



From: The Badvertising coalition

To:

Lilli Matson, Chief Safety, Health and Environment Officer, Transport for London

Seb Dance, Deputy Mayor for Transport and Deputy Chair, TfL Board

Dr Mee Ling Ng OBE, Chair of the Advertising Steering Group, TfL Board

Cc. Christopher Macleod Director, Customer & Revenue, TfL

30th November 2022

Dear Lillie Matson, Seb Dance, Dr Mee Ling Ng and Christopher Macleod,

On behalf of a group of independent civil society organisations concerned about the impact of advertising on the climate, we are writing to urge you to consider introducing a new clause to Transport for London's *Advertising Policy* to rule out adverts for high-carbon goods - specifically, those for fossil fuel companies, cars and airlines. In particular, we would like you to consider an immediate phase out of adverts for cars, in order to align with both your own corporate and institutional interests and the Mayor's Transport Strategy.

Many local authorities at the international level have already adopted new policies prohibiting advertising for high-carbon goods and services including the city of Amsterdam, its metro operator, several other Dutch cities, Sydney, and most recently the Swedish capital of Stockholm. In the UK, Liverpool, Norwich and North Somerset Councils have all adopted motions to remove advertising by fossil industries, carmakers and airlines.



## Context

A recent report by The House of Lords' Environment and Climate Change Committee<sup>1</sup> raises the alarm as to the disproportionate influence of adverts for high-carbon goods - especially those for larger, more polluting SUV vehicles - which contribute to undermining the positive impact environmental messages can have in driving sustainable behaviour change. This argument resonates with findings from our own recent research<sup>2</sup>, exploring how exposure to adverts for SUVs systematically influences demand for these vehicles. Our research found that survey participants who reported occasional exposure to adverts for SUVs were 70% more likely to own an SUV than a standard car and 250% more likely to own an SUV than no motor vehicle at all.

## Aligning TfL and Mayoral policy objectives

We note that adverts for High Fats, Salt and Sugar (HFSS) products have been prohibited across TfL's advertising estate in recognition of the fact that these adverts contribute to child obesity<sup>3</sup> and to reflect the specific requirements of the Mayor's Food Strategy<sup>4</sup>. Since its implementation four years ago, the ban has already led to positive health benefits by reducing obesity cases<sup>5</sup>.

We believe that adverts for cars, airlines and fossil fuel companies should be treated in the same way as those for HFSS products: by ending them across the network to align with TfL's Corporate Environment Plan<sup>6</sup> as well as the Mayors'

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<sup>1</sup> <https://committees.parliament.uk/publications/30146/documents/174873/default/>

<sup>2</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)

<sup>3</sup>

<https://tfl.gov.uk/info-for/media/press-releases/2018/november/mayor-confirms-ban-on-junk-food-advertising-on-transport-netwo>

<sup>4</sup> <https://www.london.gov.uk/what-we-do/communities/food/london-food-strategy-0>

<sup>5</sup>

<https://www.standard.co.uk/news/london/london-tube-tfl-junk-food-ad-ban-research-b1016062.htmlb>

<sup>6</sup> <https://content.tfl.gov.uk/tfl-corporate-environment-plan-29-september-2021-acc.pdf>



Environment<sup>7</sup> and Transport<sup>8</sup> strategies. TfL's Sustainability Report 2021 states that as "London's strategic transport authority", you are "committed to help realise the environmental outcomes of the Mayor's Transport Strategy and the transport elements of the London Environmental Strategy". These policies have clear objectives to support a modal shift from road to sustainable and active travel in order to reduce carbon emissions and air pollution.

The Mayor's Transport Strategy contains the ambitious and important target of aiming for "80% of all trips in London to be made on foot, by cycle or using public transport by 2041". This objective is supported by both the Environment Strategy and TfL's Corporate Environment Plan.

*As well as incentives and supporting infrastructure to encourage a move to ULEVs, it will also be necessary to use disincentives to phase out fossil fuel vehicles altogether - London Environment Strategy<sup>9</sup>, May 2018*

### **TfL's current Advertising Policy and Code of Acceptance**

TfL's existing Advertising Policy lists legitimate grounds for refusal of ads, including the following clause:

*(m) it may adversely affect in any way the interests of the site owner, TfL or any member of the GLA Group;*

Our analysis of data from the 2018/2019 London Travel Demand Survey finds that, for all income groups except the lowest, the more cars are present in a household, the fewer trips its members make by public transport. The observed effect is very substantial.

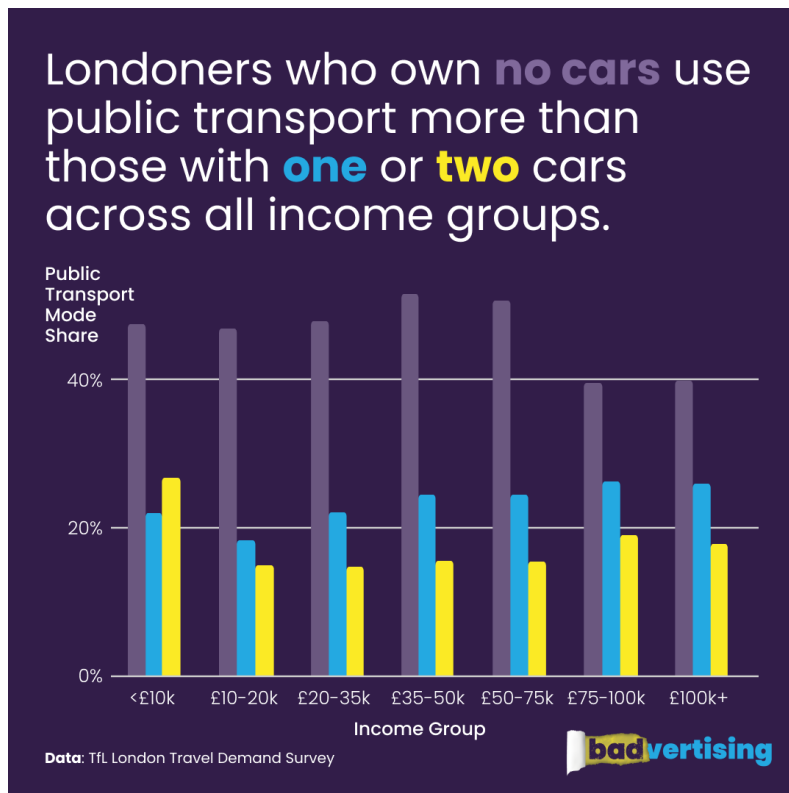
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<sup>7</sup> [https://www.london.gov.uk/sites/default/files/london\\_environment\\_strategy\\_0.pdf](https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

<sup>8</sup>

<https://www.london.gov.uk/programmes-strategies/transport/our-vision-transport/mayors-transport-strategy-2018?intcmp=46686>

<sup>9</sup> [https://www.london.gov.uk/sites/default/files/london\\_environment\\_strategy\\_0.pdf](https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)



We believe that this evidence, considered in light of our own research showing that car ads are highly effective at persuading consumers to purchase them, demonstrates that the current practice of running adverts for cars targeting passengers on TfL’s public transport networks is undermining TfL’s commercial interests.

### What we propose

Based on all the above, we recommend that **TfL urgently amends its Advertising Policy to include a provision to screen out adverts for high-carbon products and services**, to be consistent with both Transport for London’s and the Greater London Authority’s objectives.

Moreover, we note that TfL’s existing Advertising Policy *already contains sufficient grounds to preclude the organisation from carrying ads for cars* specifically given that it includes a provision to refuse adverts that would adversely affect the

# badvertising

interest of the site owner, TfL, or any member of the GLA Group.<sup>10</sup> We argue that permitting cars to be advertised to public transport passengers on its network already contravenes TfL's Code of Acceptance and should therefore cease with immediate effect.

Furthermore, our own calculations indicate that revenues from high-carbon adverts only make up a small share of advertising revenues and an even smaller percentage of the company's total revenues. Based on TfL's advertising reports and a list of all advertisers requested for 2018/19 and 2021/22 in the Motors and Travel & Transport categories<sup>11</sup>, we estimate that around 4% of TfL's advertising revenue is derived from adverts for high-carbon transport goods and services, while cars ads accounted for just 0.48%<sup>12</sup>. Compared to TfL's overall gross revenues, advertising revenues account for around 2.8% in a normal year, while ads for high-carbon transport goods and services only generate around 0.1% of total TfL revenues - with car ads specifically bringing in just 0.01%.

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<sup>10</sup> <https://content.tfl.gov.uk/tfl-advertising-policy-250219.pdf>

<sup>11</sup> In July 2022, we requested a list of all advertisers for 2018/19 and 2021/22 in the Motors and Travel & Transport categories. The list TfL provided shows that these are predominantly adverts for cars and flights. From this list, we removed companies in these sectors selling low-carbon products or services (e.g. car sharing apps or UK rail holidays). All our calculation and methodological assumptions can be found here:

<sup>12</sup> Sources and calculations available here:

<https://docs.google.com/spreadsheets/d/1MNTPHKEG3-yLsZIZ0SP5-fXUHPEj0iPu2QId-IK8rNM/edit#gid=620863139>



*Share of TfL advertising revenue derived from high carbon transport goods and services and cars specifically.*

We strongly believe that the positive impact of amending TfL's Advertising Policy to align with the Mayor's Transport and Environment Strategies, alongside enforcing the relevant clause in the existing Code of Acceptance to refuse car ads with immediate effect, would clearly outweigh any potential loss in revenues from prohibiting ads for these products. We are currently in dialogue with Network Rail who, we believe, would equally benefit from introducing such measures.



We recognise and commend the Mayor's and Transport for London's global leadership on responding to the climate crisis, and we hope that you will consider this proposal with care as a part of this leadership. Where London leads, other cities will follow, and this is particularly important in light of the lack of commensurate action at the level of national government in the UK. We would warmly welcome the opportunity to meet with you to discuss this further.

Yours sincerely,

Leo Murray, Possible

Emilie Tricarico, New Weather Institute

Charlotte Gage, Adfree Cities UK

Robbie Gillett, Badvertising

Andrew Simms, Rapid Transition Alliance

David Boyle, New Weather Institute

Freddie Daley, Rapid Transition Alliance