**Sergio Mujica**
ISO Secretary General
Chemin de Blandonnet 8
1214 Vernier, Geneva
Switzerland


19 November 2024


**Subject: Industry Response to the Proposed ISO Technical Committee on Digital Marketing Standards**

Dear Mr. Mujica / Dear Members of the ISO Technical Management Board,

On behalf of a coalition of organizations representing the global marketing and digital industries, we are writing to express our firm opposition to the proposal to establish a new ISO Technical Committee (TC) for digital marketing standards ahead of your upcoming Technical Management Board meeting.

**Background**

As you know, the ISO TC proposal, originating from the Chinese Standards Association (SAC), aims to create global standards for digital marketing. While we recognize the importance of fostering international collaboration, this proposal presents significant risks that could undermine the integrity of existing frameworks, particularly the [ICC Code for Advertising and Marketing Communications](#) (ICC Code). This Code is the globally recognized benchmark for ethical marketing, used across more than 50 countries, and is uniquely positioned to provide consistency and coherence in the industry.

**Key Concerns**

1. **Fragmentation of Standards:**

The introduction of an ISO standard risks fragmenting the regulatory landscape, resulting in different standards being applied in various contexts. This could weaken the global consistency and coherence provided by the ICC Code.

2. **Dilution of Ethical Standards:**

Unlike the ICC Code, the ISO proposal lacks detailed guidelines on key issues such as transparency, data protection, and safeguarding vulnerable groups. This could lower the ethical bar for marketing practices and erode consumer trust.

3. **Confusion Among Stakeholders:**

The coexistence of the ICC Code and an ISO standard would create uncertainty for marketers, regulators, and consumers, complicating compliance efforts and reducing the effectiveness of self-regulation.

4. **Undermining Self-Regulation:**

The ICC Code is a cornerstone of the global self-regulatory ecosystem, fostering industry-led governance and minimizing the need for legislative intervention. Introducing a parallel ISO system could jeopardize this ecosystem and disrupt the principles of self-regulation.

**Our Position**

We urge the ISO Technical Management Board to reject the creation of this new Technical Committee. This proposal does not align with the overarching goal of achieving harmonization in global standards and risks undermining existing ethical frameworks that are widely accepted and effective.

The ICC Code already provides a comprehensive, adaptable, and internationally endorsed framework for marketing communications, addressing all forms of marketing, including digital and data-driven practices. Adding a competing standard would only fragment the landscape and weaken the cohesion necessary for ethical marketing practices worldwide.

**Call to Action**

We strongly encourage ISO to recognize the ICC Code as the foundation for global marketing standards and to prioritize collaborative initiatives that strengthen existing frameworks rather than introducing competing ones. By doing so, we can collectively ensure ethical consistency and consumer trust across all markets.

Thank you for your attention to this critical matter. We look forward to continued dialogue and collaboration to uphold the highest standards for our industry.

Yours sincerely,

Stephan Loerke, CEO
World Federation of
Advertisers (WFA)

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

Townsend Feehan, CEO
Interactive Advertising
Bureau – IAB Europe

Enrico Girotto, Director
for Public Affairs
Federation of European
Data and
Marketing (FEDMA)

Fleur Parnet, Chief
Executive Officer
Belgian Association of
Marketing (BAM)

Konrad Shek, Director
Advertising Information
Group

Angela Mills Wade,
Executive Director
European Publishers
Council

Philip Perez, Presidente
Cámara Argentina de
Anunciantes

Thomas Kragh, Direktør
Dansk Annoncørforening

Andrea Hunt, President
and CEO
Association of Canadian
Advertisers (ACA)

Jean-Luc Chetrit, CEO
Union des Marques

Katja Heintschel von
Heinegg, Director

Zentralverband der
Deutschen
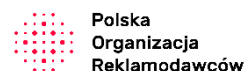Werbewirtschaft (ZAW) /
German Advertising
Federation

Gregory Antoniadis,
President of the Board
Hellenic Advertisers
Association

Osamede
Uwubanmwen,
President
Advertisers' Association
of Nigeria (ADVAN)

Brian Yuyi, Chief
Executive Officer
The Marketing
Association of South
Africa – MASA

Elżbieta Gorajewska,
Managing Director
Polish Organization of
Advertisers

**Sveriges Annonsörer**

Hanna Riberdahl, CEO
Sveriges Annonsörer AB

Peter Mihók, President
Slovak Chamber of
Commerce and Industry

Peter Knutsson,
Advertising Ombudsman,
Reklamombudsmannen
(RO)

Annette Tannerfeldt,
CEO
Swedma

Johan Taubert, CEO
Swedish Media
Publishers' Association
(TU)

Tina Wahlroth, CEO
The Swedish Contact
Centre Association
(Kontakta)

Roland Ehrler, Managing
Director
Association of Swiss
Advertisers SWA-ASA

Linda Nilsson, CEO
Association of Swedish
Communication
Agencies' (KOMM)

Phil Smith, Director
General
ISBA - the Incorporated
Society of British
Advertisers

**ANNEX – Response to SAC's proposal for collaboration addressed to ICC Secretariat**

ICC has been recently contacted directly by SAC, who reached out to the ICC Secretariat with a proposal for collaboration. While we appreciate their initiative and the opportunity for partnership, we would like to take this moment to respond collectively, with all parties copied, as we strongly believe that this is not a bilateral matter. Rather, it is a global process that requires the involvement of multiple stakeholders and as many countries as possible, including the participation of both ISO and ICC secretariats. Below, we outline our responses to their proposals.

| Category | ICC Code | Proposed ISO Digital Marketing Standards | Coalition's response to SAC's argument |
|---|---|---|---|
| Primary Objective | Establish ethical principles and responsible behavior | Provide measurable standards and technical tools for improvement of digital marketing practices. | The ICC Code has a broader scope that covers all marketing communications, including digital and data-driven marketing, with no exclusions. This allows it to regulate the entire advertising and marketing ecosystem, ensuring that all forms of marketing, including e-commerce, are aligned with ethical standards. The ISO proposal focuses only on digital marketing and excludes e-commerce transactions, which leaves critical areas of marketing practice unregulated and unaddressed. This narrower focus limits the scope and effectiveness of the ISO standards compared to the comprehensive approach of the ICC Code. |
| Core Focus | Ensures ethical behavior, focusing on transparency, data privacy, children and | Focuses on methods and tools to optimization. | While optimization is important, it is crucial to maintain the emphasis on ethical |

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| | sustainability claims etc. | | considerations as outlined in the ICC Code. The ICC Code already provides comprehensive guidelines on transparency, data privacy, and ethical advertising practices, which are essential for maintaining consumer trust. |
| Technical Implementation | High-level ethical framework without detailed technical guidelines for digital marketing processes. | Provides specific standards for implementing digital marketing strategies and measuring success. | The ICC Code is part of a self-regulatory ecosystem active across 50+ countries, with self-regulatory organizations (SROs) enforcing its principles. These SROs ensure compliance and track improvements, ensuring ethical behavior globally, backed by data and case-based enforcement. |
| Measuring Performance | Focuses on ethical practices without tools and guidance for measuring effectiveness. | Develops metrics, provides indicators and methods for tracking and assessing digital marketing efficiency and performance. | The advertising ICC Code's self-regulatory ecosystem provides real-time enforcement via SROs of the national codes, which are generally building on the principles of the ICC code, with independent oversight through juries or complaints committees." The system provides transparency through annual statistical reports and cross-border complaint mechanisms that address global concerns effectively. EASA and |

| | | | ICAS publish these reports, showing data that proves the system works. |
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| Stakeholders | Advertising associations and organizations performing advertising and marketing communications. | Both organizations and professionals conducting digital marketing. | The ICC Code is supported by a global network of stakeholders spanning the entire advertising and marketing ecosystem. Together, the ICC, EASA, ICAS, and key partners such as the WFA (World Federation of Advertisers), IAA (International Advertising Association), IAB (Interactive Advertising Bureau), FEDMA (Federation of European Data and Marketing) ensure that comprehensive, responsible marketing standards are upheld worldwide. This coalition brings together companies, associations, and SROs to cover all markets, ensuring ethical and responsible advertising practices on a global scale. |