



Low-Carbon Advertising and Sponsorship Policies: A Public Health Brief for Local Authorities

Key points

- Local authorities (LAs) and the public health workforce are committed to addressing climate change. Public discourse around fossil fuel use and high-carbon goods/sectors is key to this.
- The influence of fossil fuel marketing on human health can be usefully understood through a Commercial Determinants of Health lens.
- Low-carbon advertising and sponsorship policies are needed to shift norms, set new standards and drive reduced fossil fuel consumption, and have already been implemented by councils both in the UK and internationally.
- Increasing knowledge, improving governance skills, forming links with allied stakeholders and several available toolkits and guidance documents can all support the implementation of low-carbon advertising policies.

Note: this brief is primarily aimed at those working in local authorities, particularly in the English public health system context; however, many of the principles and information it contains will be of relevance to and can be used by public health professionals working in other organisations and public health systems.

Recommendations

With the long-term goal of banning fossil fuel-related advertising, and to further the FPH's wider climate and health goals, we recommend that the FPH can work to drive this agenda forwards by:

1. **Supporting the public health workforce in developing knowledge and skills regarding the Commercial Determinants of Health and the impacts of advertising and sponsorship, including a focus on fossil fuels, and the public health case for advertising restrictions**, for example through focused information resources, training events and integrating this into the Public Health curriculum and professional standards.
2. **Working to develop and support learning networks of councils and professionals engaged in these topics, in partnership with other organisations such as ADPH, the Local Government Association (LGA), the COSLA/SOLACE in Scotland, and relevant NGOs.** This would enable local authority professionals to share good practice and precedents for success, strengthen their governance around CDOH, and support one another in addressing implementation challenges to successfully introduce low-carbon advertising policies.

In parallel, public health and other relevant professionals based in (or with links to) Local Authorities should:

1. **Engage with local and national networks focused on this topic area as these develop, and contribute their practical and implementation expertise as relevant**, in order to build and spread capacity for effective policy development and local implementation.
2. **Strengthen Local Authority governance around Commercial Determinants of Health, particularly as they relate to climate and environmental issues**, for example through a policy governing decision-making so that health is prioritised and organisational conflicts of interest are addressed. This work can make use of resources such as the [ADPH Good Governance toolkit](#)¹, which can aid in identifying and tackling council-specific barriers to implementation of advertising bans.
1. **Create opportunities for ambitious commitments and policy changes on low-carbon advertising and sponsorship, working with elected members and local communities.** This can be supported by case studies of effective implementation and resources like [Badvertising's Low-Carbon Advertising Toolkit](#)² and could also form part of local Climate Plans.
3. **Establish clear metrics and/or engage with academics to support evaluation of the process and impacts of any advertising and sponsorship policy changes implemented**, including public perception-related changes, to build the evidence base for action.

Introduction

Reducing the greenhouse gas emissions that contribute to global heating and tackling localised air pollution are major priorities for public health, and reducing fossil fuel dependency can contribute to both aims. Local authorities and institutions in the United Kingdom (UK) are implementing measures to lower emissions and support sustainable system change³. Nationally, the UK has set legally binding net zero targets by 2050⁴, but is not on track to meet the interim 2030 target: only a third of the emissions reductions required to achieve this are covered by credible plans⁵. Timely and more ambitious action at all levels of government will be necessary to change course and protect human health.

This briefing sets out the public health case for introducing Low-Carbon Advertising and Sponsorship Policies, with a focus on local authorities – though other organisations and public health systems can consider how they could influence and/or adapt such policies to their own context. These policies are low-cost and effective measures that supports efforts to reach net zero and reduce air pollution.

Fossil fuels are a major contributor to climate change due to the high greenhouse gas emissions released when they are burned⁶. Their promotion through marketing⁷ perpetuates their use and enables high-emitting sectors to manipulate public discourse and cultural norms.

High-carbon marketing undermines policy efforts to reduce greenhouse gas emissions. Restricting this type of marketing has great potential to reduce the acceptability of fossil fuel use, accelerate the shift to clean energy, and yield substantial health benefits. A useful, although not exact, parallel is the tobacco epidemic, the spread of which was facilitated through complex large-scale influences that included global marketing⁸. The ban on tobacco advertising, promotion and sponsorship played a crucial role in curbing the health impacts of smoking⁹.

Public Health Impacts of Fossil Fuels and Greenhouse Gas Emissions

Human and planetary health are impacted throughout fossil fuels' life cycle (including production, transportation, consumption and waste products). This has interconnected environmental, social and direct human implications, as depicted in the infographic (p.9). The climate impacts raise particular concern as they could lead to irreversible tipping points¹⁰. Climate change has been described as one of the greatest threats to human health and is already placing increasing strain on individual health and health systems, globally¹¹.

Key direct health impacts of fossil fuel use include those from air pollution, which kills up to 43,000 people annually in the UK¹². Further, due in part to dependence on expensive fossil fuels, millions more people are at risk of or experiencing cold homes¹³, further exacerbating health inequalities in the current cost-of-living crisis.

Historically, the burden of harm from fossil fuels has disproportionately fallen on those least responsible. In the Global South, fossil fuel profits have come at the cost of conflict, social instability and greater environmental damage, despite their relatively late, and low, fossil fuel uptake compared to the Global North¹⁴. Communities are often directly impacted through waste, spills and accidents from fossil fuel production¹⁵, and have inadequate resources to counter these damages.

Role of Public Health and Local Authorities

Public health is committed to reducing fossil fuel dependency and positively influencing the public discourse. This commitment is exemplified by the Faculty of Public Health's recent position statement¹³, which includes the recommendation to the public health community to *"Influence and organise action focused on advertising and sponsorship and offer a route through which local- and regional-level public health action can contribute towards this goal."*

Local authorities, of which over 300 have declared a climate emergency¹⁶, have a key role in promoting and protecting the health of local communities, and a statutory duty to protect their residents¹⁷. They can influence local communities' health both through the work of public health teams and across their functions, including advertising and sponsorship policies, and can be a key driver of system change.

The Influence of Commercial Practices

Marketing (including advertising, promotion and sponsorship) is well known to influence consumer behaviour, which in turn impacts human health^{7,18}. This can best be understood through a 'Commercial Determinants of Health' lens¹³. Corporate advertising in the UK is a powerful, multi billion-pound industry, and warrants effective regulation, as its interests can conflict with public health and cause harm.

The pervasive influence of marketing on harmful consumer behaviour is evident with tobacco use, where direct and indirect (promotion and sponsorships) advertising increases the risk of beginning and continuing to smoke⁹. High-carbon marketing, which normalises and glamorises actions such as frequent flying, is often creative, persuasive, and highly influential¹⁹. For example, evidence shows that when people are exposed to Sports Utility Vehicle (SUV) advertising, their demand for SUVs is increased, with an increase in both desired and actual ownership².

More damaging still, fossil fuel companies have repeatedly employed tactics including knowingly spreading inaccurate information and sowing doubt in the public perception of climate science²⁰ and greenwashing (exaggerating or misrepresenting their 'green' credentials), thereby helping prevent a timely fossil fuel phase-out.

Role of Low-Carbon Advertising and Sponsorship Policies in Local Authorities

There are many examples of curbing marketing resulting in positive public health outcomes^{9,21}. Increased tobacco consumption from widespread marketing was followed by a demonstrable reduction in smoking after comprehensive advertising bans were instated. Under the UK's Tobacco Advertising and Promotion Act (TAPA) 2002, great strides were taken to reduce tobacco exposure and de-normalise consumption²².

Councils already have advertising restrictions for many health-harming products, including tobacco, alcohol, unhealthy food, gambling, and weapons²³. These are impactful: notably, the Transport for London (TfL) ban on High in Fat, Salt or Sugar (HFSS) food and drink advertisements resulted in a 19.4% decrease in purchases of chocolate and confectionery, relative to levels expected without the policy²¹. There is a strong case for such policies to be extended to marketing for high carbon companies and products such as fossil fuel-powered cars, fossil fuel companies, airlines/airports and cruise travel².

Locally, low-carbon advertising and sponsorship policies are expected to contribute towards overall public health and sustainability goals in different ways: directly through a decrease in exposure locally, but more importantly through indirect impacts, including reduced normalisation of fossil fuels and high-carbon products, less acceptance of the harms they cause, and an overall shift in social norms, as well as paving the way for wider (and potentially national) uptake of similar policies.

There will be some decrease in exposure following a specific local ban; however overall public exposure to high-carbon advertisements would not be expected to substantially reduce given that this change is situated within a complex system. This policy brief advocates for changes in structural determinants of health, rather than focusing on individual-led solutions²⁴. This includes addressing the normalisation and acceptance of fossil fuel products, and the dominance of environmentally damaging corporations, through consistent public messaging. Increased intolerance of fossil fuel-related adverse impacts, and more structural opportunities for solutions, can be achieved through this kind of system remodelling.

The IPCC has stressed the need for such structural changes, calling on professionals, experts, and regulators to aid the establishment of low-carbon standards and practices²⁵. Low-carbon, fossil-fuel-free marketing policies, already introduced in at least six local areas in the UK as of 2024² (see below) can contribute to such action. By introducing such policies, public discourse can change, which may help shift social norms, whilst such change is limited by persistent exposure to high-carbon advertising²⁷.

Such policies can also pave the way for more local authorities (as well as other organisations which have advertising hoardings or accept sponsorship deals) to take similar action, which in turn could generate increased appetite for wider uptake, including at a national level²⁶. We also know that there is strong public support for low-carbon advertising policies, with 68% of people in a 2022 poll of 2000 UK-based adults supporting restrictions on advertisements with a negative environmental impact²⁸.

Precedents for low-carbon advertising and sponsorship policies

In the UK, Sheffield and Edinburgh city councils have gone furthest in prohibiting high-carbon advertising and sponsorship, in March and May 2024 respectively, adopting restrictions on fossil fuel companies, airlines, airports, SUVs and fossil fuel-powered cars^{29, 30}.

Cambridgeshire (2022), Basingstoke and Deane (2023), Coventry (2022) and Somerset Councils (2023) have also introduced policies that restrict fossil fuel advertising. Hackney (2023), Liverpool (2021), Norwich (2021) and North Somerset (2021) are among those that have passed motions on this, indicating a commitment to work towards restricting the advertisement of high carbon products². Internationally, Amsterdam was the first to lead with prohibition of advertisements from fossil fuel companies and the aviation industry in 2020³¹. And in 2022, France banned advertising from fossil fuel companies, except for gas products, but did not ban sponsorships³².

Implementation in practice: recommended resources

There are many relevant toolkits and sources of advice and support for implementation. We include links to several here.

Step-by-step implementation process

TfL's ban on HFSS advertising is a guiding example for such policy. Sustain's Healthier Food Advertising Policy Toolkit³³, integral to its formation, provides a useful timeline of steps in its implementation, and key considerations at each stage.

Revenue Implications

The Sustain toolkit addresses loss of revenue, as a commonly cited hurdle that local authorities may experience. Contrary to predictions, in the year following the policy implementation, TfL's revenue increased as alternative healthier brand adverts were opted for. Moreover, despite a temporary dip during the pandemic, TfL's advertising revenue has continued to climb since. No local authority has reported loss of advertising revenue since implementing HFSS policies (which are similar in scope to policies around high-carbon advertising, and have been taken up by a larger number so far).

Sheffield's and Edinburgh's Advertising and Sponsorship policies also acknowledge and incorporate mitigation for any potential loss to council revenue. Recognising the need to support local economies, the Sheffield policy has exemptions with restrictive sponsorship arrangements, for small local or independent businesses, depending on specific advertising circumstances^{29,30}. Local businesses will not leverage the same degree of brand manipulation and buying power as compared to larger corporations.

Sheffield's policy despite having a broad scope of restrictions which include fossil fuels and HFSS amongst alcohol, vaping and gambling is predicted to have a low loss of revenue (£14,000-£21,000 per quarter revenue loss)³⁴. Importantly, the costs saved from avoided health impacts are not included in this figure and are likely to outweigh potential marginal losses.

Legal advice

Legal advice to Councils in England and Wales commissioned from Richard Wald KC of 39 Essex Chambers by Adfree Cities and Badvertising found that such policies are lawful, proportionate and necessary. They concluded, 'it is within local authorities' power and discretion to adopt advertising policies that exempt adverts and sponsorship from high-carbon products and services, and that there is a strong legislative background to do so'. It also states that councils have broad scope to design evidence-based policies at their discretion, and the risk of successful legal challenge is low³⁵. Badvertising's toolkit for local policy-makers² summarises this legal assessment.

Governance

The ADPH-endorsed Good Governance Toolkit¹ outlines critical concepts and a navigation strategy to manage corporate interests in the policy process. It recognises organisational conflict of interest posed by the private sector in LAs and several useful strategies which can be employed to prioritise public health interests, such as avoiding informal routes of influence with corporate representatives.

A Model Motion Design

Adfree Cities provides a model motion to be presented at council meetings². It can be adjusted to reflect the specific council context.

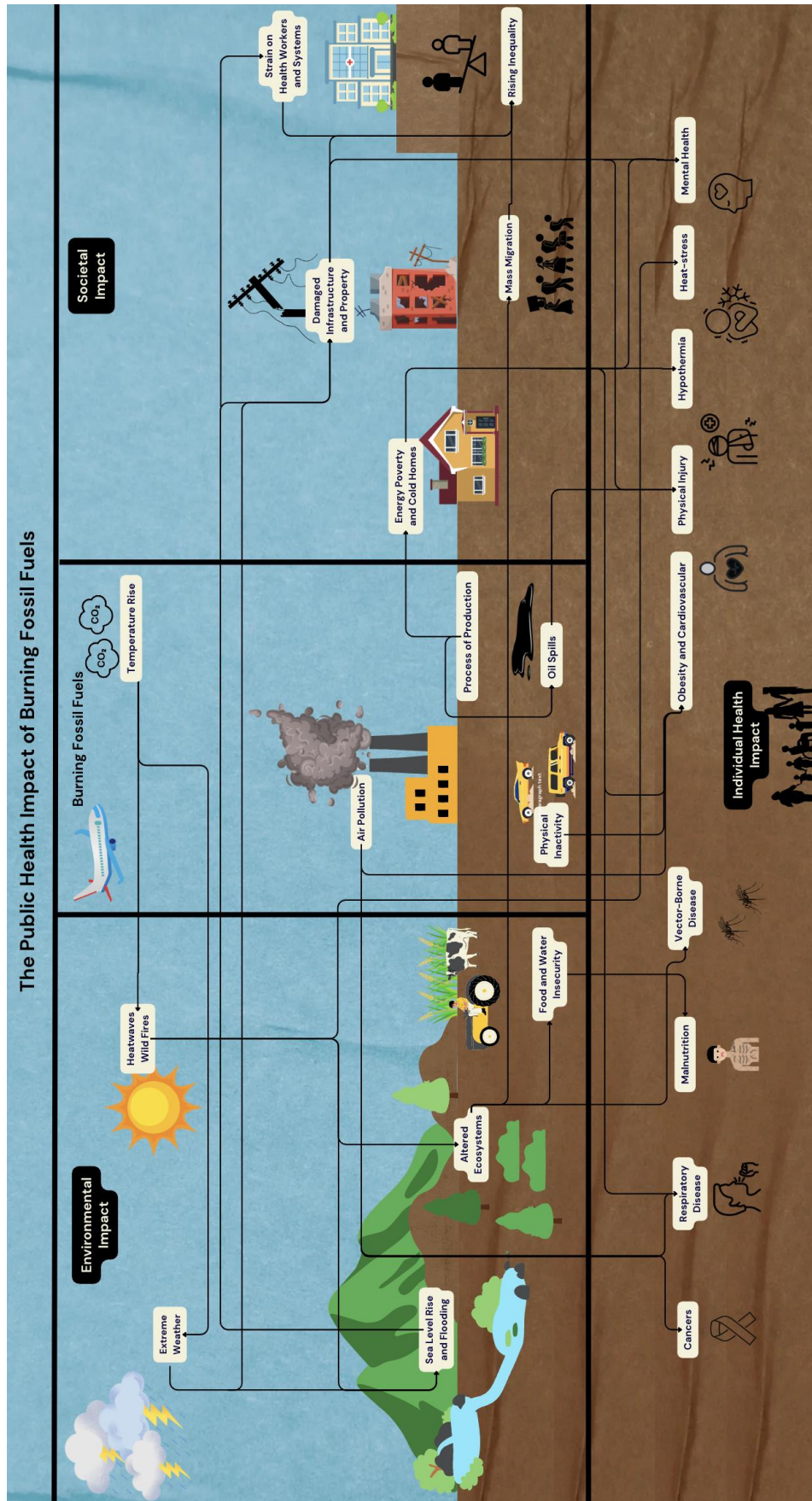
Conclusions

There is a strong and growing case for local authorities to adopt low-carbon advertising and sponsorship policies that prevent the promotion of fossil fuels and high-carbon products from a public health perspective, in view of the direct and indirect harms from air pollution and climate change. Other organisations with a public health remit (e.g. NHS organisations), particularly in the devolved nations, can also take action on this agenda by engaging with their local Councils, and considering how this could apply within their own context (including in relation to wider fossil fuel-related CDOH issues, such as divestment and partnerships). Moreover, momentum is building, with increasing numbers of councils committing to and implementing these kinds of policies, and growing awareness, and public health professionals can play a key role in this shift.

Authors: Devina Sharma, Isobel Braithwaite, Veronica Wignall, Anna Brook, Kathrin Lauber.

Contributors: Shannon Kennedy, Christus Ferneyhough, Anya Göpfert, Tizzy Keller, Marc Davies, Phil Mackie.

Infographic



References

- ¹ Good governance toolkit - ADPH [Internet]. ADPH. 2024 [cited Aug 2024]. Available from: <https://www.adph.org.uk/resources/good-governance-toolkit/#:~:text=This%20is%20a%20set%20of>
- ² Local Policymakers Toolkit — Badvertising. Badvertising [Internet]. Badvertising. 2014 [cited Aug 2024]. Available from: <https://www.badverts.org/policymakers-toolkit>
- ³ Back Local Climate Action | Local Government Association [Internet]. www.local.gov.uk. Available from: <https://www.local.gov.uk/about/campaigns/make-it-local/back-local-climate-action>
- ⁴ UK Government. UK Becomes First Major Economy to Pass Net Zero Emissions Law [Internet]. Gov.uk. 2019. Available from: <https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>
- ⁵ Dooks T. UK off track for Net Zero, say country's climate advisors - Climate Change Committee [Internet]. Climate Change Committee. 2024. Available from: <https://www.theccc.org.uk/2024/07/18/uk-off-track-for-net-zero-say-countrys-climate-advisors/#:~:text=The%20Climate%20Change%20Committee%27s%20assessment>
- ⁶ Nations U. Causes and Effects of Climate Change [Internet]. United Nations. 2023. Available from: <https://www.un.org/en/climatechange/science/causes-effects-climate-change#:~:text=Generating%20electricity%20and%20heat%20by>
- ⁷ Thomas S, van Schalkwyk MCI, Daube M, Pitt H, McGee D, McKee M. Protecting children and young people from contemporary marketing for gambling. Health Promotion International. 2023 Mar 18;38(2).
- ⁸ World Health Organization (WHO). WHO Framework Convention on Tobacco Control [Internet]. ahpsr.who.int. 2003. Available from: <https://fctc.who.int/publications/i/item/9241591013>
- ⁹ Tobacco EURO [Internet]. www.who.int. Available from: https://www.who.int/europe/health-topics/tobacco/banning-tobacco-advertising-sponsorship-and-promotion#tab=tab_1
- ¹⁰ Understanding climate tipping points [Internet]. www.esa.int. Available from: https://www.esa.int/Applications/Observing_the_Earth/Space_for_our_climate/Understanding_climate_tipping_points
- ¹¹ World Health Organization. We must fight one of the world's biggest health threats - climate change [Internet]. www.who.int 2023. Available from: <https://www.who.int/news-room/commentaries/detail/we-must-fight-one-of-the-world-s-biggest-health-threats-climate-change>
- ¹² Public Health | LAQM [Internet]. laqm.defra.gov.uk. Available from: <https://laqm.defra.gov.uk/air-quality/guidance/public-health/>
- ¹³ Position Statement Fossil Fuels, the Fossil Fuel industry and Public Health: the case for ending extraction and exploration to protect public health The fossil fuel industry and drawing on public health lessons from other industries [Internet]. 2024. Available from: <https://www.fph.org.uk/media/m0tnmniw/fph-statement-fossil-fuels-the-fossil-fuel-industry-and-public-health.pdf>
- ¹⁴ Strazzante E, Rycken S, Winkler V. Global North and Global South: How Climate Change Uncovers Global Inequalities - Generation Climate Europe [Internet]. Generation Climate Europe. 2021. Available from: <https://gceurope.org/global-north-and-global-south-how-climate-change-uncovers-global-inequalities/>
- ¹⁵ The Hidden Costs of Fossil Fuels [Internet]. Union of Concerned Scientists. 2024. Available from: <https://www.ucsusa.org/resources/hidden-costs-fossil-fuels#:~:text=Externalities%20are%20sometimes%20easy%20to>
- ¹⁶ Local Government Association. 2024. Available from: <https://www.local.gov.uk/about/campaigns/build-back-local/local-path-net-zero#:~:text=Over%20300%20local%20authorities%20have,the%20impact%20of%20climate%20change>
- ¹⁷ Parliament.uk. 2012. Available from: <https://researchbriefings.files.parliament.uk/documents/SN06844/SN06844.pdf>
- ¹⁸ McGrane E, Wardle H, Clowes M, Blank L, Pryce R, Field M, et al. What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature. Public Health [Internet]. 2023 Jan 26;215. Available from: <https://www.sciencedirect.com/science/article/pii/S0033350622003420>

- ¹⁹ Stubenvoll M, Neureiter A. Fight or flight: How advertising for air travel triggers moral disengagement. *Environmental Communication*. 2021 Aug 18;15(6):765-82.
- ²⁰ Supran G, Oreskes N. Assessing ExxonMobil's climate change communications (1977–2014). *Environmental Research Letters* [Internet]. 2017 Aug 1;12(8):084019. Available from: <https://iopscience.iop.org/article/10.1088/1748-9326/aa815f/meta>
- ²¹ Appleby K. Impact case study - Evaluating the impact of the removal of “junk-food” advertising on public transport networks in London - NIHR School for Public Health Research [Internet]. NIHR School for Public Health Research. 2023. Available from: <https://sphr.nihr.ac.uk/news-and-events/impact/impact-case-study-junk-food-advertising-tfl/#:~:text=Our%20researchers%20found%20that%20the>
- ²² A Post Implementation Review Report of Tobacco Legislation Coming into Force [Internet]. 2010. Available from: <https://assets.publishing.service.gov.uk/media/6013eb1cd3bf7f70b83bfb74/pir-tobacco-legislation-web-accessible.pdf>
- ²³ Adfree Cities. Don't advertise here: Somerset Council bans polluting car, airline, fossil fuel ads. - Adfree Cities [Internet]. Adfree Cities - for happier, healthier cities. 2023 [cited 2024 Aug 29]. Available from: <https://adfreecities.org.uk/2023/09/dont-advertise-here-somerset-council-bans-polluting-car-airline-fossil-fuel-ads/>
- ²⁴ Ralston R, Godziewski C, Carters-White L. The many meanings of policy instruments: exploring individual and structural determinants in obesity policy. *Policy & Politics*. 2023 Mar 22;1–19.
- ²⁵ Creutzig F, Roy J, Devine-Wright P, Perkins P, Sanches-Pereira A, Weber E, et al. SPM 503 5 Demand, Services and Social Aspects of Mitigation Coordinating Lead Authors: Lead Authors: Contributing Authors. Available from: https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_Chapter05.pdf
- ²⁶ McKeivitt S, White M, Petticrew M, Summerbell C, Milica Vasiljevic, Boyland E, et al. Characterizing restrictions on commercial advertising and sponsorship of harmful commodities in local government policies: a nationwide study in England. *Journal of Public Health*. 2023 Aug 22.
- ²⁷ Castro-Santa J, Drews S, Bergh J van den. Nudging low-carbon consumption through advertising and social norms. *Journal of Behavioral and Experimental Economics*. 2023 Feb;102:101956.
- ²⁸ George S, editor. edie; 2022. Available from: <https://www.edie.net/survey-two-thirds-of-brits-would-welcome-ban-on-adverts-for-environmentally-harmful-products/>
- ²⁹ Appendix 1 -Advertising and Sponsorship Policy Sheffield City Council Advertising and Sponsorship Policy [Internet]. [cited 2024 Aug 29]. Available from: <https://democracy.sheffield.gov.uk/documents/s66761/Appendix%201%20-%20Sheffield%20City%20Council%20Advertising%20and%20Sponsorship%20Policy%202024-2026.pdf>
- ³⁰ Policy on advertising and sponsorship: proposed amendments [Internet]. Available from: <https://democracy.edinburgh.gov.uk/mgConvert2PDF.aspx?ID=70730>
- ³¹ Amsterdam, 1st city in the world to ban fossil ads, takes next steps [Internet]. World without fossil ads. 2020. Available from: <https://www.worldwithoutfossilads.org/listing/amsterdam-first-city-in-the-world-to-ban-fossil-ads/>
- ³² Frost R. France becomes the first European country to ban fossil fuel adverts [Internet]. Euronews. 2022. Available from: <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>
- ³³ Healthier Food Advertising Policy Toolkit | Sustain [Internet]. www.sustainweb.org. Available from: <https://www.sustainweb.org/reports/feb22-advertising-policy-toolkit/>
- ³⁴ Policy Committee Report Report to Policy Committee Author/Lead Officer of Report: Nicola Allen, Advertising & Sponsorship Officer Purpose of Report [Internet]. 2023. Available from: <https://democracy.sheffield.gov.uk/documents/s66760/Report%20-%20Advertising%20and%20Sponsorship%20Policy%202024-2026.pdf>
- ³⁵ Legal Advice to Councils on policies to control High Carbon Advertising [Internet]. Available from: <https://www.newweather.org/wp-content/uploads/2023/05/High-Carbon-Advertising-Opinion.docx-1.pdf>