Recommendation: Promotion of and Advocacy for Regulated Goods in Organic Content
We restrict the sale of regulated goods in organic content but allow for the promotion or advocacy for the use of many of these products. We want to determine if we should remove or age-gate content that promotes the use of regulated goods; however, this may result in censorship of content that does not include a direct harm to the user.

Note: our advertising policies related to regulated goods are stricter, and explicitly prohibit promotion of regulated goods.
Promotion of Regulated Goods - Organic Content

Overview

**Recommendation**

Allow promotion of regulated goods other than non-medical drugs

**Source**

Cross-functional Feedback

**External Outreach**

58 External Engagements

**Working Groups**

6 XFN Working Groups
Promotion of Regulated Goods – Organic Content

Status Quo

Definition of promotion
Content that speaks positively, coordinates, or encourages the use of a Regulated Good
AND/OR
Content that provides instructions to use or make a Regulated Good

<table>
<thead>
<tr>
<th></th>
<th>Peer to Peer Buy/Sale/Trade</th>
<th>Brick and Mortar Buy/Sale/Trade</th>
<th>Promotion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Medical Drugs</td>
<td>Not Allowed</td>
<td>Not Allowed</td>
<td>Not Allowed</td>
</tr>
<tr>
<td>Pharmaceutical</td>
<td>Not Allowed</td>
<td>Not Allowed</td>
<td>Allowed</td>
</tr>
<tr>
<td>Marijuana</td>
<td>Not Allowed</td>
<td>Not Allowed</td>
<td>Allowed</td>
</tr>
<tr>
<td>Firearms</td>
<td>Not Allowed</td>
<td>Age-Gated (21+)</td>
<td>Allowed</td>
</tr>
<tr>
<td>Alcohol</td>
<td>Not Allowed</td>
<td>Age-Gated (18+)</td>
<td>Allowed</td>
</tr>
<tr>
<td>Tobacco</td>
<td>Not Allowed</td>
<td>Age-Gated (18+)</td>
<td>Allowed</td>
</tr>
<tr>
<td>Knives</td>
<td>Age-Gated (18+)</td>
<td>Age-Gated (18+)</td>
<td>Allowed</td>
</tr>
</tbody>
</table>
“I am at home with my Bro @jameson_hungary! Choose to stay home, too! 🙏🏻”

“Crazy beautiful cross of Pineapple Express and Blissful Wizard from @flawless.bc Cultivated exclusively using Advanced Nutrients #marijuana #AdvancedNutrients”

“I spend countless time with these two objects. It is one of my happy places. Quarter sawn beech cutting board by @wienspa and the right handed @shuncutlery 8” chef’s knife. Love the tools you use every day. || #knives #cooking #pawdesign”

“@in_range_inc has the coolest toys, he @cwgunwerks and @mg.armory.llc are bad influences...go follow all three!”
Promotion of Regulated Goods - Organic Content
Examples – Status Quo

‘Right thing to do’: Free marijuana for vets, people with disabilities

“This is definitely a great way to give back to your community if you have the means to do so... and cannabis keeps on giving.”

Reminder: Take Your Birth Control!

“A friendly reminder from Planned Parenthood to keep taking your daily birth control pills, which can be hard to remember if routines are being disrupted!”

“A gun is like a parachute – if you need one and don’t have it, you’ll probably never need one again.”

‘Where there’s smoke, there’s me.... #music #musician #manouche #gypsy #gypsyjazz #composer #bohemian #guitar #guitarist #django #reinhardt #movie #cinema #filmscore #soundtrack #cigar’
Promotion of Regulated Goods - Organic Content
Examples – Status Quo

“Open to trades as well! Gimme your best offer. Looking for 1k on this umbrella armory dsg. 5 pts epm mags”

“Hit me up #weedmemes #weedfeed #marijuana #marijuanasociety #marijuanaforsale #smokeweeds #weedcommunity”

“Box of Saint Luis Rey Marquez RE Cuba No. 1464/7500 (Oct 2016) Just dm me #cigarsofinstagram #cigarforsale #cigarsdaily #cigarians #cigarphotography”

“Delivering”
Studies suggest an overwhelming majority of people trust recommendations from people they know, and suggest similar levels of trust with online influencer opinions. Influencers who create content and share it on various social media sites have the ability to change opinions, to raise product awareness, or damage the reputation of a specific brand.

Children and adolescents feel closely connected to social influencers and do not consider them to be strangers, but relatable and approachable, according to research.

Research suggests children and adolescents have difficulty distinguishing commercial content vs organic content by influencers. This can increase their likelihood of being unwittingly manipulated and may hinder the ability of a user to make an informed choice.

Promotion of Regulated Goods

Research suggests the consumption habits of children and adolescents are persuaded by the online content influencers post. Policies should ensure content that poses a risk of harm to minors be restricted on the platform.

Sources: van Reijmersdal, 2020, Hendriks, 2020, De Veirman, 2019, Nielsen, 2016, Lisichkova 2017
We connected with 58 stakeholders globally across a range of perspectives, including freedom of expression, tobacco control, firearm advocacy, marijuana advocacy, and more.
**Key Themes:**

**Harms:** Perspectives on harm differed by the type of regulated good, and included normalization and glamorization leading to adoption, addiction, and/or negative outcomes.

**Speakers:** No consensus on whether influencers have larger impact on behavior than close social circle. Organic content from advertisers was seen as particularly concerning.

**Age-Gating:** Support for age-gating content was divided and differed based on the type of regulated good (less support for age-gating pharmaceuticals). Skepticism on effectiveness of age-gating was expressed by those for and against it.
Promotion of Regulated Goods - Organic Content

Status Quo

Allow promotion of regulated goods other than non-medical drugs

Pros

- Allows the most voice
- Most operable

Cons

- Does not remove or age-gate promotion of regulated goods that are illegal or age-restricted in many regions
- Does not remove or age-gate promotion of regulated goods where stakeholders have expressed safety concerns
Promotion of Regulated Goods - Organic Content

Age-gate (18+) commercial promotion

If Brand/product is tagged with a promotional message (e.g., I love @Budweiser), we will age-gate the content

**Pros**

- Limits promotional content for minors that may have a greater chance of leading to purchases
- Allows room for voice and advocacy of regulated goods

**Cons**

- Increased operational challenge
- Limited reviewer capacity for age-gating and no proactive model for enforcement
- Ignores promotional content from individuals or influencers that are untagged
- Does not differentiate between more and less harmful goods
<table>
<thead>
<tr>
<th></th>
<th>Peer to Peer Buy/Sale/Trade</th>
<th>Brick and Mortar Buy/Sale/Trade</th>
<th>Promotion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Medical Drugs</td>
<td>Not Allowed</td>
<td>Not Allowed</td>
<td>Not Allowed</td>
</tr>
<tr>
<td>Pharmaceutical</td>
<td>Not Allowed</td>
<td>Not Allowed</td>
<td>Age-Gated (18+) when tagged</td>
</tr>
<tr>
<td>Marijuana</td>
<td>Not Allowed</td>
<td>Not Allowed</td>
<td>Age-Gated (18+) when tagged</td>
</tr>
<tr>
<td>Firearms</td>
<td>Not Allowed</td>
<td>Age-Gated (21+)</td>
<td>Age-Gated (18+) when tagged</td>
</tr>
<tr>
<td>Alcohol</td>
<td>Not Allowed</td>
<td>Age-Gated (18+)</td>
<td>Age-Gated (18+) when tagged</td>
</tr>
<tr>
<td>Tobacco</td>
<td>Not Allowed</td>
<td>Age-Gated (18+)</td>
<td>Age-Gated (18+) when tagged</td>
</tr>
<tr>
<td>Knives</td>
<td>Age-Gated (18+)</td>
<td>Age-Gated (18+)</td>
<td>Age-Gated (18+) when tagged</td>
</tr>
</tbody>
</table>
**Promotion of Regulated Goods - Organic Content Examples – Option 2**

<table>
<thead>
<tr>
<th>Age-Gated (18+)</th>
<th>Age-Gated (18+)</th>
<th>Age-Gated (18+)</th>
<th>Age-Gated (18+)</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image1.png" alt="Image" /></td>
<td><img src="image2.png" alt="Image" /></td>
<td><img src="image3.png" alt="Image" /></td>
<td><img src="image4.png" alt="Image" /></td>
</tr>
</tbody>
</table>

- “I am at home with my Bro **@jameson_hungary**! Choose to stay home, too! 🙏🏻”
- “Crazy beautiful cross of Pineapple Express and Blissful Wizard from **@flawless.bc** Cultivated exclusively using Advanced Nutrients #marijuana #AdvancedNutrients”
- “I spend countless time with these two objects. It is one of my happy places. Quarter sawn beech cutting board by **@wienspa** and the right handed **@shuncutlery** 8” chef’s knife. Love the tools you use every day. || #knives #cooking #pawdesign”
- “@in_range_inc has the coolest toys, he @cwgunwerks and @mg.armory.llc are bad influences…go follow all three!”
Promotion of Regulated Goods - Organic Content
Examples - Option 2

Allow

‘Right thing to do’: Free marijuana for vets, people with disabilities

‘This is definitely a great way to give back to your community if you have the means to do so... and cannabis keeps on giving.’

Allow

Reminder: Take Your Birth Control!

“A friendly reminder from Planned Parenthood to keep taking your daily birth control pills, which can be hard to remember if routines are being disrupted!”

Allow

“A gun is like a parachute – if you need one and don’t have it, you’ll probably never need one again.”

Allow

‘Where there’s smoke, there’s me....

#music #musician #manouche #gypsy #gypsyjazz #composer #bohemian #guitar #guitarist #jango #reinhardt #movie #cinema #filmscore #soundtrack #cigar’
Promotion of Regulated Goods - Organic Content

Age-gate Tier 1 goods (18+, firearms, and pharmaceutical drugs*)

**Pros**

- Limits promotion for areas that have high severity, risk, and reach
- Age-gates promotion of goods that may result in the most harm to minors
- Protects minors from the most dangerous content deemed by internal and external feedback.

**Cons**

- Promotion of regulated goods is often tied to political speech (e.g., firearms, birth control)
- Promotion of safe firearm usage may be age-gated under this option
- Prevents minors from seeing content promoting safe or proper pharmaceutical use (e.g., treatments for ADHD, Diabetes, birth control, etc.)
- Limited reviewer capacity for age-gating and no proactive model for enforcement
## Promotion of Regulated Goods - Organic Content
### Option 3

<table>
<thead>
<tr>
<th></th>
<th>Peer to Peer Buy/Sale/Trade</th>
<th>Brick and Mortar Buy/Sale/Trade</th>
<th>Promotion</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Non-Medical Drugs</strong></td>
<td>Not Allowed</td>
<td>Not Allowed</td>
<td>Not Allowed</td>
</tr>
<tr>
<td><strong>Pharmaceutical</strong></td>
<td>Not Allowed</td>
<td>Not Allowed</td>
<td>Age-Gated (18+)</td>
</tr>
<tr>
<td><strong>Marijuana</strong></td>
<td>Not Allowed</td>
<td>Not Allowed</td>
<td>Allowed</td>
</tr>
<tr>
<td><strong>Firearms</strong></td>
<td>Not Allowed</td>
<td>Age-Gated (21+)</td>
<td>Age-Gated (18+)</td>
</tr>
<tr>
<td><strong>Alcohol</strong></td>
<td>Not Allowed</td>
<td>Age-Gated (18+)</td>
<td>Allowed</td>
</tr>
<tr>
<td><strong>Tobacco</strong></td>
<td>Not Allowed</td>
<td>Age-Gated (18+)</td>
<td>Allowed</td>
</tr>
<tr>
<td><strong>Knives</strong></td>
<td>Age-Gated (18+)</td>
<td>Age-Gated (18+)</td>
<td>Allowed</td>
</tr>
</tbody>
</table>
Promotion of Regulated Goods - Organic Content
Examples – Option 3

<table>
<thead>
<tr>
<th>Allow</th>
<th>Allow</th>
<th>Allow</th>
<th>Age-Gated (18+)</th>
</tr>
</thead>
</table>

“I am at home with my Bro @jameson_hungary! Choose to stay home, too! 🙏🏻”

“Crazy beautiful cross of Pineapple Express and Blissful Wizard from @flawless.bc Cultivated exclusively using Advanced Nutrients #marijuana #AdvancedNutrients”

“I spend countless time with these two objects. It is one of my happy places. Quarter sawn beech cutting board by @wienspa and the right handed @shuncutlery 8” chef’s knife. Love the tools you use every day. || #knives #cooking #pawdesign”

“@in_range_inc has the coolest toys, he @cwgunwerks and @mg.armory.llc are bad influences…go follow all three!”
Promotion of Regulated Goods - Organic Content
Examples – Option 3

Allow

‘Where there’s smoke, there’s me....
#music #musician #manouche #gypsy #gypsyjazz #composer #bohemian #guitar #guitarist #django #reinhardt #movie #cinema #soundtrack #cigar’

Allow

‘Right thing to do’: Free marijuana for vets, people with disabilities

‘This is definitely a great way to give back to your community if you have the means to do so... and cannabis keeps on giving.’

Age-Gated (18+)

Reminder: Take Your Birth Control!

“A friendly reminder from Planned Parenthood to keep taking your daily birth control pills, which can be hard to remember if routines are being disrupted!”

Age-Gated (18+)

“A gun is like a parachute – if you need one and don’t have it, you’ll probably never need one again.”
Promotion of Regulated Goods - Organic Content

External Outreach

Option 1: Status Quo (Recommendation)

Option 2: Age-Gate Commercial Promotion

Option 3: Age-Gate Tier 1 Violations

Ban All Promotion
FACEBOOK