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GLOBAL FACTBOOK
OF
ADVERTISING SELF-
REGULATORY
ORGANIZATIONS

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Appendix: List of Advertising Self-Regulatory Organizations worldwide

Introduction

The Global Factbook of Advertising Self-Regulatory Organizations ('Global SRO Factbook') is a yearly publication of the International Council for Advertising Self-Regulation (ICAS). This third edition presents **principal facts and figures on the Self-Regulatory Organizations (SROs)** belonging to the ICAS network for the calendar year 2019.

It complements the **Global SRO Database**, an online tool available on the ICAS website at: <https://icas.global/srodatabase>. Based on a common methodology, the Global SRO Database aims to provide transparency on the way SROs operate. The data it contains is standardized as much as needed to allow for a high-level comparison between different markets around the world.

To complement the Global SRO Database, the **Global SRO Factbook** provides an aggregate overview of the facts and figures listed in the Database. It contains useful background clarifications highlighting some local specificities, while putting them in a broader international context.

Both these tools intend to shed some light on the work carried out by SROs in their respective markets while facilitating the sharing of knowledge on different aspects of self-regulatory systems. The explanations provided in the Factbook should be understood in that context, keeping in mind that there is no such thing as the 'best way' to operate a self-regulatory system for advertising. Differences in language, cultural sensitivities, business practices and legal provisions mean that a single model would be unlikely to achieve effective outcomes in all the markets covered by the ICAS membership.

On the opposite, effective self-regulation requires the development of solutions tailored to local characteristics - which don't prevent individual markets from learning from the experiences of one another.

As a result, the description of certain practices included in this Factbook, where adopted by a majority of SROs, should not be interpreted as a recommendation of ICAS. These current practices should rather be seen as possible tools to achieve more responsible advertising - tools that constantly need to be assessed and adjusted to ensure that they meet the needs of the local market, and of society as a whole.

1. Self-Regulatory Organizations

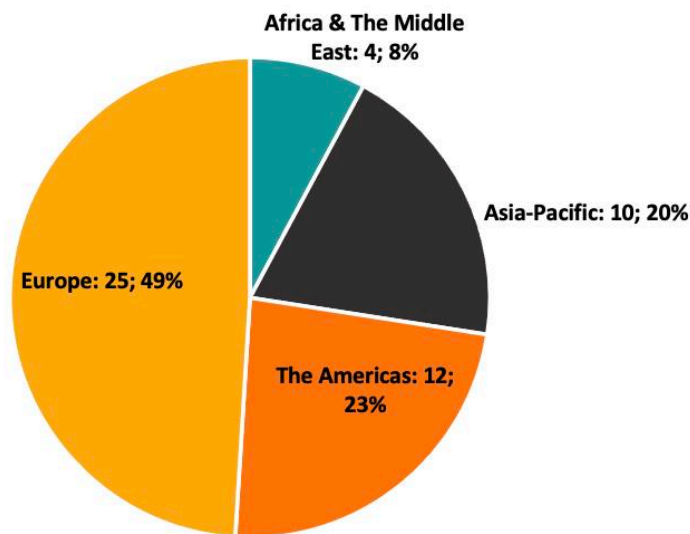
A. Market coverage of Advertising Self-Regulation

SROs are independent bodies set up by the advertising industry to apply standards aimed at ensuring that advertisements are responsible from an ethical point of view. Today, ICAS estimates that there are at least **51 countries with advertising SROs around the world** (see the full list in the Appendix)¹. Among these, around half are already direct members of the ICAS network, with SROs in another 16 countries being indirect members via the European Advertising Standards Alliance (EASA), ICAS’ sister organization in Europe. ICAS members include the largest and oldest SROs in the world such as those in France, UK, Spain, USA and Canada.

Europe is the continent counting the highest number of SROs (49%), followed by the Americas (23%) and Asia-Pacific (20%). In Africa and the Middle East, there are currently 4 operational SROs (8%).²

In several markets, including major markets like China, efforts are currently underway to establish fully-fledged independent SROs. ICAS and EASA work closely with these markets to support the promotion of advertising self-regulation.

Chart 1. Geographical spread of established SROs



Unless otherwise specified, the data provided later in this Factbook cover all of ICAS’ 24 SRO members. However, the new SRO in Colombia became operational only in 2020, and thus has no activity data for 2019.³

¹ For the purpose of this report, countries where more than one organization performs the functions of an SRO are only counted once.

² For the purpose of Chart 1, Turkey is counted as part of the Africa & Middle East region, despite also being part of Asia and Europe, and Russia is counted as part of Asia-Pacific, despite being also part of Europe.

³ See list in Appendix.

B. History and SRO governance

L'Autorité de régulation professionnelle de la publicité (ARPP) in France is the oldest SRO in the world. It was founded in 1935. The Canadian SRO, Ad Standards, was created in the 1950s, with four SROs following in the 1960s (in the UK, the Netherlands, Italy, and El Salvador). The trend then accelerated in the 1970s, 1980s, 1990s and 2000s. Among the most recent SROs, one was created in 2018 in South Africa⁴, and the newest SRO, the Colombian SRO Autocontrol⁵, was created in 2019 becoming fully operational in 2020.

SROs are typically created by representatives of the advertising industry committed to promoting self-regulatory standards. The organizational set-up of SROs however varies greatly from market to market. Statutes or Articles of Incorporation, as well as Annual Activity Reports, where available, can be accessed in the [Global SRO Database](#).

To support their governing bodies and provide services to the market (industry players, consumers and/or public authorities), SROs as a rule have permanent staff. The size of the Secretariat however varies greatly from market to market, depending on the financial resources of the SRO and on the scope of the services provided. The smallest SROs are operated by volunteers from the industry or by a single staff member. In fact, **more than half of ICAS SRO members (58%) employ less than 10 staff members**. Only three SROs employ more than 50 staff members: BBB National Programs in the US⁶ and AUTOCONTROL in Spain with each more than 80 employees and the Advertising Standards Authority (ASA) in the UK, with more than 100 employees.

In 2019, more than half of ICAS members operated with an annual budget of less than USD 1 million, and only 3 SROs have annual expenses above USD 5 million.

C. SRO funding models

Overall, SROs can be grouped into three main categories in terms of how their activities are financed. Looking both at ICAS members and non-ICAS members:

1. The vast majority of SROs worldwide (32 markets) are primarily financed by **membership fees**. In this model, annual contributions from member firms and/or associations representing the advertising industry are used to finance the activities of the SRO. Membership fees can take the form of a fixed amount or of proportional fees based on a gliding price scale (with larger members paying a higher fee than smaller members). In some cases there are also different levels of membership fees depending on the type of businesses members represent, and/or depending on the type of services provided.

⁴ The Advertising Regulatory Board (ARB) in South Africa was established in November 2018 following the closure of the former SRO. The Advertising Standards Authority (ASA) of South Africa had been created in the 1950s.

⁵ In September 2019, the new SRO, Autocontrol Colombia was launched to replace the former Comisión Nacional de Autorregulación Publicitaria (CONARP), which was itself created in the 1980s.

⁶ Not all of BBB National Programs' employees are engaged in advertising self-regulation. About a third of the staff are engaged in non-advertising dispute resolution.

2. Six markets use a **levy system**. This means that a small percentage of advertising costs goes to finance the operation of the SRO. This amount is typically collected by advertising agencies before it is transferred to the SRO. These agencies act as intermediaries between advertisers and media owners (TV, radio, billboard sites, newspapers, websites...).
3. The remaining SROs (10 markets) use **other models**, which are either based on service fees, or a combination of the membership and levy systems.

More information on SRO funding models can be found in the ICAS Note [How are Self-Regulatory Organizations financed?](#) published on 1 October 2018.

2. The Self-Regulatory System

A. Advertising Standards

The existence of a Self-Regulatory Code of Standards or a set of Guiding Principles governing the content of ads is typically a pre-requisite for establishing a Self-Regulatory System. Most self-regulatory standards and programs incorporate the basic principles that:

- All ads should be prepared with a due sense of social responsibility, notably in terms of being legal, decent, honest and truthful;
- All ads should conform to the principle of fair competition, as generally accepted in business, and consistent with competition laws;
- No ad should impair public confidence in advertising.

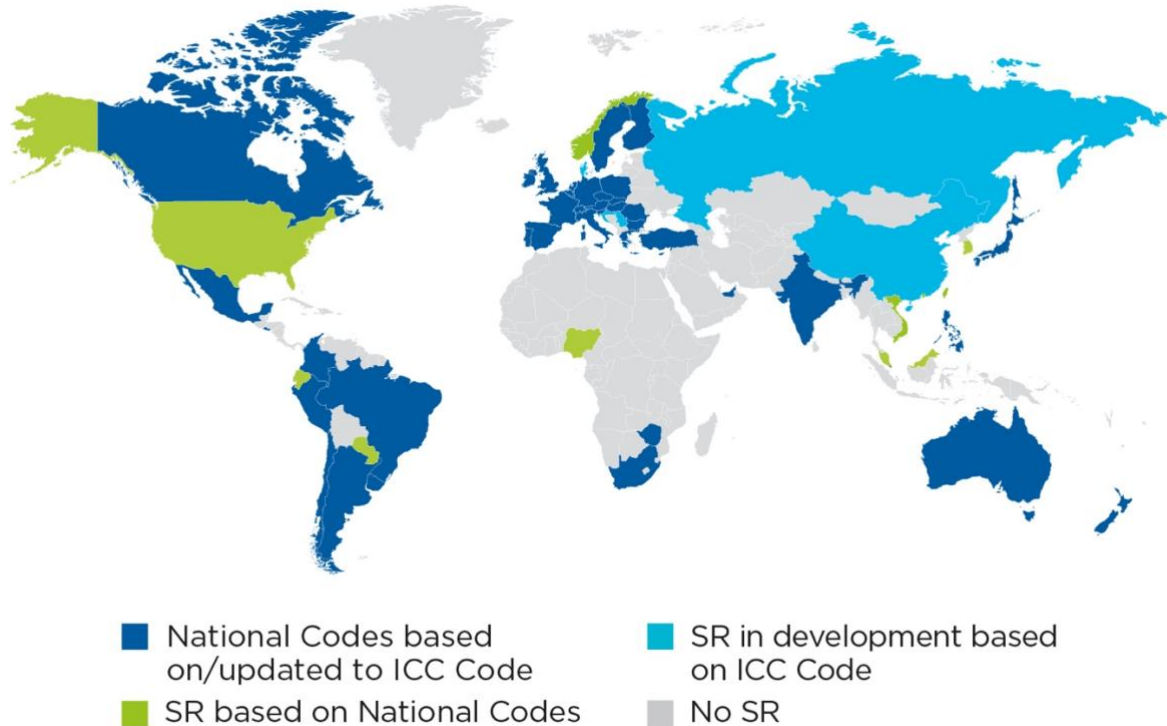
In most countries, local advertising standards are based on the [Advertising and Marketing Communications Code](#) of the International Chamber of Commerce (thereafter 'ICC Marketing Code'). National adjustments are however often necessary to take into account legal, social, cultural and economic features.

Among ICAS markets:

- 3 markets (Belgium, Colombia and Sweden) use the ICC Marketing Code in its original version, having translated it into the local language(s);
- 1 market, the United States, implements self-regulatory standards which were developed independently of the ICC Marketing Code;
- The remaining markets use national self-regulatory standards which are in part inspired by the ICC Marketing Code.

Specific provisions contained in local standards are typically agreed upon by an independent standards-making body within the SRO, and subsequently updated on a regular basis. The main Standards are also often accompanied by sectoral guidelines addressing the marketing of specific products or services (e.g. alcohol, beauty products...) or by issue-specific guidelines (e.g. on interest-based advertising, on advertising to children, on influencer marketing, etc.).

Chart 2. Use of the ICC Marketing Code worldwide



Source: ICAS and the International Chamber of Commerce (ICC), June 2019.

B. Scope of Self-Regulation

When assessing whether an ad is compliant with applicable self-regulatory standards, SROs use slightly different criteria depending on their mandate and scope of activities. Most of them work to ensure that ads are legal, decent, honest, truthful, socially responsible and fair. More and more SROs also assess ads in terms of their regard for consumers’ privacy and data protection rules. Other criteria, not listed in Table 1, may also be used by some SROs such as whether ads comply with the principle of environmental responsibility or with the protection of children’s rights.

Table 1. Criteria used to assess whether an ad is compliant with local standards

Criterion	% of ICAS markets where the SRO assesses ads against this criterion
Legality: whether an ad is compliant with applicable laws	79% (all except Australia, Ireland, Italy, New Zealand and the US)
Decency: whether an ad is not offending standards of decency prevalent in the local culture	96% (all except the US)
Honesty: whether an ad is not abusing the trust of consumers or exploiting their lack of experience or knowledge	100%
Truthfulness: whether an ad is not including content that could mislead consumers (e.g. regarding the actual benefits/characteristics of the product or service)	100%
(Social) responsibility: whether an ad respects human dignity and is free of any form of discrimination, including that based upon race, national origin, religion, gender, age, disability or sexual orientation	92% (all except Peru and the US)
Fairness: ensuring that an ad is not derogatory to the competition and is free of plagiarism	79% (all except Australia, Belgium ⁷ , Mexico, South Africa and the US)
Right to privacy: ensuring that an ad complies with (self)-regulatory standards on data protection for consumers	63% (all except Australia, Belgium, Chile, India, Ireland, Italy, Mexico, Peru and South Africa)

C. Complaints-handling body

SROs may intervene before an ad is published or after an ad is published. All SROs offer mechanisms of some sort to handle complaints from consumers and/or competitors (see section 3.B)⁸. In most cases, these complaints are examined by an independent body within the SRO, often called the Jury or Complaints Committee. Separate from the standards-making body, the Jury is in charge of determining whether an individual ad is in breach of self-regulatory standards.

- **In the vast majority of cases (65%), all eligible consumer and/or competitor complaints are examined by the Jury.** The SRO staff may filter some complaints which are out of scope, but all decisions on individual ads are made by the Jury;
- **In six cases (Canada, Ireland, Italy⁹, the Netherlands, Sweden and the UK), some decisions on individual ads may be taken by the SRO Secretariat.** The most complex cases or cases without a clear precedent are however always assessed by the Jury;

⁷ Because JEP in Belgium does not deal with competitors' complaints, the principle of fair competition is rarely invoked in the complaints received by the Jury. This does not mean however that JEP cannot use the fairness criterion in its assessment of ads.

⁸ In September 2019, the SRO in Colombia began operating and the services it currently offers were provided starting from 2020. The information in this section does thus not include data from Colombia.

⁹ IAP in Italy has two independent bodies: the jury, which examines both competitor and consumer issues and the Review Board (or Complaints Committee) which is in charge of consumer issues. Both bodies are in charge of determining whether an individual ad is in breach of self-regulatory standards. The SRO Secretariat can take action on individual ads, but the outcome of each case needs to be formally approved by the Review Board.

- **In two cases (the US and South Africa), all first level decisions on individual complaints are taken by the SRO rather than by a Jury.** In these countries a Jury can be assembled to examine first level decisions when these are appealed.

The size and composition of the Jury varies from market to market. In small markets, the Jury is often composed of less than 10 members whereas in large markets, Jury members may be selected from a pool of more than 100 individuals. Since Jury members are often independent professionals supporting on a voluntary basis, the individuals taking part in Jury meetings are not necessarily the same from one meeting to the other.

Jury members typically include individuals with an experience of the advertising industry, but in many markets a significant percentage or even a majority of Jury members are independent lay experts or people representing interests other than those of the industry such as academics, retired judges or consumer advocates.

- **In 6 markets, all Jury members are independent from the advertising sector** (Australia, France, Italy, Peru, Portugal and Spain);
- **In 6 markets, half or more than half of Jury members are independent** from the advertising sector (Belgium, India, Ireland, New Zealand, Romania and the UK);
- **In the remaining markets, advertising industry professionals represent a majority** in the pool of Jury members, but independent experts, lawyers and representatives of civil society organizations are often also involved in Jury decisions.

3. SRO Services

A. Advisory services

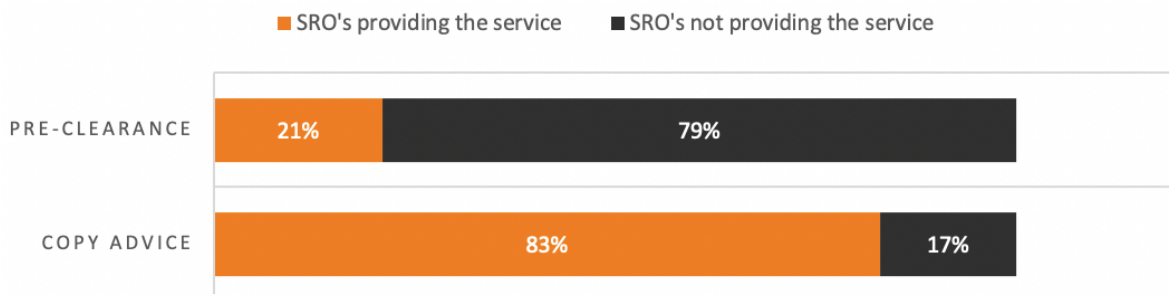
For the purpose of this report, we use the term ‘advisory services’ to describe those services provided by SROs to advertisers and their agents prior to the publication of an ad. Such services can be divided into two main categories:

- **Pre-clearance**, whereby an ad must be assessed by the SRO as a compulsory pre-condition before it can be published. The obligation, where it exists, often covers specific media such as TV or radio, or particularly sensitive sectors such as medications and medical devices, ads directed at children, or ads for financial services;
- **Copy advice**, where the SRO issues an opinion as to whether an ad complies with advertising standards prior to the publication of the ad, at the request of the advertiser, agencies, or the media. The advice is provided on a confidential basis and is usually non-binding. It may include suggestions of amendments to ensure compliance with the rules. Copy advice can be a free service or a paid service, depending on the market and the type of ad/advertiser.

Pre-clearance is provided by SROs in five markets covered by ICAS’ membership: Canada, Chile, France, the Philippines and Portugal. The Advertising Standards Council (ASC) in the Philippines is the SRO processing the highest number of pre-clearance requests every year, with more than 34,700 opinions issued in 2019, most of which are provided within the next business day. More than 68,000 ads were pre-cleared in total by these five SROs in 2019.

Copy advice is a service frequently offered by SROs. 83% of ICAS members provide copy advice services. In 2019, these SROs processed more than 65,000 copy advice requests. Spain is the SRO that administers the highest number of copy advice requests every year, with almost 40,000 opinions issued in 2019. In the majority of cases, copy advice is provided within 48 hours, and some SROs even offer an express service of same-day response.

Chart 3. SROs’ advisory services



B. Complaints

One of the main benefits of advertising self-regulation worldwide is that it provides a cost effective (typically free of charge), fast and efficient solution to address consumer complaints about individual ads. Among ICAS members, **only one SRO currently does not handle consumer complaints** (ABG in the U.A.E)¹⁰.

All SROs except one¹¹ handle competitor complaints. The process for handling competitor complaints is usually broadly similar to that in place for handling consumer complaints, except that, unlike consumers, companies are often required to pay a fee to file a complaint. Moreover, in some countries, special public hearings are organized to debate cases filed by competitors.

Chart 4. SROs' complaints-handling service in 2019



The number of consumer complaints handled by SROs varies from market to market and from one year to the other. If we consider the 22 ICAS members offering the service, the average number of complaints processed in 2019 was about 2,400. There are however major differences in practice:

- 7 SROs handled fewer than 20 consumer complaints;
- 3 SROs handled up to 500 consumer complaints;
- 6 SROs handled between 500 and 1,000 consumer complaints;
- 4 SROs handled between 1,000 and 5,000 consumer complaints;
- 2 SROs handled more than 5,000 consumer complaints.

The ASA in the UK is the SRO handling the highest number of consumer complaints per year: with almost 36,000 complaints in 2019.¹²

The number of competitor complaints handled by SROs also varies from market to market but is understandably often lower than the number of consumer complaints. The 22 ICAS members which provided statistics on this service collectively processed about 2,100 competitor complaints in 2019. In practice:

- 10 SROs handled fewer than 10 competitor complaints;
- 6 SROs handled between 10 and 50 competitor complaints;
- 6 SROs handled more than 50 competitor complaints.

¹⁰ The Colombian SRO, Autocontrol, will handle consumer complaints starting from 2020. Their data is not included in this section of the 2019 report.

¹¹ JEP in Belgium. In the U.A.E., the ABG has a system in place for handling competitor complaints, but no complaints were received in 2019.

¹² According to the ICAS methodology, consumer complaints include both complaints submitted by individuals and complaints submitted by organizations representing consumers' interests. In case several complaints are received on the same ad and handled as a single case, all underlying complaints are counted. A complaint is defined as an expression of concern about a particular ad which requires a response. It may include one or several concerns about the given ad by the same complainant.

As in the case of consumer complaints, the UK ASA is the SRO handling the highest number of competitor complaints per year: 808 in 2019, followed by ARPP in France with 797 competitor complaints.

In the majority of cases (78%), decisions on consumer complaints are publicly available. The list of decisions (sometimes called ‘rulings’) is typically available on the SRO’s website, and a list of links to such pages can be accessed via the ICAS [Global SRO Database](#). Those decisions may be published in full or in summary form, depending on the applicable rules of procedure. In one case (Romania), decisions can be accessed via a secured extranet developed for SRO members rather than via the public website. The three SROs which do not publish decisions on consumer complaints count among those SROs handling 15 or fewer consumer complaints per year.

Competitor complaints are also often publicly available (77% of cases), but the decisions may only be published in part or in an anonymized form due to the sensitivity of some aspects pertaining to competition law.

Finally, it should be noted that in more than three-fourths of the markets covered by the ICAS Global SRO database, **complaints can also be received from other entities** rather than consumers and competitors. Such entities include public authorities and NGOs, but some SROs also sometimes undertake own initiative investigations to identify ads which are in potential breach of self-regulatory standards.

C. Other services

In addition to advisory services and complaints handling, SROs often provide other services to serve the needs of consumers and of the advertising industry locally. Educational services are especially important to raise awareness about ad standards and enhance compliance. Such services include online and in-person courses, certification programs, conferences, as well as partnerships with universities and other educational institutions. Some SROs also provide monitoring services in relation to specific sectors, sometimes carried out in cooperation with public authorities in co-regulation scenarios. Finally, a few SROs offer mediation services (e.g. in the telecoms sector) and specialized services to address privacy and data protection concerns around marketing practices.

To find out more about the activities of SROs in all the ICAS markets, you can download their activity reports from the [Global SRO Database](#) or visit their websites, listed on the [Members](#) page of the ICAS website.

Appendix: List of Advertising Self-Regulatory Organizations worldwide

The below list includes organizations which can largely be described as SROs, i.e. independent bodies set up and/or funded by the advertising industry to apply self-regulatory standards aimed at ensuring that advertisements are ethical.

In several markets not listed here, including major markets like China, efforts are underway to establish fully-fledged independent SROs. ICAS and its European sister organization EASA work closely with these markets to support the promotion of advertising self-regulation.

Please note that the data included in the ICAS Global SRO Database and in this Factbook only include members of ICAS (marked in bold).

Country code	Country	Short name of the SRO	Full name of the SRO	Association membership
AE	United Arab Emirates	ABG	Advertising Business Group	ICAS
AR	Argentina	CONARP	Consejo de Autorregulación Publicitaria	CONARED*
AT	Austria	ÖWR	Österreichischer Werberat (Austrian Advertising Council)	EASA
AU	Australia	Ad Standards	Ad Standards	ICAS
BE	Belgium	JEP	Jury d'Ethique Publicitaire / Jury voor Ethische Praktijken inzake reclame	EASA, ICAS
BG	Bulgaria	NCSR	National Council for Self-regulation	EASA
BR	Brazil	CONAR	Conselho Nacional de Autorregulamentação Publicitária	CONARED*, ICAS
CA	Canada	Ad Standards	Ad Standards	ICAS
CH	Switzerland	CSL	Schweizerische Lauterkeitskommission/ Commission Suisse pour la Loyauté	EASA
CL	Chile	CONAR	Consejo de Autorregulación y Ética Publicitaria	CONARED*, ICAS
CO	Colombia	Autocontrol	Autocontrol Colombia**	ICAS
CY	Cyprus	CARO	Cyprus Advertising Regulation Organisation	EASA
CZ	Czech Republic	RPR	Rada Pro Reklamu	EASA
DE	Germany	DW WBZ	Deutscher Werberat Zentrale zur Bekämpfung unlauteren Wettbewerbs e.V.	EASA
EC	Ecuador	SAC	Special Advertisement Committee	CONARED*

ES	Spain	AUTOCONTROL	AUTOCONTROL	EASA, ICAS
FI	Finland	MEN LTL	Mainonnan eettinen neuvosto / The Council of Ethics in Advertising Finland Liiketalautakunta / The Board of Business Practice Finland	EASA
FR	France	ARPP	Autorité de régulation professionnelle de la publicité	EASA, ICAS
GR	Greece	SEE	Advertising Self-Regulation Council	EASA
HU	Hungary	ÖRT	Önszabályozó Reklám Testület/ Hungarian Advertising Self- Regulatory Board	EASA
ID	Indonesia	DPI	Dewan Periklanan Indonesia/ Indonesian Advertising Council	n/a
IE	Ireland	ASAI	The Advertising Standards Authority for Ireland	EASA, ICAS
IN	India	ASCI	The Advertising Standards Council of India	ICAS
IT	Italy	IAP	Istituto dell'Autodisciplina Pubblicitaria	EASA, ICAS
JP	Japan	JARO	Japan Advertising Review Organization	n/a
KR	Korea	KARB	Korea Advertising Review Board	n/a
LU	Luxembourg	CLEP	Commision Luxembourgeoise pour l'Ethique en Publicité	EASA
MX	Mexico	CONAR	Consejo de Autorregulación y Ética Publicitaria	CONARED*, ICAS
MY	Malaysia	ASA	Advertising Standards Advisory Malaysia	n/a
NL	The Netherlands	SRC	Stichting Reclame Code	EASA, ICAS
NZ	New Zealand	ASA	Advertising Standards Authority	ICAS
NO	Norway	MFU	Matbransjens Faglige Utvalg (the Food and Drink Industry Professional Practices Committee)	n/a
PE	Peru	CONAR	Consejo Nacional de Autorregulación Publicitaria	CONARED*, ICAS
PH	The Philippines	ASC	Advertising Standards Council	ICAS
PL	Poland	RR	Związek Stowarzyszeń Rada Reklamy	EASA
PT	Portugal	ARP	Auto Regulação Publicitaria	EASA, ICAS
PY	Paraguay	CERNECO	Centro de Regulacion, Normas y Estudios de la Comunicacion	CONARED*

RO	Romania	RAC	Romanian Advertising Council	EASA, ICAS
RU	Russia	AMI	Advertising Council	EASA
RS	Serbia	NAESO	National Association for Ethical Standards in Advertising	EASA
SE	Sweden	RO	Reklamombudsmannen	EASA, ICAS
SG	Singapore	ASAS	Advertising Standards Authority of Singapore	n/a
SI	Slovenia	SOZ	Slovenian Advertising Chamber	EASA
SK	Slovakia	RPR	Rada Pre Reklamu	EASA
SV	El Salvador	CNP	Consejo Nacional de la Publicidad	CONARED*, ICAS
TR	Turkey	ROK	The Advertising Self-Regulatory Board	EASA
UK	United Kingdom	ASA	The Advertising Standards Authority	EASA, ICAS
		Clearcast	Clearcast	EASA
US	USA	BBB NP	BBB National Programs	ICAS
UY	Uruguay	CONARP	Consejo Nacional de Autorregulación Publicitaria	CONARED*
ZA	South Africa	ARB	The Advertising Regulatory Board	ICAS
ZW	Zimbabwe	ASAZIM	The Advertising Standards Authority of Zimbabwe	n/a

* CONARED is an informal network of Latin American SROs. Unlike EASA and ICAS, it does not have a permanent Secretariat. Its members usually meet on an annual basis.

** In September 2019, the SRO in Colombia began operating and the services it currently offers started in 2020. The information included in the 2019 Global SRO Factbook therefore only represents three months of operation for Autocontrol.

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