**Summary of main areas of change**

***The following details the main areas of change from the previous official draft of the code upon which we received many comments. It incorporates also revisions made resulting from reviews of the chapters which identified areas to be tackled in the general provisions rather than in the detailed chapters or vice versa.***

**Introductory part of the Code:** This section has been updated to address the current code revision.

**Definitions:**

* **Influencer and influencer marketing definitions** have been slightly amended.
* **Claims** definition added.

**General Provisions: Introduction**

* **Scope of the code:** Revised to clearly indicate areas in and out of the code.
* **Responsibility:** The detailed application on responsibility has been moved up to the introductory part of the GPs together with interpretation and implementation.
* **Implementation:** All the Implementation has been moved up to the front.
* **Code Review:** This section has been consolidated.

**General Provision articles:**

**Art 2 Social and Environmental Responsibility:** This has been revised to include a new provision concerning **anti-corruption** and another subsuming the revised old article 22 on **environmental behaviour and responsibility.**

**Art 5 Truthfulness** has been reordered and a provision on **aspirational claims** added based on the approach in the framework on environment but widened. The latter because of spotting a theme which is now wider than the chapter D concerned.

**Art 7 Identification and Transparency** This article has been revised and rationalised from other parts of the GPs concerning mixed content i.e. influencer marketing.

**Art 11 Presentation of the Offer:** A new article was made compressing many of the provisions in chapter C which had been identified as more generally applying and belonged in the GPs.

**Art 18** **Testimonials and endorsements; Influencer marketing communications:** This article has been revised to amalgamate the art 17 on testimonials and 18 on influencer marketing to cover **endorsements** and address **influencer marketing** as issues were common.

**Art 19 Children and Teens:** This article has been shortened and the detail removed to a **proposed separate chapter** to be included in the code. It also addresses ensuring the respect of rules and standards regarding minors for restricted products. N. B. The proposed separate chapter content is drawn from the existing article of the Code on children and teens.

**Art 20. Data protection and Privacy:** Responding to numerous comments this section has been substantially shortened based on a proposal by FEDMA to principles that can be more universally accepted.

**Art 24: Code Responsibility:** This article has been substantially shortened and the general approach to responsibility moved to the introductory part of the GPs (see above)

Articles deleted completely and/or subsumed into other sections or articles of the code since the previous version.

* **Previous Art 18 and 19 Testimonials and Influencer marketing:** amalgamated -see previous section notes.
* **Previous Art 23 – Transparency on cost of communication:** Deleted from GPs and moved to Ch C.
* **Article 21 – Children and teens:** details removed into proposed separate chapter -see enclosed proposal. N. B. The proposed separate chapter content is drawn from the existing article of the Code on children and teens.
* **Article 25 – Environmental behaviour**: subsumed into Art 2 - see previous section notes.
* **Previous Art 26 Responsibility:** large part moved to introduction of GPs see previous section notes.

**Key questions for consideration**

1. Is the **order** of the introductory areas of the GPs and the articles suitable or do you have any further suggestions? Please note we wish to retain as much as possible the current sequence from articles 1-7.
2. Have we suitably ensured that the **scope of the code** applies to people, soft and hardware involved in advertising and marketing communications?
3. Do you agree with the proposal for a separate chapter on **children and teens** as proposed or would you prefer to retain the detail in the general provisions?
4. Following long discussions re **data privacy** and applicability is the current proposal with much shorter provisions now acceptable?