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

About the author
Robbie Gillett is the Badvertising campaign manager at Possible and co-director of Adfree Cities.
@Badvertising11 @adfreecities www.badverts.org

Version 2.2 – October 2021
This report was first published in November 2020.

Permission to share

This document is published under a creative commons licence:
Attribution-NonCommercial-NoDerivs 2.0 UK
http://creativecommons.org/licenses/by-nc-nd/2.0/uk/
# Contents

- Introduction
- The Rationale
- The Evidence
- Definitions of advertising for high carbon products
- Model Motion for Council meetings
- Precedents
- Frequently Asked Questions
- Types of outdoor advertising space
- Further Reading
**Introduction**

Fossil fuel companies, car companies and airlines spend billions each year advertising their high carbon products – despite growing public concerns over air pollution 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 2020, over 480 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, climate change, sustainability 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 cars at their bus stops.

**Local authorities have control of the following areas of advertising:**

- Advertising billboards and screens located on council-owned land.
- 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.
- Planning consent for advertising infrastructure (e.g new digital billboards) and some advertising content.
The Evidence

Polluting Cars and SUVs

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 drive to persuade us to buy these larger, dirtier vehicles has been so effective that it now threatens public policy goals to reduce greenhouse gas emissions. Advertising of these vehicles should be regulated as part of meeting the UK’s Net Zero target.

At the same time, 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.

Advertising the ‘dirtiest third’ of new cars sold in the UK - comprising all cars in ranges with average emissions exceeding 160gCO₂/ km - should be immediately legislated against, alongside advertising cars which are too large for a standard UK parking space.
Whilst the UK government has recently committed to end the sale of petrol and diesel cars by 2030, polluting vehicles sold in the next 10 years will stay on the road beyond that date. As such, ending advertising for the dirtiest third of vehicles is helping to achieve the policy goal of reducing road emissions.

**Airline advertising**

The aviation industry faces considerable uncertainty at the time of writing. National aviation policy needs to be updated to account for the sector’s emissions - which in 2011 were 6% of the UK’s greenhouse gas emissions.

In the meantime, reining in advertisements that actively encourage us to fly is a common sense policy measure that can be implemented by local councils today. 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.

At a national level we need progressive policies including affordable rail travel and good holiday leave to allow us to travel more slowly. We also need measures such as a frequent flyer levy, which place higher taxes on the frequent flyers who take the majority of flights and cause the most pollution.

**Fossil fuel company advertising**

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

BP, for example, were the subject of a successful legal case by Client Earth in 2020 for misleading adverts. The case highlighted that only 4% of BP’s investments were in renewable energy whereas 96% were in fossil fuels. As such their renewables adverts should be considered misleading.

---

Definitions of high carbon products

<table>
<thead>
<tr>
<th>Category</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Airlines and airports:</strong> all advertising by airports and airlines which might reasonably be deemed to promote more flying</td>
<td>There are no low carbon options for commercial air travel available currently or for the foreseeable future, so air travel <em>per se</em> should be treated as high carbon.²</td>
</tr>
<tr>
<td><strong>Fossil fuel companies:</strong> 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</td>
<td></td>
</tr>
<tr>
<td><strong>Cars:</strong> exclude all advertising and promotions for petrol, diesel and hybrid vehicles and Plug-In Hybrid Electric Vehicles (PHEV)</td>
<td>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.³</td>
</tr>
</tbody>
</table>


Model Motion for Full Councils

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, were 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?] involving the upkeep and maintenance of over ___ bus stops across the city many of which include advertising panels.

- That advertising prohibitions and restrictions already exist regarding all tobacco products and 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](https://www.badverts.org/case-studies))


- 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.
- 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.

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.

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).

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.

Amsterdam’s high carbon advertising ban

In December 2020, Amsterdam became the first city to pass a motion against high-carbon advertising. The motion states that, “excesses of advertising for fossil products, such as for flying holidays for dumping prices or directly for companies working in the fossil fuel industry, should be prohibited” within the city. The ban will cover adverts for coal, oil and gas products as well as advertising for foreign holidays and flights. It also includes the prohibition of events held by the fossil fuel industry within the city. The Hague agreed to similar policies in October 2021.

Grenoble removal of advertising billboards

The most low carbon option for local authorities is to reduce or remove outdoor advertising sites altogether. In 2015, the french city of Grenoble removed 326 advertising billboards. The Mayor of Grenoble commented, “We want a city which is less aggressive and less stressful to live in.”
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 andSalt 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

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

Upselling Smoke: The case to end advertising of the largest, most polluting new cars New Weather Institute and Possible, August 2020

Taking Down Junk Food Ads - how local areas are taking action on outdoor advertising Sustain, 2019

Why Taking Down Billboards is Good for the Local Economy Adblock Bristol, 2019