

How might a ban on advertising for high-carbon goods and services work?

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ABOUT THIS DOCUMENT AND THE AUTHOR

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Flint was the lead author of the motion to Green Party conference in Autumn 2020 entitled 'Ban on advertising of high-carbon goods and services'. This policy, [which was adopted at the conference](#), states:

'The current climate emergency makes the promotion of high carbon products and services such as air flights and SUVs increasingly unsustainable. The Green Party will therefore seek to progressively reduce and ultimately eliminate all advertising for and promotion of such goods and services.'

The following document is adapted from the background paper that supported this policy. It is published in the hope that it will support campaigners and decision-makers across the UK in implementing similar policies at national, regional and local levels.

CONTEXT: CLIMATE EMERGENCY

The UK parliament, hundreds of local councils and Scottish and Welsh Parliaments have declared a climate emergency. That is, they have declared that climate change is so severe and urgent a threat that it should be treated as an emergency.

An effective emergency response needs decisive action from government and business. It also requires us all to stop using climate-wrecking products, like Sports Utility Vehicles (SUVs), and services like flying.

Yet we are still bombarded with adverts for these same goods and services. That's crazy; it must stop. And local communities should play their part in stopping it.

THE ROLE OF CONSUMERS IN DRIVING CLIMATE CHANGE

On average 12 tonnes of CO₂ or equivalent is emitted for each UK resident each year. A report in the Journal of Industrial Ecology (Ivanova, et al, 2015) found that household consumption drove two thirds of global greenhouse gas (GHG) emissions in 2007. It hasn't changed much since then. So the choices that consumers and households make are important in driving or mitigating climate change.

Most of this is just ordinary life – food, travel to work or new curtains. Consumers make choices but they aren't told the emissions and can't easily find out. Yet there are big differences:

- Flying produces a lot of CO₂.
- Cycling produces much less than driving.
- SUVs produce more than small cars and much more than battery-electric cars.
- Cattle and sheep produce more than pigs and chickens.
- Badly insulated houses produce more than well insulated ones.

Consumers can contribute by making low carbon choices – and for this they need product labels that show the emissions.

Decisions to avoid high-carbon products are not easy and we should not make them harder by allowing advertisers to incessantly urge them to make the wrong decisions. Such advertising does more than endorse specific products – it makes the whole category attractive. It's unfair and damaging. It must stop.

WHAT DO WE MEAN BY HIGH CARBON?

A sharp distinction between high carbon (bad) and low carbon (good) would be too crude, there's clearly a spectrum. We should define four categories:

- Very high carbon. Sale of these products and services would be forbidden.
- High-carbon. Advertising should be forbidden.
- Intermediate carbon. Advertising permitted with mandatory 'climate damage' warning (similar to that [proposed by Client Earth](#)).
- Low-carbon. No restrictions.

Defining "high carbon"

Some products, e.g. fossil fuels, are obviously high-carbon but we really need proper metrics. Where available, sector-specific metrics, e.g. grams of carbon dioxide equivalent per kilometre travelled (gCO_{2e}/km) for cars, and kilograms of carbon dioxide equivalent (kgCO_{2e}, or even tonnesCO_{2e}!) for flights, will be the best choice if the definitions are sensible and the data is readily available.

But there are no such metrics in most sectors so we need a different approach as a fallback. For instance, we could use kilograms of carbon dioxide equivalent per retail pound spent (kgCO_{2e}/retail£) and start by defining high carbon as having a carbon intensity greater than 3kgCO_{2e}/retail£. The following would have fallen within the definition in 2010 (Berners Lee, 2010): fossil fuels, fertilisers, electricity, flying and probably some examples from other categories. (It's satisfying to note that, due to moving away from coal and increasing use of renewables, grid electricity would no longer count as high carbon.)

Unfortunately, this metric would penalise 'budget' products over their 'luxury' counterparts even where their associated emissions are much the same. Where this is an issue a measure of emissions per unit of product should be preferred.

We also have to consider purchases, especially large purchases such as petrol-fuelled SUVs, that encourage continuing emissions. To do this we might have to apply the metric to the product's whole lifetime.

There are also products and services, such as bikes, car clubs and possibly battery-electric vehicles, that help people to reduce emissions. A complete policy should promote them.

Whatever the initial level, the high-carbon threshold must be reduced over time. Even the UK government now accepts the need to reduce emissions to zero (if only by 2050) and this policy should align with the goal.

HOW CAN WE MAKE IT WORK?

Any advertising ban should cover all media including direct mail, billboards, newspapers, magazines, terrestrial radio and TV, online media and social media ads masquerading as peer content.

We should also include "below the line promotions" such as frequent flyer schemes, retail club cards, railcards, etc., [as proposed by the Committee on Climate Change](#).

Probably only frequent flyer schemes themselves would count as high carbon.

The current regulatory situation is:

- Newspapers, posters, websites, social media, cinema, emails, leaflets and billboards are subject to self-regulation via the [Advertising Standards Authority](#) (ASA).
- Broadcast media are regulated by the ASA under contract from Ofcom.

I do not believe that the ASA, being an industry body, can move fast enough or vigorously enough to meet our needs. I therefore propose the creation of a specialist unit to publicise the new law, advise advertisers of its limits, search for offending ads and start legal enforcement action. I think this should not be part of the police.

Advertising

It would be easy to ban ads from direct mail, billboards, print media and terrestrial TV in the UK.

Online advertising is harder. We should ban firms that *sell* high-carbon goods and services (HCGS) in the UK from advertising in the UK. (There are precedents from the days of Radio Luxembourg and Radio Caroline.)

The problem of course is that an online advertiser may say it is targeting customers in the US but be happy that UK customers see its ads. Much of the Internet appears outside effective regulation. But is it?

Anyone who spends time online knows that some websites block access to some content on the basis of their country of residence. These restrictions could be extended to HCGS ads.

It would be even harder to ban advertising on social media, especially if it masquerades as peer content. That government *could* do it is apparent from the 'success' of the 'Great Firewall of China' but such a Draconian approach cannot be considered in a free society.

However, the concentration of digital advertising on a few platforms (e.g. Google and Facebook) and through a few agencies, notably WPP,) raises the possibility of regulating these platforms and/or agencies.

Avoidance/evasion

HCGS producers depend heavily on advertising and will, [as the tobacco companies did and continue to do](#), try to avoid the proposed advertising rules by lobbying, enforcement action under trade treaties and by 'creative' interpretations of the rules. The government must be resolute in resisting this and the enforcement unit creative in identifying breaches. A general 'anti avoidance' law may be needed.

LIKELY EFFECTS OF THE POLICY

An HCGS advertising ban would:

1. reduce the sales of HCGSs. The example of tobacco shows, according to a World Bank study (Jha et al, 1999, p45 et seq) "Comprehensive bans on advertising and promotion can reduce demand by around 7 percent ... in high-income countries."
2. increase support for the view that the purchase of such things is immoral, or at least anti-social.
3. motivate manufacturers and retailers to produce and offer lower carbon versions, e.g. smaller, battery-powered, cars, and to use low-carbon electricity in their factories and shops.

To be fully effective the advertising ban needs to be part of a comprehensive set of climate emergency policies backed by a comprehensive campaign of public education. It will not be a quick fix.

GENERAL EFFECTS OF ADVERTISING

Advertising promotes products, brands and categories and legitimises activities. It seems obvious that advertising for particular products will increase people's desire to other products of the same kind (Monbiot, 2011), e.g. ads for Ford cars should encourage the purchase of all cars, or even consumer durables in general. By contrast the advertising industry often claims that ads only promote brand switching. Surprisingly for such an important issue, the evidence is far from clear (Lambin, 1976, Bagwell, 2005, and Alexander, Crompton and Shrubsole, 2011) with different studies reaching opposite conclusions. On balance I agree with Alexander, Crompton and Shrubsole (p22) that "advertising may be encouraging society to save less, borrow more, work harder and consume greater quantities of material goods." (Also Monbiot, 2011). In short, encouraging consumerism and growth.

Studies of specific categories

The situation is a little clearer when we narrow the focus.

- A systematic review of the literature (Tedstone et al, 2015) shows that "both old (eg TV, press, radio) and new (online advertising, advergaming, social media) marketing

methods are effective in influencing food preference, choice and consumption in [adults and] children.” Furthermore “almost every study included in the review shows, whatever the technique, that marketing is effective at influencing food preferences and food choice.”

- A review by Boyland et al (2016) found that “acute exposure to food advertising increases food intake in children but not in adults.”

If we look at tobacco then, according to a review by Prof. Henry Saffer, 2004 “The empirical work finds some evidence that bans (of alcohol and tobacco advertising) do reduce consumption” though the effect is not large. According to a World Bank study (Jha et al, 1999, p45 et seq) “Comprehensive bans on advertising and promotion can reduce demand by around 7 percent, according to econometric studies in high-income countries.”

The bans on tobacco advertising also remind smokers that smoking is harmful both to them and to others and encourage non-smokers and ex-smokers to maintain their positions. I think the proposed restrictions would have similar effects.

The bans would delegitimise the products and services concerned. A valuable result in the struggle for public support.

Impact on values

The UN Special Rapporteur in the field of cultural rights says: “... individual consumers .. [make ... choices] ... within a sociocultural, economic and political framework that shapes and limits how they think, feel and act Advertising and marketing practices increasingly help to shape this framework.” (Shaheed, 2014, para 46.)

Alexander, Crompton and Shrubsole (2011) argue that advertising almost always appeals to and strengthens extrinsic rather than intrinsic values whereas intrinsic values favour community and environmental responsibility.

It seems likely that adverts for high-carbon goods and services are particularly destructive of environmental values.

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