We are writing to lodge a complaint over “Born to Roam” advertisements for Toyota UK, made by agency The&Partnership. The ads were promoted on Facebook in January 2023, seen on YouTube, and installed as OOH ads in Bristol and other cities in January and February 2023.

The “Born to Roam” ad series is considered to be in breach of advertising Codes and guidance relating to Social Responsibility, on the grounds that the ads’ creative content trivialises consumer behaviour that is likely to result in harmful pollution, and encourages and condones consumers to disregard the harmful environmental impact of their actions. The ads are also considered to encourage unsafe and reckless driving, including in urban environments. Lastly, they are seen to be in breach of CAP Codes relating to harm and offence caused by gender stereotyping.

The paid-for Facebook ad, first shared on January 9, 2023, and promoted several times, includes a video which shows a large number of Toyota Hilux SUVs driving through wild natural terrain, including through a river; then moving to drive on a rural road and in an urban environment. A voiceover says: “One of nature’s true spectacles. Toyota Hilux. Born to Roam.”

www.facebook.com/ads/library/?id=957848371862532.

This ad is also available on YouTube: www.youtube.com/watch?v=o9UghOWLimo

The OOH ad shows dozens of large Toyota Hilux SUVs driving through a valley under the slogan “Born to Roam”. The wheels of the first vehicle are shown to be raising dust from the terrain, and in the background, vehicles are driving
over a grassy level into the valley below before emerging in the foreground of the image. The number of cars, and their size, gives an impression of domination over the natural landscape.

We are concerned that these adverts contravene CAP Code, Principle 1.3: *Marketing communications must be prepared with a sense of responsibility to consumers and to society*, by

- Encouraging, condoning and trivialising harmful environmental practices
- Encouraging harmful and irresponsible driving

We also believe that the ads contravene CAP Code Principles 30.6 (*Advertising must not encourage behaviour prejudicial to health or safety*) and 30.7 (*Advertising should not encourage behaviour which is grossly prejudicial to the protection of the environment*).

The ads are further seen to be in breach of CAP Code Principle 4.9, relating to harm and offence caused by gender stereotyping.

**Public Safety:**

- In the video ad, as the vehicles move onto a rural road, a large number of cars are shown driving in the road’s only two lanes. Given that it would be highly unlikely for this type of rural road to be one-way; the ad is considered to condone unsafe driving through driving on the wrong side of the road.
• In the video ad, as the vehicles move to an urban landscape, the vehicles are seen driving in a way that dominates the road and crosses lanes at a large and complex junction. They are also driving at speed, emphasised by the quick turn of the head of the female viewer. Given speed restrictions and the need to take care while driving in urban areas given the density of other road users and pedestrians, the ad is considered to irresponsibly encourage and condone unsafe driving.

![Image showing vehicles driving in an urban landscape](image)

• In the video and outdoor ad, the vehicles are depicted driving off-road over the edge of a hill into the valley below; this appears unsafe.

• In the UK, off-road driving is not permitted: Section 34 of the Road Traffic Act 1988 provides the offence of driving a mechanically propelled vehicle without lawful authority on common land, moorland or land not forming part of a road, or on any road which is a footpath, bridleway or restricted byway. These adverts each promote off-road driving, in contravention to UK Law.

**Environmental harm:**

• The overall context of the ads encourage behaviour that would be severely prejudicial to the environment:

The Facebook, YouTube and OOH ads each depict an unusually large number of Toyota SUVs driving off-road through natural environments. In the video, the vehicles are seen to cause material impact on the environments they drive through: the vehicles raise spray and dust and are clearly causing disruption and destruction to the wild terrain, including rivers.
The large number of vehicles shown in the ads, as well as the individual movement and material impact of each vehicle, trivialises the harms caused by off-road driving in natural habitats; the creative content flaunts a disregard to the ecology of natural areas and the wildlife that inhabit these areas.

The slogan “Born to Roam” implies that by owning and driving a Hilux SUV, customers are fulfilling a natural instinct, a sentiment that acts to separate the customer from the environmental impact of this behaviour. Adding to the visual content of the ads, this serves to further encourage and condone behaviour that would be severely prejudicial to the environment.

The UK’s Countryside Code encourages visitors to the countryside to leave their car at home, acknowledging the harms caused by cars to the environment through pollution and material impact. The Code asks that visitors stay on marked paths, and that they protect the environment. It asks that visitors “care for nature - do not cause damage or disturbance”. The

sentiment of Toyota’s “Born to Roam” ads does not respect UK Countryside Code, encouraging behaviour that harms the environment, rather than protecting it.

- The ads trivialise consumer behaviour likely to result in harmful pollution:

The ads depict many large-bodied Toyota Hilux SUVs being driven through natural and urban environments. SUVs are known to be disproportionately polluting owing to their size and weight and the Toyota Hilux is a particularly highly polluting vehicle: average CO₂ emissions for the Hilux are given by Toyota as between 223 and 259gCO₂/km. From 2021, EU targets for CO₂ emissions for cars are 95gCO₂/km; the Hilux’s emissions are up to 2.7 times higher than this.4

The content of these ads, including the overwhelmingly large number of vehicles shown, trivialises consumer behaviour likely to result in harmful pollution; namely the driving of large, high-emissions vehicles. This is reinforced by the attitude of the male character depicted as involved in the driving shown in the video, who seems casual and unconcerned, while the slogan “Born to Roam” further reinforces the ad’s message that driving highly polluting vehicles is natural, inconsequential and an entitled right. Overall, the ad portrays driving large Toyota Hilux vehicles as trivial and inconsequential, normalising the excessive pollution resulting from this behaviour.

---

3www.toyota.co.uk/new-cars/hilux?fbclid=IwAR1u2VNjmsv3SN8yA7NCVwVw3G30Rnru-ChQVUT6sjkEWaT5p80xO6H4bQ
The House of Lords Environment and Climate Change Committee has warned that the advertising of SUVs runs in a contrary direction to efforts to move away from behaviours associated with high emissions and negative environmental impacts. The IPCC’s Sixth Assessment (WG3) also warns that “the accelerating growing preference for SUVs challenges emissions reductions in the passenger car market”, and includes moving away from heavier, larger vehicles as a critical demand-side step to reduce emissions from road transport. Given this, any advertising that promotes the driving of SUVs, a highly polluting behaviour, is socially irresponsible. The particular context of this ad also trivialises this behaviour; this is unacceptable.

According to the UK Government, the annual mortality of human-made air pollution in the UK is roughly equivalent to between 28,000 and 36,000 deaths every year. A large proportion of air pollution is from road transport, which emits greenhouse gases, nitrogen oxides and particulate matter that are harmful to the climate and to public health. Among road vehicles, SUVs are disproportionately polluting: with emissions 2.7 times higher than EU targets, this applies to the Toyota Hilux. In the video ad, dozens of Hilux vehicles are shown driving through urban areas, where residents particularly suffer from air pollution.

From the urban driving scenes, and final shot of one SUV pulling onto a driveway outside a suburban house, it is clear that the vehicles in the advert are not used exclusively for off-road purposes and are not solely owned and used by farmers or others whose profession would necessitate off-road driving. On the contrary, the vehicles are being advertised to an urban clientele who have no a priori need to drive off-road. This is further confirmed by the placement of the advert in central Bristol. In 2021, three quarters of newly purchased SUVs were registered to addresses in towns and cities.

---


8 [https://static1.squarespace.com/static/5ebd0080238e863d04911b51/t/6065dbeb73734b58372d797b/l617288180453/Mindgames+On+Wheels+-+how+advertising+sold+false+promises+of+safety+and+superiority+with+SUVs.pdf](https://static1.squarespace.com/static/5ebd0080238e863d04911b51/t/6065dbeb73734b58372d797b/l617288180453/Mindgames+On+Wheels+-+how+advertising+sold+false+promises+of+safety+and+superiority+with+SUVs.pdf)
Sexist stereotyping:

- In the video ad, the vehicles are shown driving in an urban environment. As a stream of vehicles drives through the city, a female viewer is fleetingly seen as she turns her head to watch. At the end of the ad, a male driver is shown with the keys to the vehicle, and opening the door, showing ownership of the car.

In the context of the video, this can be seen as a stereotypical depiction of contrasting gender roles. A male character is depicted as adventurous and exploring extraordinary environments, while a female character passively looks on. The male is self-assured, confident and owns an expensive car. The female is fleetingly shown in a passive role, watching the cars with a wary or awestruck expression and no further context to her character. This is considered to perpetuate harmful gender stereotypes and is likely to cause harm and offence.

Conclusion

We welcome the ASA’s regulation of advertising to prevent social and environmental harms, and hope the regulator will consider the points raised above. We urge the ASA to ban Toyota’s ‘Born to Roam’ ad wherever it occurs, and to prevent Toyota making any future marketing communications that encourage environmentally or socially irresponsible behaviour.

Yours sincerely,

James Ward & Veronica Wignall

Adfree Cities and Badvertising