

Model Ethical & Low Carbon Advertising Policy motion

Badvertising & Adfree Cities, December 2023

The following text could form the basis of motions to Council meetings. The text will need to be adapted to reflect local scenarios.

This Council notes:

On the evidence to restrict 'high-carbon' ads

- That the continued paid promotion of activities or products that are potentially harmful to mental or physical health or the environment, such as junk food, gambling, alcohol or high carbon products (including fossil-powered cars, fossil fuel companies and airlines and airports), are very common across a variety of out of home advertising media.
- That statistical evidence shows how exposure to advertising increases consumption of advertised goods and services. A 2021 study found that exposure to SUV advertising can make someone 250% more likely to own an SUV than no vehicle at all.¹ A ban on advertising for unhealthy food across the Transport for London network resulted in a drop in household purchases of unhealthy food and drink, preventing 100,000 obesity cases with an expected saving to the NHS of £200 million.²
- That a single '48 sheet' digital billboard can use as much energy as 37 average UK homes and that a double-sided digital 'bus stop - size' advertising screen uses three times as much electricity as an average UK home³. In addition, there is the energy used in the manufacturing and distribution of ad infrastructure and printed materials.^{4,4}
- That extra emissions resulting from advertising products at the national level is calculated to have added 208 million tonnes of CO₂e in 2022, an increase of 11% since 2019.⁵

¹ Professor Tim Kasser et al., 2021

http://www.badverts.org/s/Advertising-and-demand-for-SUVs_Kasser-et-alBadvertising-2021.pdf

² London School of Hygiene & Tropical Medicine

<https://www.lshtm.ac.uk/newsevents/news/2022/junk-food-advertising-restrictions-prevent-almost-100000-obesity-cases-and>

³ Adfree Cities, 2022

<https://adfreecities.org.uk/2022/12/the-electricity-costs-of-digital-out-of-home-advertising-screens/>

⁴ Wellbeing Economy Alliance, 2021

<https://wellbeingeconomy.org/the-environmental-impacts-of-corporate-advertising>

⁵ Purpose Disruptors, 2022 <https://www.purposedisruptors.org/advertised-emissions>

- Last year a nationally representative survey of UK public attitudes found that over two-thirds (68%) of UK adults said that they would restrict the advertising of environmentally harmful products.⁶

On the modalities to restrict high-carbon ads

- That _____ Council currently holds an Advertising Concession Agreement with ___[insert company]_____ involving the upkeep and maintenance of over __[insert number]___ bus stops across the city many of which include advertising panels and __[insert number]___ advertising billboard sites.
- 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. The Greater London Authority (GLA), which controls Transport for London (TFL) property, enacted 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 advertising prohibitions and restrictions already exist regarding all tobacco products, 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, HFSS products, medical and health claims, religion, financial products, and pornography.⁷
- That legal advice provided by Richard Wald KC of 39 Essex Chambers concludes that local authorities are in their legal right to ban 'high-carbon advertising', with broad scope to design a policy according to their discretion and with limited prospects of legal risks or challenges.⁸
- 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]
- That while there is no standardised definition of high-carbon products and services, councils such as Cambridgeshire, Somerset, Basingstoke & Deane,

⁶ Badvertising, 2022:

<https://www.badverts.org/latest/polling-finds-big-uk-majority-in-favour-of-curbs-on-polluting-ads>

⁷ <https://www.badverts.org/case-studies>

⁸ Richard Wald KC, 39 Essex Chambers, 2023

<https://www.newweather.org/wp-content/uploads/2023/05/High-Carbon-Advertising-Opinion.docx-1.pdf>

Norwich and Liverpool have developed and implemented ethical advertising policies partially or fully restricting these products.

- That banning advertising for certain products is not the same as banning the products themselves.

Full Council believes:

- That the very 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: HFSS products undermine health objectives, petrol and diesel car adverts (especially for Sports Utility Vehicles) undermine air quality objectives, carbon emissions reduction targets and public health objectives.
- That the proliferation of new digital advertising billboards is incompatible with carbon emission reduction targets given their disproportionately high electricity usage.

Full 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 and public health issues: including alcohol, gambling, 'high carbon' products and services (namely petrol, diesel and hybrid cars, fossil fuel companies and airlines and airports), and HFSS products.
- If the above is not possible, to begin work on a new policy, to take effect when the current Advertising Concession Agreement is next renewed.
- 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.
- Write to the Secretary of State for Digital, Culture, Media and Sport, asking for a ban on such forms of unethical advertising nationally.
- Write to the Secretary of State for Levelling up, Housing and Communities asking for reforms to Planning Guidance on outdoor advertising to take into account the unique problems with energy-intensive digital billboards such as light pollution, impacts on wildlife, mental health and climate emergency.