CREATOR RISK INTELLIGENCE

The Signal

Monthly intelligence on Creator Risk, regulatory change, and brand safety incidents. Issue 04 · April 2024

Italy is moving faster than any other European market to legislate directly in response to a creator scandal. The draft bill prompted by Pandorogate — already dubbed the Ferragni Law — is working its way through parliament. Whether it passes in its current form or not, the direction of travel is clear.

01 — THE FERRAGNI LAW

Italy · Draft legislation moves through parliament · April 2024

Italy's Council of Ministers approved the draft bill on 25 January 2024 — within weeks of the AGCM fine. Officially designated as the DDL Beneficenza, targeting charitable promotions by social media influencers, it has already become universally known as the Ferragni Law. As of April 2024, the bill is progressing through the parliamentary process. It has not yet been enacted into law.

What the bill proposes

The draft bill targets influencers with more than one million followers who use their platforms to promote commercial products or services connected to charitable causes. Under the proposed legislation, such promotions would be required to clearly disclose the exact amount of any donation made to the charity, the percentage of sales revenue that will be donated, and any conditions or limitations on the charitable commitment. Vague language — 'proceeds go to charity,' 'we support this cause' — would no longer be compliant. The bill as drafted applies to promotional content as well as organic posts that mention a charitable connection.

Prime Minister Giorgia Meloni, who had been publicly critical of Ferragni since the scandal broke, reinforced the government's position as the bill moved forward: 'The real role models are not influencers who make loads of money promoting expensive products supposedly for charity.'

What it means beyond Italy

The DDL Beneficenza is notable not just for its content but for its existence as a political act. It is the first draft national legislation in Europe written specifically in response to a single creator incident. Whether it passes in its current form or is amended significantly, the signal it sends to other European governments is unambiguous: there is political appetite to legislate directly in response to brand safety failures. The question for brands operating across Europe is not whether Italy's approach will be replicated elsewhere — it is how quickly.

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Draft legislation follows scandal with a 3–6 month lag. The Ferragni Law has not yet passed — but the regulatory environment of 2025 and 2026 is being written right now, in direct response to the incidents of 2023 and 2024. Brands that understand this dynamic have time to get ahead of it. Those who wait for the final law to pass will be managing compliance under pressure.

RECOMMENDED ACTION

Any creator partnership involving charitable claims or cause-related marketing should be structured now to meet the standards the DDL Beneficenza proposes — regardless of the market of activation or whether the bill has yet passed. The documentation requirements are straightforward: exact donation amounts, recipients, and any conditions. Review your current cause-related partnership contracts against that standard.

02 — REGULATORY NOTE

Italy · EU · USA · April 2024

A busy month for influencer marketing regulation across multiple markets.

ITALY	DDL Beneficenza (the Ferragni Law) approved by Cabinet on 25 January 2024 and progressing through parliament as of April 2024. Not yet enacted. AGCOM simultaneously consulting on a Code of Conduct for influencers — expected to cover creators with 500k+ followers or 1M+ monthly views. Italy is moving faster and more deliberately than any other European market.
EU	The EU AI Act progresses through the European Parliament. When enacted, it will require AI-generated content — including synthetic influencers and AI-edited imagery — to be clearly labelled. Brands running campaigns featuring AI-generated creator content should begin preparing for disclosure requirements.
USA	FTC enforcement continues to focus on supplement and health product claims. Multiple supplement companies face actions for using undisclosed influencer testimonials. The FTC has issued guidance making clear that 'gifted' products require disclosure even without payment — the material connection test is met by value, not cash.

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The Signal is published monthly by Signal Intelligence. Each issue covers real Creator Risk incidents, regulatory developments, and the intelligence that brand-side teams need before they need it. Subscribe at signalintelligence.consulting — and if this issue was forwarded to you, make sure you're on the list for the next one.