

Halo & the European Media Freedom Act (EMFA): Enabling Cross-Media Measurement to the Benefit of European Consumers

About WFA

The World Federation of Advertisers (WFA) is the voice of marketers worldwide, representing over 150 brands and 60 national advertiser associations worldwide. Over half of our members are European, and we support national advertiser associations in 20 EU Member States.

About this document

WFA strongly supports the European Media Freedom Act (EMFA) and its objectives of safeguarding media pluralism, fostering fair competition and promoting more transparent and inclusive audience measurement.

WFA research shows that the absence of independent and comparable cross-media measurement in today's fragmented media landscape presents a significant challenge for the advertising industry. This creates inefficiencies and undermines transparency, trust and fairness in the media ecosystem.

WFA's cross-media measurement initiative, Halo, proposes a privacy-centric, voluntary, inclusive, pro-competitive, transparent and industry-driven technical framework that could help address these challenges and meet the objectives of the EMFA, to the ultimate benefit of European consumers.

This document outlines how the Halo initiative upholds the core principles of the EMFA, allowing for clear benefits to the advertising industry, the media ecosystem more generally and consumers at large.

Why the advertising industry needs inclusive and privacy-centric cross-media measurement

One of the most important decisions advertisers need to make is where to invest their advertising budgets. To do so, advertisers can be most successful when they have access to objective, verifiable, comprehensive and comparable data by *medium and media* to understand how many different people have seen an ad or piece of content ('Reach') and how many times those people have seen the ad ('Frequency').

Cross-media reach and frequency measurement enables advertisers to gain an objectively comparable understanding of their ad campaign performance and media services against the universe of potential audiences. Importantly, it supports advertisers as they seek to be better positioned to allocate budgets more efficiently, directing their marketing spend to where it drives value for their business and, ultimately, consumers. Such cross-media measurement also helps minimise the risk of ads reaching the wrong or unintended audiences, or providing consumers with a poor experience with excessive frequency of the same ad.

Cross-media measurement fosters more competition among different media – from digital, TV, radio, print and beyond – by enabling fair and comparable measurement of **all** media. Cross-media measurement thereby supports a more diverse, efficient and sustainable media landscape where ads show up on the medium that is fit for purpose from the perspective of all stakeholders in the advertising industry. For consumers, this ensures not only continued access to a variety of quality and reliable content and services but also improves the relevance and effectiveness of their advertising experience.

Why cross-media measurement is a challenge today

Measuring and comparing campaign performance across media has become increasingly difficult to achieve due to four key challenges:

1. **Industry politics and consensus vacuum:** There have been numerous initiatives launched (and progress made) by measurement companies, broadcasters, JICs and others – all designed to expand measurement capabilities into areas beyond the traditional (single media measurement) scope. However, for various reasons, often more political than technical, progress has been difficult. As a result, there are no widely recognised, non-proprietary, inclusive, privacy-centric advertising industry supported systems or methodologies for measuring cross-media reach and frequency.

2. **Fragmented consumer behaviours:** Audiences today consume different content across a growing number of devices (smartphones, tables, laptops) and media (TV, digital, connected TV, offline, print, etc). At an extreme, a decade ago, a single TV ad could reach a billion people across just eight channels. Today, WFA research identifies that advertisers have an average of nine different media touchpoints per campaign. This number of touchpoints is expected to continue to rise for 70% of brands.
3. **Varied value systems:** Ad measurement methodologies differ greatly across media, making like-for-like comparisons difficult. Linear TV ad exposures, for example, are extrapolated from household 'panel' viewing behaviour, then projected onto a population. These ad exposures are often reported as minute-by-minute viewing averages or use duration weighting (where exposures are adjusted based on how long an ad was viewed). In contrast, audience attention and engagement in the digital world are recorded on a milli-second and on a 'census' basis, captured through servers or tags, with reporting focused on impression counts. Other media, like radio or print, are often still measured via declarative survey studies. There are fundamental differences in how people consume media across these different environments, of course, but the current solutions do not help bridge the varied value systems. 74% of WFA members believe a lack of comparability across methodologies is a major challenge to cross-media measurement.
4. **Unequal access to data:** Some digital 'walled gardens' use proprietary measurement systems that can be incompatible with other platforms and media and may lack transparency or access. 86% of WFA members say that 'walled gardens', data silos and incomplete data present a 'major challenge' to cross-media measurement which needs to be overcome. Equally, the methodologies used by measurement companies are not always transparent to advertisers, which can create accountability gaps. In fact, only 12% of WFA members claim to receive detailed information about how different measurement systems work.

How Halo aims to enable cross-media measurement

To contribute to addressing these challenges and to support measurement organisations to develop cross-media measurement solutions that meet the needs of the advertising industry, WFA, advertisers, national advertiser associations, media owners, agencies, measurement providers and others, launched the Halo initiative in 2019.

Coordinated by WFA, this voluntary initiative was launched with the goal of proposing a technical framework that enables the development of unified, privacy-first and inclusive measurement tools for measuring advertising reach and frequency across media channels (digital, TV, radio, print, etc.). The Halo initiative is grounded in the '[North Star](#)' needs of the advertising industry. It is shaped by the Halo community, which builds and maintains the voluntary Halo open-source framework and code components (released under the Apache 2.0 license). The initiative's core mission is to develop and propose technical input components that can enable measurement organisations to combine measurements across the fragmented media landscape while improving transparency, neutrality, inclusivity and accountability in cross-media measurement.

Halo is not a measurement tool. It is only a proposed component of a measurement solution, to be developed by measurement organisations depending on local needs and particularities. Fundamentally, the framework is an enabler for others.

Measurement organisations (e.g. Origin, Nielsen, Kantar, etc) and JICs can choose to use the Halo Framework (or parts of it) as input when building their high-quality cross-media measurement solutions, using consistent (yet flexible) foundations, in a way that best meets their individual local needs. The voluntary Halo Framework is designed to build upon or incorporate existing data or research assets; ideally linear TV measurement would be provided by the existing local currency, usually managed by a JIC, and existing panel assets would underpin any deployment.

Indeed, while acknowledging that the varied value systems described above are challenging, the Halo initiative does not seek to impose a single comparison metric (or, more realistically, set of metrics). Once local measurement organisations choose to incorporate the open-source framework and code components into

their operations, they are responsible for managing the real data integration, defining relevant metrics, establishing rigorous audit protocols and producing measurement outputs.

Halo remains a standard-agnostic, underlying, open-source, technical framework, focused on the consistent personification and de-duplication of impression data, through recourse to panels and first-party data. It is not the final authoritative currency or tool and does not favour any specific party or metric; local organisations maintain the flexibility to agree on the metrics and standards, following local requirements and particularities.

One of the core strengths of the Halo initiative are the privacy-preserving treatments designed to be applied to real-life data that would enter the framework, if measurement organisations choose to rely on it. To address access inequities, bring down data silos and inject more accountability into measurement, the Halo Framework proposes secure approaches that should give all stakeholders in the advertising industry the confidence that user data will be treated appropriately. The highly privacy preserving treatments applied within the Halo framework meet the highest bar in terms of data protection.

How the Halo initiative supports the objectives of the European Media Freedom Act

We believe that the Halo framework could serve as a potential model for audience measurement systems to meet the obligations of Article 24 of the EMFA. Indeed, while the Halo framework is by no means a measurement ‘solution’, when executed, its technical underpinnings meet the objective of helping advertisers access more detailed information, enabling them to comprehensively measure the performance of campaigns across different media.

By proposing a fair, comprehensive, neutral and transparent technical framework for cross-media measurement solutions, Halo aligns with the EMFA’s objectives. Relying on the freely available technical framework could enhance transparency, plurality and trust in the European advertising market.

Notably, WFA research shows that a large majority of advertisers believe that the Halo framework proposals may help enable media owners to better demonstrate the relative performance of their ad inventory and compete on a level playing field.

Halo upholds the principles of **transparency, impartiality, inclusiveness, proportionality, non-discrimination, comparability, and verifiability** as outlined in Article 24. In the absence of legal definitions for these principles, we have provided our view below on how we consider that the voluntary Halo framework aligns with the principles set out in the EMFA.

EMFA principle	How the voluntary Halo framework aligns with the principle
TRANSPARENCY	One of Halo’s primary objectives is to provide technical proposals to address opacity in audience measurement, which has led to challenges that are well documented in recital 69 of the EMFA. The Halo framework fosters transparency by providing an open-source, well-documented and transparent methodology to enable cross-media measurement solutions, developed as a result of peer-to-peer review within the advertising industry. WFA staff oversee and coordinate this volunteer group to ensure all work adheres to the initiative’s objectives of transparency, inclusivity, and neutrality.

IMPARTIALITY	<p>The Halo framework aligns with the EMFA's principle of 'impartiality' by proposing a methodology developed by the advertising industry and which includes many contributions from diverse industry stakeholders including advertisers, agencies, national advertiser associations, audience measurement providers and panel experts, consulting companies, trade groups, media owners, technologists and others. The methodology has been validated by auditors and measurement organisations as being fair and impartial.</p> <p>The voluntary Halo framework should, ideally, be used in combination with appropriate, representative governance, that serve the local needs of advertisers while also respecting the North Star needs of the advertising industry.</p> <p>Beyond this, the initiative itself does not prescribe if the framework should or could be used and the framework remains impartial to if and how it is implemented. Ultimately it has been developed to enable local groups, measurement organisations and JICs to build their own cross-media measurement solutions from consistent and quality foundations.</p>
COMPARABILITY	<p>The voluntary framework does not prescribe the metrics that local JICs and measurement organisations should use. Rather, Halo delivers on the principle of 'comparability' through a technical approach which permits the creation of various reporting metrics (including, but not limited to, standard comparison metrics, derived from all measurable impressions) and the ability to objectively apply multiple standards with auditable code.</p> <p>Comparability is a key advertiser requirement, and Halo has proposed an approach through which these metrics could be set. But the metrics used for a local measurement solution remain in the control of measurement organisations. Critically, the measurement organisations should also decide how they audit the input data required for comparability, to ensure it meets the highest thresholds.</p>
INCLUSIVENESS	<p>The Halo methodology has been developed in partnership with a diverse set of contributors, including advertisers, agencies, national advertiser associations, audience measurement providers and panel experts, consulting companies, trade groups, media owners, technologists and others. The voluntary framework reflects a wide range of industry perspectives and is representative of the wider advertising ecosystem.</p> <p>Either as an observer, advisor or contributor, anyone is welcome to participate in the Halo community, including JICs, measurement companies, print advertisers, broadcasters, etc.</p> <p>This approach upholds the principle of 'inclusiveness', guaranteeing that all relevant stakeholders have an opportunity to shape the Halo framework.</p>
VERIFIABILITY	<p>Halo's technical design fully aligns with the principle of 'verifiability'. Firstly, the framework is based on an open-source mode of operating. All code and documents are available for peer review. Secondly, to deliver upon the advertising industry needs for trust, Halo encourages local measurement services to conduct rigorous third-party audits of all components. Critically, this should include the data inputted to local systems by participating media owners, as mentioned earlier.</p> <p>Moreover, a Media Ratings Council audit is pending this year to validate the framework proposal, including the governance of code development, the accuracy of measurement as envisaged by the framework, and the consistency of outputs. The Media Ratings Council is an independent, nonprofit industry body that audits and accredits media measurement services to ensure they meet established standards for accuracy, transparency and reliability.</p>

<p>NON-DISCRIMINATION & PROPORTIONALITY</p>	<p>The voluntary Halo framework has been developed with the objective of avoiding the favouring of any particular medium, format or media owner, upholding the principle of ‘non-discrimination’ and seeking to enable a more level playing field. The framework provides the means for all participants in a measurement exercise – regardless of size or influence – to be measured, ensuring that equal, non-discriminatory opportunities exist for both large and small players in the media ecosystem.</p> <p>However, as important as consistent methodologies are, it’s acknowledged that uniform or ‘one-size-fits-all’ approaches to measurement may preclude the participation of (or place too great a burden on) relatively small media owners. So the Halo initiative adheres to the principle of ‘proportionality’ by proposing a voluntary framework flexible enough to accommodate all media owners, with fallback measurement proportionate to their capabilities and data assets. Ultimately, though, the degree to which media owners are accommodated by a cross-media measurement solution is for (local) measurement solutions to establish and not by the voluntary Halo Framework which is only a proposed means to an end.</p> <p>One of the hallmarks of the Halo framework is its application of first-party data and demographics, done to consistently ‘personify’ digital impressions at scale. Indeed, the application of first-party data in audience measurement is necessary and effective, given the limitations of panels in a fragmented media environment. But, to be clear, first-party data is not taken at face value by the Halo Framework’s technical approach. This data must be used in conjunction with panels, acting as the source of truth for demographic correction and for training personification models. And JICs and measurement organisations should consider carefully, when choosing to use the Halo Framework, the panels they use in combination with first-party data. From the perspective of advertisers, panels need be large enough to provide critical fallback measurement, ensuring that all media owners have the capacity to be measured, including those with proportionally more or less first party data assets.</p>
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More technical and detailed information about Halo can be found [here](#).

Conclusion

WFA and its members consider the Halo initiative an important driver for fair, pro-competitive cross-media measurement solutions across the EU and beyond. The Halo framework and technology are designed to be adapted to local needs for inclusive, local measurement solutions. WFA believes that the technical framework benefits advertisers, media owners and consumers and promotes a more level playing field for media owners as they compete for advertising buys.

WFA is aware that Halo’s open-source framework proposal is currently being deployed in the UK and the US as the technical foundation for the development of their local cross-industry cross-media measurement solutions. WFA is aware that other measurement organisations, including JICs, and their respective industry stakeholders are interested in considering how the voluntary framework can enable their local cross-media measurement solutions. As has always been the case, the framework proposal is freely available to anyone, and all stakeholders are [free to contribute to its development](#).

We call on policymakers to support and facilitate cooperation between advertisers, JICs, media owners, agencies and other key industry stakeholders to implement cross-media measurement solutions that are truly transparent and inclusive, whether based on the Halo framework or otherwise, in alignment with the EMFA’s principles. We strongly support the EMFA’s vision and believe Halo can play a crucial role in achieving its objectives.

For further information, please reach out to:

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