

Emerging Issues in High-Carbon Advertising



Briefing: From Fast Fashion to Fancy Cruises

What Should we Stop Advertising to Raise our Survival Chances?

June 2023



Contents

Introduction

Summary

1. Fast Fashion
2. Beef, dairy and other climate-damaging foods
3. Cruise ships: extended and luxury maritime travel
4. Overseas Holidays
5. Other emergent trends
 - Sector wide greenwashing
 - 'Luxury' sustainability and the polluter elite
 - An eye on offsetting
 - False solutions: over-hyped technological fixes
6. Conclusion: growing calls for 'tobacco-style' controls on high-carbon advertising

Introduction

Heavily climate-polluting products and companies are increasingly seen as the 'new tobacco' with measures being taken to stop promoting them by controlling their adverts. What began with attention on oil and gas companies quickly shifted to focus on cars that use petrol and diesel and the aviation industry, because these are some of the main ways in which polluting fossil fuels are 'consumed'. From small towns to big cities, more and more tobacco-style bans on advertising fossil fuels, cars and airlines are now being introduced. These products and services are some of the most obvious pathways for pollution. But others might be as polluting but less easy to see. For that reason, some local authorities in the Netherlands, for example, who are introducing controls on polluting products have also listed things like red meat. This briefing picks up this conversation and asks, beyond the clear cases for action, what should we stop advertising to raise our survival chances?

We look at a range of things from fast fashion to fossil finance, red meat and dairy products, to cruise liners, long haul holidays as well as a few other related marketing trends. These all fall into the category of things for which there is a widespread understanding, and clear recommendations to government from official advisors, such as the UK's Climate Change Committee, that demand needs to be reduced. The briefing also looks at the over-hyping of some technological fixes to the crisis of global heating.

One thing to be clear about is, just as with tobacco, controls on advertising do not remove anybody's access to the product or service if they want to seek it out. But they do reduce demand that would not be there were it not for the marketing campaigns.

Summary

Now that the impacts of the climate crisis are impossible to ignore, adverts for polluting products that make the problem worse seem increasingly incongruous. For that reason, calls for 'tobacco-style' bans on their advertising are rising,¹ especially in richer industrialised countries that need to cut emissions hardest and fastest. Yet there are other damaging products and services, perhaps less immediately obvious, whose advertising could – and perhaps should – be similarly reconsidered. These are the emerging issues.

Any successful restrictions on high-carbon advertising need to cover the most carbon-intensive and environmentally destructive sectors, products and services. But 'high-carbon advertising' is not a static category. New goods and services with substantial environmental impacts may start being heavily advertised within certain markets, such as the recent phenomenon of advertisements for disposable vaping products. Moreover, the emissions created by a specific industry, such as fast fashion, may rapidly accelerate and require additional measures to curtail demand, which advertising controls and regulation could help achieve.

A dynamic approach to the issue of high-carbon advertising is required – especially given the fact that global emissions must at least halve by 2030 to prevent global temperatures permanently overshooting the 1.5°C temperature guardrail. The need for dynamism is even more apparent when considering matters of social justice and equity within and between countries. Wealthy, industrialised, and high-consumption nations are obliged by the international agreements they have signed to reduce emissions at a far greater rate than the middle- or low-income nations that have done the least to create the climate crisis, but are already feeling the impacts. In these wealthy, high-consumption societies, advertisements for products that are disproportionately responsible for climate change take on an additional layer of indefensible irresponsibility.

For these reasons, it's important to track emerging issues in high-carbon advertising. This paper seeks to do that by exploring the cases of the advertising of fast fashion, environmentally-damaging food, holidays abroad, extended sea tourism (cruises), and fossil fuel financiers, alongside other goods and services.

For example, on their current trajectories, driven by massive advertising campaigns:

- By 2030, emissions from fashion are expected to rise by almost 50 percent.²
- At the current rate of growth, meat consumption in Europe is predicted not to fall, but to rise by 76 percent by 2050,³ but it has been estimated that it needs to drop by 71 percent by 2030, and 81 percent by 2050, to meet climate goals.⁴
- The global cruise industry is growing rapidly at an estimated 11 percent per year up to 2028,⁵ and cruise ships may be even more carbon intensive per passenger than flying.⁶

The issue of 'greenwashing' across sectors is also considered since this adds to the need for 'tobacco-style' controls on advertising for polluting industries. Altogether it highlights the need to broaden the scope of the current conversation about the type of advertising that undermines our long-term survival chances.

Fast fashion

Fast fashion is a heavily advertised model of fashion that quickly reproduces 'high fashion' or catwalk designs on a mass scale, selling low-cost clothing according to fast-changing trends. This model has not only led to human rights abuses throughout fashion's supply chain,⁷ but also has an outsized impact on global greenhouse gas emissions, water consumption, and plastic pollution.⁸ Far from abating in the face of international climate agreements to rapidly reduce pollution, however, emissions from fashion consumption are accelerating in line with demand. By 2030, emissions from fashion are expected to rise by almost 50 percent.⁹ As a result, the global fashion industry will be emitting the same amount of emissions as those that were released by India in 2021, the most populous nation on earth and the third largest emitter of greenhouse gases after China and the USA.¹⁰

Fast fashion is also a major consumer of artificial textiles, such as polymers and other synthetic fibres, which currently make up 1.35 percent of global oil consumption.¹¹ Without substantial efforts to curtail fast fashion's growth, the industry's appetite for fossil fuels is set to balloon. Synthetic fibre use is estimated to grow from 69 to 73 percent of total fibre production globally by 2030.¹² Put simply, if the fashion industry continues with the status quo, in less than ten years, almost three-quarters of our textiles will be produced from fossil fuels. If this forecast becomes reality, fashion ads will even more become fossil fuel ads.

Achieving necessary reductions in emissions from fast fashion requires both rapid reductions in levels of clothing consumption and an increase in garment longevity.¹³ Currently, fast fashion advertising is working in opposition to these two connected aims.

Advertising is central to the fast, and 'ultrafast',¹⁴ fashion model. Advertising for fast-moving trends at relatively affordable or artificially cheap prices stimulates demand for new, on-trend clothing that simultaneously fosters an ethos of disposability which fuels overconsumption, overproduction, and still higher levels of waste.¹⁵ Fast fashion advertisements often make use of highly successful targeted online advertising and influencer marketing campaigns that streamlines the purchasing process.¹⁶



Boohoo advert on Transport for London's tube network in London, UK, in 2023.

What's more, a significant amount of these advertisements target consumers in wealthy countries where fast fashion consumption is already excessive, particularly among the richest citizens. To align fashion consumption with the 1.5°C temperature goal of the Paris Agreement by 2023, the richest 20 percent in Britain need to cut their fashion consumption footprint by 83 percent, while the richest 20 percent in Germany and Italy must cut fashion consumption footprint by 75 percent.¹⁷

Fast fashion adverts omit the social and environmental costs of garment manufacturing through overt promotion of low-cost clothing that not only fails to acknowledge any associated harms, it positively obscures and, much like a table magician or conjuror, directs attention away from them. Further to this, greenwash techniques in advertising that, for example, might focus on an insignificant slightly greener detail while missing the product's main impact, often misrepresents a brand's environmental credentials, acting as a smokescreen. Meanwhile fast fashion continues to pollute unabated. Fashion's greenwashing has incurred legal action, including a class action lawsuit in the United States against fashion giant H&M's advertising for its 'Conscious Collection'¹⁸ as well as investigation into major brands' misleading green claims by the UK's Competition and Markets Authority (CMA).¹⁹

While fashion consumption must be rapidly reduced in many countries, and the fashion industry needs to pivot towards more sustainable approaches to garment manufacturing, an important and immediate step is to make harmful fashion options less appealing. Restricting advertising for fast fashion is one step that can take away the appearance of fast-changing and disposable fashion trends being 'normal'. It can also assist in shifting consumer attitudes away from environmentally damaging fashion choices, and reduce overall garment consumption in line with planetary boundaries. Advertisements for fast fashion actively undermine these required shifts, therefore making tobacco style ad-bans or tighter regulation on fashion advertisements a logical and valuable tool in society's efforts to bring about a low carbon future.

Beef, dairy and other climate-damaging foods

Diet is one of the largest contributors to global greenhouse gas emissions, with global food consumption alone having the potential to add 1°C of warming by 2100.²⁰ Around 75 percent of this potential warming is driven by animal products, such as beef, other ruminant meat, and dairy products, as these are the most carbon- and methane-intensive foods available.^{21,22,23} Livestock farming has been estimated to account for between 16.5 and 28 percent of all greenhouse gas pollution worldwide²⁴ and is a major driver of deforestation, biodiversity loss, and other environmental harms, such as the pollution of rivers and streams. Recent research suggests that a global shift away from animal-sourced foods could greatly reduce these 'hidden' costs associated with the production of food, saving up to \$7.3 trillion by curtailing the production-related health burden and ecosystem degradation, while also curbing carbon emissions.²⁵

Reduced production and consumption of animal products is essential for reducing greenhouse gas emissions from diets, curtailing deforestation, and freeing up land for the restoration of nature, carbon drawdown and sustainable livelihoods for indigenous populations.²⁶ Research has found that emissions from the global food system cannot be sufficiently reduced without an 'ambitious' shift to more plant-based diets.²⁷ It has been estimated that meat consumption in the European Union should drop by 71 percent by 2030, and 81 percent by 2050, to meet climate goals.²⁸ The UK's Climate Change Committee has recommended a far more conservative 20 percent reduction in meat and dairy consumption in the UK by 2030, and a 35 percent reduction for meat by 2050, in order to meet the UK's emission targets.

Yet tackling the consumption of beef, dairy, and other climate-damaging foods is fraught with difficulty. In the words of the Intergovernmental Panel on Climate Change (IPCC), “*diets are deeply entrenched in cultures and identities and hard to change*”.²⁹ The political and cultural sensitivity of this debate,³⁰ as well as (and often fuelled by) well-funded industry lobbying and PR campaigns,^{31,32} may explain why policy initiatives have lagged behind those for other pro-climate initiatives.^{33,34} Regulating the advertisement of these foods may be a pragmatic and achievable means to curtail demand without stimulating backlash.

Advertising for, or featuring, animal products is widespread and successfully promotes consumption.³⁵ Beyond this, it acts to reinforce social norms and lock in the deep entrenchment of meat, dairy, and eggs within food cultures and around specific identities, while masking the significant costs to biodiversity, the climate, animal welfare and public health.^{36,37} Research into the promotion of beef, for example, highlights how advertising often draws on (mis)conceptions of male masculinity and ideals of virility.³⁸

Far from taking steps to end the promotion of high carbon diets, advertising that promotes livestock farming currently has financial support from political bodies. Greenpeace reported that the European Commission spent 32 percent of its €776.7 million five-year farm product promotion budget on advertising campaigns for meat and dairy, with no similar level of support to advertising for fruit and vegetables.³⁹ This is likely to promote the growth of meat and dairy markets, dangerously undermining science-backed calls for societal shifts to climate-friendly diets. At the current rate of growth, meat consumption in Europe is predicted not to fall, but to rise by 76 percent by 2050.⁴⁰

Diets must change – particularly in wealthier nations where consumption of animal products is already high.⁴¹ Advertising has been identified as a targeted policy intervention to help lower meat consumption in favour of plant-based alternatives.⁴² Restricting advertising for animal products will help to lower consumption and associated emissions, shift social norms around food and diets, and aid the achievement of other climate goals, such as restoring nature and soil quality.



McDonald's advert in Bristol, UK, in 2022.

Cruise ships: extended and luxury maritime travel

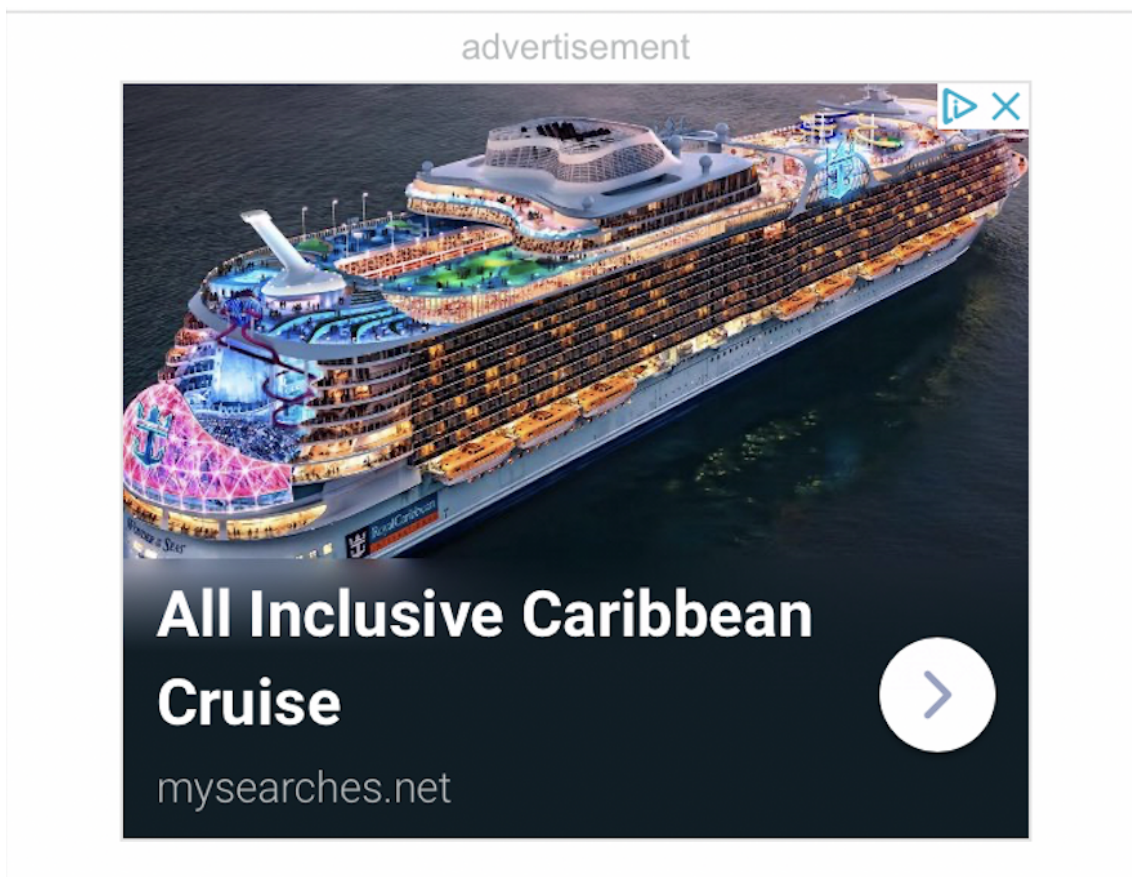
The global cruise industry is growing rapidly at an estimated 11 percent per year up to 2028.⁴³ As such, the cruise industry is now the fastest growing subsection of the global travel and tourism industry.⁴⁴ In an effort to capture more of this growing market, cruise providers are building wider and taller ships, which means more people and more pollution. The biggest ship currently in circulation carries almost 7,000 people, an additional 2,300 crew members, and weighs 236,857 tonnes.⁴⁵

Such cruise ships are extremely emissions intensive. Studies suggest that a large cruise ship can have a carbon footprint of more than 12,000 cars and pollute the air, soil, fragile habitats, and marine wildlife that exists in close proximity to cruise ships and the harbours in which they dock.⁴⁶ The same study finds that passengers on a seven-day Antarctic cruise would emit as much carbon dioxide as the average European does in a year.⁴⁷ In fact, cruise ships may be more carbon intensive per passenger than flying, with the world's most efficient large cruise ships emitting around 250g CO₂ per

passenger per km, while flying releases an average of 80g CO₂ per passenger per km.⁴⁸

Further justifications for regulating the advertisements for cruise ships are their impacts on human health. In 2017, one of the largest cruise operators, Carnival, emitted more sulphur oxides (SO_x) along Europe's coasts than all of the continent's 260 million cars.⁴⁹ Sulphur oxides, alongside other pollutants such as nitrous oxide and particulate matter, can cause premature death, respiratory disease,⁵⁰ and asthma in children.⁵¹ These pollutants can also cause acid rain, which can devastate agricultural and natural habitats.⁵² For the cities that host large cruise ships in their harbours, toxic air is the price that the local citizens must pay for the privilege.

Given the emissions intensity of cruise ships and the increasing size of the industry, along with the harms caused to the health of humans and local ecosystems, it would be logical to include advertisements for these marine giants in prospective high-carbon ad bans.



Online advert for a long-distance cruise, 2022.



HSBC 'sustainability' advert in Bristol, UK, 2021. This advert was banned by the Advertising Standards Authority in 2022 for misleading consumers by failing to mention HSBC's substantial financial support to fossil fuels.

Coal, oil, and gas financiers

Banks continue to be the lifeblood of the fossil fuel economy. According to the most recent data, the world's 60 largest banks have provided \$5.5 trillion in fossil fuel financing in the seven years since the adoption of the Paris Agreement, with \$673 billion of finance provided in 2022 alone.⁵³ Due to the necessity of finance for supporting existing and expanding fossil fuel production, any bank that bankrolls fossil fuel companies and projects can, by extension, be defined as 'high-carbon'.

Advertising for consumer banking aims to attract retail customers by building a positive brand image, often themed around responsibility, community, and care.^{54,55} This acts to sustain a 'social licence' that facilitates investment by individuals, funds, and corporations. Adverts for specific financial products are designed to attract investors.

Of late, many large multinational banks have been using advertising as a way of bolstering their green credentials and deflecting attention away from how their own business operations contribute to climate change. During the

run up to the 2021 COP26 climate summit in Glasgow, Scotland, banking giant HSBC used advertising on physical billboards, TV, and online to promote climate-friendly initiatives such as tree-planting schemes and a pledge to invest \$750 billion – \$1 trillion in sustainable financing and investment (an investigation by the Bureau of Investigative Journalism later showed that billions of dollars labelled by HSBC as ‘sustainable finance’ has in fact supported mines, oil rigs and gas infrastructure⁵⁶).

The adverts failed to mention HSBC’s role in supporting fossil fuels, with the bank providing just under \$145 billion in finance to fossil fuel companies and projects between 2016 and 2022.⁵⁷

HSBC’s adverts were subsequently banned by the UK’s Advertising Standards Authority (ASA) for misleading citizens by omitting this ‘material information’, with the regulator ruling that any future advertising campaigns must disclose the bank’s contribution to the climate crisis.⁵⁸ Complaints have also been raised to the UK regulator over similar advertising campaigns for Barclays and Standard Chartered Bank.⁵⁹

Advertising space should not be used to promote banks, and other financial actors, including asset managers and insurers, who continue to provide support for fossil fuels.

Overseas Holidays

Current policy recommendations for restrictions on high-carbon advertising include flights since there are no low carbon options for commercial air travel available currently or in the foreseeable future.⁶⁰ A logical extension to this is that advertisements for overseas holidays that require air travel should also be defined as high-carbon. Overseas holidays would include advertising and promotions for holiday package deals with flights included, and those that promote travel to destinations that can be reasonably assumed to necessitate or favour air travel.



An advert for foreign package holidays located at a train station.

Other emergent trends

While not necessarily high-carbon products or services per se, there are several thematic trends developing within the advertising industry that campaign and advocacy efforts must be cognisant of.

Sector wide greenwashing

Due to rising public concerns over the climate crisis, companies in all sectors are increasingly surfing this 'green wave' to promote their products and services. This can range from exaggerating green credentials in advertising and labelling to deliberate, well-funded and heavily strategised

greenwashing advertising and PR campaigns with the power to influence public opinion.^{61,62}

The burgeoning prevalence of misleading environmental claims in the “golden age of greenwash” has meant that advertising regulators cannot keep up.⁶³ A backlog of complaints at under-resourced regulators, their reactive (rather than proactive) approach to regulating advertising, their lack of enforcement teeth, and the absence of comprehensive legislation around greenwashing have thus far created an environment where companies can greenwash without fear or favour – although promising changes in legislative landscapes in the UK and Europe, such as the UK’s Competition and Markets Authority’s (CMA) “Green Claims Code”, may begin to address this.

Unabated, insufficiently regulated cross-sector greenwashing is delaying meaningful climate action as social norms significantly are set by advertising’s “persuasion architecture”. In one example, extensive greenwashing by the fossil fuel industry has successfully reinforced perceptions of fossil gas as “clean” and “green”, framing “natural gas” as a “transition fuel”,⁶⁴ thereby delaying a move away from fossil fuels to renewable and low-carbon sources of energy. In the car industry, advertising for electric cars by carmakers that are still predominantly selling fossil-powered cars delays a much-needed shift away from private vehicles towards mass transit, through the heavily advertised (mis)perception that electric vehicles are a silver bullet for emissions caused by road transportation.⁶⁵

Preventing greenwashing is critical for ending deception and distraction, and for unlocking more ambitious climate action. However, it is worth a word of caution: that addressing greenwashing should not detract from achieving a ‘tobacco-style’ end to high-carbon advertising, but instead stimulate further progress towards this goal.

Brand-stretching to bolster green claims

Big polluters are using advertising to stretch their brand to appear greener. Brand-stretching refers to the practice of companies leveraging brand awareness and customer loyalty to introduce new products or services similar to those they already offer under the umbrella of their existing brand, enabling them to sell more of both the new and original products.⁶⁶

As car manufacturers begin to produce more electric vehicles (EVs), many are centering EVs and associated ideas like sustainability and innovation in their advertising campaigns even if their commercial strategies remain dominated by polluting fossil fuelled-vehicles. Analysis by DeSmog in 2022 of the adverts of carmakers Peugeot, Citroen, Jeep, and Fiat found that over half

of their ads touted green credentials, while only one in eight cars sold were lower-emissions or EVs.⁶⁷

As an advertising strategy, brand-stretching can help companies evade tighter regulation around green claims by centring advertising campaigns around their relatively slim 'green' products rather than their polluting operations, while still bolstering their green image and furthering their social licence.

'Luxury' sustainability and the polluter elite

The consumption-based emissions of the rich and super-rich far outweigh the emissions footprint of the average citizen. Recent analysis shows that if the amount of millionaires in the world continues to grow at its current rate, by 2050 the spending of these millionaires will use up 72 percent of the remaining 1.5°C carbon budget.⁶⁸ This carbon inequality is shocking both between and within nations. In the USA in 2019, the top 0.1 percent of richest households had emissions that were 57 times higher than the bottom decile of U.S. households and 597 times higher than an average low-income country household in countries such as Ethiopia or Yemen.⁶⁹

A concrete example of advertisements that cater solely to the polluter elite would be private jet adverts. Private jets emit at least 10 times more pollutants than commercial planes per passenger.⁷⁰ Despite inflationary pressure squeezing the disposable incomes of billions worldwide, and the general sourness of the global economic outlook, private jet sales are taking off. According to one report, private jet sales are expected to reach their highest ever level in 2023, after the market doubled in size over the past two decades.⁷¹ Emissions from this burgeoning fleet of private jets has increased by 23 percent since the pandemic and shows no sign of slowing.⁷²

Given this vast carbon inequality between and within nations, any policy restricting advertising must be designed in such a way as to guard against an increase in advertisements for exclusive, high price goods and services that could claim to be low-carbon, but still normalise a largely high-carbon lifestyle, such as electric-powered private jets, eco-holidays, and expensive electric cars. As with any policy that seeks to address climate change, advertising bans must acknowledge and seek to address emissions disparities. Otherwise, those policies' effectiveness will be limited, may erode public support, and could disproportionately harm marginalised groups.

FLEXJET

ELEVATE YOUR EXPECTATIONS.
SEAMLESS, DOOR-TO-DOOR SERVICE, TAILORED FOR YOU.

THE GULFSTREAM G650™ AND SIKORSKY S-76®, PAIRED EXCLUSIVELY AT FLEXJET



+44 (0) 20 3856 8151 | FLEXJET.COM
YOU WON'T JUST BE FLOWN, YOU'LL BE MOVED.

© 2023 FLEXJET LTD.

"A F
OF

Gath
Cran
and G
Festi

resta
papp
herb
have
choo
choo
perfi
imp
/ Tho
Husi
grou
one

A full page private jet advert in the Financial Times' How To Spend It, May 2023

An eye on offsetting

Offsetting has emerged as a standard approach to mitigating the emissions that arise from businesses' operations in a whole host of sectors, from aviation to technology. However, offsetting does not reduce emissions and may in fact make the problem worse by delaying genuine emissions reductions at their source.⁷³ A series of investigations into established and well-regarded voluntary carbon markets – the primary route through which offsets are purchased and sold – has shown that more than 90 percent of rainforest offsets are completely worthless and have led to no actual reductions in emissions. What's more, these nature-based offset schemes fall prey to the very harms they purport to prevent: climate-induced droughts and wildfires that ravage forests and release 'offset' carbon back into the atmosphere where it will stay for years and years to come.

Claims regarding carbon offsetting, or those that promulgate assertions of climate neutrality based on offsets, should be regarded as de facto greenwashing and subsequently banned. The UK's ASA has recently announced that it will step up its enforcement on the use of terms such as 'carbon neutral' due to the overwhelming evidence of offsets' flaws, although the official guidance is yet to be finalised and published.

False solutions

The race to net zero is well and truly on, with the USA and EU both launching huge subsidy programmes to stimulate green innovation and capture the opportunities created by this industrial push. As part of this, companies will undoubtedly promote a range of technological solutions to meet the urgent challenge of cutting emissions. Some of these technologies will be proven and effective, but others may follow a concerning trend where unproven and unscalable technologies are promoted as mitigation tools. Advertising and PR will be essential to marketing these false solutions to consumers and entrenching them within governments' climate policy.

A contemporary example is the promotion of hydrogen boilers in the UK as a solution to decarbonising heating (and beyond). Despite numerous peer-reviewed studies showing that using hydrogen for heating is less economic, less efficient, more resource intensive, and associated with larger environmental impacts than heat pumps,⁷⁴ for instance, hydrogen boilers continue to be pushed by industry and supported by the government. What's more, the vast majority of hydrogen is produced using fossil fuels. In fact, at the end of 2021, almost 47 percent of global hydrogen production came from gas, 27 percent from coal, 22 percent from oil, and 4 percent from electrolysis.⁷⁵ According to the UN renewable energy body, IRENA, only 1 percent of global hydrogen production was produced using renewable energy.⁷⁶



Industry actors with vested interests are pushing hydrogen for heating homes when better, more efficient options exist.

Advertisements for hydrogen boilers and other false solutions, such as ExxonMobil’s algae biofuels⁷⁷ and bio-energy with carbon capture and storage (BECCS),⁷⁸ will lock in more emissions in the near term, delay the deployment of genuinely transformative technologies, and allow big polluters to maintain market share and social licence. For these reasons, they should be closely monitored for inclusion in ad bans and tighter regulation.

Conclusion: growing calls for ‘tobacco-style’ controls on high-carbon advertising

While pragmatism and flexibility are prerequisites for the creation of climate policy, the sheer scale of high-carbon advertising and its near universal reach, as well as the dangers of greenwashing, suggest the need for outright ad bans. There is a historical precedent for regulating the advertisement of certain goods on the grounds of harm caused to health and wider society. Advertising and sponsorship for tobacco products have been banned in the UK and in many other parts of the world. It is now not permissible to advertise tobacco products under the Tobacco Advertising and Promotion Act 2002 (TAPA).

In light of the harms caused by climate breakdown, including harm to public health far in excess of tobacco, calls are growing for ‘tobacco-style’ bans on advertising for high carbon products, to drive down emissions. The World Health Organisation and UN Environment Programme have endorsed recommendations for a ‘tobacco-law’ to end advertising for fossil fuels.⁷⁹

In 2022 the French government banned advertisements for energy products derived from fossil fuels, including petrol products and energy from the

combustion of coal.^{80,81} Despite this positive-seeming step, critics point out that the ban does not prevent fossil fuel firms from advertising their “green” products, meaning that polluting companies can continue to maintain a positive brand image through advertising, limiting the impact of the ban. Elsewhere, in the absence of national level legislation, municipalities and public transport bodies in Australia, the Netherlands and the UK have introduced local restrictions on advertising and sponsorship of the most polluting products across outdoor advertising, print and online media.

Recommendations for what is defined as ‘high carbon’ advertising vary among policy efforts; currently these have largely focused on fossil fuels and the use of fossil fuels in transportation (see Appendix for restrictions under Low Carbon Advertising policies in the UK, France, Australia and the Netherlands). As well as political support⁸² this has a strong public mandate: in the UK, 68 percent of participants in a nationally representative survey said they would restrict advertising for environmentally harmful products and services.⁸³ A European Citizens Initiative (ECI) to ban fossil fuel advertising collected more than 350,000 signatures in 2021–2022. The ECI called on the European Commission to propose an EU legislative act to ban any promotion or advertising, or sponsorship relationship, for:

- a. any and all companies and associated sub brands or lobbying organisations that extract, refine, produce, supply, distribute, or sell any fossil fuels.**
- b. any companies that promote the use of any fossil fuel powered air, road or maritime vehicles operating from fossil fuels, with the exception of vehicles dedicated to transport services of general economic interest.**

As the climate emergency accelerates and the urgency of emissions cuts grows, support for local and national tobacco-style advertising bans is growing. The breadth and scope of such bans should therefore be considered in light of substantial emissions contributions from sectors other than energy and transportation. As this paper makes clear, high-carbon advertising can be found across a multitude of sectors and industries. If we are to curtail the demand for products and services that harm the health of the planet and people, then addressing advertising is both logical and essential.

If you have seen any other examples of high-carbon advertising that this paper omits, please do not hesitate to get in touch with the Badvertising campaign via [Twitter](#), [Instagram](#), or [our website](#).

-ENDS-

About the authors

Veronica Wignall is a campaigner and researcher at Adfree Cities and the Badvertising campaign, and coordinator of Adblock Bristol.

Freddie Daley is a research associate at the University of Sussex, a coordinator of the Cool Down - Sport for Climate Action Network and researcher for the Badvertising campaign. @Fred_Daley

Emilie Tricarico is an ecological economist working on new economic models for Climate Action Leeds and a researcher for the Badvertising campaign.

Andrew Simms is a co-director of the New Weather Institute and co-founder of the Badvertising campaign.

Badvertising

'Badvertising' is a campaign to stop adverts fuelling the climate emergency. This includes ads for cars, airline flights and fossil fuels. We ended tobacco advertising when we understood the harm done by smoking. Now we know the damage done by fossil fuel products and activities, it's time to stop promoting them.

The campaign is organised by the [New Weather Institute](#) think tank and kindly funded by the [KR Foundation](#). It is delivered in partnership with climate charity [Possible](#) and the [Adfree Cities](#) network.

Badvertising is targeting national legislation to curb high carbon advertising, as well as the advertising policies of media outlets and local and regional public bodies with commitments to tackle the climate crisis.

June 2023



Endnotes

1. See: www.badverts.org and <https://www.worldwithoutfossilads.org/>
2. World Bank, 2019, 'How Much Do Our Wardrobes Cost to the Environment?', <https://www.worldbank.org/en/news/feature/2019/09/23/costo-moda-medio-ambiente>
3. FAO, 2012, 'World Agriculture Towards 2030/2050', <https://www.fao.org/3/ap106e/ap106e.pdf>
4. Greenpeace European Unit, 2020, 'EU Climate Diet: 71% less meat by 2030', <https://www.greenpeace.org/eu-unit/issues/nature-food/2664/eu-climate-diet-71-less-meat-by-2030/>
5. BusinessWire, 2022, 'Insights on the Cruise Global Market to 2028', <https://www.businesswire.com/news/home/20221026005823/en/Insights-on-the-Cruise-Global-Market-to-2028---Rising-Popularity-of-Theme-Cruises-are-Substantially-Driving-Growth---ResearchAndMarkets.com>
6. ICCT, 2022, 'What if I told you cruising is worse the climate than flying?', <https://theicct.org/marine-cruising-flying-may22/>
7. Environmental Audit Committee, 2019, 'Fixing fashion: clothing consumption and sustainability', https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/1952/full-report.html#heading_6
8. Niinimäki et al., 2020, 'The environmental price of fast fashion', *Nature Reviews Earth & Environment*, 189–200. <https://doi.org/10.1038/s43017-020-0039-9>
9. World Bank, 2019, 'How Much Do Our Wardrobes Cost to the Environment?', <https://www.worldbank.org/en/news/feature/2019/09/23/costo-moda-medio-ambiente>
10. Tollefson, 2021, 'Carbon emissions rapidly rebounded following COVID pandemic dip', *Nature*, <https://www.nature.com/articles/d41586-021-03036-x>
11. Changing Markets et al., 2021, 'Fossil Fashion: The hidden reliance of fast fashion on fossil fuels', https://changingmarkets.org/wp-content/uploads/2021/01/FOSSIL-FASHION_Web-compressed.pdf
12. Changing Markets et al., 2021, 'Fossil Fashion: The hidden reliance of fast fashion on fossil fuels', https://changingmarkets.org/wp-content/uploads/2021/01/FOSSIL-FASHION_Web-compressed.pdf
13. Niinimäki et al., 2020, 'The environmental price of fast fashion', *Nature Reviews Earth & Environment*, 189–200. <https://doi.org/10.1038/s43017-020-0039-9>
14. Makers Valley, 2022, 'Is the Ultra Fast Fashion Model a Blueprint for Success?', <https://blog.makersvalley.net/ultrafast-fashion>
15. Hot or Cool Institute, 2022, 'Unfit, Unfair, Unfashionable', <https://hotorcool.org/unfit-unfair-unfashionable/>
16. *Ibid.*
17. Hot or Cool Institute, 2022, 'Unfit, Unfair, Unfashionable', <https://hotorcool.org/unfit-unfair-unfashionable/>
18. Commodore v. H&M Hennes & Mauritz LP, 2022, Class Action Complaint, <https://www.classaction.org/media/commodore-v-h-and-m-hennes-and-mauritz-lp.pdf>
19. UK Government, 2022, 'ASOS, Boohoo and Asda investigated over fashion 'green' claims', <https://www.gov.uk/government/news/asos-boohoo-and-asda-investigated-over-fashion-green-claims>
20. Ivanovich et al., 2023, 'Future warming from global food consumption', *Nature Climate Change*, <https://www.nature.com/articles/s41558-023-01605-8>
21. *Ibid.*
22. Ritchie and Roser, 2022, 'Environmental Impacts of Food', *Our World In Data*, <https://ourworldindata.org/environmental-impacts-of-food>
23. Xu et al., 2021, 'Global greenhouse gas emissions from animal-based foods are twice those of plant-based foods', *Nature Food*, <https://doi.org/10.1038/s43016-021-00358-x>
24. Twine, 2021, 'Emissions from Animal Agriculture—16.5% Is the New Minimum Figure', *Sustainability*, <https://doi.org/10.3390/su13116276>
25. Lucas et al., 2023, 'Low-carbon diets can reduce global ecological and health costs', *Nature Food*, <https://www.nature.com/articles/s43016-023-00749-2>

26. IPCC, 2022, 'Climate Change 2022: Mitigation of Climate Change', AR6 WG3, <https://www.ipcc.ch/report/ar6/wg3/>
27. Springmann *et al.*, 2018, 'Options for keeping the food system within environmental limits', *Nature*, <https://doi.org/10.1038/s41586-018-0594-0>
28. Greenpeace European Unit, 2020, 'EU Climate Diet: 71% less meat by 2030', <https://www.greenpeace.org/eu-unit/issues/nature-food/2664/eu-climate-diet-71-less-meat-by-2030/>
29. IPCC, 2022, 'Climate Change 2022: Mitigation of Climate Change', AR6 WG3, <https://www.ipcc.ch/report/ar6/wg3/>
30. The Guardian, 2022, 'England must reduce meat intake to avoid climate breakdown, says food tsar', <https://www.theguardian.com/environment/2022/aug/16/england-must-reduce-meat-dairy-intake-says-henry-dimbleby>
31. The Guardian, 2023, 'Inside big beef's climate messaging machine: confuse, defend and downplay', <https://www.theguardian.com/environment/2023/may/03/beef-industry-public-relations-messaging-machine>
32. Desmog, n.d., 'European Roundtable for Beef Sustainability', <https://www.desmog.com/european-roundtable-for-beef-sustainability/>
33. Monbiot, 2022, 'There's one big subject our leaders at Cop27 won't touch: livestock farming', *The Guardian*, <https://www.theguardian.com/commentisfree/2022/nov/09/leaders-cop27-livestock-farming-carbon-budget-governments>
34. The Guardian, 2020, 'EU's farm animals 'produce more emissions than cars and vans combined'', <https://www.theguardian.com/environment/2020/sep/22/eu-farm-animals-produce-more-emissions-than-cars-and-vans-combined-greenpeace>
35. Kasser *et al.*, 2020, 'Advertising's role in climate and ecological degradation', *Badvertising*, <https://static.squarespace.com/static/5ebd0080238e863d04911b51/t/5fbfcb1408845d09248d4e6e/1606404891491/Advertising's+role+in+climate+and+ecological+degradation.pdf>
36. Greenpeace, 2021, 'Dissected: The 7 Myths of Big Meat's Marketing', <https://www.greenpeace.org/denmark/r/dissected>
37. Bellet *et al.*, 2021, 'Re-thinking public health: Towards a new scientific logic of routine animal health care in European industrial farming', *Humanities & Social Sciences Communications*, <https://doi.org/10.1057/s41599-021-00890-y>
38. Greenpeace, 2021, 'Dissected: The 7 Myths of Big Meat's Marketing', <https://www.greenpeace.org/denmark/r/dissected>
39. Greenpeace, 2021, 'Killer offer on meat – and you might be paying for it', <https://www.greenpeace.org/international/story/47164/killer-offer-on-meat-europe-advertising/>
40. FAO, 2012, 'World Agriculture Towards 2030/2050', <https://www.fao.org/3/ap106e/ap106e.pdf>
41. Springmann *et al.*, 2018, 'Options for keeping the food system within environmental limits', *Nature*, <https://doi.org/10.1038/s41586-018-0594-0>
42. James *et al.*, 2022, 'Targeted policy intervention for reducing red meat consumption: conflicts and trade-offs', *BMC Nutrition*, <https://doi.org/10.1186/s40795-022-00570-3>
43. BusinessWire, 2022, 'Insights on the Cruise Global Market to 2028', <https://www.businesswire.com/news/home/20221026005823/en/Insights-on-the-Cruise-Global-Market-to-2028---Rising-Popularity-of-Theme-Cruises-are-Substantially-Driving-Growth---ResearchAndMarkets.com>
44. Reuters, 2022, 'Cruise industry faces choppy seas as it tries to clean up its act on climate', <https://www.reuters.com/business/sustainable-business/cruise-industry-faces-choppy-seas-it-tries-clean-up-its-act-climate-2022-07-27/>
45. Marine Insight, 2023, 'Top 20 Largest Cruise Ships In 2023', https://www.marineinsight.com/know-more/top-10-largest-cruise-ships-2017/#1_Wonder_of_the_Seas
46. Lloret *et al.*, 2021, 'Environmental and human health impacts of cruise tourism: A review', *Marine Pollution Bulletin*, <https://www.sciencedirect.com/science/article/abs/pii/S0025326X21010134>
47. *Ibid.*
48. ICCT, 2022, 'What if I told you cruising is worse the climate than flying?', <https://theicct.org/marine-cruising-flying-may22/>
49. Transport & Environment, 2019, 'Luxury cruise giant emits 10 times more air pollution (SOx) than all of Europe's cars – study',

- <https://www.transportenvironment.org/discover/luxury-cruise-giant-emits-10-times-more-air-pollution-sox-all-europes-cars-study/>
50. Wigenstam et al., 2016, 'Inhaled sulfur dioxide causes pulmonary and systemic inflammation leading to fibrotic respiratory disease in a rat model of chemical-induced lung injury', *Toxicology*, <https://pubmed.ncbi.nlm.nih.gov/27565714/>
 51. Sunyer et al., 2003, 'Respiratory effects of sulphur dioxide: a hierarchical multicity analysis in the APHEA 2 study', *Occupational and Environmental Medicine*, <https://oem.bmj.com/content/60/8/e2>
 52. LightHouse, 2021, 'Cruise ships' pollution', <https://escplighthouse.eu/2021/11/24/cruise-ships-pollution/>
 53. BankTrack et al., 'Banking on Climate Chaos: Fossil Fuel Finance Report 2023', https://www.banktrack.org/download/banking_on_climate_chaos_2023/banking_on_climate_chaos_2023.pdf
 54. MarketingWeek, 2020, 'How HSBC's 'Together We Thrive' positioning turned around a decline in brand value', <https://www.marketingweek.com/hsbc-together-we-thrive-brand-reputation/>
 55. Astuter, n.d., 'Barclays Bank', <https://www.astuter.co.uk/casestudies/barclays-bank/>
 56. The Bureau of Investigative Journalism, 2022, 'Mines, pipelines and oil rigs: what HSBC's 'sustainable finance' really pays for', <https://www.thebureauinvestigates.com/stories/2022-10-31/mines-pipelines-and-oil-rigs-what-hsbc-s-sustainable-finance-really-pays-for>
 57. BankTrack et al., 'Banking on Climate Chaos: Fossil Fuel Finance Report 2023', https://www.banktrack.org/download/banking_on_climate_chaos_2023/banking_on_climate_chaos_2023.pdf
 58. The Guardian, 2022, 'Watchdog bans HSBC climate ads in fresh blow to bank's green credentials', <https://www.theguardian.com/business/2022/oct/19/watchdog-bans-hsbc-ads-green-cop26-climate-crisis>
 59. AdFreeCities, 2022, 'Big banks' greenwashing goes unregulated', <https://adfreecities.org.uk/2022/07/big-banks-greenwashing-goes-unregulated/>
 60. Stay Grounded, n.d., 'Greenwashing', <https://stay-grounded.org/get-information/#greenwashing>
 61. InfluenceMap, 2022, 'The International Gas Union's Climate Strategy', <https://influencemap.org/landing/-a794566767a94a5d71052b63a05e825f-20189>
 62. Desmog, 2023, 'The Rise of the 'Climate Friendly' Cow', <https://www.desmog.com/2023/04/26/rise-of-the-climate-friendly-cow/>
 63. Badvertising & AdFreeCities, *Forthcoming*, 'ASA Report'.
 64. InfluenceMap, 2022, 'The International Gas Union's Climate Strategy', <https://influencemap.org/landing/-a794566767a94a5d71052b63a05e825f-20189>
 65. Badvertising, *Forthcoming*, 'OVER-CHARGED? Car makers are pushing green credentials through their advertising of electric vehicles - but is this a positive development?'
 66. Mackman, 2020, "What is Brand Stretch and Brand Extension?", <https://mackman.co.uk/brand-stretch-extension/>
 67. Sherrington, 2022, "Revealed: How Car and Airline Advertising 'Misleads' the Public and Threatens Climate Action", *Desmog*, <https://www.desmog.com/2022/05/18/revealed-how-car-and-airline-advertising-misleads-the-public-and-threatens-climate-action/>
 68. Gössling and Humpe, 2023, 'Millionaire spending incompatible with 1.5 °C ambitions', *Cleaner Production Letters*, <https://doi.org/10.1016/j.cpl.2022.100027>
 69. Starr et al., 2023, 'Assessing U.S. consumers' carbon footprints reveals outsized impact of the top 1%', *Ecological Economics*, <https://doi.org/10.1016/j.ecolecon.2022.107698>
 70. Institute for Policy Studies (USA), 'High Flyers 2023: How ultra-rich private jet travel costs the rest of us and burns up the planet', <https://ips-dc.org/report-high-flyers-2023/>
 71. *Ibid.*
 72. *Ibid.*
 73. Badvertising, 2022, 'Caught Offside: Why offsets won't solve sports' climate problem', <https://www.badverts.org/latest/briefing-why-offsets-wont-solve-sports-climate-problem>
 74. Rosenow, J., 'Is heating homes with hydrogen all but a pipe dream? An evidence review', *Joule*, http://www.janrosenow.com/uploads/4/7/1/2/4712328/is_heating_homes_with_hydrogen_all_but_a_pipe_dream_final.pdf

75. IRENA, n.d., Hydrogen, <https://www.irena.org/Energy-Transition/Technology/Hydrogen>
76. *Ibid.*
77. The Guardian, 2023, 'Big oil firms touted algae as climate solution. Now all have pulled funding', <https://www.theguardian.com/environment/2023/mar/17/big-oil-algae-biofuel-funding-cut-exxonmobil>
78. OneEarth, 2023, 'BECCS: No time for false saviours', <https://www.oneearth.org/beccs-no-time-for-false-saviours/>
79. Reclame Fossielvrij, 2022, 'WHO director Maria Neira 100% endorses 'tobacco law' for fossil industry', <https://verbiedfossielereclame.nl/who-director-maria-neira-100-endorses-tobacco-law-for-fossil-industry/>
80. EuroNewsGreen, 2022, 'France becomes first European country to ban fossil fuel ads - but does the new law go far enough?', <https://www.euronews.com/green/2022/08/24/france-becomes-first-european-country-to-ban-fossil-fuel-ads-but-does-the-new-law-go-far-e>
81. LegiFrance, 2021, 'Chapter II : Encadrer et réguler la publicité (Articles 7 à 22)', <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000043956924>
82. Reclame Fossielvrij, 'Worldwide initiatives to ban fossil fuel advertisements', <https://verbiedfossielereclame.nl/only-words/>
83. Badvertising, 2022, 'Polling finds big UK majority in favour of curbs on polluting ads', <https://www.badverts.org/latest/polling-finds-big-uk-majority-in-favour-of-curbs-on-polluting-ads>