

ICC Sweden Comments for the Revision of the ICC Advertising and Marketing Communications Code

We welcome this opportunity to share our thoughts, ideas, and comments for the Pre-Revision Study that will lead up to the revision of the ICC Advertising and Marketing Communications Code. These comments have been prepared in close dialogue with ICC Sweden's Marketing Committee, which gathers senior experts from across the Swedish business community. Below you will find suggestions and comments considering both structural and substantial changes.

Structure

- An overarching comment is the need to early in the revision process consider how to **improve the accessibility and user-friendliness** of the code. We suggest that the Commission in conjunction with the revision considers how the Marketing Code can also be presented in an easy-to-use digital interactive format.
- A widely used element of the newly released ICC Framework for Responsible Environmental Marketing Communications is the checklist provided. It provides a good initial overview of what marketers need to take into consideration and the scope of the rules, which allows for further reading of relevant parts of the framework and facilitates its practical application by marketers. It has also proven to play an important role in educational purposes. The Code revision should take inspiration from this and **introduce checklists** as part of the Code itself. Checklists should be made interactive with links to relevant parts of the Code to further facilitate its use. In general, making the Code more user-friendly with additions such as these are important in order for more businesses to apply and use the Code. Apart from checklists, the Commission should consider if there are other add-ons that can be helpful in this regard.
- It should be considered whether there is also a need for specific summaries/overviews etc. for different **target groups** to aid in the practical application of the code. This could apply to checklists as well, which could then target different user-groups, such as marketers or legal counsels. Students could be another relevant target group. Having products such as code summaries or checklists tailored for educational purposes would serve as a great way to consolidate its relevance for coming generations. While some believe the Code is already too

long, ensuring that these tailored elements are designed as digital add-ons could facilitate increased use of the Code without expanding the document too much.

- In terms of improving user-friendliness, it should also be considered if practical examples can be provided of the application of the different articles of the Code, e.g., as part of a checklist.

Substance

- We welcome the upcoming revision of the Code and **support a comprehensive update** with all chapters open for revision. Such a process is important in order to uphold the relevance of the ICC Marketing Code and the self-regulatory system, and in order to reflect current policy developments and trends within the field. Areas that should be addressed in the revision range from issues that the Commission is already addressing such as dark commercial patterns and diversity and inclusion but should also address the increasing importance of influencer marketing and retouching of images etc., at all times maintaining the Code's current technological neutrality.
- The Code is addressing marketing communications, but the border between **marketing communications and other types of corporate communications** are becoming increasingly blurred, not least in digital channels. Consider if this is something that needs to be more explicitly addressed in the revision.
- To add to the structural comment above regarding increasing the user-friendliness of the Code, consideration may be taken regarding if some elements of the Code need further clarification. One example mentioned in this regard was Chapter D1 §3.
- While the **ICC Framework for Responsible Environmental Marketing Communications** has just recently been updated, the increasing importance of environmental marketing and the fact that the field is quickly evolving, warrants continuous updates. The upcoming EU proposal on substantiating green claims (30.11.2022) is one example, which will require companies making 'green claims' to substantiate these against a standard methodology to assess their impact on the environment, using Product and Organization Environmental Footprint methods. Therefore, consider if this framework, as well as other frameworks to the Code, should be revised in conjunction with the Code itself or otherwise at least be given a timeline for the next revision. Relating to the Environmental Marketing Framework, one aspect that could warrant further clarification is:

- **Circular economy.** While referred to, the current framework is not explicit on its meaning, referring to a lack of consensus. However, this is a field that is quickly evolving. A future framework needs to reflect this, including the ongoing standard setting work as well as the work done by the new ICC Global Working Group on Circular Economy. The terminology could also be updated to reflect this. The current guidance is tied to term “waste”, whereas the industry is shifting to the use of “secondary resources and materials”, which needs to be reflected.

We hope that you will give these comments due consideration and look forward to engaging with you in the continued process of revising the Code.

Your sincerely,

A handwritten signature in blue ink, appearing to read "H. Blomqvist".

Henrik Blomqvist

Acting Secretary-General

ICC Sweden