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In Search of an Egyptian Product Placement Regulation

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Abstract

This article analyses product placement regulation in different countries and regions. The investigative aim is to extrapolate from other systems' regulations useful elements, which might benefit the Egyptian broadcast ecology given the current goals and challenges it faces. The methodology is based on official document analysis in nine countries grouped into four broad categories ranging from no existing product placement policies in a country such as India to more effective well-defined laws in countries such as the United Kingdom, Korea, and Turkey. The research highlights the drawbacks and advantages of each category concluding that the fourth and final category of regulation models has the highest potential of usefulness for future policy considerations in the Egyptian context.

Keywords: Egyptian broadcast; Product placements; Spot advertising; Satellite channels

Introduction

Product placement is simply defined as the subtle presentation of a specific brand in mass media programs on television or in films [1]. The practice dates back to more than a hundred years [2], but the concept came into the limelight in the 1980s following Spielberg's blockbuster film E.T., which was released in 1982. Gupta and Gould [3] implied that Hershey's experienced a 66 per cent increase in sales of their Reese's candy as a result of product placement in the film. Since then scholars started paying close attention to media content to spot instances of product placements.

Recently, the challenges faced by marketers with regards to spot advertising have led to growing reliance on product placement as a more feasible alternative. Newell, Salmon, and Chang [2] point out that "the business of product placement has been an integral and active portion of mass media for more than a century" as producers attempt to cut costs by obtaining free props and create an additional source of revenue in cases of paid product placements.

In Egypt, however, spot advertising is still a growing business and while product placement use is acknowledged as a source of revenue for filmmakers and marketers, currently there are no broadcast policies that address or attempt to regulate this practice on Egyptian television.

This study provides a review of current international product placement practices by examining four different, broad regulatory approaches and assessing the advantages and drawbacks of each. Then a recitation of particular aspects of existing product placement policies is done to see which practices are well suited for Egypt.

Purpose of the Study

This study explores different broadcast systems and their divergent regulations with regards to promotional messages. This is to help propose a realistic, comprehensive Egyptian product placement policy through comparing and analyzing the strengths and weaknesses of the models in other countries

Literature Review

As traditional advertising evolves and faces new limitations across different countries, product placement becomes more significant [4]. The value of product placement as a source of funding can be better appreciated when examining the declining income yielded by spot advertisements.

When spot advertisements generate less income, broadcasters and filmmakers have less money to fund film and television production. They thus turn to product placement and other innovative and non-traditional forms of marketing.

Researchers such as Balasubramanian, Gupta and Lord, Gupta et al., Wenner, Lehu, and Williams et al. [4-9] note that when compared to spot advertising, product placement cannot be avoided as the brands appear as components of film or television scenes.

However, with its advantages, many countries have decided that regulation was pivotal for product placement or else the practice can yield negative effects. In Egypt, though product placement has been growing rapidly, until now there is no valid regulation pertaining to it. The following section explores current Egyptian regulations that relate to mass media in general and advertising in specific.

Advertising-related Regulation in Egypt

Several documents relate to Egyptian television advertising regulation: rules for state channels, rules for satellite channels, consumer protection laws and the newly signed Unified Media Law. Here is a quick review to offer a proper context for this study.

Advertising on state channels

The Egyptian Radio and Television Union's (ERTU's) general advertising policies apply to Egyptian state channels only. Here there is an extensive list of rules governing advertisement.. By reviewing those rules, two major themes of relevance were found: censorship of commercials based on political, moral, and religious content; and censorship for the protection of consumer rights.

There is a clear warning that advertisements are not to contain religious, political, or immoral content. The regulations state that advertisements for books, plays, films, or other works of art are prohibited, if those works had not already obtained a license from the censorship unit. Strict warnings exist against advertisements for alcohol or those that use violent or obscene language ("ERTU Advertising Rules") or challenge traditional family values (Item #16 ERTU Advertising Rules) or "tarnish the image of Egyptians by making them appear ignorant, rude, or vulgar" (Item #13 ERTU Advertising Rules).

The second area of policy restrictions governing state channels clearly takes into consideration protecting consumers from manipulation or deception by product promoters. Here, there is a strict warning against commercials that may be misleading. These include comparative advertisements that belittle competitive products. Moreover, advertisements targeting children are "to respect and protect the innocence and well-being of younger viewers" (Item #7 ERTU Advertising Rules). The regulations also refer to various permits issued before particular categories of advertising are to be aired; namely food or beverages, hospitals and medical products or property.

More importantly, there is a specific article, which subtly deals with product placement. It states that the coverage of recent films, songs, and plays is allowed, but must be limited to once per programme with a maximum of six minutes of coverage (Article #3 of Promotional Content in ERTU Programming).

However, this does not refer to the typical type of product placement: when brands are embedded in a less conspicuous manner appearing as a natural part of the scene or plot rather than being explicitly promoted.

Advertising on private satellite channels

The satellite channels contract, signed with the Egyptian ministry of investment, only contains two lines on the guidelines and rules associated with advertisements. It calls for channels to respect consumer protection laws and advertising regulations of the countries receiving the channel signal, including policies about advertisements for medication, medical equipment, and holding contests (Article 12.1.D).

The contract warns that if its articles were not adhered to, an official warning would be issued to the satellite channel to stop airing such content. If within three days the advertisement was not removed, then the channel may risk suspension of transmission.

As with ERTU regulations there is no stipulation in the private satellite contract regarding the use of product placement or a maximum time for spot advertising within a fixed period of broadcast time.

Consumer protection law (CPL)

The CPL was enacted by Law #67 of 2006. The purpose of the law was to regulate consumer-trader relations, which encompasses overseeing that advertisements are truthful and not misleading. The Law is relevant because Article 12 informs the public of how consumers can protect their rights in case they face any problems when purchasing a product" (Consumer Protection Agency: About CPA).

Article 6 of the law directly addresses advertising, stating that every supplier and advertiser shall provide the consumer with correct information concerning the nature and characteristics of the product. Article 19, meanwhile, specifies the powers of the agency stating it shall compel the violator to adjust and remove the ad immediately or within the time limit fixed by the Agency's Board of Directors.

Theoretically, Articles 6 and 19 should hold advertisers accountable when using misleading and deceptive commercials. However, despite its promising wording, there are some loopholes associated with the role of the Agency. Consumer rights are generally formulated in rather general terms in the existing Egyptian legislation, which jeopardises effective access to justice even if the consumer is trying to defend his/her rights" [10].

Unified media law

In 2014, the newly formed Egyptian parliament passed a new media law covering the private and national media institutions in Egypt. Among the proposed constitutional changes was the formation of a regulatory body: the Higher Council for Media Regulation.

Recently this Council has been charged with reforming Egyptian television and unifying the regulations that apply to state and private satellite channels. The Council's duties include overlooking advertising practices on television. Although it does not refer to product placement specifically, it

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does refer to advertising related practices and the authority of the Council concerning their regulation.

Unlike other television regulatory bodies, which were purely of state employees, the composition of the newly formed Council consists of a healthy mix of professionals, experts, and relevant union members. Despite this, the new body, the Higher Council, has been criticized for replacing the old Egyptian ministry of information by acting as a government arm and applying uncalled for censorship.

The above examination of advertising policies reveals that consumer protection; along with political, cultural, and religious sensitivities seem to be the only concerns Egyptian policymakers have had, thus far, with advertising.

Justification for Creating an Egyptian Product Placement Policy

There are many reasons that support the need for an Egyptian product placement policy, as opposed to the option of leaving this advertising practice unregulated. The justification for regulation comes in light of issues related to increased commercialism and materialism, subliminal advertising effects, and the impact of promoting ethically charged products and some media effects theories. This need for a timely Egyptian product placement policy has proven pivotal given the new constitutional changes that seek to coordinate the rights of state and private channels and the restrictions imposed on them.

Research Question

What are the international regulations that could be used as a model for an Egyptian product placement legislation?

Methodology

The following is a comparison of current product placement regulation in nine broadcast systems where the practice has been prominent and is growing in use. The countries chosen for closer scrutiny were Australia, Brazil, Canada, China, India, Korea, Turkey, the United Kingdom, and the United States. The countries were selected for various reasons. Firstly, they are large product placement markets [2,11-15]. Secondly, they cover a broad-geographical and cultural spectrum. Thirdly, the countries reflect divergent product placement policies. Finally, information on their product placement regulation was publicly accessible.

There is no statistical data on the size of the product placement industry in Egypt. PQ Media, which offers country specific reports on the relevant regulatory framework and the size of the product placement industry, does not report on product placement in Egypt. The only available data is based on research that compares the frequency of product placement use in the top five Hollywood and Egyptian films between 2010 and 2013. This report reveals that use of product placement in top Egyptian films has doubled [16].

To understand product placement regulation in each nation, policy documents and official government websites were directly examined when written in English. This was the case for UK and US regulation. In instances where official documents were written in a language other than English, the researcher accessed various websites that offered English language translations about the country's product placement laws. This was the case for Turkey, Brazil, China, and Korea. In Australia, Canada, and India, there seemed to be no specific laws; thus, legal websites and secondary research documentation were used to clarify the approach to product placement in these countries.

The countries have been categorized into four regulatory categories. Interestingly, the broadcast model did not necessarily predict the type of product placement policy. The first category includes countries with no product placement regulation or restrictions: This group includes only India. The second category encompasses countries with no specific product placement regulation but where general advertising laws must be respected: Australia, Brazil, and China. The third group of countries has specific product placement laws, but they seem fairly ineffective: Canada and the United States. Finally, the fourth category includes countries with clear, well-defined, and seemingly effective product placement regulation: Turkey, the United Kingdom, and Korea.

Category 1: No product placement regulation

India is the only prominent example of country where product placement is completely unrestricted. There are no current particular regulations for product placement in India, where this practice has been booming over the last 10 years [17,18]. According to Krishnamurthy [17], so far there are no plans by News Broadcasters Association of India (NBAI) to impose any restrictions.

While the NBAI is discussing a comprehensive media code of ethics, there is no evidence that it would contain references to product placement.

India produces the largest number of films annually when compared to all other countries in the world [19]. This indicates a huge potential for product placement as a source of revenue generation for the Indian film and broadcast industry. This would also mean that there is room for abuse and overuse of product placement by advertisers and commercial entities.

The current climate, in which there is a lack of regulation, could result in excessive commercialization. Egypt can be classified in this category. As in India, whilst product placement practices are booming in Egypt, there are no specific laws to regulate them.

A carefully designed product policy could allow Egypt's broadcast system to reap the financial benefits of this practice without neglecting essential concerns addressed throughout this research.

Category 2: Advertising laws define product placement practices

Australia: Regulation of product placement in Australia is minimal. According to PQ Media, Australia is ranked fourth globally in terms of the size of its product placement market. Its expenditure on product placement was estimated to be $104 million in 2010 [20]. Existing product placement research mainly centers on Australian audience attitudes towards the practice [21-23].

With respect to specific Australian polices there is a self-imposed broadcast regulation code to guide advertising practices. This code mandates disclosure of commercial content in non-fiction programmes, documentaries, and current affairs programmes [24,25]. However, the disclosure is not obligatory in other types of programming [24].

In a few Australian regions there are laws banning Payola, which is a practice through which the company pays to have its products broadcast in selected programmes. Uniform restrictions across all Australian territories still exist, however. For example, direct or indirect promotion of cigarettes and tobacco is denied in any type of media. Yet there remain some major contradictions in current policies [24], as long as there is disclosure.

Brazil: The second country in this category is Brazil, which is the second-largest product placement market in the world behind the United States [26]. Evidently the existence of formal regulation has no direct link or apparent impact on the overall value of the product placement market as Brazil has no specific, detailed product placement regulation.

La Pastina [11] notes that product placement in telenovelas exists as a main source of funding. Brazilian broadcasters turn to product placement, in part, to avoid regulation, which limits commercials to a maximum of 15 minutes each hour. In Brazil product placement practices are influenced by three main sources: laws created by the Brazilian advertising self-regulation entity (CONAR), CONAR Code of Ethics (Articles 10 and 28), and the Consumer Defense Code (Article 36).

Article 36 of the Consumer Defense Code states that promotion must be disclosed so it is immediately and clearly recognized. Article 28 of The Code of Ethics of CONAR (the Brazilian self-regulation body in charge of advertising and promotion) similarly warns that an advertisement of any form must be readily recognized. This guideline also applies to product placement use through Article 10 [27].

In summary, product placement in Brazil is permissible as long as there is some form of sponsorship identification. It seems that economic benefits are the driving force behind regulation in this area, with little concern about the effects of product placement on children or the increased commercialization of editorial content.

China: The third country in this category is China. Interest in examining Chinese audience attitudes towards brand placement has been evident as early as 2003. Mckechnie and Zhou [28] have found that compared to other nationalities the Chinese were less accepting of product placement. In 2012, Chinese product placement spiked to $103-million, growing 27.2 per cent compared to placement spending in 2008 [15]. This could be a result of the recent overall growth of China's television and film sectors.

Similar to Australia and Brazil, China does not have any clear regulation on product placement. Yet, since product placement is a form of advertisement, the existing Chinese Advertising Law regulates it. The State Administration of Radio, Film, and Television is the legal entity in charge of creating any regulation in this area [29].

Of relevance to product placement is Article 14 of the Advertising Law, amended in 2015, which states that an advertisement shall be identifiable to consumers and shall not be published in the disguised form of a news report on mass media (Chapter 2, Article 14, Advertising Law of the People's Republic of China, 2015).

Here the law is too limited, only referring to removing advertised content from news segments. This is similar to Brazilian laws described above. A second concern is that Article 14 suggests that product placement is not classified as commercial content or advertising.

Clearly a main area of weakness in Chinese regulation is associated with the application of the advertising law. For example, Article 22 (previously Article 18 in the 1994 law) prohibits advertisements of tobacco in newspapers, television, radio, film, and all other media. However, as Han [29] notes, product placement of tobacco is not prohibited on Chinese television.

Rannamets [30] notes that audiences in China have recently raised complaints about product placement, which has led the State Administration of Radio and Film to promise that it would deliberate the matter of regulation in this area. However, the amended advertising law of 2015 has not reflected such pressures to directly and more specifically address product placement or the use of props.

Category 3: Formal but ineffective product placement regulation

This section is an exploration of models in which product placement regulation is well defined yet appears to be ineffective. Canada and the United States are examples of such countries.

Canada: The Canadian advertising regulations stem from four main sources: Canadian Radio, Television and Telecommunication Commission (CRTC) regulation implemented through the Broadcasting Act, Advertising Standards Canada (ASC), which is advertising's self-regulation authority, and the Ethics Code of the Canadian Association of Broadcasters (CAB).

The Ethics Code of the Canadian Association of Broadcasters has created Articles 13, 14, and 15 with regards to product placement. Of prominence is Article 14, which states that broadcasters shall ensure that advertising material within a newscast is clearly distinguishable from the news information adjacent to it and that there is no influence by advertisers on the reporting of news or public affairs, which must be accurate, balanced, and objective (Ethics Code of Canadian Association of Broadcasters, Article 14, Clauses B and C).

Although Article 15 of the Code prohibits subliminal advertising, the regulation in Canada, ironically, seems to be moving away from restrictions and in favor of deregulation.

Ginosar and Levi-Faur [31] note that in 2006, following a public hearing, the CRTC considered amending broadcasting advertising by favoring decreased restrictions in response to economic and technological changes. Of major significance for this study, is the fact that product placement was removed from the calculation of the maximum number of advertising minutes which can be broadcast.

The United States: The United States is the other country in the same category. It is the largest product placement market in the world and "solid growth during most of the 2006-11 period fuelled a 12.8% [Compound Annual Growth Rate] CAGR gain" [32].

The Federal Communication Commission (FCC) regulates product placement through the Communications Act of 1934, Article #317 [30]. This section, as amended, requires broadcasters to disclose to their listeners or viewers if a matter has been aired in exchange for money, services or other valuable consideration (Communications Act 1934, 1934, Payola and Sponsorship Identification).

Generally, the FCC does not prohibit product placement, but requires disclosure. The manner of sponsorship disclosure, however, is not specified. Thus, some sponsors may simply be mentioned briefly in closing credits. The nature of identification of placements has raised criticism by various groups, including Commercial Alert, an activist group whose mission is to protect consumers against commercial exploitation [33] and The Writers' Guild of America [34]. However, the conclusion was that more stringent regulation of product placement could not be introduced because it constituted a challenge to free speech [35].

A second problem with the current practice in the United States is that unpaid placements used as props are not regulated. Props officially offered free of charge are not regulated and are hence unrestricted. This means, for example, that the camera can linger on the branded product in US productions.

This ineffective policy has created a loophole, which advertisers in the US have been taking advantage of. For example, while, tobacco companies signed different agreements, committing not to use paid-for brand placement in films [34], Rannamets [30] notes that these companies circumvent this ban by providing cigarettes to films "free of charge." Accordingly, the placed tobacco brands are legal and they do not even have to be disclosed in the credits.

Given the current nature of the product placement practices in the United States, it seems that regulatory forces are facing a dilemma, which weakens their position as effective policymakers.

Category 4: Countries with effective product placement regulation

The final category in this discussion consists of Turkey, Korea, and the United Kingdom. These are examples of countries, which have detailed, clear, and useful product placement policies.

Korea: In Korea, prior to 2009, product placement was prohibited on television and real brand names were blurred or slightly modified. Product placement was officially legalized through the 2009 Korean Broadcasting Act. This law was enacted in 2010 for purposes of expanding the broadcasting industry's financial resources and production capacity [36]. The official regulatory bodies are the Korean Broadcast Advertising Corporation (KOBACO) and the Korean Communications Commission (KCC) [37].

The newly amended Korean law states that placements must be limited to entertainment and cultural programmes. It strictly forbids placement in children's, current affairs, factual, and debate programmes [36]. In addition, broadcasters are obliged to advise viewers about any incorporation of placements by utilizing subtitles at the beginning of aired programmes.

The law warns that placements may not influence the substance or composition of programmes and editorial integrity must not be affected by it. Thus, names of placed brands must not be (verbally) mentioned in programmes, nor should there be advice to purchase or use those products. Finally, the law warns that exposure to brand signs, logos, and trademarks may not surpass five per cent of the overall duration of the TV programme containing the placement [36].

The Korean system depicts a useful and practical regulatory. Lee and King [38] found that Korean audiences, who were informed about American product placement regulation, tend to prefer the new Korean law to the American and previous Korean product placement regulation. They find it to be comprehensive, practical, and also socially responsible.

The United Kingdom: The second country in this category is the United Kingdom. The UK has altered its policy towards product placement in 2010. As result of the new policy some estimate that the size of the UK product placement market could grow to £120 million by the end of 2018 [39].

The new UK regulation implemented from February 28, 2011 came as a result of and in compliance with EU regulation [40]. In the United Kingdom, the Office of Communications (OFCOM) regulates product placement under Section 9 of the Broadcasting Code.

The objectives of the product placement policy as stated by the code are to protect editorial independence, distinguish between advertising and editorial content, protect audiences as consumers, and ban unsuitable sponsorship [41].

It should be noted that placements here are distinguished from 'props'. Props which have not been paid for by sponsors and props which have been paid for in an amount that costs less than the props' actual price are permissible because they are not considered product placement [41].

In terms of reference and prominence, the UK policy warns that a placement (paid for or unpaid) must be editorially justified and not have any "undue prominence" or else it shall be banned (Article 9.9, 9.10).

Regarding the types of programmes, product placement is to be prohibited from children's, current affairs, consumer affairs, religious, and news programmes (Article 9.7).

The items which may not be advertised or placed on television include weapons, escort services, tobacco; liquor; gambling; food or beverages which are high in fat, salt, or sugar; medication; and infant milk (Article 9.13).

A final condition set by the Code is that a product placement logo (**Figure 1**) must appear for three seconds at the beginning and end of programmes as well as at the end of each commercial break [41].

Figure 1: Product Placement Logo Versions in the United Kingdom.

Clearly, the UK regulation has numerous strengths. It is a comprehensive policy, which covers a broad range of product placement-related issues with highly specific instructions.

Turkey: The third state in this category is Turkey. Despite that fact that product placement use is relatively new in Turkey [42], there are good laws governing the practice. The Turkish product placement regulation reveals strong parallels to the European Union policy and suggests that Turkey may have adapted its legislation in line with the AVMS directive as part of the accession talks with the European Union.

The Radio and Television Supreme Council (RTUK) is the entity that regulates product placement in Turkey. In 2011 the RTUK's Law on Foundation and Broadcasting Services of Radio and Television Institutions #6112 directly addressed product placement in Article 13, which regulates the practice in the following manner:

Firstly, brand placement is permitted when products and services are embedded free of charge. This is similar to the EU regulation. Secondly, placements should not be promoted in an exaggerated or unreasonable manner within a programme. Thirdly, for paid placements, disclosure of sponsorship must occur at the beginning of broadcast programmes, at the end of each commercial break, and at the end of each programme containing a product placement. Fourthly, any product categories previously banned from promotion or advertising, such as tobacco and alcohol, may not be promoted through placement. Finally, similar to EU/UK regulation, product placement is strictly prohibited in children's programmes as well as news and religious programmes [43,44].

In 2014 the 'The Second International Product Placement Symposium in Istanbul' promised looser regulation in this area, alarmed by an 80 per cent decline in traditional advertisement viewership in Turkey, for reasons, which are unclear [45].

Findings

In the next section, empirical findings will be drawn to group together essential elements from the previous legislations that may suit the Egyptian context and help in the design of an appropriate product placement policy

Problems with self-regulation

Industry self-regulation may seem like a useful approach for setting basic rules for governing product placement practice. However, it could be argued that without government intervention, the necessary changes will never be implemented. The government is needed to limit excessive materialism and control the seemingly inevitable globalization of the highly commercial models.

Transparent media laws are crucial, but they must be strengthened by supervision and enforcement, mechanisms in order to avoid abuse and misuse. A specialist on advertising ethics, Alexander [46], rightly questioned the efficiency of advertising self-regulatory bodies, noting that, "[t]he role of self-regulatory bodies is rather limited in terms of achieving major public policy goals". More recently, Wharton [47] has pointed out some serious problems related to self-regulation.

Therefore, it appears that an Egyptian government policy is needed to guide the practice of product placement and that self-regulation is not a practical option. The following sections list and summarize the various aspects recommended for such regulation.

Disclosure

Discussions about the subject of disclosure are based on a two-phase analysis. In the first, disclosure is determined whether needed or not. Then, if disclosure is needed, in the second phase the nature and form of necessary disclosure is probed.

The need for disclosure

The existing international product placement regulation prioritizes disclosure. This is particularly evident in current US, Brazilian, Turkish, Korean and EU regulations. Enforcing some form of disclosure when product placement is used is critical from a socio-cultural perspective for ensuring that there are no forms of subliminal or surreptitious advertising.

While the above countries agree that disclosure is mandatory, their policies diverge on the form of disclosure required. For example, the US and Brazil do not specify the type of disclosure. This approach is not useful, however, if the main objective of a disclosure requirement is to alert audiences to the commercial content. A more sound policy therefore is that of Turkey, Korea, and the UK, where sponsorship notifications are required to be clear and hard for viewers to miss. Because Turkish product placement laws are moving towards a more commercial approach that would increase funding, the Korean and UK regulation may be more suitable for an Egyptian policy recommendation if protection for audiences is taken seriously.

Forms of disclosure

Both the Korean and UK systems ensure that sponsorship identification is clear and visible. The UK requires sponsorship identification to occur at the beginning and end of programmes as well as after every commercial break. This is done through a P logo, which appears on screen at the beginning and end of a programme and at the end of commercial breaks. In Korea, identification is only required at the beginning of a program through subtitles.

Although the UK system applies stricter disclosure rules, the Korean sponsorship identification, through subtitles after opening credits, is a better option and should be emulated by any Egyptian product placement regulation.

There are several reasons subtitles are preferred. Firstly, subtitles allow people to read and know what specific brands are placed. Secondly, audiences could easily miss the P logo. Thirdly, even if people notice the P logo they might not be aware of what it stands for.

While disclosure needs to be prominent and visible to viewers, some forms of excessive disclosure notifications and notifications that are embedded within programmes could backfire. Reijmersdal, Tutaj, and Boerman [48] find that audiences were irritated by excessive and repeated disclosures of product placements within programmes. This implies the following for an Egyptian product placement policy proposal: While a notification signaling the use of product placement must be strategically placed to achieve visibility, the notifications must not be exaggerated or situated at times when they might interrupt the viewing experience and draw more attention to placed brands.

Editorial Justification

The most significant stipulation that should be a part of any product placement policy is the presence of "editorial justification" as a prerequisite. This is a strong aspect of European Union regulation, and accordingly, incorporated by the UK policy.

While various models reviewed call for editorial justification, it is unclear to what extent it is actually enforced. However, in the UK, evidence suggests that the principle of editorial justification is firmly applied [49].

Editorial justification is crucial, because it helps limit excessive international commercialism trends. This is addressed by Rannamets [30] who fairly notes, "If product placement goes as far as to invade all the possible industries, then a minute would not go by without someone trying to sell something". A development like this would undermine the important socio-democratic function of the media because excessive placements coupled with a lack of editorial justification would harm the trustworthiness of the media and their editorial content. Consequently, it is strongly suggested that editorial justification should be the basis for any proposed product placement policy in Egypt.

Placements Offered as Props

As the review of international product placement policies has revealed, numerous countries allow placements used as 'props' that are offered free of charge. But, for best results the non-disclosure policy associated with props should only be applied in Egyptian media if two conditions were met.

The first is that ethically charged products or brands banned in traditional advertisements may not be used as props. If this condition was not strictly applied, unregulated prop use would merely become a vehicle to promote controversial products that are restricted in other types of television promotion. The second condition is in accordance with the current United Kingdom policy. Any new Egyptian regulation should make clear that in cases where props are used as placements; editorial justification must always be present otherwise, sponsors will abuse this rule.

Limiting Product Placement to Certain Programme Genres

Egypt should follow approaches seen in Turkish, Korean, and UK television because they have a comprehensive and logical classification that is being adequately enforced. The credibility of factual shows might be greatly undermined if they were to include advertising messages in the form of placements. Viewers could rightly suspect that commercial interests were tainting content presented as being factual and unbiased. The UK policy's specification that placements be banned from religious shows seems very practical for the Egyptian context, where religious programming is already facing credibility challenges. Moreover, placements should not be allowed in children's programmes as Williams et al. [9] examined the ethicality of product placement in children's shows and has illustrated the potential harm to younger viewers.

Ethically Charged Products

Arguments associated with the placements of ethically charged products were examined by Balasubramanian; Basso; Berglund and Spets; Brennan, Rosenberger, and Hementera; Galician; Gupta, Balasubramanian, and Klassen; Kim and McClung; Schejter; Wenner and Hackley, Tiwsakul, and Preuss [4,6,7,13,21,49-54]. Such concerns have been reflected in the policies of the EU and other countries like Turkey, which ban placements for certain controversial product categories such as alcohol, tobacco, and prescription medications. A comprehensive Egyptian product placement policy recommendation should not overlook the issue of “ethically charged” products. Social responsibility mandates that the media prohibit the promotion of products that could have damaging effects.

Egypt may benefit from emulating the UK model in this area. The UK regulation, in-line with the EU’s AVMS directive, reflects a deep concern for the overall wellbeing of its citizens. It bans typically controversial products like alcohol and tobacco, but also goes beyond that to ban other categories like medication, gambling, and junk food.

It is recommended that a list of culturally and religiously controversial products be carefully compiled and thoroughly reviewed.

Another reason placements of particular brand categories should be banned is to protect children against exposure to certain products, and their usually favourable presentation, that may not be age appropriate. This seems particularly important in Egypt, where there is no watershed, as there is in the UK for example. Egyptian children generally do not have set bedtimes, and families usually do not restrict television-viewing hours. Thus, in Egypt, for example, it may not be wise to limit certain placements to late hours, assuming that children will not be exposed to them.

Conclusion

Whilst regulations in other countries have some strong points, the policies of the United Kingdom and Korea, in particular, stand out as the most elaborative since they are socially, culturally, and ethically, airtight and descriptive, accommodating boundaries within its framework. A desirable and effective comprehensive policy is not just about having more regulations, but ‘more specific’ ones, which makes them more effective.

The Egyptian broadcast would benefit from emulating the UK and Korean practices because they stress placement disclosures and specify their manner, emphasise the separation principle in certain programming, prohibit undue prominence, attempt to limit commercialism, and ban placements in particular brand categories.

In Egypt, the creation of a specific regulatory body which implements such measures may not be necessary. Since a specific advertising censorship unit already exists, this body may become responsible for implementation of any upcoming product placement regulation. Here again the emphasis should not be on creating new entities, but rather making sure that existing ones are more effective.

Given that the Egyptian constitution has recently created the Higher Council for Audio-visual Media (Article 211), and that this Council which has begun to play an active role in overseeing the overall broadcast policies in a manner similar to OFCOM. The challenge will be to avoid vagueness of roles or the creation of different bodies that have dual or redundant roles.

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