

# Misleading Environmental Claims

## CMA consultation

### Response from Adfree Cities



15th July 2021

The principles proposed in the new guidance are a welcome step forward. It is deeply concerning to think that these principles have not **already** been in place for a number of years. That the environmental claims made by firms should be truthful, accurate, substantiated, fair, unambiguous and meaningful should have been a baseline standard of integrity for any company. Nonetheless, it is important that the CMA has codified these principles as official guidance.

We particularly welcome additional points that companies should not mislead by omission and by use of green imagery. Advertisers are master communicators and we see many billboard adverts, particularly car adverts, with misleading imagery of empty roads and exotic background locations. With that in mind, in answer to Question 3.3 we recommend extra guidance is produced for the motoring industry.

We also note that the **airline industry** is increasingly making misleading green claims (see Qatar Airways Fly Greener banner ad below at Wembley Stadium) and suggest guidance is also produced for this sector specifically. It is crucial that the regulatory bodies enforce robust regulation against the over-selling of **carbon offsets** by the aviation industry as this is misleading consumers regarding their ability to mitigate the climate impacts of flying.



## **Enforcement**

Lastly, we are concerned that business will not feel a sufficient deterrent unless both the CMA and the ASA acquire more enforcement powers, including the ability to levy monetary fines against companies who wilfully breach these new guidelines.

We would like to draw the CMA's attention to our report into the shortcomings of the ASA in limiting the harms caused by advertising including environmental degradation - released in February 2021.

### **Too close for comfort – A look into the Advertising Standards Authority and the case for more controls on advertising.**

[http://adfrecities.org.uk/wp-content/uploads/2021/02/AdfreeCities\\_TCFC\\_ASA.pdf](http://adfrecities.org.uk/wp-content/uploads/2021/02/AdfreeCities_TCFC_ASA.pdf)

Yours sincerely,

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### **About Adfree Cities**

Adfree Cities is a network of grassroots groups across the UK who are concerned about the impacts of corporate advertising on our health, wellbeing, environment, climate, communities and the local economy. We campaign for happier, healthier cities free from the pressures of corporate outdoor advertising.  
[www.adfrecities.org.uk](http://www.adfrecities.org.uk)