

## ISO Guidelines on Marketing to Children

### *A Call to Action to members to engage at local level*

**Executive summary:** The International Standards Organisation (ISO) is considering adding a new international Guideline on Marketing to Children to its work programme. Significantly, the draft proposal defines children as persons under the age of 18.

**While we fully support all efforts to protect children, we believe there is no compelling business need to conduct this work. Global industry codes established by the International Chamber of Commerce (ICC), which are policed, monitored, and enforced locally by advertising standards bodies have delivered comprehensive consumer protections for over 80 years. These systems are funded to the tune of tens of millions of dollars annually and involve a variety of stakeholders, including NGOs, in both code development and enforcement.**

We believe the creation of additional standards, via the ISO, which does not have any formal legal recognition, could jeopardise this existing set-up.

To this end, WFA is calling on its member organisations to engage with their local ISO Standards bodies on the key messages in this document.

### **Background and context:**

The ISO Committee on consumer policy (COPOLCO) launched a consultation in April on a New Work Item Proposal for a Guidance for advertising and marketing affecting children with a deadline for response of 17<sup>th</sup> July 2021. The proposal originated from a submission by the Japanese ISO member, together with Save the Children Sweden. The International Council for Advertising Self-Regulation (ICAS) and the European Advertising Standards Alliance (EASA), alongside the International Chamber of Commerce, are leading industry efforts to highlight how the creation of a competing standard could hamper existing ICC guidelines and existing well-recognised self-regulatory systems. Nonetheless, a revised version emerged following an early 2020 vote by COLPOLCO members with a 50-4 margin in favour of proceeding.

### **About the ISO:**

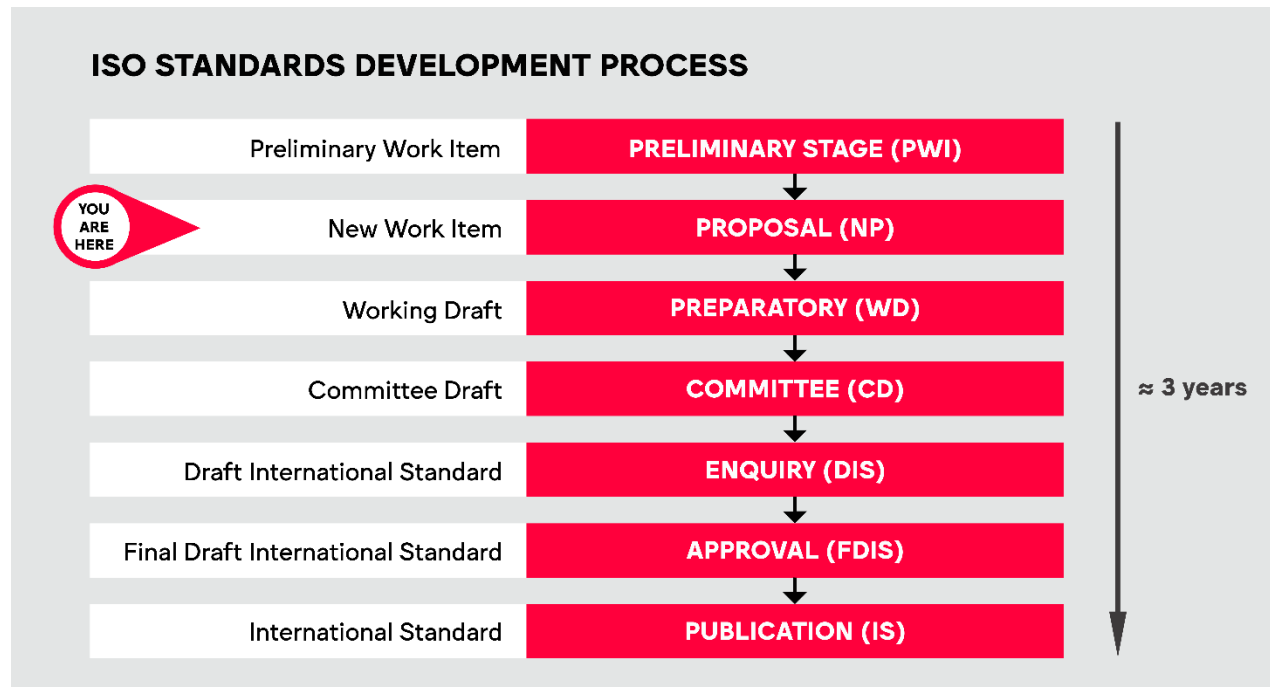
The ISO is an independent, non-governmental organisation, headquartered in Geneva, whose voting members are constituted from the Standards bodies of its 165 member countries. Founded in 1947, the ISO's remit, is to develop “voluntary, consensus-based, market relevant International Standards” that “provide solutions to global challenges”. However, the ISO is not responsible for certifying conformity with its standards, which is handled by external certification bodies. Very often its standards come at a cost. It also has no formal mechanism for monitoring or enforcing its standards.

**NB:** *Whilst some Standards bodies may be embedded within their respective governments, typically in smaller countries, many are autonomous. This poses difficulties in outreach. National associations should familiarise themselves with their local setup and contact points.*

### **Where we are in the process:**

The average timeline from an ISO proposal being tabled to being published as an international standard is approximately 3 years. The ISO's proposal on marketing to children is currently under consultation. This consultation is about the item in general, for example the scope, justification, and intended audience. It is not about the fine points of content, which would come at a later stage. The national

members have the first view and the prerogative to consult with national stakeholders as they see fit in formulating their positions and returning their votes. **Engaging at this stage is critical to ensuring the Guideline does not make it onto the ISO’s work programme.**



**Actions:**

Whilst WFA fully supports the intent of the ISO proposal, we fear that duplication could be not only redundant but counterproductive. Therefore, **WFA encourages its national associations and corporate members to relay to local ISO Standards bodies that they vote against the proposal using the following key messages:**

1. **There is no compelling business need for the ISO proposal.** The global ICC code is monitored, policed, and enforced by a well-funded, well-functioning, multi-stakeholder global system of advertising standards, which has been providing comprehensive consumer protection for over 80 years, particularly with children in mind. Industry stakeholders see no need to invest in yet another standard such as the proposed ISO guidance. The ISO standards normally come at cost and are not enforced.
2. **This could be confusing for industry, policymakers, and consumers by adding an unnecessary layer of duplication and complexity.** A mapping of the proposed ISO guidelines shows them to be almost identical with the ICC codes, which have been embedded into national codes. There is already buy-in for the ICC based standards from all stakeholders and they are properly enforced.

*For more information on the WFA’s position on this issue, please contact [Fraser Bridges](#).*

*For further details on EASA and ICAS’s joint submission to the ISO, please contact either [Lucas Boudet](#) or [Sibylle Stanciu-Loeckx](#). For more information on the ICC’s response, please contact [Raelene Martin](#).*