



## Complaint to the Advertising Standards Authority

Re: Shell adverts

Submitted: 8 July 2022



We are writing to lodge a formal complaint over greenwash-by-omission adverts for London-based company Shell PLC. The ads by agency Wunderman Thompson focus on Shell's provision of clean energy in the UK, with phrases including "*Shell experts are working on a wind project that could power six million homes*" in an online video version of the ad, and "*Bristol is ready for cleaner energy*", "*In the South West 78,000 homes use 100% renewable electricity from Shell Energy*" on OOH billboards. The hashtag used in the campaign is *#PoweringProgress*.

**See the online Shell ad here:** <https://www.youtube.com/watch?v=Z7zD1UWbSns>

**See the OOH Shell ad here:**

[http://adfreecities.org.uk/wp-content/uploads/2022/06/Shell-advert\\_BRistoJUn22.jpeg](http://adfreecities.org.uk/wp-content/uploads/2022/06/Shell-advert_BRistoJUn22.jpeg)

The ads omit material information about Shell's ongoing and substantial fossil fuel production and expansion, which remains by far the largest proportion of its business model. The ads are therefore misleading, to the detriment of customers wishing to minimise their environmental impact, and with dangerous consequences via perpetuating the company's continuing lack of meaningful action on the climate crisis through upholding a 'green' brand image that is false.

Shell PLC is currently one of the 10 most climate polluting companies in the world. Shell has not set an explicit end date for oil and gas extraction or a long term production phase-out plan aligned with the Paris Agreement to keep global heating below a 1.5°C rise compared to pre-industrial levels.[1] The energy firm instead plans to expand oil and gas production and continues to invest in exploration for new fields. The firm has over four billion barrels of oil under development or field assessment in 2021. This includes unconventional sources that are of especially high risk to ecosystems and human rights, such as ultra-deep offshore drilling and tar sands development.[2]

Far from prioritising clean energy production, as these ads suggest, Shell plans to develop its fossil fuel business further[1,2] despite warnings from the International Energy Agency that there can be no new investment in fossil fuel supply beyond that already committed as of 2021.[3] Far from #PoweringProgress, Shell's current climate policies are considered by experts to be 'grossly insufficient'[1] and the firm has been revealed to back anti-climate lobby groups as recently as 2020.[4] A recent study of twelve years of data confirms that Shell's actions neither historically nor at present match its discourse or pledges, moreover that its actions contradict its pledges (for example, lobbying against climate regulation while pledging to transition to net zero).[5]

In the first quarter of 2022, Shell announced record profits of \$9.13bn (£7.3bn). Under Shell's current plans, the energy giant would be spending between 1% and 1.25% of its revenue on green UK energy tech projects per year. Green tech representatives have said that this falls far short of what should be expected for a company of this size, especially given its large profits and its own commitments to reduce absolute emissions.[6]

After a 2021 court verdict in the Netherlands held Shell liable for damaging the climate, Shell was ordered to cut its CO2 emissions by 45% compared to 2019 levels. It is currently appealing against this decision, showing its lack of commitment to tackling climate change.[7] The company's board is also currently being sued for failing to adequately prepare for net zero.[8]

These ads obstruct climate action by garnering social standing for Shell through giving an overall impression of a company that is environmentally responsible and prioritising green technologies. In fact, Shell's overall business model is in strong contradiction to this. Any money being invested in Shell by consumers is in support of fossil fuel extraction. Any impression given by Shell that their business acts in a way that is environmentally responsible is false. Any advertising that depicts Shell as pioneering progress in green energy production is strongly misleading.

As such, we are concerned that the ads in question are in breach of the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (the Code), in particular Principles **3.1**, **3.3** (Misleading advertising), and **11.1** (Environmental claims).

In addition the ads are in breach of the ASA's guidance on marketing of electricity from renewable sources.[9] This guidance states that: "*Marketers should ensure that they do not misleadingly imply that the electricity generated from renewable sources is delivered direct to their customers; they could include a claim along the lines of "renewable electricity is supplied to the national grid, which in turn supplies your home" or similar, If electricity from renewable sources is the main focus of an ad, that information should be stated in the body copy*".

The OOH advert body copy says: "*In the South West 78,000 homes use 100% renewable electricity from Shell Energy*". This is misleading since it suggests that these homes are using 100% renewable energy provided directly from Shell, without a visible explanation that these homes draw energy from the National Grid.

We hope the ASA will take action to ban these ads wherever they, and similar versions, occur; and that future marketing communications making green claims do not similarly omit information regarding Shell's overall negative impact on the climate. Given the extremely short timeline to reduce emissions for a liveable future[10], the time it takes to investigate greenwashing ads, and the strong evidence that Shell's business model is overwhelmingly in contradiction to the impression given in this ad, we also ask that the ads be suspended pending investigation.

Sincerely,  
Adfree Cities

## References

- [1] [https://priceofoil.org/content/uploads/2022/05/big\\_oil\\_reality\\_check\\_22\\_v09-final.pdf](https://priceofoil.org/content/uploads/2022/05/big_oil_reality_check_22_v09-final.pdf)
- [2] <https://www.theguardian.com/environment/ng-interactive/2022/may/11/fossil-fuel-carbon-bomb-s-climate-breakdown-oil-gas>
- [3] <https://www.iea.org/news/pathway-to-critical-and-formidable-goal-of-net-zero-emissions-by-2050-is-narrow-but-brings-huge-benefits>
- [4] <https://unearthed.greenpeace.org/2020/09/28/bp-shell-climate-lobby-groups/>
- [5] <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0263596>
- [6] <https://www.uktech.news/energy/shell-green-energy-plan-slammed-20220421>
- [7] <https://friendsoftheearth.eu/press-release/shells-appeal-confirms-its-lack-of-commitment-to-tackling-climate-change/>
- [8] <https://www.clientearth.org/latest/press-office/press/clientearth-starts-legal-action-against-shell-s-board-over-mismanagement-of-climate-risk/>
- [9] <https://www.asa.org.uk/advice-online/environmental-claims-marketing-of-electricity-from-renewable-sources-general.html>
- [10] IPCC Sixth Assessment Report (AR6) WG III: Mitigation of Climate Change.