

badvertising

Low Carbon Advertising Policies

A toolkit for
local policymakers





Finding pathways for rapid transition to a fair economy that thrives within planetary ecological boundaries.

www.newweather.org



Possible is a UK based climate charity working towards a zero carbon society, built by and for the people of the UK.

www.wearepossible.org



Adfree Cities campaign for happier, healthier cities free from the pressures of corporate outdoor advertising.

www.adfreecities.org.uk

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Version 3.3 – February 2023

This report was first published in November 2020.

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Introduction



Fossil fuel companies, car companies and airlines spend billions each year advertising their high carbon products – despite growing public concerns over air pollution, public health and climate breakdown. This toolkit is for local authority councillors and officers in the UK wishing to implement a ‘*Low Carbon Advertising Policy*’ which would prohibit adverts for these products in council-owned ad spaces.

The Rationale



As of November 2021, over 300 councils in the UK have made climate emergency declarations. **Low Carbon Advertising Policies** present an opportunity for local authorities to further their existing health and environmental policy goals relating to air pollution, active travel, cutting carbon emissions and town planning.

It should be noted that restricting advertising for harmful products (e.g tobacco or SUVs) is not the same as banning the products themselves.

On specific policy outcomes relating to active travel, health, air pollution and public transport, adopting a low carbon advertising policy allows for joined-up thinking across different council departments. It is counter-productive for public transport bodies, for example, to be running adverts for polluting private cars at their bus stops.

Local authorities have control of the following areas of advertising:

- Advertising billboards and digital screens located on council-owned land.
- Planning consent for advertising infrastructure (e.g new digital billboards) and its content.
- Passenger Transport Executives (such as Transport for London, Transport for Greater Manchester, Merseytravel, etc) have control of advertising policies on their vehicles and transport infrastructure, and are accountable to local democratic bodies such as Mayors’ offices.

How advertising affects sustainable behaviour choices



The importance of advertising as a means of helping or hindering the adoption of low carbon lifestyles is increasingly being recognised.

In October 2022, the House of Lords published the *In Our Hands* report which states that one third of the emissions reductions required by 2035 have to come from changing how we travel, what we eat and how we heat our homes. The role of advertising is explicitly mentioned in the report as a “powerful influence on consumer behaviour on a large scale” and the authors call for “measures to regulate advertising of high-carbon and environmentally-damaging products.”¹

In line with guidelines published by the United Nations Environment Programme, such measures might include regulating advertising of carbon intensive transportation modes like flying, and selected high-carbon foods such as meat, dairy products and certain types of fish.²

Advertising, the UNEP report notes, fuels material consumption to meet needs that “might be better met through alternative and less climate-damaging means.”

We know further that advertising can motivate unsustainable choices.³ Research into behaviour change and the climate crisis by Hampshire County Council found that conflicting motivations are a major barrier to individual action.

The research found that making “doing the right thing” more visible in public communications and giving consistent messaging on actions that save larger amounts of carbon but are not widely perceived to do so (like eating less meat) were found to be strong tactics to change people’s behaviour.⁴

Advertising high carbon products normalises unsustainable choices and contradicts efforts by local authorities to promote low carbon lifestyles, making the choice much more difficult for

¹ House of Lords Environment and Climate Change Committee, 2022, *In our hands: behaviour change for climate and environmental goals* [In our hands: behaviour change for climate and environmental goals](https://www.parliament.uk/publications/2022/04/in-our-hands-behaviour-change-for-climate-and-environmental-goals) ([parliament.uk](https://www.parliament.uk/publications/2022/04/in-our-hands-behaviour-change-for-climate-and-environmental-goals))

² UNEP, 2022, *Enabling sustainable lifestyles in a climate emergency* [Enabling Sustainable Lifestyles in a Climate Emergency](https://www.unep.org/enabling-sustainable-lifestyles-in-a-climate-emergency) ([unep.org](https://www.unep.org/enabling-sustainable-lifestyles-in-a-climate-emergency))

³ Kasser et al., 2020, *Advertising’s role in climate and ecological degradation* [Advertising’s role in climate and ecological degradation](https://www.squarespace.com/publications/2020/04/advertising-s-role-in-climate-and-ecological-degradation) ([squarespace.com](https://www.squarespace.com/publications/2020/04/advertising-s-role-in-climate-and-ecological-degradation))

⁴ Baker et al., 2020, *Climate change behavioural insights* [PowerPoint Presentation](https://www.local.gov.uk/publications/2020/04/climate-change-behavioural-insights) ([local.gov.uk](https://www.local.gov.uk/publications/2020/04/climate-change-behavioural-insights))

citizens. An example of this would be advertising private motor vehicles in bus stops and train stations.⁵

“Fossil fuels are the new tobacco: we need the same tools as against tobacco. We need to fight against their lobbying, against their advertisements, against their glamorisation. We need a legally binding treaty on fossil fuels that goes even further than tobacco. In the name of health.”

Maria Neira, WHO Director of Public Health and Climate.⁶

The evidence for restricting advertising for high-carbon products

Polluting cars and SUV advertising

Over the past ten years, car manufacturers have shifted away from selling family cars towards ever bigger, more polluting – but much more profitable – ‘sports utility vehicles’ (SUVs). The industry’s marketing drive to persuade us to buy these larger, dirtier vehicles has been so effective that the rise in SUV sales now threatens public policy goals to reduce greenhouse gas emissions. Advertising of these vehicles must be regulated as part of the policy objectives to meet the UK’s Net Zero target.



⁵ Montague, 2022, *Dear il car advertising* [Detail car advertising \(theecologist.org\)](https://theecologist.org).

⁶ Comments made at a session of COP27. [WHO director Maria Neira 100% endorses 'tobacco law' for fossil industry – Reclame Fossielvrij \(verbiedfossielereclame.nl\)](#)

Advertising works. Statistical analysis reveals that demand for polluting SUVs is higher when people are exposed to advertising for those products.⁷ Exposure to SUV adverts is positively, and substantially, associated both with the desire to purchase an SUV and actual SUV ownership. The research also finds that 'green' transport messaging, such as governmental messaging encouraging the use of public transport or cycling does not reduce SUV ownership as those incentives appear to be effectively drowned out by adverts for SUVs.

As well as being a source of emissions that harm local air quality and contribute to climate breakdown, these oversized vehicles are putting pressure on urban street space. In 2019 alone, over 150,000 new cars were sold in the UK which are too big to fit in a standard parking space.⁸

Given that advertising for polluting private cars undermines public health and climate goals, advertising all petrol, diesel and SUV cars should be immediately legislated against, alongside advertising cars which are too large for a standard UK parking space.

Whilst the UK government has committed to end the sale of petrol and diesel cars by 2030, polluting vehicles sold in the preceding years will stay on the road beyond that date. As such, ending advertising for non-electric cars would positively contribute to the policy goal of reducing road transport emissions.

Airline advertising

The aviation industry is the most climate-harming form of transport and was responsible for 7% of the UK's greenhouse gas emissions in 2018.⁹ The Government's 'Jet Zero Strategy', which doesn't account for non-CO2 greenhouse gases, does not address reducing demand for flying and as such is set only to increase the sector's carbon emissions by 2050, with an estimated additional 33% more flights by 2050.¹⁰

Prohibiting advertisements that actively encourage us to fly is a common sense policy measure to limit the disproportionate

⁷ Kasser et al., 2021. *Advertising and demand for sports utility vehicles* https://www.badverts.org/s/Advertising-and-demand-for-SUVs_Kasser-et-alBadvertising-2021.pdf

⁸ Beevor et al., 2019. *Upselling Smoke: the case to end advertising of the largest polluting cars* <https://www.badverts.org/s/Upselling-Smoke-FINAL-23-07-20.pdf>

⁹ Climate Change Committee, 2020. *The Sixth Carbon Budget – The UK's path to Net Zero* <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Aviation.pdf>

¹⁰ Chapman, 2022. *The Jet Zero strategy is an abdication of responsibility to the planet and future generations* <https://www.businessgreen.com/opinion/4053483/governments-jet-zero-strategy-abdication-responsibility-planet-future-generations>

climate impact largely caused by a minority of frequent flyers. It is a policy measure that can be implemented by local councils in the immediate term whilst the more challenging issues of creating sustainable alternatives to flying and a just transition for aviation industry workers are developed.

It should be noted that prohibiting adverts for airline flights is not the same as prohibiting the flights themselves, and will have no negative impact on those who need to fly for work or family reasons.

The Climate Change Committee has urged the UK Government to put in place policies and mechanisms to reduce demand for air travel. Ending adverts that glamourise and normalise flying, and justify expansion of the sector through misleading green claims, is an important tool that complements levers such as affordable rail travel and a frequent flyer levy.¹¹

Fossil fuel industry advertising

Advertising for fossil fuels promotes companies and products with considerable environmental impact, helping to 'lock in' a fossil fuel economy and delaying a societal shift to cleaner energy. Evidence shows how advertising by fossil fuel firms has deliberately spread doubt and misinformation about climate breakdown, from climate denial ads¹² to recent nuanced and highly strategised¹³ ad campaigns aiming to prolong support for fossil fuels through narratives of patriotism, pragmatism and a framing of fossil fuel majors as 'part of the solution'.¹⁴

Major fossil fuel companies such as BP, Shell and ExxonMobil have come under heavy criticism for how they use commercial advertising to "greenwash" their brand image.¹⁵ Often those companies disproportionately emphasise their renewable energy projects when these make up a relatively small proportion of their portfolio.

Oil giant BP, for example, was the subject of a successful legal case by ClientEarth in 2020 over a widespread advertising campaign touting the company's investment in renewables. The

¹¹ Climate Change Committee, 2022, *Progress Report to Parliament* <https://www.theccc.org.uk/publication/2022-progress-report-to-parliament/>

¹² The Guardian, 2021, *The forgotten oil ads that told us climate change was nothing* <https://www.theguardian.com/environment/2021/nov/18/the-forgotten-oil-ads-that-told-us-climate-change-was-nothing>

¹³ Influence Map, 2022, *The International Gas Union's Climate Strategy* <https://influencemap.org/landing/-a794566767a94a5d71052b63a05e825f-20189>

¹⁴ Influence Map, 2021, *The Oil and Gas Industry's Digital Advertising Strategy* <https://lobbymax.org/report/Climate-Change-and-Digital-Advertising-a40c8116160668aa2d865da2f5abe91b#1>

¹⁵ Client Earth, 2020. *BP greenwashing complaint sets precedent for action on misleading ad campaigns* <https://www.clientearth.org/latest/press-office/press/bp-greenwashing-complaint-sets-precedent-for-action-on-misleading-ad-campaigns>

case highlighted that only 4% of BP's investments were in renewable energy whereas 96% were in fossil fuels. As such their renewables adverts were considered misleading. Pressures on regulatory bodies facing unprecedented levels of complaints over misleading green claims have added to calls for local authority bans on fossil fuel advertising.¹⁶

Definitions of high carbon products



Category	Notes
Airlines and airports: all advertising by airports and airlines which might reasonably be deemed to promote more flying	There are no low carbon options for commercial air travel available currently or for the foreseeable future, so air travel <i>per se</i> should be treated as high carbon. ¹⁷
Fossil fuel companies: We define fossil fuel companies as all firms and associated sub brands or lobbying organisations that extract, refine, produce, supply, distribute, or sell any fossil fuels	
Cars: exclude all advertising and promotions for petrol, diesel and hybrid vehicles and Plug-In Hybrid Electric Vehicles (PHEV)	Advertising for Battery Electric Vehicles (BEV) as distinct from PHEV could still be permitted, and in principle hydrogen fuelled vehicles. PHEVs have been shown not to yield meaningful emissions savings over conventional vehicles. ¹⁸

¹⁶ <https://adfreesities.org.uk/2022/07/big-banks-greenwashing-goes-unregulated/>

¹⁷ Climate Change Committee, 2019, *Letter: International aviation and shipping and net zero*, "Zero-carbon aviation is highly unlikely to be feasible by 2050" <https://www.theccc.org.uk/publication/letter-international-aviation-and- shipping/>

¹⁸ Transport & Environment, 2020, *A new Dieselgate in the making* https://www.transportenvironment.org/sites/te/files/publications/2020_11_Plug-in_hybrids_report_final.pdf

Model Motion for Council Meetings



The following text could form the basis of motions to Council meetings. They will need to be adapted to reflect local scenarios.

This council notes:

- That it is possible for local authorities to implement advertising policies against specific products if they consider them to be harmful to the amenity of an area. This Council notes that the Greater London Authority (GLA), which controls Transport for London (TFL) property, was able to enact a *Healthier Food Advertising Policy* in 2018 prohibiting High Fat, Sugar or Salt (HFSS) food advertising on TFL property. Council planning departments will be able to advise on how to restrict the use of 'deemed consent' under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 including writing to the relevant Secretary of State.
- That _____ Council currently holds an Advertising Concession Agreement with Clear Channel UK [/other company?] involving the upkeep and maintenance of over ___ bus stops across the city, many of which include advertising panels.
- That existing billboards may not have planning permission but there has been no consistent approach to removing them via enforcement.
- That many outdoor advertising spaces (both council-controlled and private) contain adverts for high carbon industries such as airlines, airports, SUVs, petrol and diesel cars and fossil fuel companies.
- That advertising prohibitions and restrictions already exist regarding all tobacco products and nicotine-containing e-cigarettes, guns and offensive weapons, breath testing and products designed to mask the effects of alcohol, 'pyramid schemes', prostitution services, 'obscene material' as well as other rules regarding marketing to children, high fat sugar and salt products, medical and health claims, religion, financial products, and pornography. (<https://www.badverts.org/case-studies>)
- That statistical evidence shows how exposure to advertising for high carbon products increases

consumption of those goods and services.¹⁹.
(https://www.badverts.org/s/Advertising-and-demand-for-SUVs_Kasser-et-alBadvertising-2021.pdf)

- That extra emissions resulting from advertising products at the national level is calculated to have added 208 million tonnes of CO2e in 2022, an increase of 11% since 2019.
(<https://www.purposedisruptors.org/advertised-emissions>)
- That many advertising companies are switching to digital billboards which allow them to sell many more advertising slots. These billboards display a series of alternated digital adverts, which are often static but can display moving images and can be updated remotely.
- That a double-sided digital bus stop advertising screen uses four times the electricity of an average British home (<https://adfreecities.org.uk/2019/11/the-electricity-cost-of-digital-adverts>) and that their bright illumination at all hours negatively affects the local wildlife and the local residents, including severe mental health impacts.
(<https://adfreecities.org.uk/wp-content/uploads/2021/09/living-next-to-digital-billboards-M32.pdf>)
- That a climate emergency was declared by this council on [date], which included a commitment to reduce citywide carbon emissions to ____ by _____. [Delete if not applicable]

This council believes:

- That the purpose of advertising is to stimulate demand for goods and services, most of which are for national and international brands, not local businesses, with limited benefits to the local economy.
- That some advertising content undermines the council's objectives regarding public health, air pollution and sustainable consumption. For example, High Fat Sugar and Salt products undermine health objectives, petrol and diesel car adverts, especially for Sports Utility Vehicles, undermine climate and air quality objectives and airline advertising undermines carbon emission reduction targets.

¹⁹ Research from Knox College, USA shows that exposure to Sports Utility Vehicle (SUV) advertising, for example, makes consumers 71% more likely to own a SUV than a standard sized car

This council resolves:

- To review its Advertising Concession Agreement[s] immediately, to investigate the possibility of amending the current set of prohibitions and restrictions during the term of the agreement to include products that contribute to climate change and air pollution.
- If the above is not possible, to begin work on a new policy, to take effect when the Advertising Concession Agreement is next renewed.
- To implement a Low Carbon Advertising Policy as part of the council's planning policies, to apply to bus stops, billboards and advertising spaces in the city within the jurisdiction of the local planning area.
- To adopt a presumption against planning applications for all new digital advertising screens in the city due to the high electricity use of these technologies.

Precedents



Liverpool City Council passed a motion in January 2021 to review its advertising arrangements and implement a low carbon advertising policy. See page 15 of these [council minutes](#).

Norwich City Council passed a motion in July 2021 to implement an [ethical advertising policy](#) including restrictions on environmentally-damaging products, junk food, gambling and payday loan products.

North Somerset Council passed a motion in July 2021 [to restrict advertising](#) for high carbon products.

All three of the above councils are currently working up implementation strategies for these policies.

Cambridgeshire County Council updated its [Advertising and Sponsorship Policy](#) to include restrictions on advertising for fossil fuels and other environmentally-damaging products in December 2022.

Outside the UK, councils in Sydney²⁰, Amsterdam²¹, Haarlem²² and Utrecht have all implemented motions to end fossil advertising. France has passed national legislation prohibiting some adverts for fossil fuels as well.²³

Healthier Food Advertising Policies

The Greater London Authority (GLA), which controls Transport for London (TfL) property including most [London bus stop](#) ad spaces, enacted a *Healthy Food Advertising Policy* in 2018 prohibiting High Fat, Sugar or Salt (HFSS) food advertising on TfL property. Similar policies have been adopted by [Southwark](#), [Haringey](#) and [Merton](#) Borough Councils covering their non-bus stop advertising sites.

For more information please see [Taking Down Junk Food Ads](#) – how local areas are taking action on outdoor advertising (2019), and the [Healthier Food Advertising Policy Toolkit](#) – A local government guide for restricting unhealthy food advertising, by food charity Sustain.

In March 2021, **Bristol City Council** adopted a new [Advertising & Sponsorship Policy](#) prohibiting advertising for junk food, gambling, payday loans and alcohol – as well as ruling out advertising in parks. They also produced a [Guidance Document](#) to accompany the policy.

Scrutiny Committees

Whilst scrutiny committees for some councils may not be a suitable forum (and do not exist at some local authorities), they can provide a supplementary pathway for developing advertising policies with officers. Bristol City Council's Overview & Scrutiny Committee held conversations about the Council's Advertising & Sponsorship Policy before the policy was finally adopted.

²⁰

<https://www.adnews.com.au/news/city-of-sydney-votes-to-end-fossil-fuel-advertising>

²¹

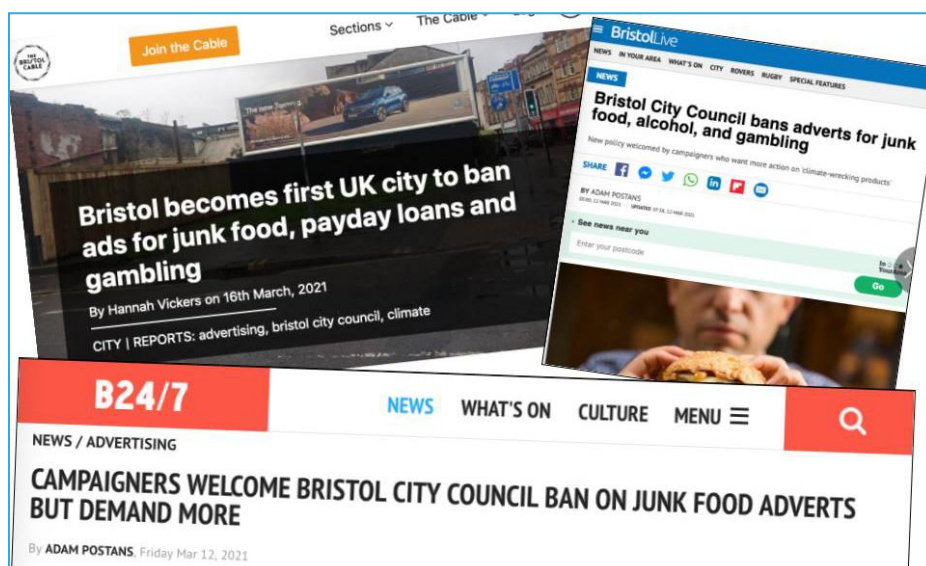
<https://www.euronews.com/green/2021/05/20/amsterdam-becomes-first-city-in-the-world-to-ban-this-type-of-advert>

²²

<https://www.independent.co.uk/travel/news-and-advice/haarlem-ban-adverts-flights-netherlands-b2162480.html>

²³

<https://www.euronews.com/green/2022/08/24/france-becomes-first-european-country-to-ban-fossil-fuel-ads-but-does-the-new-law-go-far-e>



Frequently Asked Questions

Do local authorities have the powers to prohibit advertising for certain products?

Yes. As the ban on junk food advertising adopted by Bristol and some London local authorities already shows, it is possible for councils to implement such measures. Council planning departments should be able to advise on how to restrict the use of 'deemed consent' under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 including writing to the relevant Secretary of State.

My council does not own any advertising sites. Should we still implement a policy?

Even if your Council does not own any land with advertising sites on, your council may hold a contract (an 'Advertising Concession Agreement') with an advertising company for the maintenance of bus stop advertising panels or other street furniture. Your council will be able to affect what is displayed on those ad sites through the terms of the contract.

Won't the council suffer a loss in revenue by prohibiting adverts for high carbon products?

It is possible to replace adverts for high carbon products with adverts for less damaging products. Any small drop in council revenues by excluding adverts for high carbon products such as

SUVs or airlines needs to be considered against the environmental benefits of cleaner air and reduced greenhouse gas emissions (and the avoided public health costs).

Why are you only focusing on advertising for high carbon products?

Our own research has shown that advertising high carbon goods and services is actively undermining efforts to reduce UK carbon emissions in line with our commitments on climate change. Councils may wish to consider these policy measures against advertising for high carbon products in conjunction with other harmful products such as payday loan companies, gambling and High Fat, Sugar and Salt Products.

Types of outdoor advertising spaces



There are different types of outdoor advertising billboards. These consist of large digital advertising screens, older paper poster sites and bus stop advertising panels (digital and paper). It is common that local authorities have direct control over bus stop advertising spaces (bottom right) as well as smaller sites such as lamppost ribbons. However, some local authorities own a small number of larger advertising sites as well. If a council creates an advertising policy to restrict advertising for certain products, it can be applied to advertising sites it owns – but not to ad sites on private land.



Stand-alone 'bus stop size' digital screens (called 'six sheet' size). Most of these are on private land, but some will be owned by local authorities



Digital screens and paper 'six sheets' at bus stops. These could be controlled by an 'Advertising Policy' created by a local authority.



Large digital advertising screens. Most of these are on private land, but some will be owned by local authorities



Large '48 sheet' size paper poster billboards. Most of these are on private land, but some will be owned by local authorities

Further Reading



[Advertised Emissions Temperature Check 2022.](#)

Purpose Disruptors, 2022.

[The electricity costs of Digital Out Of Home advertising screens.](#)

Adfree Cities, 2022.

[Advertising and Demand for Sports Utility Vehicles.](#)

Professor Tim Kasser, Monica Guillen Royo, Clara Viñas y Bardolet, Andrew Simms, December 2021

[Advertising's role in climate and ecological degradation.](#) What does the scientific research have to say?

Professor Tim Kasser with Andrew Simms, David Boyle and Emilie Tricarico, November 2020

[Upselling Smoke:](#) The case to end advertising of the largest, most polluting new cars

New Weather Institute and Possible, August 2020

[Why Taking Down Billboards is Good for the Local Economy](#)

Adblock Bristol, 2019