

19 November 2024

**Subject: ICAS, EASA and ICC response to the proposed formation of a technical committee on digital marketing**

Dear Mr Mujica,

Dear Members of the ISO Technical Management Board,

We are writing on behalf of the International Council for Advertising Self-Regulation ([ICAS](#)), the European Advertising Standards Alliance ([EASA](#)) and the International Chamber of Commerce ([ICC](#)) in response to the proposal for the creation of a new ISO standard and technical committee on "Standardization in the field of terminology, requirements, guidance, practices, tools, and methods for organizations and professionals conducting digital marketing."

As outlined in our letters dated 27 September (on behalf of ICC) and 30 September (on behalf of ICAS and EASA), we respectfully urge you not to proceed with the proposal for a new ISO standard for digital marketing and consider the risks of conflicting with existing global standards and a well-established and effective advertising regulatory framework for digital/online advertising. Below, we outline key points to support our position:

### **1. Existing Global Standards Are Robust and Comprehensive**

The International Chamber of Commerce (ICC) recently published the 11th edition of its Advertising and Marketing Communications Code, following an extensive national and global consultative process. This widely recognized standard extensively covers digital marketing, addressing critical topics such as AI, algorithms, and enhanced transparency, ensuring high standards for responsible advertising in the digital space. As it also covers marketing in non-digital space, it ensures a cohesive approach to standards for responsible advertising across the whole marketing and advertising eco-system. Since 1937, the ICC Advertising and Marketing Communications Code has stood as the gold standard for business self-regulation, shaping ethical practices through eleven revision processes to meet evolving global challenges. Serving as the backbone of self-regulatory rules worldwide, the ICC Code provides a comprehensive framework for responsible advertising, ensuring global consistency while upholding robust consumer protection standards. Its influence extends far and wide, being expressly recognized in 42 countries with active self-regulatory organizations (SROs), and it is widely endorsed and referenced by companies, associations, governments, and national organizations. This enduring legacy underscores its pivotal role in fostering trust and accountability in the advertising and marketing industry.

### **2. National Advertising Standards Are Enforced**

In major advertising markets worldwide, national advertising codes are in place that cover digital marketing. These codes – which are generally building on the principles of the ICC code – are implemented and enforced by independent advertising standards bodies or self-regulatory organizations (SROs). Many SROs also enforce legal provisions and collaborate with regulatory

authorities at national level. This global network of SROs ensures responsible advertising practices and adapts to local market nuances while maintaining international consistency.

### **3. Recognition by International Organizations**

The benefits of advertising self-regulation are widely acknowledged by prominent international governmental organizations, including the Asia-Pacific Economic Cooperation (APEC), the European Union (EU), the Council of Europe's 'European Audiovisual Observatory' (EOA), the Organization for Economic Cooperation and Development (OECD) and the United Nations Conference on Trade and Development (UNCTAD). In the US, the regulatory authority primarily responsible for oversight of advertising and marketing practice, the Federal Trade Commission (FTC), recognizes the role and efficacy of advertising self-regulation, and actively promotes participation by members of the advertising ecosystem.

These endorsements affirm the efficacy and global acceptance of advertising self-regulatory mechanisms.

### **4. Accessibility and Support for SMEs**

The ICC Code is freely accessible, making it an invaluable resource for businesses or organizations of all sizes, including small and medium-sized enterprises (SMEs) anywhere in the world. This ensures that everyone who wants to advertise online, regardless of resources, can adhere to high ethical standards without having to pay to access the standards.

### **5. Proven Effectiveness and Adaptability**

The current advertising self-regulatory system has demonstrated its effectiveness across diverse markets. It is designed to be technology-neutral and future-proof, ensuring it remains relevant amidst rapid technological advancements in digital marketing. This flexibility fosters innovation while maintaining ethical standards. If digital marketing processes would be standardized, such as methods or tools used, this could stifle innovation by imposing rigid frameworks.

### **6. Technological Advancements in Advertising Self-Regulation**

SROs increasingly utilize advanced tools, including AI, to monitor and regulate online advertising effectively. These innovations enhance the efficiency and responsiveness of self-regulatory systems, further reducing the need for a new ISO standard.

### **7. Risks of Duplication and Fragmentation**

Introducing an ISO standard for digital marketing poses significant risks of duplication and fragmentation:

- It could create conflicting frameworks, leading to complexity, confusion, and inconsistency across global markets.
- This redundancy may undermine consumer protection efforts, as existing systems already address evolving consumer concerns and expectations effectively.

## Conclusion and Recommendation

In conclusion, we urge ISO members not to advance with this proposal for a new Technical Committee, given the robust frameworks that already exist under the guidance of national SROs and organizations like ICC, ICAS and EASA. These self-regulatory systems, underpinned by the ICC Advertising and Marketing Communications Code, have long ensured responsible advertising practices, including provisions for digital marketing. The recent update of the ICC Code, which addresses emerging technologies like AI, further demonstrates the ability of current standards to evolve and adapt to new challenges.

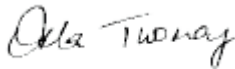
Thank you for considering our perspective. If you have any questions or need clarifications, please don't hesitate to contact us. The ICC, ICAS and EASA remain committed to collaborating with ISO and we look forward to discussing how to best work together. However, when it comes to advertising and marketing practices, we hope that we can count on your support of the existing frameworks that are already well-established rather than introducing new layers of standardization.

We appreciate your consideration and look forward to continued collaboration.

Yours sincerely,



**Guy Parker**  
ICAS President



**Orla Twomey**  
EASA Chairwoman



**Andrew Wilson**  
Deputy Secretary General – Policy  
International Chamber of Commerce (ICC)

Attachment: [ICC position dated 27 September](#) and [EASA/ICAS position dated 30 September 2024](#)