

15th December 2022

Dear Rt Hon Michelle Donelan MP, Secretary of State for Digital, Culture, Media and Sport,

As a group of organisations working to address climate change, we are deeply concerned about the lack of meaningful and effective progress by the UK advertising industry to reduce greenhouse gas emissions from their sector. In particular, we have serious doubts about the ability of industry's flagship climate initiative 'Ad Net Zero' to help the UK meet its Net Zero goals. In the absence of effective self-regulation, we support the House of Lords recommendations that the government should regulate advertising for high carbon and environmentally-damaging products, building on the effective precedent of regulating against the damaging effects of tobacco advertising.

Established in 2020, **Ad Net Zero** is an initiative created by the Advertising Association and other industry bodies that aims to reduce the carbon impact of the advertising industry to "real net zero" emissions by the end of 2030. However, the remit and scope of Ad Net Zero is insufficient to address the great majority of the greenhouse gas emissions that result from advertising. Therefore, we believe it needs immediate reconsideration and engagement from DCMS, to ensure advertising can fulfil its responsibility, contribution to meeting the UK's goals, and play a proper part in addressing global heating. There is a clear public mandate for action, seen in the expressions of public concern, with polls showing that 68% of UK adults believe that advertising for environmentally-harmful products should be restricted.<sup>1</sup>

In its current form, Ad Net Zero is concerned only with advertising agencies' operational emissions from offices, business travel, and the production and placement of adverts - so-called scope 1 & 2 emissions. It does not consider their more significant 'Scope 3' emissions associated with **the increase in sales of high-carbon goods and services generated by advertising**. Evidence shows the disproportionate carbon impact associated with the goods and services that advertising agencies promote, with the advertising industry responsible for an estimated 208 million tonnes of CO<sub>2</sub> in 2022, an 11% increase from 2019.<sup>2</sup> This means that the UK advertising industry is responsible for 32% of every British citizen's carbon footprint.<sup>3</sup>

There is growing global momentum behind tackling misleading environmental claims in advertising - so-called greenwash. A 2022 report from the United Nations' High-Level Expert Group on the Net Zero Emissions Commitments of Non-State Entities recommends that non-state actors, such as the corporations that ad agencies represent, must align their external policy and engagement efforts to the goal of cutting global emissions in half by 2030 and reaching net zero by the 2050, this means **focusing on absolute emissions reductions across the full value chain (Scopes 1, 2, and 3)**.<sup>4</sup> The report recommends that professional services companies, such as advertising agencies, should "publicly disclose how customer engagements contribute to net zero and how greenwashing is being tackled."<sup>5</sup>

Furthermore, **major advertising firms currently listed as members of the AdNetZero programme, except one (BBH), are well known for providing marketing services to the world's largest greenhouse gas emitters, many of whom do not have Science Based Targets in place to reach**

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<sup>1</sup> [Opinium Research](#), April 2022

<sup>2</sup> [Advertised Emissions 2022](#) - Temperature Check 2022, Purpose Disruptors

<sup>3</sup> [Advertised Emissions 2022](#) - Temperature Check 2022, Purpose Disruptors

<sup>4</sup> [Integrity Matters: Net Zero Commitments by Businesses, Financial Institution, Cities and Regions](#) - Report by the UN High-Level Expert Group on the Net Zero Commitments of Non-State Entities, 2022

<sup>5</sup> [Integrity Matters: Net Zero Commitments by Businesses, Financial Institution, Cities and Regions](#) - Report by the UN High-Level Expert Group on the Net Zero Commitments of Non-State Entities, 2022

**net zero and are actively planning to increase their greenhouse gas emissions.** These include Mindshare (BP), Ogilvy (BP, Shell Myanmar, PTT Oil, Pan American Energy), Adam&Eve (Exxon Mobil), AMV BBDO (Exxon Mobil), McCann (ExxonMobil, Equinor, Saudi Aramco, Indian Oil), and Havas (Shell, BP, Exxon Mobil, TotalEnergies, Phoenix Petroleum Philippines), amongst others.<sup>6</sup>

A recent report on behaviour change from the House of Lords went further and actively recommended that the UK Government should regulate advertising content for high-carbon and environmentally-damaging products and services. Building on the Committee on Climate Change assessment, the House of Lords states that 32 percent of emissions reductions up to 2035 require decisions by individuals and households to adopt low carbon technologies and choose low-carbon products and services, as well as reduce carbon-intensive consumption.<sup>7</sup> The report also highlighted the absence of policy interventions, regulations or fiscal measures to reduce emissions, from the Department for Digital, Culture, Media & Sport (DCMS).<sup>8</sup>

The clear omission of the environmental impact of the goods and services that advertising agencies actively promote, as well as the clients they align themselves with, casts serious doubt on the effectiveness of the Ad Net Zero initiative to deliver real and ambitious climate action within advertising. If Ad Net Zero purports to be “advertising’s response to the climate crisis”<sup>9</sup> it must contend with the true environmental and public health impacts of the goods and services it advertises and how the industry shapes public sentiment towards these.

Without accounting for its full impact, industry self-regulation initiatives such as Ad Net Zero will fail to deliver the level of emissions reductions required to ensure a habitable climate for future generations. Worse still in creating only the impression of meaningful action, it risks creating a false sense of security that progress in line with targets is being made, when that is not the case. **We therefore support calls for the government to introduce tobacco-style restrictions on advertising of high-carbon and environmentally damaging products to protect consumers and the planet.**

Signatories:

Andrew Simms, Co-director, New Weather Institute

Leo Murray, Co-director, Possible

Areeba Hamid & Will McCallum, Co-Executive Directors, Greenpeace UK

Hugh Knowles & Miriam Turner, Co-Executive Directors, Friends of the Earth England, Wales & Northern Ireland

Prof Peter Newell, Research Director, Rapid Transition Alliance

Dr. Philip Webber, Chair, Scientists for Global Responsibility

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<sup>6</sup> Clean Creatives F-List, <https://cleancreatives.org/learn-2022>

<sup>7</sup> [In our hands: behaviour change for climate and environmental goals](#), House of Lords Environment and Climate Change Committee, October 2022, page 3

<sup>8</sup> [In our hands: behaviour change for climate and environmental goals](#), House of Lords Environment and Climate Change Committee, October 2022, page 81

<sup>9</sup> [Ad Net Zero](#) website, 2022