

Brussels, 18 September 2019

IAB Europe's Self-Assessment Report in Relation to the Code of Practice on Disinformation

Background

Interactive Advertising Bureau Europe (IAB Europe, EU Transparency Register: 43167137250-27) joined the Multi-stakeholder Forum on Disinformation convened by the European Commission in May 2018, and worked alongside other stakeholders from online advertising and platforms sectors between May and September 2018 to develop the [Code of Practice on Disinformation](#) (Code).

IAB Europe also contributed to the development of the [Annex of Best Practices](#), released alongside the Code, by providing information on applicable cross-industry best practice in the field of brand safety and transparency in the online advertising supply chain.

Following the unveiling of the full version of the Code, IAB Europe publicly endorsed it and became its signatory. In its role as a trade association, IAB Europe did not enter into any specific obligations stemming from the Code on behalf of its members. Instead, IAB Europe committed to make its members fully aware of the Code, and encourages them to join it or respect its principles, as appropriate.

IAB Europe's engagement

Over the course of 2018, IAB Europe kept its membership apprised of the developments within the Multi-stakeholder Forum on Disinformation. Since the presentation of the Code to Commissioner Mariya Gabriel in October 2018, IAB Europe continues to promote the Code amongst its members, incorporating various types of external and internal communications, briefing materials, meetings and conferences. These briefings have been addressed to the broad IAB Europe membership, as well as all constituencies within the organisation (relevant face-to-face meetings of relevant task forces, committees, councils, and eventually Board and General Assembly).

In addition to the briefings themselves, more specialised fora within the organisation – such as Policy Committee and Brand Advertising Committee comprising experts in relevant domains of public policy and brand safety – have been holding regular discussions reflecting on optimal policy approaches to tackling disinformation and technology solutions that could minimise the risk of advertising inadvertently appearing on websites carrying disinformation, inclusive of collaboration with fact-checking organisations. All exchanges within any group hosted by IAB Europe are open to all its members, both National IABs representing the local markets as well as corporate members, which means that they are multi-stakeholder in their nature and involve publishers, agencies, and ad tech companies.

In January 2019, IAB Europe submitted an [explanatory note on its responsibilities and activities in relation to the Code of Practice](#). The same month, IAB Europe participated in the [Commission's Conference: 'Countering online disinformation'](#), where IAB Europe's CEO, Townsend Feehan joined a panel discussion of the Code's signatories. Subsequently, IAB Europe has been continuing active discussions with its membership on the topic of disinformation. In particular, discussions have centered upon the relevance to industry of the scrutiny of ad placement, whilst also promoting awareness of efforts to ensure the uptake of the Code. Critically, from an industry perspective, any exploitation of the legitimate business model of ad-supported content by clandestine actors causes reputational concerns for all players in the value chain. Advertising remains the main revenue stream for the diverse European media landscape, providing citizens with a range of information sources and quality content, which in turn lends itself as a powerful tool for citizens looking for credible sources of information – the more trusted content on the web, the less attractive disinformation becomes.

IAB Europe remains of the viewpoint that online disinformation is a major social challenge that has exposed the fragility of our democratic institutions and the willingness and ability of bad actors to leverage tools that enable our freedom to communicate against us. It is critical to enlist the broadest possible scope of well-meaning actors if it is hoped to tackle it successfully.

Organising and informing the community takes time. Capabilities of various players in the online ad ecosystem may substantially differ depending on their position in the supply chain. Internal discussions reveal that thorough examination of the Code is usually sought before taking a decision on becoming a signatory and declaring which provisions of the Code are applicable. Eventually, any member of IAB Europe, be it a company member or a National IAB, remains free to decide on whether they would like to become a signatory to the Code. Since October 2018, IAB Europe has held bilateral discussions on the Code with several of its members, and further facilitated contacts between DG CNECT and a member seeking to become a signatory to the Code¹.

The digital advertising industry, just like broader society, has a communal- and self-interest in promoting a healthy and safe digital environment. IAB Europe understands that broad cross-industry engagement is key for the success of the Code's establishment, and commercial pressure from companies' clients can further accelerate its uptake. Cross-industry investment in brand safety and further development of tools with the help of relevant third-party partners are also relevant in the context of tackling disinformation. In this context, we have been open to discussions with fact-checking organisations, and reached out to fact-checkers independently, whilst also participating in structured dialogue with such stakeholders as facilitated by the European Commission. It appears that on a commercial basis, various verification services providers may be in a position to and/or in fact are already devising technologies that use keyword tracking, or leveraging partnerships with fact-checking and media organisations to identify disinformation.

We are glad to reaffirm IAB Europe's long-standing commitment to upholding brand safety by participating in discussions on disinformation. Giving brands confidence that they are buying authentic inventory and placing ads in a safe environment helps to safeguard the sustainability of the digital advertising business model. It is critical due to the fact that ultimately any online ad investment is informed by choices made by a buyer or a party working on its behalf.

¹ At the time of writing, the signing of the Code by said company is still to be confirmed.

Next to various commercial offerings, there are several market-wide programmes designed to increase transparency and trust in how digital advertising is bought and sold, inclusive of upholding brand safety and eliminating fraudulent advertising.

IAB Europe works with its membership to share best practices and help in harmonising relevant business standards across the continent. As part of its efforts to do so, IAB Europe would like to hereby enclose aggregated reporting to track and identify different brand safety activities and policies used by its members and those of European National IABs, which include stakeholders from across the digital advertising ecosystem. Some of the initiatives originated from the United States market, yet are being used by European players too, hence the inclusion of such US equivalent initiatives.

Future discussions

Looking to the future, IAB Europe fully supports the self-regulatory regime in the field of disinformation, given major concerns regarding the impact of any legislative influence on fundamental rights, including the freedom of speech and media. The agility and flexibility of voluntary commitments are critical, especially given the nature of an ever-changing online landscape.

Further collective efforts, including all stakeholders from the digital advertising value chain and other relevant stakeholders, will be necessary to successfully tackle the challenge of disinformation, whilst safeguarding against any fragmentation of obligations and requirements across the EU. Coordinated discussion with an aim of providing more clarity and potentially a single set of standards to provide guidance to Member States and Companies in the area of the elections and political advertising, is also critical in this regard.

Notwithstanding the aforementioned considerations, we would like to highlight the relevance of the legal data protection framework, the principles of which are indeed explicitly applicable in the digital advertising context. Pursuant to the General Data Protection Regulation (GDPR), if users have transparency about and control over, how their personal data is processed, and data controllers are bound to adhere to principles such as data minimisation, purpose limitation, and privacy by design and default, personal data may be processed, including in relation to the delivery of digital advertising.

Aggregated reporting on brand safety activities and policies

Several European markets, led by or with the participation of National IABs, have developed market-wide programmes to ensure the quality of advertising online. These include but are not limited to: [‘Digital Ad Trust’](#) in the French market, [‘Digital Trust Initiative’](#) in the German market, [‘IAB Quality Index’](#) in the Italian market, and [‘IAB UK Gold Standard’](#) in the UK market.

The core proposition of such initiatives revolves around ensuring brand safety, minimising the risk of ad fraud, and upholding high viewability standards. Depending on the market, the scope of such initiatives may be broader including, for instance, a ‘user experience’ dimension. While programmes of this kind take different form and shape, ultimately, they are designed to increase transparency and trust in how digital advertising is bought and sold. Importantly, they are being developed to become fully-fledged schemes with relevant monitoring and certification

mechanisms. Said mechanisms allow to understand what the uptake of these initiatives is and how many companies are implementing measures identified.

IAB Europe works with its membership to share best practices and help in harmonising relevant business standards across the continent. The enclosed table defines the domains of brand safety, ad fraud, and viewability, and further lists a host of initiatives that have been unveiled with a view to responding to a challenge in a given field, whether they are part of market-wide programme or singular initiative.

Topic	Initiative (e.g. guideline, principles or certification)	Market / organisation
Brand Safety	<i>Brand safety refers to considerations, practices and tools devised to keep a brand's reputation safe when they advertise online.</i>	
	EU Memorandum of Understanding on Online Advertising and IPR	Pan-European – various signatories, including IAB Europe and several of its National IABs and corporate members
	IAB Austria delivery quality guideline – section 4	Austria – IAB Austria
	DACH Programmatic Code of Conduct – covers ad fraud and brand safety	DACH – BVDW (rep. IAB Germany), IAB Austria, IAB Switzerland
	Adkodex – Signatories pleads to inform employees and filter out unwanted IP-infringing domains from a blacklist in their ad systems, so that infringing sites cannot advertise on participating sites and legit campaigns are not placed on infringing sites	Denmark
	Digital Ad Trust	France – SRI, IAB France, UDECAM, UDA
	Digital Trust Initiative	Germany – BVDW (rep. IAB Germany)
	Whitepaper Brand Safety in cooperation with the OWM (subsidiary of WFA)	Germany – BVDW (rep. IAB Germany)
	IAB Quality Index – Publisher quality seal based on 5 KPIs: Viewability, Brand Safety, Invalid Traffic, Ad-clutter, Respect of LEAN Principles	Italy – IAB Italy
	IAB Poland “Advertising Awareness” initiative promotes the benefits of advertising on sites that are legitimate and warns the industry from placing ads on sites that distribute pirated content	Poland – IAB Poland
	Programmatic Code of Conduct	Poland – IAB Poland
	DTSG Good Practice Principles – Following a commitment to the Principles, each Signatory will have their ad misplacement minimisation policies independently verified by a JICWEBS approved provider	UK – JICWEBS (IAB UK, AOP, ISBA, IPA, NMA), part of the IAB UK Gold Standard

	Anti-piracy pledge and Certified Against Piracy programme – IPR infringing sites	US – TAG
	TAG Inventory Quality Guidelines. Certification can be obtained at two different tiers: self-certification and independent validation certification	US – TAG
Ad Fraud		
	<i>Advertising fraud can take several different forms, but each involve the creation of illegitimate, non-human traffic (bots) to deliberately attempt to extract money from advertising budgets. Any fraudulent activity has a detrimental impact on the entire advertising value chain.</i>	
	IAB Austria delivery quality guideline – general IVT and sophisticated IVT detection (translation of TAG / JICWEBS Taxonomies)	Austria – IAB Austria
	DACH Programmatic Code of Conduct – covers ad fraud and brand safety	DACH – BVDW (rep. IAB Germany), IAB Austria, IAB Switzerland
	Digital Ad Trust	France – Digital Ad Trust
	Ad fraud guideline including definitions of Traffic	Germany – BVDW (rep. IAB Germany)
	Digital Trust Initiative	Germany – BVDW (rep. IAB Germany)
	IAB Quality Index – Publisher quality seal based on 5 KPIs: Viewability, Brand Safety, Invalid Traffic, Ad-clutter, Respect of LEAN Principles	Italy – IAB Italy
	White paper on ad fraud in digital advertising	Netherlands – IAB Netherlands
	Programmatic Code of Conduct	Poland – IAB Poland
	Ad Fraud and Brand Safety Guide	Spain – CIP Spain, IAB Spain, AEACP, AIMC, AM, AUTOCONTROL, OJD
	GÜR, The Platform of Trustworthy Ad on Digital GÜR’s cooperation with TAG	Turkey – IAB Turkey, Advertisers Association, Agency Association
	Good practice principles for reducing risk to exposure to ad fraud which companies can be certified against to receive a seal (ABC and BPA)	UK – JICWEBS (IAB UK, AOP, ISBA, IPA, NMA), , part of the IAB UK Gold Standard
	Non-human traffic taxonomy (a revision of the TAG taxonomy)	UK – JICWEBS (IAB UK, AOP, ISBA, IPA, NMA)
	Anti-fraud Guidelines	US – TAG
	General invalid traffic guidelines – the MRC states that all accredited or certified digital measurement organisations must apply the General IVT detection processes	US – MRC
	Sophisticated invalid traffic guidelines – the	US – MRC

	MRC states that sophisticated IVT detection is eligible for independent accreditation or certification	
Viewability	<i>Viewability is an online advertising metric that aims to determine whether an ad impression had the opportunity to be seen or not by a human. A served ad impression can be classified as a viewable if the ad was contained in the viewable space of the browser window, on an infocus browser tab, based on pre-established criteria such as the percent of ad pixels within the viewable space and the length of time the ad is in the viewable space of the browser.</i>	
	Pan-European certification framework and viewability product principles (display and video) to reduce measurement discrepancies	Pan-European – European Viewability Steering Group
	IAB Austria delivery quality guideline – section 7	Austria – IAB Austria
	IAB Finland Viewability Guide	Finland – IAB Finland
	Digital Ad Trust	France – SRI, IAB France, UDECAM, UDA
	Digital Trust Initiative	Germany – BVDW (rep. IAB Germany)
	Guideline for technical measurement of viewability (incl. defining a viewable impression guideline)	Germany – BVDW (rep. IAB Germany)
	IAB Quality Index – Publisher quality seal based on 5 KPIs: Viewability, Brand Safety, Invalid Traffic, Ad-clutter, Respect of LEAN Principles	Italy – IAB Italy
	Viewability standard for online campaigns	Poland – IAB Poland
	Viewability recommendation	Romania – IAB Romania
	Spanish standards and best practices guide for ad viewability 2017	Spain – IAB Spain, AEACP, AIMC, AM, AUTOCONTROL, OJD
	Viewability measurement guidelines and certification framework (incl. defining a viewable impression guideline)	Sweden – IAB Sweden
	Viewability Best Practice Principles	UK – JICWEBS (IAB UK, AOP, ISBA, IPA, NMA)
	Certification framework and viewability product principles (display, video and mobile) to reduce measurement discrepancies	US – MRC