

Monday, 13 May 2013

ICANN
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094
USA

Big Room Inc. and Dot Eco Global Community Organization Public Comment on April 2013 Government Advisory Committee Advice

Dear ICANN,

Big Room Inc. and the Dot Eco Global Community Organization welcome the opportunity to comment on the Advice contained in the 11 April 2013 ICANN Governmental Advisory Committee (GAC) Communiqué.

The specific recognition by the GAC of the importance of “the clear and collective opinion of a community on a gTLD where the community is impacted by that gTLD application” is an important and timely contribution to the new gTLD process given the approaching community-priority evaluations.

The GAC has also recommended that ICANN establish additional safeguards for all new gTLDs; specific safeguards for strings that are linked to regulated or professional sectors; and further targeted safeguards for strings associated with market sectors that have clear and/or regulated entry requirements.

The GAC specifically advised that ICANN ensure that registries of environment-related gTLDs – including .eco – require registrants to agree to compliance with applicable laws, to undertake validation, and to agree to periodic checks that ensure validity of relevant authorisations, charters, licenses and/or other related credentials for participation in the sector. We strongly agree with and support this advice.

As evidenced by our approach to date, we firmly believe that the Internet user is more likely to be harmed by environment-related gTLD registries that do not require compliance with applicable laws and validation of environmental credentials, than by registries that do.

The “Regeneration Consumer Study¹” is an online survey of consumer attitudes, motivations and behaviours around sustainable consumption among 6,224 respondents in six major international markets (Brazil, China, Germany, India, United Kingdom and United States). It was developed by BBMG, GlobeScan and SustainAbility and fielded during September and October 2012.

¹ The Regeneration Consumer Study is an online survey of consumer attitudes, motivations and behaviours around sustainable consumption among 6,224 respondents in six major international markets (Brazil, China, Germany, India, United Kingdom and United States). Fielded in September and October 2012, the study represents a holistic exploration of sustainability market trends, priorities and engagement pathways, including information on sustainable consumption, trust, transparency, social issues, behaviour change, consumer collaboration, participation and advocacy actions. Data across all six international markets reflect a margin of error of +/- 1.3 percent. Specific country-level data reflect a margin of error of +/- 3.1 percent.

The study found that “consumers across all six markets look to certification seals or labels on product packaging (40%) as the most trusted source of information about whether a product is environmentally and socially responsible.” This suggests that the average consumer finds external verification of environmental claims helpful.

The study also found that the least trusted source of information was traditional company communications. According to the study, “barely one in ten consumers rely on company advertisements or website content, reinforcing the perception that the most reliable claims often come from sources largely beyond a company’s control.” This suggests that the average consumer finds these kinds of unverified environmental claims unhelpful.

The understanding that externally verified environmental claims are helpful while unverified environmental claims are unhelpful is a key basis for many government consumer protection policies on environmental claims².

To explore whether this extends to environment-related gTLDs, in February 2012 Vision Critical, on behalf of Big Room, conducted a survey to understand public expectations of the term eco and of the .eco gTLD in particular³.

The results suggest that it does. The majority of respondents (58%) indicated they would expect domain names ending in .eco (e.g. www.anyname.eco) to be members of an environmental organization, professional association or have made a specific commitment to the environment. A large majority (67%) of respondents indicated that they would expect a website that had a domain name ending in .eco to contain environmental/ecological related information.

This is a key reason why the environmental community has expressed a consensus view that the .eco gTLD should be ‘community-designated’. Indeed, as Big Room Inc.’s .eco application explains:

“The purpose and principles outlined in the .ECO Policy Consensus define what .ECO will mean as an active expression of the goals, values and interests of the Community.”

“All major international membership organizations (e.g. IUCN, WWF, Greenpeace), the largest global business and environment organizations (e.g. World Business Council for Sustainable Development, Green Economy Coalition), the largest international Community alliances (e.g. 350.org, TckTckTck) and the key global environmental reporting standards (e.g. Global Reporting Initiative, Carbon Disclosure Project) support the creation of .ECO as a

² See Big Room Inc. .eco gTLD application response to question 20 (d) for an indicative list of applicable national and international policy on environmental consumer protection legislation.

³ The Big Room .eco survey is a random online Omnibus survey of 1,016 US adults from diverse ages, incomes, ethnicities and regions, conducted 15-16 February 2012 among a sample of Americans who are also Springboard America panel members. The margin of error, which measures sampling variability, is +/- 3.10%, 19 times out of 20. The sample was balanced by age, gender and region according to the most recent American Community Survey (2009).

Community TLD. The United Nations Environment Programme (UNEP) has been an observer to the .ECO community process since 2010.

These institutions represent over 190 countries, 1,000 entities, and more than 10 million individual members.”

This research, community engagement and public policy suggest that a safeguard-oriented approach to environment-related gTLDs – and .eco in particular – is appropriate.

Sincerely,

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