



**Submission from the Interactive
Advertising Bureau (IAB) Australia**

**Response to the ACCC Digital
Platforms Inquiry Final Report**

16th September 2019

About INTERACTIVE ADVERTISING BUREAU (IAB) AUSTRALIA

The Interactive Advertising Bureau (IAB) Australia Limited www.iabaustralia.com.au is the peak trade association for digital advertising in Australia. IAB Australia was established in 2005, incorporated in 2010 and is one of over 44 IAB offices globally. Locally there is a financial member base of approximately 130 organisations that includes media owners, platforms, media agencies, advertising technology companies as well marketers. The board has representation from the following organisations; Google, Guardian News & Media, Facebook, News Corp Australia, Nine, REA Group, Seven West Media, Simpson Solicitors, Verizon Media.

IAB Australia's charter is to grow sustainable and diverse investment in digital advertising in Australia by supporting the industry in the following ways:

- Advocacy
- Research & resources
- Education and community
- Standards

The Charter includes a focus on standards that promote trust, steps to reduce friction in the ad supply chain; and ultimately improve ad experiences for consumers, advertisers and publishers.

Introduction

As recognised in the ACCC's Digital Platforms Inquiry (DPI) Final Report, an advertising funded model provides substantial consumer benefits, by providing with little or no charge access to a broad range of content and services as selected by particular consumers to meet their individual preferences and interests.

IAB Australia is looking to work with both Industry and Government to identify the best approaches to meet the new consumer focused privacy recommendations as well as drive further transparency and education in the ad tech supply chain.

As an industry it's essential that we work together to find the right balance between delivering customised and relevant advertising experiences to consumers which respects their privacy, while also allowing businesses to compete and innovate in ways that allow them to meet consumers expectations.

Our organisation, Board and various technical committees are well equipped to help guide Government and industry on these issues given our considerable experience driving consumer and industry standards

and guidelines locally, while globally, IAB has been a key player working with governments and industry to implement solutions that work for both consumers and business. The IAB is able to provide background and industry education in areas related to the following recommendations:

Recommendation 5: Inquiry into ad tech services and advertising agencies

Recommendation 16: Strengthen protections in the Privacy Act

Recommendation 17: Broader reform of Australian privacy law

Recommendation 18: OAIC privacy code for digital platforms

IAB Australia supports widely adopted industry driven solutions that can evolve as technology and consumer habits change and that help enable media owners and advertisers, large and small, to be able to operate efficiently and effectively. We are focussed on solutions that provide further transparency for advertisers and consumers that can:

1. enable marketers to make informed decisions
2. ensure that consumers' rights are protected.
3. promote innovation and diversity in the ad ecosystem.

IAB Australia is strongly supportive of initiatives that improve transparency provided by custodians of personal information about individuals as to those custodians' data practices. Transparency ensures accountability, and in particular accountability of data custodians for data ecosystems within which they participate. Accountability is optimally achieved by creating strong incentives for participants in consumer data ecosystems to:

- adopt fair and response data governance policies and practices,
- minimise collection, handling and disclosure of personal information about individuals,
- require clear allocations of accountability and responsibility as between participants in consumer data ecosystems, with consequences for non-compliance with allocated responsibilities.

Regulation can play an important role in promoting transparency, accountability and consumer choice. However, creating 'consumer choice' through additional regulation for greater disclosure to consumers will often fall short of their intended goals. Rather, such requirements often place great burden upon consumers by requiring consumers to read and understand explanations of complex digital eco-systems.

Some data regulatory frameworks, notably including the EU GDPR, impose additional requirements for consumer consent such that it is the only valid legal base for certain data processing. However, placing an additional burden upon consumers will often be a sub-optimal way of ensuring fair, responsible and accountable data governance by participants' complex digital data ecosystems. This ecosystem has to

develop schemes in order to lawfully obtain and pass valid consents through the ecosystem (e.g.: IAB Europe’s Transparency and Consent Framework). Government should undertake an assessment of GDPR to determine whether similar regulations in Australia would operate as intended and not unduly impact the competitive landscape.

Advertiser & Ad Tech Supply Chain Transparency

Recommendation 5: Inquiry into ad tech services

IAB Australia, the local industry body with the deepest expertise on digital advertising technology and a member base covering all sides of the advertising ecosystem, is well placed to assist and work with the ACCC digital platforms branch with Recommendation 5 of the ACCC’s final report for the DPI.

We are very keen to provision this via:

- Clear examples of all the various types and mechanisms of digital advertising buying currently functioning in Australia.
- Education, visualisation and clarity on the supply of all the ad tech services enabling digital advertising in Australia.
- Simple explanation of what service or solution each type of ad technology provides.
- A high-level review of the current and forthcoming related industry standards.

We believe in supporting a transparent approach to the way that digital media inventory is bought and sold along with a clear understanding of the role of any intermediaries. IAB Australia is well positioned to play a role in education for advertisers to ensure they are able to make informed decisions on the ad tech supply chain, particularly for programmatic media buying.

For industry standards to work effectively, wide adoption is necessary, and continuing education of all sides of the advertising ecosystem (media owners, platforms, ad-tech, agencies and advertisers) is essential. Globally the IAB has established a non-profit research and development consortium, IAB Tech Lab, which develops and provides technical standards, software, and services to drive the growth of an effective and sustainable global digital media ecosystem that benefits consumers.

Consumer Privacy and Transparency

As mentioned above, IAB Australia is strongly supportive of initiatives that improve transparency provided by custodians of personal information about individuals as to those custodians’ data practices and we agree with the report that consumers are better off when they are sufficiently informed and

protected from meaningful risk. However we would like to raise considerations on recommended policy changes that may:

- Broaden the definition of personal information and rely more heavily on consent without a thorough analysis of the impact that this will have on the market
- Place extra unnecessary burdens on consumers
- Impact diversity and competition in the ad ecosystem
- Disrupt and deter innovation and industry without improving consumer privacy

Recent Initiatives That Focus on Issues Raised in DPI Report

Australian Digital Advertising Practices

IAB Australia along with the Media Federation of Australia (MFA) and the Australian Association of National Advertisers (AANA) recognising the need for more clarity on the digital advertising supply chain published the Australian Digital Advertising Principles in 2018. While these Practices were created with the advertiser in mind, they also serve to educate and inform all players within the digital ecosystem including agencies, publishers and ad tech vendors. The Practices are currently being updated for a Version 2 release in late 2019.

In addition to the Australian Digital Advertising Practices, IAB Australia published an [Auction Mechanics Handbook](#) published in February 2019 – giving the industry education and clarity on how programmatic auctions operate.

The IAB would welcome any opportunity to take part in consultation with Treasury, Department of Communications and the Arts, and the Attorney General’s Office. Please contact Gai Le Roy, CEO of IAB Australia, on any aspect of this submission.

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