% increase year on year) comprising:
  - \$5.4bn in general display advertising,
  - \$6.1bn in search and directories,
  - \$7.1bn in mobile' and
  - \$3.1bn in video.

\*Source: IAB Australia - <https://iabaustralia.com.au/resource/online-advertising-expenditure-report-fy22-june-quarter-2022-2/>

- Social media advertising spend is not broken out as a category within the IAB reporting. However, Statista.com\* estimates that:
  - Ad spending in the Social Media Advertising segment is projected to reach US\$3.71bn in 2022 (equivalent to \$5.8bn AUD)
  - Ad spending is expected to show an annual growth rate (CAGR 2022-2027) of 8.52%, resulting in a projected market volume of US\$5.59bn by 2027.

Given this data (albeit an estimate based on global data) it would imply that social media advertising could represent at least 40% of total online advertising in Australia.

\*Source: <https://www.statista.com/outlook/dmo/digital-advertising/social-media-advertising/australia>

**ACCC Q 12) Are any social media platforms considered a ‘must have’ for advertising in Australia? To what extent do advertisers use more than one social media platform?**

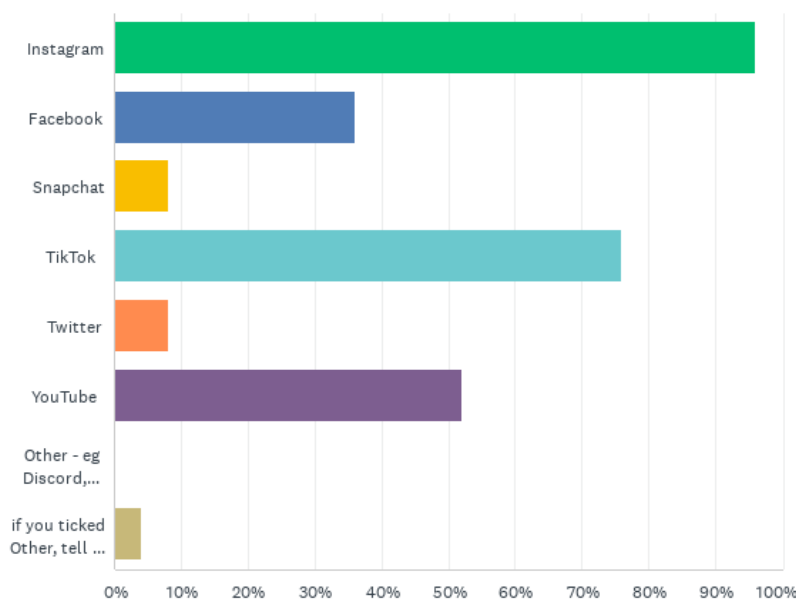
AiMCO’s membership have confirmed Instagram as their most utilised social media platform, it is closely followed by TikTok which has risen to prominence in the last 2 years, then followed by YouTube, Facebook and other platforms.

In terms of main social channels used for influencer campaigns, our members indicated:

- Instagram 95% - nearly all campaigns
- TikTok - 75% fast growth over the last two years
- 50% use YouTube
- 40% use Facebook

Social media platforms are chosen to suit the brief, brand and campaign and based on audience and campaign objectives. Also, a specific advertising campaign will often be promoted across a number of different social platforms along with other media like outdoor, TV or SVOD.

The below data was taken from a survey snapshot of a sample of 25% of our member companies who indicated the social platforms they consider most important for influencer marketing:



Source: AiMCO Online Member Survey September 2022 - 25 representative companies from a membership of 90 companies

**ACCC Q 13) To what extent do advertisers choose to engage with one particular social media platform over another? Are there reasons for advertisers choosing to engage with one social media platform and not the other?**

There are a range of factors that will determine why one particular social media platform is chosen, or why a range may be selected. These days most influencer campaigns are multi-platform.

Members indicated that these factors fall into four broad areas – audience of the platform, ability to deliver to campaign objectives, creative formats available and measurement (metrics and reporting capabilities).

**Audience & campaign objectives:**

- Consumer engagement with the content and relevance of the audience to the brand are the two primary factors. Audience engagement and participation with influencer content on a platform matters for influencer marketing.

- Different platforms are known to be optimized for different advertising objectives and purposes. For example, TikTok/Facebook is generally considered good for awareness marketing and advertising, whereas a platform like Instagram is expected to be lower funnel conversion focussed.
- Selection is also often dependant on the campaign objective and existing brand channels – scale of platform and what it can add to a campaign across other media channels.
- Selection is driven by the audience of the platform matching the advertiser demographic and age target e.g., Facebook is older markets, Instagram is ideal for 18 to 40 also Mums, TikTok is across teens to 40yrs, YouTube for Kids, LinkedIn for professional markets.

**Formats & Creativity:**

- TikTok is used more video than Instagram (IG) which has static content – although IG has addressed this with new and revised video formats.
- Selection is based on key messaging required & format of content required – i.e., short form video, longer form etc, client alignment to content categories.
- Audience alignment for specific content can determine channel e.g., health and well-being content mostly sits with Instagram.
- Format requirements might dictate channel e.g., long form video leans to YouTube.
- The ability to vet the creator on the platform (i.e., check the creator content for suitability and to obtain engagement metrics for their content).
- The scale of platform, targeting capability and creators' content on the selected platform are also selection factors.

**Measurement & Metrics:**

- Advertisers are interested in social media platforms they can measure and evaluate. Reach and relevance to their specific target audience - ease of use and reporting capabilities are key considerations.
- Ability to track and measure the effects of a post for marketing KPIs is important to brands.
- More advanced platforms in this regard are Instagram and YouTube. TikTok is playing catch up and developing more robust measurement.
- Instagram is one of the highest engaged social media platforms and it has the most data available to understand and forecast marketing campaign KPIs – this provides greater visibility of tangible results whether it be conversion, brand association etc.

**Member Opinion: why TikTok is gaining advertiser support:**

- TikTok is being considered more and more by Brands as it:
  1. Has a very powerful and unique algorithm - the For You Page (FYP) is almost entirely algorithm-driven which means that even small brands can reach large audiences. The algorithm can quickly identify a user's preferences and deliver precise audience targeting. As a result, there's a greater chance for content to go viral and to easily reach new users.
  2. The TikTok platform also allows for Influencers and Brands to link their YouTube and Instagram accounts, thus providing an integrated communication experience.
  3. There is no glass ceiling on TikTok. Unlike other social media channels where the number of followers dictates your level of engagement - the two aren't inherently linked on TikTok.

**ACCC Q14) Do social media platforms offer equivalent or substitutable services in advertising? Are there differences in the advertising service offering between platforms? If so, are these differences material enough to impact the decision that digital advertisers make to engage with one platform over another?**

**Do social platforms offer equivalent or substitute services?**

Most platforms have similar capabilities in terms of targeting, ad units and measurement. However, not all offer the same level of sophistication or detail and the differing technology between social media platforms means the reporting is different for each.

The baseline advertising service is similar, but the audience targeting, access to data, and advertising options differ by platform.

**Are the differences material enough?**

In our members opinions, each platform is evaluated against its strengths, ability to deliver to the brief and campaign objectives. For some advertisers and their agents, the differences may be enough to change platform choice depending on the campaign.

In some cases, but not all - Meta, TikTok, Pinterest, Snapchat and Google (YouTube) all have a range of more or less equivalent influencer marketing formats, but the CPMs (Cost per thousand audience reached) and technology can differ based on the platform and influence selection.

**Are the differences enough to impact the decision?**

Yes, the formats may be similar, but difference can determine selection of one platform over another for influencer marketing campaigns. Objectives of campaign along with ad formats, platform capability, combined with audience delivery impact selection.

Also, for more regulated brand categories clients will make selections based on specific issues and areas of concern. For instance, age-gate options are important for some products – e.g., it's necessary filter out under 18 for alcohol (Whilst TikTok did not offer age gating in the beginning they do now)

(It should be noted that age-verification is self-declared on channels – the EU's Audiovisual Media Services Directive, which seeks to level the playing field between digital and traditional media companies, will tighten rules for user-generated content platforms which will require more reliable methods than simply asking the user for their date of birth).

**ACCC Q15) What role does the rate and intensity of ads shown on a social media platform, have on the choice of firms to engage with social media platforms for the purpose of advertising? What role do non-price factors, such as the quality of a service such as image or video sharing, have on the choice of firms to engage with social media platforms for the purpose of advertising?**

All advertisers evaluate their campaigns via post analysis and return on investment (ROI) assessments. Issues such as number of ads, quality of service, virality and audience engagement all impact the campaign results and hence selection process of a social channel by an advertiser (or their agency). Likewise, these measures are assessed ongoing by agencies on behalf of their clients and assessments regarding channel suitability are made, and may shift, accordingly.

Given algorithms are used on social media to sort content in a user's feed and the social networks regularly tweak their algorithms in a bid to improve user experience, marketers need to assess any algorithm changes and tweak their social media strategy accordingly.

**ACCC Q16) How influential are consumer engagement trends on social media in choosing a particular social media platform for advertising? Are factors such as demographic engagement or time spent by consumers engaging with a social media platform relevant in choosing a social media platform for advertising?**

As indicated previously marketers are seeking specific target audiences, hence consumer engagement with a particular platform will impact advertiser selection of channel.

This has been seen in the dramatic shift towards TikTok by advertisers with it currently being used for approx 75% of our members for campaigns. TikTok is being seen to attract a younger audience profile than Instagram and Facebook and hence is being used for campaigns targeting the youth market.

**ACCC Q17) To what extent are advertisers able to compare the performance of advertising on different social media platforms? To what extent are advertisers able to compare the performance of different types of advertising on social media platforms with advertising on other websites and digital platforms?**

**Comparison between social media platforms?**

AiMCO members mostly consider the metrics to be comparable in some manner, even if not directly comparable, given an understanding of the variances in definitions between social platforms. For example, the definition of an impression on Instagram is different to one on TikTok. This means video is harder with success measured slightly differently across TikTok, Meta and YouTube.

There are technology offerings that provide data (pulled from the social channels via API) to aid comparison between platform measurement. However, in comparison to say traditional media such as TV, Radio, print where consistent measurement applied across the industry, social media is completely different with each platform having its own measurement approach.

**Comparison of social media platforms with other websites, digital platforms?**

Feedback from AiMCO members is that whilst it's somewhat possible given there is some alignment with formats e.g., stories. Metrics available are different but still comparable for certain metrics such as video views / engagement.

There is also the ability to create CTR (Click through rate) and CPM (Cost per thousand) metrics to use to compare against other formats. There is limitation as each metric can be calculated differently across each format.

It's worth noting given differences in definitions and measurement direct comparisons can pose challenges. There are not consistent metrics between platforms – comparing like for like can be a challenge.

**(b) Market Structure and trends in the supply of social media services**

AiMCO is not providing comment on this section.

**(c) Relationships between social media platforms and consumers**

**(i) Consumer engagement with social media platforms**

The ACCC is seeking information and views on the experiences of consumers and businesses when dealing with social media platforms, including the extent to which consumers face harms, the prevalence of scams, and the risk of misleading or deceptive content on social media services. We particularly invite consumer and business experiences relating to these areas.



**Questions for market participants**

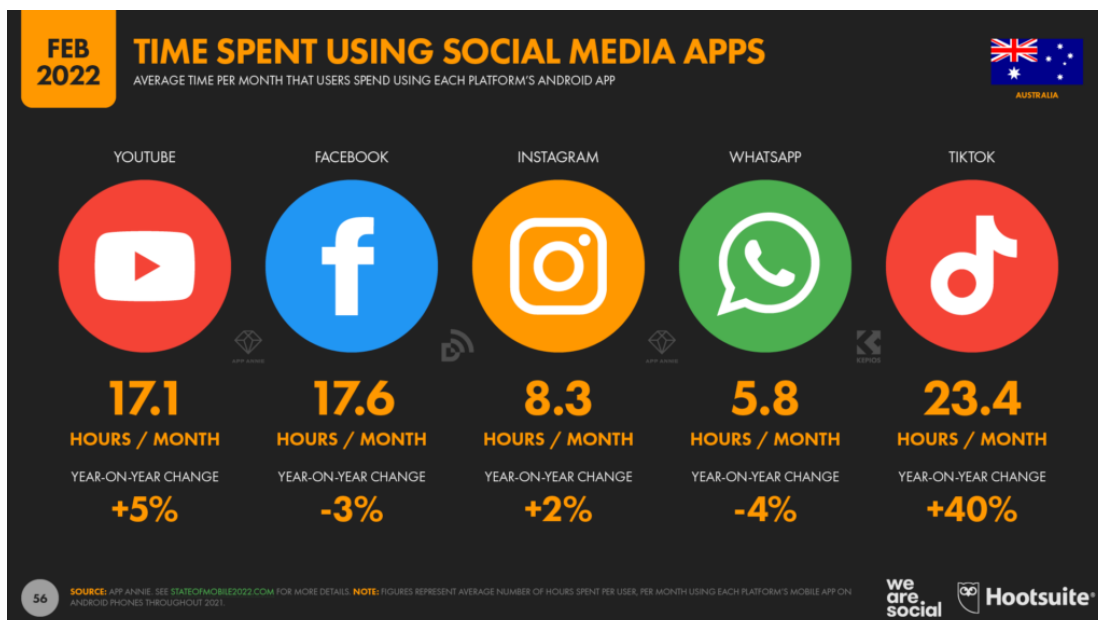
**ACCC Q26) Are consumers spending less or more time engaging with social media platforms? Has the COVID-19 pandemic and associated lockdowns had an impact on consumer engagement? Are any trends in consumer engagement on social media that emerged during the COVID-19 pandemic likely to continue?**

**Time engaging?**

AiMCO members indicated it is their experience that consumers are spending more time engaging with social media platforms, often in fragments and not long periods of time. Consumers are also mixing up their engagement across platforms not just one or two.

The We Are Social & Hootsuite Digital Report 2022 confirms that during the pandemic time spend on certain social platforms definitely increased – especially TikTok.

- Australian TikTok users scroll through the app for 23.4 hours per month – a whopping 40% jump since the beginning of 2021. Meanwhile, the *Meta* properties either stalled or shrunk their social growth: Instagram grew 3% while Facebook and WhatsApp dropped 3% and 4% respectively.



Source: <https://wearesocial.com/au/blog/2022/02/digital-2022-australia-online-like-never-before/>

**COVID-19 impact on consumers?**

The pandemic and lockdowns saw an increase in consumer engagement online. Consumers shifted a considerable amount of their shopping online due to necessity. This had the knock-on effect that advertisers also sought to engage audiences more on social platforms during the pandemic with influencer marketing being one of the advertising channels that grew during this period.

Also, BeReal is born out of the pandemic era, and speaks to a desire to authentically connect with community - likewise, TikTok's success can be accounted to a similar impact.

The We Are Social & Hootsuite Digital 2022 Report states:

- Not only did Australians spend more time online in 2021, but we also splashed more cash on mobile applications and in-app purchases.
- Collectively we downloaded 788 million apps during the year and spent AUD\$3.24 billion (USD\$2.31 billion) both on and in them, a +21% increase year-on-year. We also spent +25% more on subscriptions and downloads across video games, on-demand video, books, and music, as we searched for ways to fill the time during lockdown.

Source: <https://wearesocial.com/au/blog/2022/02/digital-2022-australia-online-like-never-before/>

### **Any trends emerging post COVID-19?**

AiMCO members indicated that the trends they have seen emerge post covid include:

- People have changed their behaviour towards social platform usage during covid with increased usage but with it focused more on authentic engagement and content. This has allowed platforms such as TikTok and Be Real to build considerable market share
- Online shopping boomed; consumers are now more likely to convert online (rather than just research online)
- Increased engagement post covid – consumers are now less passive with growing interest in co-viewing
- Emergence of new platforms - TikTok grew and will continue to grow also vertical video formats are now well established (this is also evident in influencer content)
- Newer social media platforms are seeing faster growth from launch – e.g. BeReal
- Ongoing growth in influencer marketing and the growth of creators as content collaborators for brands.

### **ACCC Q 27) Has the development of social networking features and related services by social media platforms led to new consumer harms, and/or exacerbated existing consumer harms?**

AiMCO member feedback:

- Generally, the social platforms exacerbate existing harms as opposed to creating new ones as it exposes people en masse vs in the past exposure was more limited.
- Social commerce, whilst quick and easy, also carries a risk of fraudulent behaviour, most often reported in the form of poor product quality received when compared to what was sold visually, delays in supply chain availability, etc. Consumer awareness is important.
- Bullying and trolling continues to be present on social media platforms. Not only for consumers but creators also. For creators boosted content tools that share ad content (to extend audience reach) mean they are receiving bullying via DM from people who don't usually follow them which can be an issue.
- Trolling of campaigns in the comments also happens and it is considered that the lack of / inadequate content moderation by the platforms can allow harmful content on platforms.
- There is little doubt that the algorithms for some social media platforms can funnel people down paths that are not healthy and potentially feed harmful behaviours. As a society we need greater education for people, so they understand how this all works and how to manage/avoid it. As an industry, we are mindful that influencers/creators have a responsibility to ensure they create appropriate, positive, safe, accurate content to help combat this.
- From an influencer marketing perspective brand messages are in effect designed for cohorts of followers. This means it is effectively tailoring messages that fit the values of the virtual online communities. For instance, in the beauty space many client ads & product promotions are briefed to not represent perfect skin, perfect weight, or models that are all white. Diversity of talent used has in a way helped curb the impact of social expectation and has assumed a position of celebrating diversity rather than looking for mass appeal.

### **ACCC Q 28) What impact has advertising on social media had on consumer engagement on social media? Has advertising on social media led to any specific consumer harms?**

#### **Consumer engagement?**

- Consumer engagement with influencer advertising has continued to increase, due to many factors but mainly the dramatic increase in the number of influencers/creators and the increasing levels of sophistication as advertisers & influencers find new ways of collaborating.

- The growing sophistication of advertising formats, and advertisers seeking creative collaborations with influencers/creators has increased creativity and led to higher consumer engagement. This has in turn led to consumers gaining the confidence to purchase through social media.
- The benefit of influencer marketing on social media is the variation in campaigns, the individualised creative enables advertisers to connect with specific audiences in a manner they relate to – rather than a formulaic broadcast approach, advertisers can address niche audiences by engaging niche creators that connect with that specific audience.
- Consumers are responding to what is engaging and interesting. Influencers watch this closely and modify their content according to what gets a reaction – this enables higher engagement than traditional campaigns.
- Upon speaking with popular influencers that have high follower numbers - the greatest shift for them is in maintaining their authenticity even when partnering with a Brand. Audiences have become incredibly discerning and don't use social media 'to be sold to.' Therefore, finding the right brands to collaborate with is important as otherwise consumer engagement suffers.

### **Consumer harms?**

AiMCO members recognise the need for appropriate, safe influencer marketing content that incorporates ad disclosure – they are aware of and committed to working within industry guidelines. This feedback is provided within that context:

- Unfortunately, there still are influencers out there who mislead consumers on the products they are promoting, though some may also do so unknowingly due to lack of knowledge and understanding of consumer and other regulatory law.
- Unfortunately, yes, comparisons of looks, body shape, wanting to be just like the person they see influencing, young people all trying to be influencers, using products not appropriate for them just because an influencer promotes it.
- As social media is being consumed on single-use platforms, young children may be exposed to inappropriate and not properly curated content versus TVCs that are vetted before going to air.
- Bad actors can cause harm through poor declaration of commercial interest or through the promotion of harmful products or lifestyle choices. ACCC, TGA, ABAC, ASIC and other regulatory bodies such as Ad Standards are aware of the need to address this and in general the established advertising industry understand and ensures responsible advertising protocols are adhered to. The issue also generally relates to more poorly regulated categories such as multilevel marketing companies (MLMs) recruit people to sell their products, usually on commission.

### **ACCC Q 29) Are consumers faced with potentially misleading and/or deceptive claims through advertising on social media (including sponsored advertising or posts featuring influencers)? If so, has the incidence of potentially misleading and/or deceptive claims increased or decreased over time?**

AiMCO acknowledges that consumers are faced with potentially misleading and / or deceptive claims through advertising on social media. We also acknowledge that there are influencers / creators and advertisers who are not doing the right the right thing, bad actors abound.

However, our work is to limit this impact by educating brands and businesses in the industry ecosystem on their obligations under Australian Consumer Law, the AANA Code of Ethics along with our own AiMCO Code of Practice. This in turn educates the influencers/creators that agencies and brands work with because their engagement contracts stipulate appropriate disclosures and behaviours required.

AiMCO's role within the industry is to educate and provide guidance for responsible advertising, best practice, and the advancement of knowledge within influencer marketing. Since our establishment in November 2019 the areas we have been addressing with members include:

- Developing a Code of Practice to address the legal frameworks applicable: ACL and ad disclosure, IP rights, contracts and vetting of creators
- TGA regulation of promotion of therapeutic goods
- ABAC regulation of alcohol promotion
- ASIC financial products & services advertising regulatory guidance
- Safety and mental health on social media (consumer & creator)
- Supporting diversity within our industry; selection of diverse creator talent
- Delivering content from webinars, podcasts and newsletters that covers issues relevant to influencer marketing

**ACCC Q 30) Are businesses impacted by potentially misleading and/or deceptive claims through display advertising, including sponsored advertising or posts featuring influencers?**

We think that inevitably businesses are at times impacted but we have no oversight of this area.

**ACCC Q 31) What is the process for consumers and business users to report potentially misleading and/or deceptive claims in advertising on social media, and what role do social media platforms play in these processes? How effective are these processes?**

The existing process for reporting misleading or harmful content is via Ad Standards which is an arm of the Australian Association of National Advertisers (AANA). This self-regulatory framework has provided an effective process across all other advertising mediums since inception in 1998 and influencer marketing is now a regular inclusion.

In addition, consumers are able to report misleading and/or deceptive claims directly to the platforms through their on-platform options.

Whilst we have seen Ad Standards increase their review and reporting of influencer/creator advertising issues over the last two years, we note the risks and challenges that a consumer notified complaint process present. These include the level of consumer motivation to lodge a complaint through the platform as well as consumer knowledge of the process to lodge through Ad Standards.

Whilst in general AiMCO members consider the process is working well below is some AiMCO member feedback that recognises the challenges:

- Ad Standards is a robust industry solution and has been adequate for traditional channels for many decades. It is addressing and acting on influencer campaigns that are reported to them and this has had some impact. However, the marketplace is now so much bigger, and given the scale of social media and the level of advertising and influencer/creator branded content, the question remains as to whether that process can now adequately cover the issue.
- It relies entirely on consumers reporting the issues before any action is taken. The issue with this is that consumers not only need to be very motivated, but they are also not always aware when they are viewing misleading and deceptive conduct online.
- Very few consumers would know the process to report to Ad Standards or even to the other regulatory bodies such as ACMA or ACCC, so the platforms play a huge role in this. People report the ad via the on-platform options and so there should be a robust, timely means of the platforms also being accountable and facilitating this process.

- There is much room for improvement here. The sheer volume of content being posted/produced means without a robust framework of dealing with complaints, it's very hard for platforms to police potentially misleading/fraudulent content. Many rely on the advocacy of users to flag such content, but there isn't one single social platform that has nailed this just yet.
- Consumers can report breaches to a number of avenues but expect this may decrease over time if action is not taken which sufficiently deters repeat offenders. Ad Standards have no power to issue fines etc and the ACCC has not taken action in relation to influencers.
- Platform action is not timely. Fake accounts can be live for months even with the account being reported by multiple people.
- The platforms make it hard to communicate to them - no phone number, no direct contact to report to. I'd say this is an area they need to address and ensure prompt actions are taken to investigate.

### **UK House of Commons Committee – Inquiry into Influencer Culture**

In a further note, we are sure that the ACCC Digital Platforms team are across the UK inquiry: <https://committees.parliament.uk/work/1126/influencer-culture/>

### **Conclusion:**

AiMCO recognises that there is a need to expand our services to encompass some of the issues raised and to support the wider advertising and influencer/creator community.

However, despite recognising the need, given we are a very small industry body funded by members, there is limited resource to be able to develop training and other programmes to guide the industry and influencer/creator community.

To accelerate AiMCO's programme of knowledge regarding the various legal obligations and best practice applicable to influencer marketing, through education and other programmes, we would welcome government and industry partnerships.

We would appreciate ACCC guidance on ways in which we might work together.

**For further information contact:** [info@aimco.org.au](mailto:info@aimco.org.au)

**Website:** [www.aimco.org.au](http://www.aimco.org.au)

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