



From: The Badvertising Coalition

To:

Andrew Ledger, *Head of National Contracts & Business Development*  
Felix Chamberlain, *Head of Sustainability*

30th November 2022

Dear Andrew Ledger and Felix Chamberlain,

Thank you for your reply to our open letter<sup>1</sup>, dated 12th September 2022, in which we urged you to consider amending your Code of Acceptance on advertising to align with your net zero emission target by 2050 and with your policy objective of encouraging a modal shift to low-carbon transport. In the letter, we specifically recommended that you introduce a provision to screen-out adverts for high-carbon products and services, in particular those for fossil fuel companies, cars and airlines, in order to avoid contradictory messages and be consistent with your company's interests. Cars, and in many circumstances flights, are rival transport choices in competition with train travel.

We acknowledge your concern regarding the challenges in defining precisely what constitutes a high-carbon product or service. However, all recent evidence points towards the need for public bodies to proactively regulate against the most climate-harmful forms of advertising in the absence of much-needed Government legislation in this field.

For example, several local authorities in the UK (Norwich<sup>2</sup>, Liverpool<sup>3</sup>, North Somerset<sup>4</sup>) have already adopted motions to remove high-carbon adverts in

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<sup>1</sup> <https://www.badverts.org/latest/letter-a-low-carbon-advertising-policy-for-network-rail>

<sup>2</sup> <https://adfreecities.org.uk/2021/07/norwich-council-votes-to-limit-harmful-advertising/>

<sup>3</sup>

<https://www.transportextra.com/publications/local-transport-today/news/68372/liverpool-explores-ads-ban-on-fossil-fuel-cars-and-flights>

<sup>4</sup>

<https://www.badverts.org/latest/north-somerset-council-votes-to-end-adverts-for-high-carbon-products>



public spaces. Meanwhile the metro operator in Amsterdam has voluntarily introduced a ban on adverts for cheap flights and polluting cars<sup>5</sup>, following the lead of Amsterdam's City Council in becoming the world's first city to ban adverts for fossil fuel products in public spaces.<sup>6</sup>

A recent report by The House of Lords' Environment and Climate Change Committee<sup>7</sup> recognises the positive role environmental messages can have in driving sustainable behaviour change, but raises the alarm as to the disproportionately larger presence of adverts for high-carbon goods - especially those for polluting SUV vehicles - which directly undermine these positive messages. The Lords' argument reiterates findings from our own research<sup>8</sup>, which we quoted in our initial letter<sup>9</sup>, on how adverts for SUVs influence demand for these vehicles.

60. There is great potential to normalise behaviours associated with reduced greenhouse gas emissions and environmental impacts—including public transport use and active travel—through positive representations in broadcast television, advertising and on social media. However, at present aspects of the media environment run in a contrary direction, for example the proportion of advertising devoted to SUVs (Sports Utility Vehicles) and disinformation and misinformation on climate change available on social media. (Paragraph 311)

Source:

<https://committees.parliament.uk/publications/30146/documents/174873/default/>

The House of Lords' report actively recommends that the Government regulates advertising content for high-carbon and environmentally-damaging products

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<https://nltimes.nl/2021/05/03/amsterdam-bans-metro-station-ads-promoting-cheap-flights-polluting-cars>

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<https://www.euronews.com/green/2021/05/20/amsterdam-becomes-first-city-in-the-world-to-ban-this-type-of-advert>

<sup>7</sup> <https://committees.parliament.uk/publications/30146/documents/174873/default/>

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[https://www.badverts.org/s/Advertising-and-demand-for-SUVs\\_Kasser-et-alBadvertising-2021.pdf](https://www.badverts.org/s/Advertising-and-demand-for-SUVs_Kasser-et-alBadvertising-2021.pdf)

<sup>9</sup> In the research survey, participants that had reported occasional exposure to adverts for SUV vehicles were found to be 71% more likely to own an SUV than a standard car, and respectively 250% more likely to own an SUV than no motor vehicle at all.



and services, and specifically calls for standardised definitions to be drawn up by the Government. Submissions to this enquiry also highlighted the absence of policy interventions, regulations or fiscal measures, from the Department for Digital, Culture, Media & Sport (DCMS) to promote climate-friendly behaviour changes. We have previously petitioned the Secretary of State for DCMS on this subject. Until effective guidance is released from the Government, public bodies can actively take the necessary steps to limit the harm caused by high-carbon advertising.

We appreciate your concern about remaining 'fair and impartial' when regulating advertising in accordance with Network Rail's Code of Acceptance. However, we also note that the current Code already lists a number of legitimate grounds for the refusal of ads, including this clause:

*"in the reasonable opinion of Network Rail, it might adversely affect the interests of Network Rail in any way;"*

Considering that Network Rail's *Sustainability Strategy*, quoted below, actively supports a modal shift towards low-carbon transport, we contend that **running ads for polluting cars at your stations directly goes against your company's interest**, by promoting high-carbon forms of transport, and therefore contradicts the clause above listed in your existing Code of Acceptance.

*"As well as reducing our own emissions we can also encourage passengers and freight away from more carbon-intensive methods of travel like road and air onto the railway" - [Network Rail Environmental Sustainability Strategy](#), p.11*

Moreover, evidence from the National Travel Survey (NTS), combined with our own statistical survey on the positive correlation between car adverts and car ownership<sup>10</sup>, demonstrate that running adverts for cars is already harming your

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<sup>10</sup>

[https://www.badverts.org/s/Advertising-and-demand-for-SUVs\\_Kasser-et-alBadvertising-2021.pdf](https://www.badverts.org/s/Advertising-and-demand-for-SUVs_Kasser-et-alBadvertising-2021.pdf)

commercial interests, as set out in our new briefing note<sup>11</sup>. Analysis of NTS data on modal share of trips, aggregated across the years 2014-2019 and controlled for income, shows clearly that the more cars are present in a household, the fewer train journeys its members make each year<sup>12</sup>.

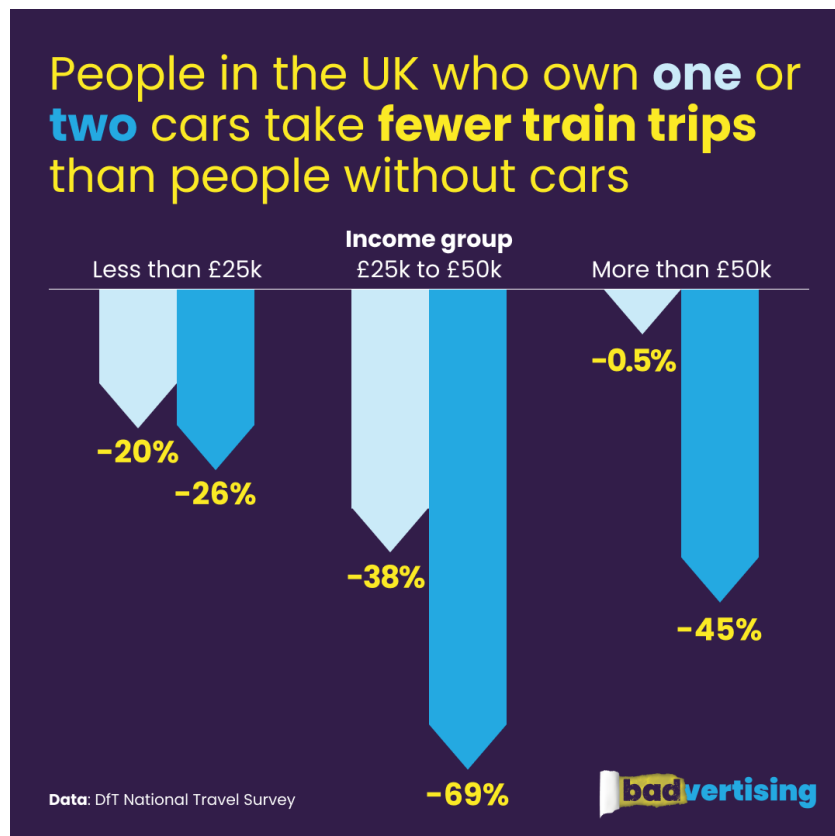


Figure 1: Reduction in annual train journeys taken by English drivers compared to non-drivers, by income.

The evidence presented above outlines the adverse effects on the commercial interests of public transport authorities arising from the promotion of car adverts on their advertising estates, irrespective of their stated aims in relation to climate change and environmental health.

<sup>11</sup>

[https://docs.google.com/document/d/1ra2hKb7Z\\_SqllKp4uIiQP2QkMDHW\\_ZZf7Q2QCLfoY24/edit?usp=share\\_link](https://docs.google.com/document/d/1ra2hKb7Z_SqllKp4uIiQP2QkMDHW_ZZf7Q2QCLfoY24/edit?usp=share_link)

<sup>12</sup> Calculations [available here](#).



Based on Network Rail's *existing* Code of Acceptance for advertising, which includes an explicit provision for the refusal of adverts which adversely affect the company's interests, we would argue that there are already substantial and sufficient grounds to add 'advertising for cars' as part of this exclusion criterion. This could be implemented with immediate effect, in advance of more substantive changes to the Code of Acceptance, including provisions to exclude adverts for air travel and by fossil energy companies, in order to align with Network Rail's climate change commitments.

Thank you again for your correspondence on this matter, and we hope that you will consider the further evidence we have provided here with care. We would of course be delighted to meet with you to discuss this further.

Yours sincerely,

Leo Murray, Possible

Emilie Tricarico, New Weather Institute

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