

**Ad Standards**

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Adrian O'Connell
Chief Executive Officer
Standards Australia
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By email

Dear Adrian

We appreciate the opportunity to provide input on the International Organisation for Standardisation (ISO) new work item proposal (NWIP) 'Guidance for advertising and marketing affecting children'.

We support the International Council for Advertising Self-Regulation's (ICAS) and the European Advertising Standards Alliance's (EASA) submission to the ISO, recommending the removal of this proposal.

The proposed guidelines replicate current, highly regarded and globally adopted standards based on the International Chamber of Commerce (ICC) Marketing Code. The proposal would complicate the advertising self-regulation system in Australia while potentially undermining the long-term international effort to provide a consistent and reliable system of advertising self-regulation.

Background on Ad Standards

Australia's advertising self-regulatory system has worked successfully with the advertising industry for 23 years to maintain a high standard of advertising and ensure consumer trust and protection within the Australian community. Ad Standards gives a voice to consumer values and guides industry in maintaining decent and honest advertising aligning with prevailing community standards.

Our organisation is recognised by Australian State and Federal Governments, sector regulators and, most importantly, the advertising industry as a reliable platform for consumer protection in advertising content across all mediums, online and offline.

The Codes and Initiatives we administer are based on the ICC Marketing Code to ensure advertisers are held to the highest standard and create content that reflects international best practice.

The protection of younger demographic groups including children and teenagers is at the core of not just the Codes and Initiatives we administer, but the wider work we carry out. We provide a range of education and training resources to advertisers to aid them in creating socially responsible ads.



Australian advertising Codes and Initiatives

Ad Standards administers a range of [Codes and Initiatives](#) that relate to advertising and marketing communications aimed at children. All guidelines have built in safeguards to ensure children are not exposed to harmful or inappropriate content. These safeguards have been in place for over two decades in Australia, are subject to ongoing review and are updated from time to time. They relate to everything from the promotion of wagering products and occasional food and beverages, to the use of adult themes in advertising content.

Where advertisers flout these protections, Ad Standards requires the removal or modification of the offending content. We publish the [Ad Standards Community Panel's rulings](#) on our website for the public to view, placing the advertiser's reputation at risk. In the rare circumstances where these rulings are not adhered to by the advertiser, Ad Standards employs its connections with industry, media and government to escalate the repercussions of non-compliance.

Recommendation

We are deeply concerned that the guidelines detailed in the NWIP would merely reproduce those outlined in the ICC's Marketing Code, the very foundation of our current regulations, or worse, differ to some degree from them. In either case this would lead to confusion within the industry about the appropriateness of the standards we currently administer, undermining their authority with detrimental outcomes for Australia's advertising self-regulatory system. It would also weaken the well-established international system operated by peer organisations around the world, represented by ICAS and EASA.

We strongly recommend the ISO reconsider moving forward with the new work item proposal and, instead, recognise the ICC Marketing Code as the international standard for best practice in regulating advertising content. We seek Standards Australia's support in opposing the NWIP. The ICC's response to the NWIP provides a strong basis for removal of the proposal, given its Code already provides robust, uniform, internationally accepted guidance around advertising and marketing to children and teenagers.

Advertising self-regulation bodies, ICAS and EASA, have also submitted a detailed and evidence-based comment on the unnecessary development of a duplicate guidance document, which further substantiates the need to abandon the proposed standards.

We encourage Standards Australia to adopt this position and put forward a case to the ISO to remove this proposal.

Yours sincerely

Richard Bean

Executive Director, Ad Standards Australia