

## **Vulnerable consumers - Protecting children in digital markets: making use of empirical research and advertising regulation. \***

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Digital markets create challenges for most consumers. It is becoming increasingly challenging for consumers to make informed decisions because of businesses using powerful marketing techniques, such as deceptive design, micro-targeted advertisement, and influencer marketing. Children are at particular risk in digital markets due to their limited experience, credulity, and understanding of commercial activities.

Legal definitions of "children" differ across countries. Some countries adopt a single definition, where anyone under a specified age or within a certain age range is considered a child. Others use multiple categories, such as distinguishing "children" (those under 12-14 years old) from "young people" (those older than the child category but not yet considered adults). Despite these differences, non-adults are generally seen as more vulnerable to harmful marketing practices. For the purpose of this principle, a children is defined as every human being below the age of 18 years unless under the law applicable to the child, majority is attained earlier.<sup>1</sup> However, it is important to recognize that a child's vulnerability can vary based on age and other demographic factors, and businesses should comply with the relevant laws in the jurisdiction where their content is directed.<sup>2</sup>

As children increasingly navigate online platforms, they encounter numerous marketing and advertising tactics designed to capture their attention. Depending on the country, children may not legally be able to enter contractual relationships. One of the biggest challenges for online platforms is ensuring accurate age verification. Although websites like Etsy and eBay mandate users to be at least 18 years old, and social media platforms such as TikTok and Instagram have a

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<sup>1</sup> 18 years old is the age established by Article 1 of the United Nations Convention on the Rights of the Child (1989). See: [https://downloads.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf?\\_ga=2.159671037.1700221556.1591975152-1409316946.1591975152](https://downloads.unicef.org.uk/wp-content/uploads/2016/08/unicef-convention-rights-child-uncrc.pdf?_ga=2.159671037.1700221556.1591975152-1409316946.1591975152)

<sup>2</sup> Protecting children online, OECD (2020) [https://www.oecd.org/en/publications/protecting-children-online\\_9e0e49a9-en.html](https://www.oecd.org/en/publications/protecting-children-online_9e0e49a9-en.html)

minimum age requirement of 13, these age checks are often self-reported, making them easy to surpass. However, most setups would allow children to enter everyday contracts, or they can require parental authorization or oversight to do so. Various kid-friendly debit cards<sup>3</sup> work like regular debit cards, allowing children to purchase online under the debit card limitations. Alternatively, the contract may be with the parent, but the child is the recipient and user of the goods or services. Thus, discussing children as vulnerable consumers in e-commerce remains relevant regardless of their legal capacity. In response, the UNCTAD informal working group on consumer protection in e-commerce, during its 2023-2024 cycle, has prioritized these young, vulnerable consumers group.

Under the UNCTAD WGE a webinar, led by Sweden shed light on effective ways to disclose commercial content to children on social media. Certain members also presented enforcement cases related to the protection of this group of vulnerable consumers. This technical note builds on the insights shared during the webinar and includes further contributions from other members of the informal working group.

This technical note:

- Attempts to define the concept of vulnerability in the context of e-commerce.
- Focuses on children as a particularly vulnerable group in the digital age.
- Describes how a better understanding of consumer behaviour, through research and cooperation with academia, could strengthen the protection of children as vulnerable consumers in digital markets.

Protecting vulnerable consumers is key to ensuring well-functioning consumer markets for all consumers. The United Nations Guidelines for Consumer Protection (UNGCP)<sup>4</sup> allude to the intrinsic vulnerability of consumers vis-a-vis suppliers and recognise that consumers often face imbalances in economic terms, education levels and bargaining powers<sup>5</sup>. The UNGCP do not distinguish amongst consumer groups and thus do not specifically mention children; however, they set out the protection of vulnerable and disadvantaged consumers as a legitimate need<sup>6</sup> and emphasise the need to provide consumers with adequate information to make informed choices according to their individual needs and preferences.<sup>7</sup> The UNGCP also call for a level of protection for consumers using electronic commerce that is at least equivalent to that in other forms of commerce.<sup>8</sup>

In addition, the UNGCP outline principles for good business practices, advocating for businesses to deal fairly and honestly with consumers at all stages of their

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<sup>3</sup> <https://www.forbes.com/advisor/banking/best-debit-cards-kids-teens/>

<sup>4</sup> UN Guidelines for Consumer Protection (UNGCP): [https://unctad.org/system/files/official-document/ditecplpmisc2016d1\\_en.pdf](https://unctad.org/system/files/official-document/ditecplpmisc2016d1_en.pdf)

<sup>5</sup> Paragraph 1, UNGCP

<sup>6</sup> Paragraph 5 (b), UNGCP

<sup>7</sup> Paragraph 5 (e), UNGCP

<sup>8</sup> Paragraph 5 (j), UNGCP

relationship, avoiding practices that harm consumers, particularly in respect to vulnerable and disadvantaged consumers.<sup>9</sup> It calls for businesses to avoid illegal, unethical, discriminatory, or deceptive practices that may pose unnecessary risks or harm consumers.<sup>10</sup>

The UNGCP emphasize that promotional marketing and sales practices must adhere to the principle of fair treatment, preventing consumers from being misled or exploited by aggressive or misleading tactics.<sup>11</sup> This is particularly crucial for vulnerable consumers who may be more susceptible to such practices. Moreover, the UNGCP mention that member States should encourage the formulation and implementation by businesses and consumer organizations, of codes of marketing and other business practices.

The UNGCP also advocate for the development of general consumer education programs that encompass information on the environmental impacts of consumer choices.<sup>12</sup> They underscore the importance of integrating consumer education into the basic educational curriculum, ensuring that individuals from a young age are educated about their rights and responsibilities as consumers<sup>13</sup>, which is especially crucial for children to learn how to make informed choices in the market place especially in online purchases.

## **The concept of vulnerable consumers**

To further discuss this topic, UNCTAD informal working group on the protection of vulnerable and disadvantaged consumers was established to highlight best practices, to facilitate information exchange and consultations, and it was active until 2018<sup>14</sup>, focussing on children and concluding that children may be defined differently depending on the jurisdictions studied and that several factors come into play when determining who may deem a vulnerable consumer.<sup>15</sup>

Although there is no universally accepted definition of vulnerable consumers, there are several categories of vulnerability described in literature<sup>16</sup> or legislation.

The more traditional approach defines consumer vulnerability in relation to specific consumer groups because of individual characteristics, such as age (which

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<sup>9</sup> Paragraph 11 (a), UNGCP

<sup>10</sup> Paragraph 11 (b), UNGCP

<sup>11</sup> Guideline 27, UNGCP

<sup>12</sup> Guideline 42, UNGCP

<sup>13</sup> Guideline 43, UNGCP

<sup>14</sup> UN trade and development informal Working Group on vulnerable and disadvantaged consumers <https://unctad.org/Topic/Competition-and-Consumer-Protection/Working-group-on-protection-of-vulnerable-consumers>

<sup>15</sup> UN trade and development informal Working Group on vulnerable and disadvantaged consumers, Report (2018), page 1 - <https://unctad.org/system/files/non-official-document/WG%20Vulnerable%20and%20Disadvantaged%20Consumers%20.pdf>.

<sup>16</sup> For more detailed studies of consumer vulnerability in the digital age, see OECD, Consumer Vulnerability in the Digital Age, OECD Digital Economy Papers, (2023), No. 355, 14; N. Helberger et al. EU Consumer Protection 2.0: Structural asymmetries in digital consumer markets (2021); C. Riefa, Protecting Vulnerable Consumers in the Digital Single Market 33 (2022) 4 *European Business Law Review* 607-633;

is where children normally fall), gender<sup>17</sup>, disabilities, level of education and income. Another recent approach considers consumer vulnerability as a result of both internal and external factors, which could be temporary or permanent.<sup>18</sup>

Around the world, legal systems sometimes account for vulnerability and do so in a variety of ways.

In Argentina, the classification of consumers as vulnerable and disadvantaged takes into account age, gender, health conditions or other social, economic or cultural circumstances.<sup>19</sup> MERCOSUR (Southern Common Market<sup>20</sup>) in its Resolution 37/2019 on Consumer Protection in e-Commerce<sup>21</sup> recognises that complaints by consumers in vulnerable and disadvantaged situations should be given special consideration in the resolution of disputes.

The Organization for Economic Co-operation and Development's (OECD) Consumer Policy Toolkit<sup>22</sup> defines vulnerable consumers as those who are susceptible to detriment due to various factors, including psychological or financial states, or the nature of specific transactions. The toolkit outlines that all consumers can be vulnerable at certain times, but some are persistently susceptible. Vulnerability may arise from discrimination based on race, ethnicity, or gender, low education or literacy levels, language barriers, lack of local knowledge, impaired vision, hearing, or mobility, cognitive impairments, restricted mobility, geographical remoteness, unemployment, and low income. These factors can significantly impact a consumer's ability to make well-informed decisions and effectively engage in the marketplace.

The European Commission report on *Consumer Vulnerability across Key Markets in the European Union* recognised vulnerability as a dynamic concept and recommended that socio-demographic characteristics such as behavioural characteristics, personal situation, or market structures or practices are taken into account when assessing vulnerability.<sup>23</sup> When consumers are vulnerable,

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<sup>17</sup> UN Trade and Development informal Working Group on Consumer Protection and Gender: <https://unctad.org/information-documents-search?f%5Bo%5D=sitemap%3A908>

<sup>18</sup> OECD, Consumer Vulnerability in the Digital Age, OECD Digital Economy Papers, (2023), No. 355, 14

<sup>19</sup> Provision N° 137/2024 <https://www.boletinoficial.gob.ar/detalleAviso/primera/308412/20240530>. This is replacing the classification of 'hypervulnerable' consumers found in Resolution N139/20, National Trade Secretary.

<sup>20</sup> MERCOSUR is a regional integration organization established by Argentina, Brazil, Paraguay and Uruguay, and later joined by Venezuela and Bolivia.

<sup>21</sup> Resolution 37/2019 on Consumer Protection in e-Commerce, <https://www.argentina.gob.ar/normativa/nacional/resoluci%C3%B3n-37-2019-341934/texto>

<sup>22</sup> OECD (2010), *Consumer Policy Toolkit*, OECD Publishing, Paris, <https://doi.org/10.1787/9789264079663-en>.

<sup>23</sup> European Commission, *Consumer Vulnerability across Key Markets in the European Union* (Brussels, 2016) 319. European Commission, *Consumer Vulnerability across Key Markets in the European Union* (Brussels, 2016) 319; C. Riefa, S. Saintier, 'In search of (access to) justice for vulnerable consumers', in C. Riefa and S. Saintier, *Vulnerable Consumers and the Law*, consumer protection and access to justice (Routledge 2021) 1-16.

however, the current legal framework is mostly framed around personal characteristics with only a few exceptions.<sup>24</sup>

## Children's vulnerability in digital markets

In the context of e-commerce, it is particularly relevant to consider market structures and practices when defining vulnerability. 'Digital markets are a breeding ground for vulnerability'.<sup>25</sup> Consumers are the victims of online manipulation, using information technology to covertly influence another person's decision-making by targeting and exploiting their decision-making vulnerabilities.<sup>26</sup> Some authors consider all consumers vulnerable by definition in digital market. Helberger et al argue that the power imbalances that result from the automation of commerce, dated consumer-seller relations and the very architecture of digital marketplace collide to make all consumers vulnerable.<sup>27</sup>

Children spend a lot of time online, playing games, interacting with friends, and creating content on social media platforms. Their online activities make them an important target group for traders and advertisers, resulting in digital playgrounds full of commercial content. Children are navigating through a mix of commercial and non-commercial content, where influencers - building on their relationships with their followers - intensively market products towards children.<sup>28</sup>

Children are generally considered more vulnerable than a typical adult when confronted with advertising or other commercial practices. The explanation is that children's advertising literacy and commercial awareness has not fully developed, and they are therefore less capable to critically assess advertisement<sup>29</sup> and content.<sup>30</sup> Advertising literacy, sometimes referred to as persuasion knowledge consists of knowledge, attitudes and skills which is needed to critically process advertising. It covers recognition and understanding of advertisement including the commercial intent and persuasive tactics. Children's advertising literacy

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<sup>24</sup> C. Riefa, S. Saintier, 'In search of (access to) justice for vulnerable consumers,' in C. Riefa and S. Saintier, *Vulnerable Consumers and the Law, consumer protection and access to justice* (Routledge 2021) 1-16.

<sup>25</sup> C. Riefa, *Protecting Vulnerable Consumers in the Digital Single Market* 33 (2022) 4 *European Business Law Review* 617. This is notably because the technology itself is indeed a driving factor for vulnerability, notably the use of artificial intelligence and other associated technologies.

<sup>26</sup> Daniel Susser, Beate Roessler, Helen Nissenbaum, *Technology, Autonomy and Manipulation* 8 (2019) 2 *Internet Policy Review* DOI: 10.14763/2019.2.1410, [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3420747](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3420747). Note also, vulnerability online often manifests as disengagement, where consumers may not adequately review privacy policies, accept personalized pricing, or scrutinize terms and conditions. This apathy is attributed not to a lack of information, but rather to limited consumer choice, as noted in [The protection of vulnerable consumers in the digital age](#), 11th meeting of the UN trade and development Research Partnership Platform, 18 November 2020.

<sup>27</sup> N. Helberger et al., *Choice Architecture in the digital economy: towards a new understanding of digital vulnerability* (2022) *Journal of Consumer Policy* 175-200.

<sup>28</sup> In some cases, children themselves are influencers, which raises issues not about only the use of minors as content creators to sway purchasing choices, but also their labour rights.

<sup>29</sup> Rozendaal, E & Buijzen, M., (2023) *Children's vulnerability to advertising: an overview of four decades of research (1980s-2020s)*, *International Journal of Advertising*, 2023, Vol. 42, No. 1, p. 78

<sup>30</sup> Rahali M. Livinstone S. (2022) *#Sponsoredads: Monitoring influencer marketing to young audience*, Media Policy Brief 23, LSE, [https://eprints.lse.ac.uk/113644/7/Sponsoredads\\_policy\\_brief.pdf](https://eprints.lse.ac.uk/113644/7/Sponsoredads_policy_brief.pdf)

gradually increases with age, although personal interests could have an impact.<sup>31</sup> On the whole children are uniquely vulnerable to the persuasive effect of advertising because of immature critical thinking skills and impulse inhibition.<sup>32</sup>

By understanding children's challenges online, consumer protection authorities have better pre-conditions for ensuring the right protection for children in digital markets rather than continue to rely on purely legalistic definitions of vulnerability.

The digital environment for children and youth has gone through major changes during the last two decades. Technological developments have provided advertisers with new marketing techniques, such as brand placements in online games and influencer marketing on social media platforms. Generally, these practices build upon affect-based mechanisms and are, in many cases, embedded and mixed with non-commercial content.<sup>33</sup> Children and youth often fail to identify the commercial intent, and persuasive nature of advertisement which are embedded in entertaining and, what seems to be, non-commercial content. Consequently, their consumer right to know when they are faced with advertisement is not realised. Furthermore, if children fail to identify the persuasive nature of advertisement, they are unlikely to protect themselves against its persuasive appeal since their advertising literacy has not been activated.<sup>34</sup>

Hence, clear disclosures for commercial content could help activate children's advertising literacy, and thereby their critical thinking. There are several useful studies on how to disclose commercial content to children. According to a study on the effects of disclosing influencer marketing in videos, the timing of the disclosure is an important factor for the noticeability and processing of the disclosure for sponsored online videos. A disclosure which is shown prior to the start of the video results in more visual attention than a disclosure that is shown during the video. The study also demonstrates that when children are aware that a video is sponsored due to a disclosure, they then to adopt a more critical attitudes towards the content.<sup>35</sup> Another important aspect is the wording of the disclosure. Interviews with children between 10 and 16 years old showed that explicit wording, including terms such as 'paid', and 'advertising' can help children

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<sup>31</sup> Rozendaal, E & Buijzen, M., (2023) Children's vulnerability to advertising: an overview of four decades of research (1980s-2020s), *International Journal of Advertising*, 2023, Vol. 42, No. 1, p. 80

<sup>32</sup> Rahali M. Livinstone S. (2022) #Sponsoredads: Monitoring influencer marketing to young audience, Media Policy Brief 23, LSE, [https://eprints.lse.ac.uk/113644/7/Sponsoredads\\_policy\\_brief.pdf](https://eprints.lse.ac.uk/113644/7/Sponsoredads_policy_brief.pdf).

<sup>35</sup> Eva A. van Reijmersdal, Esther Rozendaal, Liselot Hudders, Ini Vanwesenbeeck, Veroline Cauberghe & Zeph M.C. van Berlo (2022) - Effects of Disclosing Influencer Marketing in Videos: An Eye Tracking Study Among Children in Early Adolescence [Opens external](#) - *Journal of Interactive Marketing*, 49, 94-106 - doi: 10.1016/j.intmar.2019.09.001

understand when content is sponsored. More vague terms such as ‘collaboration’ and ‘partnership’ can lead to confusion among children.<sup>36</sup>

However, the effect of disclosure could also vary. While some studies indicate that disclosures reduce persuasion, others show no effect, and some even suggest increased persuasion. This latter case includes influencers, where strong parasocial relationships can enhance the positive perception of the brand.<sup>37</sup>

Improved disclosure practices can significantly aid children in navigating and understanding advertising content. However, the complex nature of emerging technologies—such as personalized content and algorithmic processes—often makes it challenging for children to comprehend these disclosures fully. Therefore, intervention by enforcement agencies is more crucial than ever to ensure that these practices are transparent and that children are adequately protected.

The International Chamber of Commerce (ICC) produced a Toolkit on Marketing and Advertising to Children, which applies to digital and non-digital markets.<sup>38</sup> The ICC recognizes that children and teens are distinct groups, considering children to be 12 and younger while teens are between 13 and 18 years old. The ICC's approach to responsible marketing to children and teens is guided by key principles. Firstly, it upholds the freedom of commercial communications and opposes outright bans on advertising to these age groups. Secondly, it advocates against advertising products unsuitable for children and teens, such as prescription drugs, alcohol, or gambling services, in media targeting them. Thirdly, special caution is advised when using certain advertising techniques, as children are still learning to understand commercial messages. Fourthly, extra privacy measures may be necessary when collecting information from children, often requiring parental consent while acknowledging teens' developing sense of privacy.

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<sup>36</sup> See for more details, Rozendaal, E., van Reijmersdal, E. A., & van der Goot, M. J. (2021). Children's perceptions of sponsorship disclosures in online influencer videos. In M. K. J. Waiguny, & S. Rosengren (Eds.), *Advances in Advertising Research (Vol. XI): Designing and Communicating Experience* (pp. 273-287). (European Advertising Academy). Springer Gabler; van Reijmersdal, E. A., & van Dam, S. (2020). How Age and Disclosures of Sponsored Influencer Videos Affect Adolescents' Knowledge of Persuasion and Persuasion. *Journal of Youth and Adolescence*, 49(7), 1531-1544.; also van Reijmersdal, E. A., & van Dam, S. (2020). How Age and Disclosures of Sponsored Influencer Videos Affect Adolescents' Knowledge of Persuasion and Persuasion. *Journal of Youth and Adolescence*, 49(7), 1531-1544.

<sup>37</sup> How Age and Disclosures of Sponsored Influencer Videos Affect Adolescents' Knowledge of Persuasion and Persuasion. *Journal of Youth and Adolescence*, 49(7), 1531-1544.

<sup>38</sup> [ICC Toolkit: Marketing and Advertising to Children - ICC - International Chamber of Commerce \(iccwbo.org\)](https://www.iccwbo.org/publications/icc-toolkit-marketing-and-advertising-to-children/)



## How to strengthen protection of children in digital markets

Consumer protection authorities across the world have different strategies and approaches to protect children in digital markets.

Equally, taking research on, for example, children's advertising literacy into account could be important to get a better understanding of how consumers are affected by digital commercial practices facilitating a more precise enforcement and protection. For this the Swedish Consumer Agency is integrating research in its prioritization of enforcement cases. For example, using research on the effects of disclosures for commercial content and problematic advertising. Children's advertising literacy plays an important role to better understand what can be expected of a child consumer. Furthermore, in Sweden, the Agency has established a Scientific Council consisting of professors and researchers in different subjects from national universities. The Council supports and updates the Agency with the latest research related to consumers and well-functioning markets. For example, statements from professors of the Council could be used to support argumentation in enforcement actions, court proceedings and public consultations on new consumer policy. Cooperation with academia through international fora, such as the UN trade and development WGE and the European Consumer Protection Cooperation Network, is also necessary to exchange experiences and build further capacity.<sup>39</sup>

The Italian Competition Authority (AGCM) has taken numerous enforcement actions aimed at protecting vulnerable consumers in digital markets.<sup>40</sup> In a recent case against a major social media platform, AGCM took action because the platform failed to protect children as vulnerable consumers by not preventing and eliminating posts and stories about dangerous challenges.<sup>41</sup> During the investigation, an expert specialized in neuro-science analysis for children was consulted. The expert confirmed the adverse effects of this kind of social media practice against children as a typical group of vulnerable consumers. As a result of the investigation, the AGCM issued a 10 million euros fine against the platform.<sup>42</sup> The AGCM concluded that the social media platform's content moderation mechanisms were inadequate, particularly in protecting minors and vulnerable users. Although the platform had implemented guidelines intended to create a safer online environment, these were inconsistently applied, resulting in insufficient protection for younger users. The sanctions imposed were grounded

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<sup>39</sup> UN trade and development webinar on protection of vulnerable consumers on digital markets (2024-04-10); [Webinar on protection of vulnerable consumers on digital markets | UNCTAD](#)

<sup>40</sup> This includes action taken on the basis of the UCPD against companies in the Bytedance Ltd group for failing to safeguard children from harmful content as well as actions against gaming major video games operators such as Electronic Arts and Activision Blizzard over marketing practices which included the use of loot boxes to encourage purchases notably among minors. See PS11594 Electronic Arts - Acquisti nei videogiochi e PS11595 - Activision Blizzard - Acquisti nei videogiochi.

<sup>41</sup> This included the so-called French cheek challenge, a self-harming practice consisting of pinching a cheek to the point of creating a scar.

<sup>42</sup> UN trade and development webinar on protection of vulnerable consumers on digital markets (2024-04-10); [Webinar on protection of vulnerable consumers on digital markets | UNCTAD](#)



in the platform's failure to adequately protect minors from potentially harmful content, the discretionary application of its own Guidelines, and the undue influence exerted on consumer behaviour through an algorithmic recommendation system that exploited user vulnerabilities. The high potential offensiveness of the platform's conduct since at least February 2023 and the platform's economic benefit derived from increased user interaction were also significant factors in determining the severity of the sanctions. The AGCM emphasized the need for more robust controls on digital content and coordinated efforts among social platforms, parents, educational institutions, and policymakers to ensure a safe digital environment, especially for minors.

The Office of the Federal Consumer Attorney (Profeco) of Mexico took into account helpful research regarding children when developing their influencer guidelines. The guidelines include a recommendation to identify paid content even if the influencer is a minor. A specific recommendation was also made to comply with regulations regarding the use of characters in advertising of food with high calory content, which is banned in Mexico.<sup>43</sup>

## Conclusions and way forward

The note highlights the growing vulnerability of children in digital markets, where they are exposed to manipulative marketing techniques that exploit their limited advertising literacy. Children often struggle to differentiate between commercial and non-commercial content, particularly with the rise of influencer marketing and embedded advertisements. Despite regulatory measures, age verification and content disclosures remain weak, making it easy for businesses to target young users with persuasive tactics.

The note stresses the importance of research and international cooperation to understand better the effects of digital marketing on children and to improve protective frameworks.

Enforcement challenges persist, but coordinated global efforts, coupled with the integration of consumer education into school curricula, are key to ensuring children are better equipped to navigate digital spaces safely.

In summary, the report underscores the vulnerability of children in digital markets, the inadequacy of current protective measures, and the urgent need for research, cooperation, and education to strengthen consumer protection.

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<sup>43</sup> <https://www.profeco.gob.mx/influencers/doc/Profeco-GuiadePublicidadparaInfluencers.pdf>; on the issue of food see also Alejandra Contreras-Manzano et al., The impact of a carton character on adults' perceptions of children's breakfast cereals: a randomized experiment (2020) Nutrition journal <https://www.springermedizin.de/the-impact-of-a-cartoon-character-on-adults-perceptions-of-child/25659640> and UNICEF, Taking action to protect children from the harmful impact of food marketing, a child rights-based approach (2023) <https://www.unicef.org/media/142621/file/UNICEF-WHO%20Toolkit%20to%20Protect%20Children%20from%20the%20Harmful%20Impact%20of%20Food%20Marketing.pdf>

To address the challenges faced by children engaging in forms of e-commerce, it is recommended that the informal Working Group should:

- Continue sharing best practices on how to make use of research and cooperate with academia to strengthen the protection of children and other groups of vulnerable consumers.
- Continue sharing best practices related to enforcement actions taken to protect children and other groups of vulnerable consumers.
- Explore the possibility to create a repository of relevant researchers and studies on the protection of vulnerable consumers through the UN Trade and Development Research Partnership Platform.

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