



# EUC Paper Series

Policy Insights

## **To Regulate or Self-Regulate? That is the Question: Bulgaria's Long Path Towards a Media Policy Concerning the Portrayals of Women in Advertising\***

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### **Abstract**

This policy essay examines how the increasing hypersexualization of the female body in Bulgarian advertising and explicit portrayals of women that normalizes it have been received by the different players in the industry and society at large. By exploring the evolution of media regulation with a focus on advertising, this essay looks at the current framework for sanctioning sexual content in advertising and its effectiveness in the European Union's newest member state. While self-regulation appears to have made strides in curbing these trends, partly due to modeling self-regulation mechanisms after those of other EU countries, numerous legal and cultural obstacles influence the public's attitude towards a greater awareness of the potential harm of sexually stereotyping and demeaning advertising.

**keywords:** *media policy, sexualization of women, self-regulation, advertising*

### **Introduction and Contextual Background**

Bulgaria and the rest of the Eastern European region have undergone enormous media transformations in the decades following the fall of the communist regime. The exponential growth of media outlets during this period increasingly signaled the need for establishing a legal framework and regulatory mechanisms to address the virtually non-existent ethical norms of the communist press. This has been a particularly evident development in the sphere of advertising, which quickly became the most recognizable outcome of the adoption of the free market media system. Seeking an abrupt, permanent and immediate departure from the financial and ideological control of the state, the Bulgarian media enthusiastically endorsed this liberal model of media operation, relying on advertising both as a main source of revenue and as a guarantee of political and economic independence. In fact, data shows that prior to the economic crisis of 2008, Bulgaria's advertising expenditure rose from \$4.3 million in 1996 to \$325 million in 2007, and is

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reported to have generated annual advertising revenue in the media sector alone of nearly \$256 million (IREX 2012). As Kirova has pointed out, ads are “like ‘air and water’ to the ‘democratic’ Bulgarian: they mostly go unnoticed, but are experienced as an indispensable part of our social habitus” (2012, 1).

However, the “new” Bulgarian media quickly fell victim to the economic trappings of the free market, which often also meant frequently overstepping the boundaries of ethical behavior. With no standing legal model and an outdated moral compass tarred by years of stifling censorship and ideological control, Bulgarian media was like the Wild West, a frontier open for adventure and full of desire for change. At the same time, the growing need for reform in media policy, regulation and accountability was extremely slow and was described as “overhasty, unpremeditated and premature” (Georgieva-Stankova 2012, 195).

One area in which the ethical missteps of the media were particularly flagrant is advertising. With the growing influx of capital in the media and virtually unbridled multinational corporate investments in the industry, women became the prime target, both as models and consumers of advertised goods. This, in turn, also led to an influx of sexually charged and provocative images of women, quickly normalizing what media scholars call the “porno chic” trend in advertising, which uses visually arresting images of sex that dehumanize and demean women in the interest of making quick profits (McNair 2009). These problematic images, media critics have argued, have nestled themselves in the media cultural diet of media consumers, who have accepted such images not only as signs of modernization and being more western, but also as normal and progressive, a sign of female liberation and gender equality (Ibroscheva 2013).

Bulgaria’s hugely profitable and very loosely regulated advertising industry took advantage of this trend, generating unprecedented record profits (Ibroscheva 2013). Recently, however, the advertising industry has become a prime target for criticism from the European Union, which deemed the unbridled exploitive images of sexuality in advertising extremely problematic (Carvajal 2008). In 2008, the European Parliament issued a scathing report on negative stereotyping in advertising, specifically naming Bulgaria’s alcohol producers as responsible for exploiting sexuality as a mainstream strategy of selling their products (European Parliament Report 2008/2038(INI)). The report recommended mandating the introduction of self-regulation to address these pressing issues. The non-legally binding document, which was drafted by Swedish MEP Eva-Britt Svensson, also called on EU institutions to monitor the implementation of existing European laws on sex discrimination. As stated in the report, stereotypes can be “straitjacket women, men, girls and boys by restricting individuals to predetermined and artificial roles that are often degrading, humiliating, and dumbed-down for both sexes” (European Parliament 2008/2038(INI)). The reaction to the report among advertising companies was a passionate one, as it called for delineating pornographic, sexually explicit (normalized sexualized images of women, referred to as porno chic) and gender stereotypical images, which are often conflated within the same category of what the EU deems problematic and exploitive depictions of women, in turn, directly or indirectly linked to issues of equality and discrimination among the sexes. As the spokeswoman for the World Federation of Advertisers put it in *The New York Times*, “The essential concern that we have is that it is mixing two different things: gender stereotyping with discrimination and degrading images[...]. That’s a real problem because stereotypes are not necessarily something that are bad. They can be totally harmless or quite entertaining” (cited by Carvajal 2008, 12).

In 2012, the EU put this idea further to the test, when it proposed a total ban on pornographic materials via its Report on Eliminating Gender Stereotypes in the EU (European

Parliament 2012/2116(INI)). Point 19 of this document called on “Member States to establish independent regulation bodies with the aim of controlling the media and advertising industry and a mandate impose effective sanctions on companies and individuals promoting the sexualization of girls.” Furthermore, the document also called on the EU and all of its Member States to take on concrete steps on its resolution of September 16, 1997 on discrimination against women in advertising which called for a ban on all forms of pornography in the media and on the advertising of sex tourism (Belavasau 2017).

The proposed ban was not supported by the European Parliament, yet, it generated enough public interest and critical response to rekindle the conversation pointing to self-regulation as the only mechanism, embraced both by European institutions and the advertising business themselves. Bulgaria, as the newest EU member state, was expected to not only bear witness to long tradition of regulating media content based upon largely universe media directives, but also to actively partake in it. Yet, because of the cultural, commercial and legal differences among the member states, currently, there are only a handful of EU-wide advertising regulations, except for general restrictions on the international trading of goods and services. The Directive on Misleading Advertising was issued in 1984 and was amended in 1997. Part of this directive addresses guidelines for the appropriate use of comparative claims in advertising. The directive compels member states to legalize comparative advertising, but it allows each country to ban comparative advertising for certain products and for professional services. Therefore, each member state must obey the directive but can tailor its legislation to be more restrictive. Conversely, the advertising industry established the European Advertising Standards Alliance (EASA) in 1992 as “the single voice for the promotion and support of effective advertising self-regulation in Europe.” The EASA aims to promote ethical standards associated with the issues affecting commercial communications across Europe and to safeguard the interests of consumers. The EASA periodically issues guidelines of common principles and recommendations for use by national self-regulatory organizations, with the intention that self-regulatory bodies will be implemented, put in place, and fully supported by member states, if such bodies have not been in existence.

In terms of media regulations, the European Union offers wide-ranging models of how to approach sanctioning and monitoring media content. While media content regulation has been a concern for the member states from the offset of the union, advertising was not addressed specifically in the original Treaty of the European Union.<sup>†</sup> National approaches range from applying a “command and control” style of regulation to a deliberately soft style of participatory soft governance (Engelbrekt 2017). Among that variety, however, self-regulation has been the preferred method of the advertising industry, which has traditionally opposed continued use of directive and has lobbied for it in hopes of avoiding stricter rules that would result from directive requiring EU interference with industry activities (Reader 1995). The concept of self-regulation, however, is new for Bulgarian media professionals and experts (Ognyanova 2009). While the country struggled to establish a workable legal model of its media operations, most of its efforts have been focused on ensuring a free and independent press, protected by legal measures and ensuring plurality of voices and points of view. Because of the heavy stress to ensure the functioning of an independent, and therefore financially self-sufficient, media system, media experts and legal advisors disparaged the concept of self-regulation as a mechanism of control and potential self-censorship. Self-regulation was discredited as an unnecessary moral panic and justified as just another attempt by the government to control the media, and therefore, public

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<sup>†</sup> Treaty on European Union, February 7<sup>th</sup>, 1992, 1992 O.J. (C 224) 1. The Treaty, which was signed in Maastricht, the Netherlands, is commonly known through the EU as the “Maastricht Treaty.”

opinion. In the same fashion, self-regulation was derided as a way to satisfy the constant “communist” urge to regulate, widely advocating for a model of media regulation that mirrors a laissez-faire spin on the “free market place of ideas.” Simultaneously, it became obvious that there was a need for a system of monitoring and regulating the operation of the exponential growth of media outlets and the content they produce and disseminate. This policy essay is an examination of the current mechanisms of regulating advertising in Bulgaria, modeled after the framework of the self-regulations practices of other European Union countries and the challenges of implementing those in post-communist Bulgaria.

Therefore, the research methodology of this policy paper was two-pronged. The first prong was a policy analysis of the existent regulatory frameworks, including legal and self-mandating bodies in charge of overseeing the advertising industry’s practices and procedures. The second prong was based on interviews conducted in 2014 with a variety of professional actors, including members of the regulatory bodies and advertising practitioners as well as a qualitative exploration of the general discourse surrounding the need for advertising regulation. The results show that the legal framework under which advertising is regulated in Bulgaria is complex and, at times, unsuccessful in handling cases brought for review because of outdated and somewhat abstract definitions of legal terms. Despite the cumbersome media law, however, the self-regulatory mechanism of the advertising industry, which was instituted in 2008, has been effective in curbing instances of harmful sexual stereotypes and continues to work towards refining the mechanism in place regardless of numerous structural and financial obstacles.

### **Research Problem and Analysis**

Below is a list of the various instances in which complaints against demeaning ads can be filed and the legal obstacles faced in the process of doing so:

- The main media supervisory body called National Council for Radio and Television (NCRT), established in 1997 and renamed in 2001 to Council for Electronic Media (CEM), is responsible for overseeing public service broadcasting, as well as commercial broadcasting, which also includes advertising. Its members are chosen by the Parliament and the President. The press and the Internet are not currently regulated by CEM, despite multiple attempts to craft a press law and introduce Internet-related amendments. Despite a strong call for maintaining a free and independent press, there is a growing concern among media experts that freedom of speech and transparency must be protected and mandated by legal means and increasing state participation.
- The current law guiding the operation of media in Bulgaria is the Radio and Television Act (RTA) of 1996, which took nearly six years to draft. Numerous amendments have been made to the law in subsequent years; however, as the Bulgarian Gender Research Association (BGSA) points out, although the law was amended in 1999 to include sanctions against commercial advertisements that affect human dignity and those that discriminate based on sex, CEM has not taken concrete steps in pushing for specific legal language addressing what BGSA deems “highly abusive and humiliating messages” in advertising. In 2000, the RTA was also amended to include further protection from dishonorable advertising, including ads that discriminate on the basis of sex or that incite hatred of sexual nature.

- Advertising is also overseen under the Law on Consumer Protection and Trade Rules (LCPTR) of 1999 as well as the Law on Competition Protection (LCP). Advertising which is considered offensive or contain discrimination is addressed under the title of “dishonorable advertising.” However, what this actually means is not explicitly defined. The provision against offensive advertising is set in Chapter 4, Section III, and covers advertising that contains elements of discrimination regarding sex, race, religion, nationality, political convictions, age, physical or mental abilities, or offends human dignity.
- Advertising regulation is also covered in the Law on Tourism, and the Law on Health. While some of these laws can cover important provisions connected to gender portrayals, such as demeaning images of women in alcohol advertising for example, they are not always applied in the courtroom.
- There is currently no Gender Equality Act or specialized governmental body of any kind that is charged with gender equality. Also, there is no law on pornography or current provisions about indecency in the media law, with the exception of a few Internet-related legislative measures concerning child pornography.
- Actions addressing the proliferation of alcohol advertising, many of which contain “porno chic” images of women only took place in 2005 when the Law on Health banned the direct advertising of alcoholic beverages (Article 55). However, the legal provisions in this law were drafted to protect vulnerable populations such as children and minors, and contain no clauses protecting the dignity of women or their right not be sexually exploited. This, according to women’s rights activists, allows for advertisers to argue that their freedom of expression trumps women’s right to non-discrimination, creating a loophole in the regulatory framework.
- Most of the legal cases filed against demeaning advertising have not been successful in awarding damages to the plaintiff, thus affecting the financial success of the campaign under review. Claims have often been dismissed for lack of empirical evidence that such portrayals can indeed affect the dignity or the well-being of Bulgarian women, a “moral” damage that might be virtually impossible to prove in court.
- Most of the legal reform that has been introduced in Bulgaria has been reactionary, rather than proactive, mainly as a result of the pressures from the European Union to align local regulations and laws with those mandated by European Audio Visual Directives. One example is Bulgaria’s painful road to implementing the digital transition strategies, mandated by the European Commission, which Bulgaria was asked to integrate into its law in 2004 (Ibroscheva & Raicheva-Stover 2013).

Since 2001, media experts in Bulgaria have been debating whether regulation or self-regulation is the right model for overseeing advertising. While some have argued that self-regulation is just another “face” of regulation, infringing upon the market’s abilities to operate independent from state interference, the European model of self-regulation was adopted in 2008 when Bulgaria joined the European Advertising Standards Alliance and established its own National Council for Self-Regulation (NCSR). The Council, which is comprised entirely of volunteer experts outside of the industry, is in charge of handling issues pertaining to the content of advertising.

According to the Secretary General of the NCSR Elly Guerganova (2014), the Council has been very successful in significantly reducing instances of sexual objectification of women in advertising. For example, the NCSR was able to effectively remove the commercial campaign “It’s Watermelon Season,” which portrayed popular female chalga<sup>‡</sup> singers as nothing more than sexual play objects. In fact, because NCSR issued a statement sanctioning the campaign in less than a month when it took over three years for the courts to consider the anti-discrimination case filed in relation to the same campaign, the Bulgarian Helsinki Committee has praised the work of the Council as important and trail-blazing. As Elly Guerganova argued, “Regulation and self-regulation go hand in hand and require a mature society. In Bulgaria, the regulatory bodies appear more mature than the business they regulate” (2014). It appears that self-regulation, albeit advisory in nature, has been relatively successful; yet multiple challenges still exist, including lack of desire among small and local firms to become members of the Council, lack of maturity both in society and in the industry to recognize about the impact of the sexualization of women in the media, limited campaign budget and low visibility among the general public.

## **Policy Recommendations**

### *1. Need for EU assistance in reforming current media and gender discrimination laws*

Bulgarian law contains explicit prohibitions of sex-based discrimination, but the law does not define what “discrimination” means. Similarly, there are no legal definitions of what constitutes “advertising.” This creates a complex and extremely difficult legal tableau to navigate, which in turn makes the efforts of the self-regulatory body and the NGOs very difficult. Pushing for further clarity in the legal language, both as far as issues of discrimination, obscenity and pornography are concerned, can help the fight against exploitation and discrimination in advertising. The “new” Bulgarian media quickly fell victim to the economic trappings of the free market, which often also meant frequently overstepping the boundaries of ethical behavior; at the same time, the growing need for reform in media policy, regulation and accountability was extremely slow and were described as “overhasty, unpremeditated and premature” (Georgieva-Stankova 2012, 195). After the collapse of the regime, the vacuum left behind by the control of the communist authorities now needs to be filled by media laws and policies that had no precedents in the cultural and legal communist past. In fact, as Ognyanova (2009) pointed out, “unlike other sectors of the economy, where the government adopts the so-called *sectoral* policies, no political acts (strategies) for media sector in Bulgaria have been developed in the years of democratic transition” (31). While self-regulation that relies on the industry “policing” its own transgressions might be the most appropriate model to ensure adherence to ethical standard in advertising, the use of EU directives might also be a useful tool when pressing local national regulators to not only install “monitoring” and “sanctioning” mechanisms in place, but to also demand that legal language be amended, and potentially be harmonized with EU laws and media regulations. This, in turn, can also be further solidified by Member States using existing administrative and legal structures to adjudicate disputing regarding transgressions by the advertising industry. In the words of Oliver Gray, the

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<sup>‡</sup> Chalga, also known as pop folk, is a musical genre characteristic of the Balkan region that combines variety of rhythms, borrowed from Arabic, Turkish, Greek, Roma, and other musical traditions. The music, while extremely popular among young people as a means of claiming a local cultural identity in the growing barrage of foreign media influences, is also very problematic because of its emphasis on hypersexualized female performers.

director general of EASA, “Effective self-regulatory mechanisms that can quickly respond to changing technologies and consumer needs for transparency, choice and control are in a growing digital single market more important than ever” (2015, 6).

## 2. *Further support for advertising self-regulation*

While the self-regulatory framework currently in place seems to have yielded impressive results, much work remains to be done to make it even more far-reaching and effective. The membership in the NCSF is completely voluntarily, and is comprised mostly of large multi-national advertising agencies, with local agencies still lagging behind. Advocating for increasing the membership numbers of the Council can also ensure its efficacy in addressing problems within the framework of the ethical recommendations of the industry. In addition, the NCSR’s budget does not allow for a large campaign educating the public about the functions and utility of the Council. In general, while plans to popularize the NCSR exist, there are no funds available to realize them. In addition, further measures need to be introduced to force the alcohol industry and its advertising into doing a better job in self-regulating its commercial messages. Despite multiple attempts to institute both legal mandates on alcohol advertising, the persisting problem is further illustrated by recent findings showing that Eastern European women are the fastest growing segment of youth who drink excessively.<sup>§</sup>

Additionally, the problem with self-regulation also has to do with the fact that consumers in Eastern Europe tend to view self-regulation as lax and to believe that the advertising industry, if left to its own devices, will not sufficiently protect consumer interests. On the other hand, advertising images of women, which might be deemed exploitive or demeaning by some consumers, are not always seen as a moral, legal or for that matter, cultural transgression. This seeming acceptance of advertising images and language that might be detrimental to women’s self-esteem has also been linked to a culture in the Eastern European region that is permeated by cultural symbols of patriarchy and in the post-communist transition, has experienced a virulent push towards a hegemonic masculinity and a return to the domesticated femininity among women (Ibroscheva 2013). This form of “benign sexism” as Millan and Elliott (2004) called it, is not unfounded in a cultural climate where attitudes towards regulation are usually conflated with a desire to control, and therefore, limit consumer choices. Voices in defense of sanctioning advertising that is offensive especially to women, on the other hand, become equated with feminist organizations often portrayed as an imposition from the West and a way to prevent consumers to enjoy freedom in expressing themselves, even when those expressions are not in good sexual taste.

## 3. *Need for media literacy and sex education*

Since much of what is considered offensive advertising is often a matter of a judgment based on one’s personal value system, there is clearly a need to educate the public about the impact of advertising and the harm of sexual stereotypes. Public awareness is also needed in understanding of who the self-regulatory mechanism work. A large media literacy campaign is sorely needed, as

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<sup>§</sup> A study published in published in the *Archives of Pediatrics and Adolescent Medicine* revealed that drunkenness is on the rise among Eastern European women by 40 percent—the highest increase among world youth. The authors of the study speculated that “with the opening of borders and markets of the formerly planned-economy societies, Eastern European countries increasingly became confronted with contemporary global alcohol marketing strategies that target particularly young people.”

currently such efforts at the government or institutional level does not exist anywhere in the country.<sup>\*\*</sup> As Eva-Britt Svensson, Swedish member of Parliament and author of the 2008 Gender Stereotyping report on advertising images, said, legislators pressed simply for self-regulation among advertisers. But she also suggested that consumers could act. “If they have more information and awareness about the impact of gender stereotypes, [...], they can start boycotting products” (Carvajal 2008).

## **Concluding Remarks**

In Bulgaria, the phenomenon of female bodies selling virtually anything and everything has become commonplace, and as such, has brought into question both the professional norms that guide the advertising industry itself as well as the regulation mechanisms that sanction exploitive and abusive usage of such images. It is important to note, however, that while those images were indiscriminately commonplace in the years immediately following the collapse of communism, since Bulgaria’s accession to the EU, the frequency of these images has decreased but not disappeared. While the removal of such visual treatments of women in advertising requires both social maturation and raising the bar of the professional norms of Bulgarian advertising, the model of self-regulation as applied by the EU, which is now mandated by the common agreement of the union, has certainly served as a stepping stone for Bulgarian advertising in its growing awareness and recognition of the social roles they play parallel to their important and undeniable market implications. To some extent, Bulgaria’s current struggles with the concept of self-discipline resembles what French consumer affair minister, Christiane Scrivener, observed in her official report on advertising regulation in 1978: “The notion of self-discipline is still all too often foreign to the thought patterns of French industry and commerce, where the job of regulation and supervision has been carried out by the state until recently” (cited in Mattelart & Palmer 1993, 13). Perhaps Bulgaria needs time to reach that stage of maturity and ability to trust entities other than the state to be efficient and effective in monitoring and sanctions transgressions in the advertising industry.

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<sup>\*\*</sup> The call for introducing media literacy programs targeting both children and parents was echoed by regulators and NGOs alike. Programs that focus on increasing young people’s critical scrutiny of media effects such as *Media Smart* in Europe, for example, include discussions of issues such as exploitation of women’s sexuality in media, and have been met with general enthusiasm, but have not been made an educational priority. There is an even more urgent need for policy implementation since UNESCO has also placed media and information literacy as a top priority, directly crosscutting into gender and media which is currently a main area of concern for the organization. Finally, gender sensitivity training for legal officials is sorely needed because despite the fact that women are represented in high numbers at the decision-making level when cases against offensive ads are reviewed by in court, they exhibit little to no understanding of the type of detriment which can be produced by ads that exploit women’s bodies and dignity.

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