

Full Letter accompanying public petition by Adblock Bristol:

<https://actionnetwork.org/petitions/end-advertising-high-carbon-products-bristol-council-sites/>

10th February 2021

Dear Mayor Rees,

Re: advertising for high carbon products in Bristol City Council's Advertising Policy

We were encouraged to see the resolutions of the [Overview and Scrutiny Committee meeting](#) on 2nd November 2020 to write a new Advertising Policy for council-controlled advertising sites.

To support the Council's ambition, we have drafted some definitions of advertising for high carbon products for the Council to consider.

Related policies

We welcome the statement in the [One City Climate Strategy](#) (February 2020) which resolved to:

"[Develop] a citywide shared understanding and commitment to responsible consumption (including lower carbon food and reduced flying), which acknowledges the generally lower impact of lower income households; and

[Create] advertising standards and restrictions to support responsible consumption."

We note the leadership and influencing role of local governments is supported by the Climate Change Committee's recent report on [Local Authorities and Sixth Carbon Budget](#) (December 2020):

"Local authorities also play a wider enabling and communications role, engaging communities, public sector and business partners in area-wide conversations and about climate change and the route to Net Zero....This wider leadership role can influence local people and businesses to take action themselves."

It is worth highlighting the recent policy adopted by the [municipality of Amsterdam](#) to ban all advertising, sponsorship and marketing events by fossil fuel companies and airlines - a world first. Bristol City Council has the

opportunity to show progressive national leadership on this issue by becoming the UK's first city to take similar steps.

In order to achieve these policy ambitions, we recommend the following definitions of 'advertising for high carbon products' that should be covered in the list of exclusions in the Council's new Advertising Policy.

We emphasise that ending **advertising** of a product is not the same as banning the product itself. A comparable example is tobacco advertising, which was finally prohibited in 2003 after decades of public health campaigning.

We recommend that Bristol Council's advertising exclusions should cover:

Category:	Notes:
<p>Airlines and airports: all advertising by airports and airlines which might reasonably be deemed to promote more flying</p>	<p>There are no low carbon options for commercial air travel available currently or for the foreseeable future, so air travel per se should be treated as high carbon¹.</p>
<p>Advertising by fossil fuel companies: We define fossil fuel companies as firms that have over 80% of their investments in coal, oil and gas. Carbon Underground 200 provides a useful methodology for this definition.</p>	
<p>Cars: exclude all advertising and promotions for petrol, diesel and hybrid vehicles and Plug-In Hybrid Electric Vehicles (PHEV)</p>	<p>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.²</p>

¹ "Zero-carbon aviation is highly unlikely to be feasible by 2050", Climate Change Committee (2019), Letter: International aviation and shipping and net zero, <https://www.theccc.org.uk/publication/letter-international-aviation-and-shipping/>

² 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

Questions

Should a fossil fuel company be allowed to advertise its 'green', 'sustainable' or 'best in class' products?

No. The advertising ban must prevent companies such as Shell, Esso and BP from using advertising to appear greener than they actually are. Any advertising by a company whose principal product is fossil fuels, even if the advert is focused on a minor activity of the company, will effectively promote the whole company. Fossil fuel companies disproportionately feature their renewable products in their advertising compared to their actual renewables investments. BP's advertising, for example, was the subject of a recent complaint by ClientEarth to the UK's National Contact Point under the OECD Guidelines for Multinational Enterprises.

<https://www.clientearth.org/latest/press-office/press/bp-greenwashing-complaint-sets-precedent-for-action-on-misleading-ad-campaigns/>

The Advertising Standards Authority in the UK recently ruled against Shell for making misleading green claims in their advertising (January 2020)

<https://www.asa.org.uk/rulings/shell-uk-ltd-g20-1049869-shell-uk-ltd.html>

Should 'high carbon' be defined in absolute terms rather than designating certain industries as 'high carbon'?

Yes it could be defined in this way. For example, the Council could define high carbon transport (cars, flights, etc), by its carbon intensity per passenger kilometre (gCO₂e/pkm) and energy products by carbon intensity per quantity of usable energy generated (gCO₂e/kWh). Or the Council could define a single metric to apply to any product being advertised, e.g. carbon intensity per retail value of the product or service (gCO₂e/retail£).

Advantages of this approach:

- A quantitative metric approach to adverts could encourage industries to produce lower carbon products, in the same way that the UK sugar tax encouraged the soft drinks industry to reformulate its products.
- A more fine-grained measure that would allow a sliding scale of regulation rather than a simple binary of allowing or disallowing adverts. For example, advertising for very high carbon products could be banned, while advertising for moderately high carbon products could be required to display a [climate change warning](#). It would also

allow the carbon intensity thresholds to be gradually reduced over time to meet carbon neutrality targets.

Disadvantages of this approach:

- There is not yet a universally accepted definition of high, medium and low carbon intensity per £, so as a first mover Bristol City Council may find it difficult to persuade advertising companies to assess adverts using this metric, and therefore enforcement would be challenging.
- An attempt at a 'universal' metric for all advertised products could have unintended side effects. For example, carbon intensity per retail value (gCO₂e/retail£) would artificially inflate the carbon intensity of lower cost products. A low cost budget flight would appear to have a higher carbon intensity per retail pound than an expensive first class flight, even though the true carbon intensity per kilometre travelled per passenger on a budget flight (gCO₂e/passenger-km) is actually lower. This is because a budget flight has more passengers per aeroplane. Other attempts at universal metrics might have other unintended consequences.