

Managing adverts for high carbon products and services

Findings from a citizens' jury and
national polling

June 2024



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Authors: Jacob Ainscough and Rebecca Willis

1 Executive summary

The UK has a legal obligation to achieve the target of net zero greenhouse gas emissions by 2050 to limit dangerous climate change. This requires changes in many areas of the economy, including energy demand and supply, transport, and food production and consumption. It also means shifts in people's consumption choices and behaviours.

Advertising influences people's choices, both by promoting products and services, and by contributing to overall cultural understanding and social norms. Given this influence, it is important to ask whether advertising should be managed to meet the UK's climate goals.

In recent years, there has been debate over whether the approach to addressing the environmental impact of advertising is sufficient, and about the efficacy of different approaches to regulating it. The research presented here aimed to gauge people's opinions on this issue, through a combination of deliberative research and polling.

We commissioned a citizens' jury, 25 people selected to represent the profile of the UK population as a whole, to learn, deliberate and provide recommendations on how, if at all, advertising should change to reflect the need to address climate change. We also conducted polling to test these findings with a demographically representative group of the British public.

People want change

Overall, we found strong support for new measures to manage the advertising of high carbon products and services. After learning about the existing approach to regulating the environmental impact of advertising, the jury rejected the idea of maintaining the status quo. Instead, they developed several proposals for how advertising could change. These included a labelling system to show the carbon intensity of products and services advertised, a levy on the advertisement of high carbon products and services, and restrictions on which products and services could be advertised to children.

Of those polled, 29% wanted no changes to be made but each of the proposals developed by the jury gained at least 60% support.

There is strong support for labelling to show carbon emissions on adverts

The most popular proposal developed by the jury was a labelling system for adverts. This would require a highly visible red, amber or green rating, based on the climate impacts of the product or service advertised. This was seen as an effective way of informing the public about how to lower the climate impact of their choices, whilst also increasing awareness and understanding of climate change. It was also seen as a way of shaping corporate behaviour, as jury members believed companies would not like their products or services to have a 'red' rating. Twenty of the 25 jury members supported this proposal by the end of the process, with four of the remainder saying they 'could

live with it'. The labelling system was also the most popular of the polled proposals: 69% supported a labelling system, with 44% strongly supporting it.

Advertising reform as part of wider package of net zero policies

Advertising reform was not seen as a panacea. Jury members were clear that factors such as cost and convenience were the major drivers of consumption choices. They saw advertising reform as part of a wider package of measures to improve public awareness and understanding about climate change and low carbon consumption.

The current lack of clear messaging or access to reliable information was a reiterated theme over the course of the jury's deliberation. A wider package of policy measures and public awareness initiatives were, therefore, seen as necessary to drive a transition to net zero living.

2 Acknowledgements

We would like to thank all the participants of the citizens' jury for their time, their insights and their good humour. The ideas presented in this report are the result of their hard work. The smooth running of the jury was ensured by Simon Wilson, Helen Bovey and their team of expert facilitators at Wilson Sherriff. For her thorough and detailed work evaluating the jury, we also thank Anna Beckett.

For their clear and detailed presentations, we thank the expert speakers who appeared before the jury: Melissa Seabrook, Sandra Bogelein, Lorraine Whitmarsh, Kaouther Kooli, Stephen Woodford, Justine Grimley, Tasmin Cooper, and James Best.

For their expertise and advice throughout the process, we thank all the attendees of an early scoping round table and especially the members of our advisory board: Andrew Simms, Anne-Marie Benoy, Jonathan Wise, Kathrin Lauber, Konrad Shek, Miles Lockwood, Stuart Macnaughtan, and Victoria Harvey. The project benefited greatly from their insights and guidance.

Finally, for their ongoing support, insights and encouragement, we thank the Climate Citizens research team at Lancaster University. Special thanks are due to Juliana Silveira for her assistance in organising the citizens' jury.

The engagement of the above-named people in this project does not imply their endorsement of the findings. Responsibility for the contents of this report remains solely with the authors.

3 Introduction

The UK has a legal obligation to achieve net zero greenhouse gas emissions by 2050 to limit dangerous climate change. This requires changes in many areas of the economy, including energy demand and supply, transport, and food production and consumption. It also means shifts in people's consumption choices and behaviour.

Analysis by the government's independent advisers, the Climate Change Committee, identifies a series of changes which will affect consumption choices and behaviour, including a shift to electric vehicles, alongside a reduction in car use overall; measures to manage the increase in demand for air travel; and a change in diets, including a reduction in meat consumption ¹.

These changes will be brought about through a combination of measures, including regulation, pricing and public investment. Overall, meeting the goals of net zero emissions requires people's commitment, both as citizens, advocating, voting for, supporting (or at least not opposing) strategies to reduce emissions; and, as consumers and members of civil society, acting in ways that reduce their own impact. In short, climate strategies require a social mandate ².

Advertising influences people's choices, both by promoting products and services, and by contributing to overall cultural understanding and social norms. Given this influence, it is important to ask whether advertising should be managed to meet the UK's climate goals.

To address this question, we commissioned a citizens' jury to understand public views on the question of how, if at all, advertising should change to reflect the need to address climate change. We also conducted polling to test these findings with a wider sample of the public.

In section 3 of this briefing, we first examine the ways in which advertising has been managed to achieve social and environmental objectives, and then briefly survey advertising regulation in the UK. In section 4, we outline the methodology used. Section 5 presents the research findings. In section 6, we discuss the wider implications.

Overall, we found that people want new measures to manage the advertising of high carbon products and services, as part of a wider strategy for better education and leadership on climate change. Concerns were expressed about the vulnerability of children and young people to advertising on social media. Participants developed proposals for a labelling system for adverts, which would require them to include a red, amber or green traffic light rating, based on the climate impacts of the product or service.

They also proposed a levy on advertising high carbon products and services, which would provide revenue for grants to support green initiatives. While there was wide support for labelling, the proposal for a levy divided opinion.

Findings from our polling also suggested that the public supports additional measures to manage the advertising of high carbon products and services. Just 29% of people polled wanted no changes and all proposals received over 60% support. In agreement with the jury, the labelling system was the most popular proposal in the polling: 69% of people supported labelling, with 44% strongly supporting it.

3.1 Research context

Below, we outline the context for this research, surveying how advertising is managed in the UK; how the advertising of high carbon products and services, in particular, is considered; and what wider research there has been into the link between advertising and climate change.

3.1.1 How is advertising managed in the UK?

Regulation of advert content in the UK is largely overseen by the Advertising Standards Authority (ASA). The guiding principle is that all advertising, including online, must be “legal, decent, honest and truthful”. Detailed rules are provided in the Advertising Codes, overseen by the Broadcast Committee of Advertising Practice (BCAP) in the case of broadcast (TV and radio) advertising, and the Committee of Advertising Practice (CAP) for all other types. These Committees consist of industry representatives, though Ofcom retains the power to sign-off any major changes to the BCAP code. The Advertising Codes adhere to, and often go beyond, legal requirements placed on advertisers. The primary role of the ASA is to enforce these Codes through a programme of proactive monitoring, responding to complaints and conducting consumer research. The system is funded by the industry through a voluntary levy on advertising ³.

This regulation applies to all advertising, but specific rules apply to some products and services because of their environmental, social or health impacts. On environmental matters, there is a general requirement that “advertising must not encourage behaviour grossly prejudicial to the protection of the environment” ⁴.

There are specific rules on ‘green claims’, requiring a high level of substantiation for any claims to environmental standards, including the use of carbon credits to ‘offset’ emissions ⁵. The ASA takes account of a company’s overall business model when deciding if a ‘green claim’ is considered to be misleading.

The ASA focuses on the content, targeting and placement of adverts. For example, the current Codes contain restrictions on placing adverts for foods that are high in fat, sugar or salt near schools. Further restrictions, such as advertising bans on specific products or services, requires legislation by parliament. For example, most forms of tobacco advertising are prohibited under the Tobacco Advertising and Promotion Act 2002.

3.1.2 Management of advertising high carbon products and services

As outlined in section 3 above, some products and services result in high levels of greenhouse gas emissions and, therefore, demand for these products and services

must be managed. This includes petrol and diesel cars, as well as a reduction in overall car use, flights, and the consumption of meat and dairy products (we refer to these as 'high carbon products and services' as a shorthand). At the UK level, there are no specific restrictions on advertising these products, beyond the measures on environmental impact outlined in 3.1 above.

Some local authorities, including North Somerset, Liverpool, Norwich, Basingstoke and Coventry, are introducing local bans or restrictions on the advertising of high carbon products and services, such as large cars (sports utility vehicles, or SUVs), flights and fossil fuel companies. Beyond the UK, Amsterdam and other Dutch cities have banned adverts for fossil fuel products, and similar bans are being considered in Stockholm, Gothenburg and Sydney. Though in many cases, these bans have yet to be implemented. In 2022, following recommendations from its Citizens' Assembly, France banned adverts for fossil fuels (the fuels themselves but not the high carbon products in which they are used). In June 2024, United Nations Secretary General António Guterres called for a ban on fossil fuel adverts.

3.1.3 Previous research

Research is limited into the effects of advertising restrictions on high carbon products and services. In other areas, there is some evidence that restricting advertising leads to reduced consumption. For example, a 2022 review suggested that restricting advertising of unhealthy foods leads to lower consumption by children⁶. This evidence has led to action. For example, the World Health Organization (WHO) and the UK's Food Strategy have both recommended advertising restrictions, and Transport for London and local areas have banned the advertising of unhealthy food.

In the case of tobacco advertising, some studies have found no effect of advertising restrictions⁷. Though more recent work suggests that restrictions can be effective, especially when they cover all advertising and promotion channels^{8,9}. This evidence is used to support public health policy such as the WHO Framework Convention on Tobacco Control.

Disentangling the effects of specific interventions is difficult. Studies take different approaches, for example, in accounting for displaced consumption. Similarly, studies differ in whether they conceptualise advertising restrictions as a product, or a driver, of the evolution of social norms. As such, the evidence for the efficacy of specific advertising restrictions remains contested. There is research which documents how the advertising and food industries have used the contested nature of the evidence to argue against restrictions¹⁰.

On high carbon products and services specifically, research by the campaign group Purpose Disruptors estimated that adverts for high carbon products and services resulted in significantly higher demand for these products and, therefore, increased carbon emissions¹¹. This was disputed by advertising industry bodies, including the Advertising Association, the industry body for advertisers, which commissioned

research questioning the methodology¹². It rejects the idea of attributing the emissions of products and services to advertising agencies, highlighting that agencies do not control the business models of the companies they serve. The report also disputes Purpose Disruptors' methodology, arguing that consumption attributable to a given advertising campaign is not necessarily additional consumption but is more likely to be displaced consumption.

These disputes are complex but, in essence, campaign groups and some academic research suggest advertising high carbon products and services leads to increased consumption and, therefore, increased emissions¹³. The advertising industry objects to this, claiming advertising primarily drives brand switching and, thus, does not lead to increased overall consumption of high carbon products and services, or that measuring any such increase is not possible. They argue that advertising can play a positive role in switching consumers to lower carbon alternatives such as electric vehicles, in support of government regulation.

To an extent, these disagreements rest on questions about where boundaries are drawn. Evidence from food and tobacco advertising, as described above, does suggest a link between advertising restrictions and decreased consumption. However, there are two reasons why it is difficult to isolate and measure the effects of advertising restrictions. First, they are often accompanied by other measures, such as taxation or regulation. For example, to what extent did banning cigarette advertising contribute to decreased smoking, in isolation from other measures, such as taxation or restricting smoking indoors? Second, advertising does not just work by affecting individual purchasing decisions, it also contributes to overall social norms¹⁴. Thus, advertising larger cars or flights may help to normalise high carbon behaviours, but measuring the precise contribution of advertising is difficult as there are many factors which shape social norms.

Rationale for this project

There is strong evidence that people are concerned about climate change and want the government to set a framework which allows people and businesses to align their actions with climate goals^{14,15}. However, there is a lack of research into people's views about how advertising is managed.

Climate Assembly UK, the citizens' assembly on climate change commissioned by the UK Parliament in 2020, recommended advertising bans or restrictions on high emission products or sectors, but it did not outline how this would work.

This research, therefore, combined a citizens' jury with polling data to investigate public views on the question of whether (and how) advertising high carbon products and services should be managed, to contribute to achieving UK climate goals.

4 Method

The research uses both a citizens' jury (a type of 'deliberative mini-public' (DMP)) and polling data to build a picture of public attitudes towards different management options. In this section, we outline our rationale for combining a DMP with polling data and give an overview of the research design. More information is available in the appendix.

4.1 Combining DMPs and polling

DMPs bring together a group of usually between 25 and 100 people, meeting over a series of sessions to learn about, deliberate on and develop proposals related to a specific policy challenge. As such, they typically have four main design features. First, they are made up of people recruited to be broadly representative of the wider public. Second, they have a learning phase, where participants are given information about the topic under discussion to build their understanding. Third, there is a deliberation phase, where participants exchange views and develop proposals. Finally, there is a decision making phase where proposals or recommendations are formalised and the level of support is assessed ¹⁶.

DMPs provide a way to understand public attitudes to a policy problem. Those participating have access to information about the issue, a chance to hear opposing views and engage in debate, and time to refine their own thinking. This means that DMPs can show what the public might think on an issue if they were provided with more information; what types of arguments and information shape people's views; and how policies would be received once implemented.

DMPs have been used extensively by organisations across the public and third sector, including parliamentary select committees, government advisory bodies and environmental NGOs ¹⁷⁻¹⁹.

DMPs and polling are complementary because polling gives an idea of how the public may react to a policy proposal if they do not have the time to learn and think about it. It can also provide larger data sets, allowing for analysis of how factors, such as gender, age and political outlook, influence views.

4.2 Research approach

The citizens' jury was made up of 25 people selected to be broadly representative of the UK population, in terms of gender, age, ethnicity, disability status, educational attainment, level of concern about climate change and political affiliation.

All participants were paid for their time. We also convened an advisory board to advise on the design of the process, consisting of academics, civil servants, advertising industry representatives and advertising reform campaigners (see appendix, page 1).

The jury met five times over three months. In sessions one to three, participants learned about the relationship between advertising, consumption and greenhouse gas

emissions. Speakers included representatives from the Met Office, the Climate Change Committee, the Advertising Association, the ASA and the campaign group Purpose Disruptors (recordings of all the presentations can be found [here](#)).

Sessions four and five focused on developing and refining proposals for managing the advertising of high carbon products and services. Following the final session, participants were sent a voting booklet for them to express their individual opinions on the proposals developed by the jury.

Following the jury, we tested the proposals through polling a nationally representative sample of 2000 UK adults in 2024. For each proposal, respondents were asked to express their support along an 11-point scale, from zero (strongly disagree) to ten (strongly agree), with five representing a neutral centre point. Data were collected in the week of 6 May 2024. See the appendix on pages 15-16 for the full question texts and additional information about the survey's design.

The jury was overseen by an independent evaluator who observed the meetings of both the steering group and the jury, and provided ongoing advice to the project team.

5 Findings

5.1 Overarching themes

Some clear shared views emerged through the citizens' jury and were confirmed by the polling. All but one of the jury members wanted further measures to manage advertising of high carbon products and services, as part of a wider strategy to tackle climate change and increase public engagement. The poll findings confirmed that the public broadly supports the introduction of new measures.

Jury members thought that better education and information on climate change is needed and that advertising could help to achieve this. Companies and, to an extent, the government, are widely distrusted which influenced the measures jury members proposed to manage advertising.

Running through the discussions was a high level of concern about children's exposure to advertising, as part of wider worries about the impacts of social media, though there were mixed views about how to respond to this. Some participants also wanted to tackle what they saw as excessive consumption and saw managing advertising as one way to address this.

These views informed the specific jury recommendations, described in section 5.2 below. First, we consider the main themes in turn.

Support for measures to manage advertising

All but one of the jury participants wanted more measures to manage the advertising of high carbon products and services, with some pointing to the labelling of food products, or warnings on gambling adverts, as precedents.

They suggested two broad reasons why this was needed: first, and most important in their view, to educate and inform people. One participant said that changing advertising could *"make people more aware of emissions and carbon in products, because people would discuss it more."* This is discussed in more detail below; second, they thought it would prompt companies to take climate into account. This led the jury to recommend a labelling scheme for adverts, described in section 5.2.

Though people wanted advertising to be managed, they did not see this as a panacea, and, in fact, they had relatively modest expectations about its likely impact. This was because they thought people's ability to choose certain products or services is limited by cost or availability, and wider cultural norms. Instead, they saw these measures as part of a wider strategy to tackle climate change and engage people, specifically they wanted more transparency in both information and regulation, and better education.

Some participants advocated a ban on advertising high carbon products and services, with one saying, for example:

“Drastic action should be taken. We should be banning the advertising of high carbon products, there should be more education and promotion of positive environmental choices”.

However, when asked to choose what options to develop into full recommendations, only one participant selected this option to focus on. A ban was the least popular of the proposals in the polling, other than ‘no change’, though it still received 49% support. In general, people thought that advertising offered an opportunity to educate and inform people about climate issues, which we discuss below.

The participant who did not want any further measures to manage advertising explained his reasoning as follows:

“I don’t want any change in advertising. I don’t want people dictating what I can and can’t do[...] How much of our lives is the government going to control? A lot of information in relation to green issues is now being contradicted by other experts saying we won’t get to net zero by 2050, it’s an impossibility. And, even if we do, the cost is absolutely staggering.”

The need for education and information

Members of the citizens’ jury consistently stressed the need for education and information on climate change and the UK’s net zero target. There were frequent references to the need for better education on climate, in schools and more widely, and this formed a constant backdrop for their deliberations on advertising. They saw advertising as a means to inform and educate:

“While involved in the jury, I’ve become more aware of climate change, and I find a lot of people don’t know a lot about it. I think it would be a good idea, before the adverts come on, to show the effects of climate change in this country.”

Different roles for advertising were considered. There were many mentions of the need for a public information campaign or programme to build climate awareness. Covid-19 and anti-smoking campaigns were seen as a potential model.

“I think the government should take better steps to advertise to the public what they are doing. It is out there, but you have to look for it, you have to do the reading on it. If it’s something they want a national change on, they can’t rely on people being proactive. It’s something they need to work on themselves, as well as pushing industry leaders to change their advertising.”

People also supported the principle of information on climate impacts accompanying advertising, through announcements before an advert, or labelling systems, like the one they proposed. As one participant said: *“...advertising is everywhere, so if you put it in, it is hard to avoid, and the message gets across.”*

Distrust of business and government

Jury members generally expressed low levels of trust in companies. Distrust of

advertising claims was widespread. Typical comments included: *"I don't take it at face value because they have an ulterior motive to sell you something"*. In particular, they did not trust advertisements making a 'green' claim:

"...it feels like they've jumped on the bandwagon. Is there actually anything behind their claims that they've got a green conscience?"

Participants had internalised a certain level of distrust. As a result, some were surprised that the advertising regulator requires all advertisements to be "legal, decent, honest and truthful". One participant said:

"I was just surprised about how strict the advertising laws were... I'm surprised that there's a law saying that they've got to be honest." (note this participant was referring to ASA codes when using the term 'law').

There was also some concern about advertisers 'policing' their own products and services. One participant said the following about gambling:

"You see a lot of restrictions saying to gamble within your means. But it's the betting companies that are advertising it. And it seems a bit hypocritical that they want your money and they're advertising to be safe with it."

As a result of this distrust, when discussing who should be involved in managing advertising, few supported voluntary action by industry, or self-regulation. This prompted them to consider government, though some worried that they would collude with industry. They pointed to unhealthy close connections between the public and private sector, with views influenced by recent scandals such as PPE provision during Covid-19.

"I think government and companies are joint together [...] The large conglomerates, corporate companies, shareholders are mainly for the rich, and those that are in government."

These worries led to people strongly backing an independent body to manage advertising and its climate impacts.

Concern about children

Some jury participants, particularly parents, expressed significant concern about children's consumption of social media and other online activity, as well as more general concerns about children's wellbeing, with one commenting:

"...this generation of children are the ones that are going to bring about change ... but I also think they've been through a lot, and a lot of them are anxious."

This was a strong influence on their views on advertising and climate change. It led them to propose specific measures to restrict advertising to children, such as bans:

"I think there should be a way of blocking all adverts on phones completely, so that, as a parent, if you've got kids, there's actually a way of going into that profile and block all adverts completely, so that your child doesn't get to see adverts."

Discussion of children often moved off advertising and onto the question of information and education about climate change. There was a lively debate about whether children should be targeted with information, because they can be reached through schools and are going to have to shoulder the burdens of a changing climate, or whether children and young people were, in fact, better informed than adults and should be given more power to shape outcomes. There were mixed views about whether it was right to give children 'scary' climate messages, with some feeling they should be protected, although others disagreed.

Questioning consumption

Some jury members said there was a need to tackle excessive consumption, though views were mixed. Those that did see consumption as a problem pointed to the need *"to stop trying to sell these 'lifestyles' – buy this car and you'll be successful"*. Some wanted more emphasis on refurbishment and reuse:

"If you buy a new gadget, you can get it refurbished and it functions the same. And it is better than throwing an old phone into landfill. That should be promoted more. There are big companies that do that, and you don't see it advertised – but you do see new iPhone adverts."

They pointed to the emergence of online platforms and other initiatives which enable second-hand purchases. This underpinned their recommendation to promote reuse and refurbishment, possibly funded through a levy on advertising, as we describe in section 4.2 below.

5.2 Jury proposals

Following the introductory phase, the jury had the task of drawing up a set of proposals. As described in section 4 above, they drew up a longlist of proposals, then voted on ideas they would like to develop further.

Three proposals were agreed: a labelling system showing the true carbon emissions of a product or service; a levy on advertising high carbon products and services; and restrictions on advertising to children.

The three proposals are described below. For each, we set out the jury's proposal, and the results of the subsequent voting, which was held by secret ballot.

For each proposal, participants had the option to vote; 'I support this', 'I can live with this', or 'I don't support this'.

Based on qualitative coding and analysis of the discussions, we then set out the reasoning behind the proposal, together with any concerns or dissenting views.

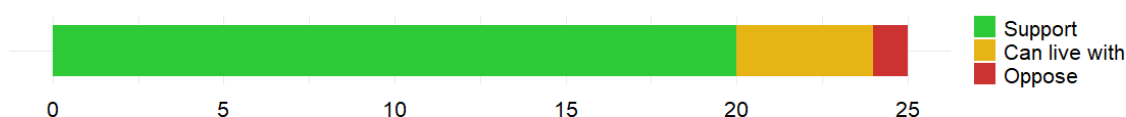
Proposal 1

A traffic light labelling system showing the true carbon emissions of a product or service

Proposal:

Adverts for products and services would carry a red, amber or green label reflecting their true lifecycle emissions. Where the advert type allows, a link would be included for people to find out more about the environmental impact of the product or service. The system would be launched with a public information campaign to educate members of the public about how the system worked and what the colours represented.

Jury vote:



There was strong support for this proposal because people thought they did not have a good sense of what they should or should not be purchasing to reduce their own carbon emissions. They said the labelling system would provide a simple way of understanding impacts. They drew parallels with widely understood food labelling.

"...it's like a universal language [...] The carbon footprint for some products is almost untraceable. But a pro of this idea, is that it would be universally understood. Traffic light systems are around the world."

Participants thought the labelling system should be launched alongside a public information campaign to familiarise people with the aims of the scheme and how it worked.

They developed the idea of an online portal where people could explore further information about the carbon emissions associated with a particular product or service, particularly significant purchases like a new car.

For those in favour of prioritising consumer choice and individual responsibility, labelling was seen as a way of ensuring consumers could make informed choices. It was also seen as a way to encourage innovation and competition between companies.

Participants believed that companies would not want their product or service to have a red label and would, therefore, innovate to bring down emissions. However, a small number expressed concern that companies may choose not to advertise, resulting in lower revenues and less consumer choice.

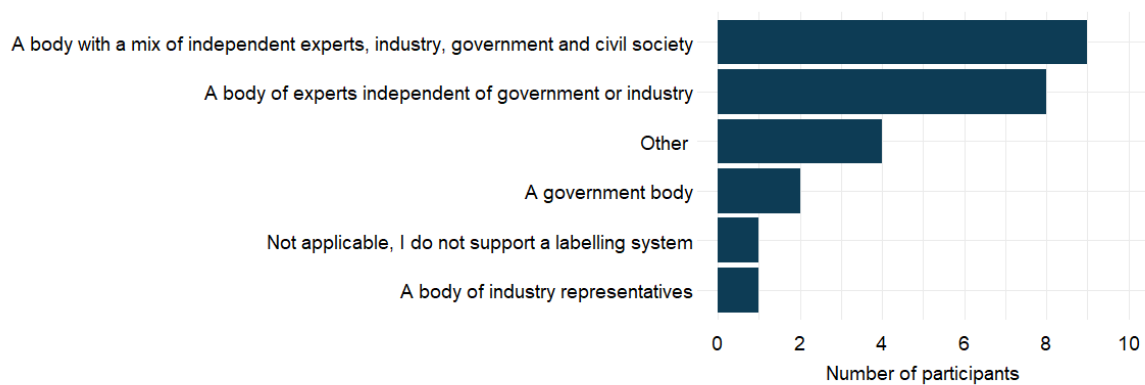
“...[the labelling system] naturally can influence healthy competition between competitors [...] you’ll strive to be on the same level as them and maybe that influences behaviours and influences organisations to naturally become greener, and generate healthy competition as a result.”

There was a strong view that the labelling process would need independent oversight. Jurors said that the body allocating labels should be independent of the industry, and potentially arm’s length from government. This view was expressed almost unanimously by the jury and was also captured in the final voting (see figure 1).

Given the lack of trust in companies, as discussed in section 5.1, people were also worried about how businesses would apply labels, with concerns that businesses would find ways to disguise the real carbon footprint of their product or seek to hide the label in small print, unless there were clear rules.

Figure 1. Attitudes regarding who should allocate the traffic light labels to products

(Taken from final voting booklet. Respondents could pick one choice)



Despite widespread support for this proposal, there were some concerns and areas of disagreement. Drawing on their experience of food labelling, people thought labels could be ignored or overridden, in the face of other factors such as cost. Similarly, several of those who voted that they ‘could live with it’ suggested that this measure would be ‘better than nothing’ and that they would accept it as part of a wider raft of measures to address high carbon consumption. However, the person who voted against the proposal did so because they said it would be ignored and would, therefore, be ineffective. Though there were different views on this, it was notable that most framed it as an issue of information provision for individual consumption choices.

“I don’t think it would work. At the end of day, if people can’t afford to buy green, they won’t. I get the idea... but, like food labels, do I listen? No, I have cake. I am more pro option 8 – levies on big businesses especially.”

Some worried that a three way categorisation would be too simplistic. By the end of the discussion, there was significant support for a number system alongside the red-amber-green system, to allow differentiation within colour categories. This also overcame the

concern that a colour based scheme would not work for people with colour vision deficiency.

There were related concerns about greenwashing, and some asked whether products like electric vehicles were really better for the climate. To address these concerns, there was a strong view that the system should consider full lifecycle emissions, from the raw materials through to end-of-life considerations.

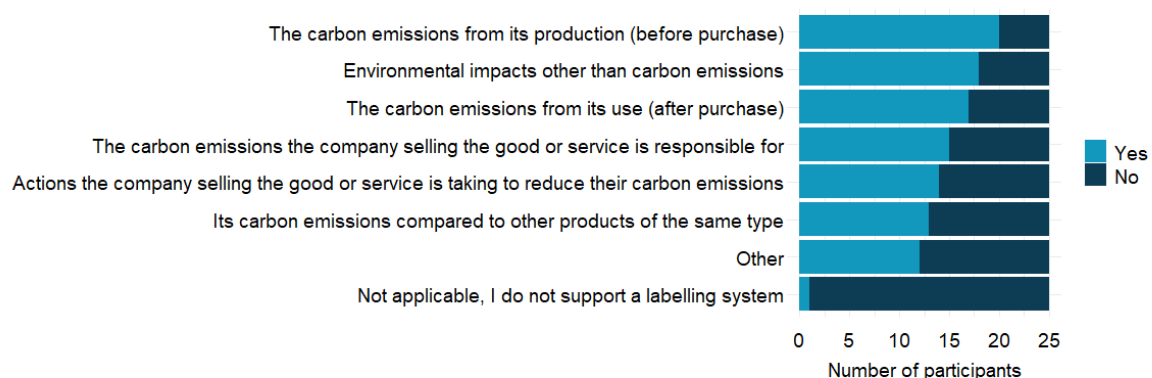
“For example the EV, no one tells you how much carbon it costs to make it. That would need to be built into the rating.”

There was considerable discussion over whether the rating should reflect the fit of products and services within the UK’s climate targets, or whether it should be a ‘best in class’ type of rating. This would mean the difference between all petrol and diesel cars being graded as red, versus smaller, more efficient fossil fuelled cars potentially receiving a better rating.

There was also debate about whether the label would apply to individual products, or to the company. Those supporting a company-wide label were concerned high polluting companies could ‘greenwash’ by having some low carbon product ranges. Those wanting labels to apply to individual products suggested companies introducing lower carbon ranges should be rewarded, something that a company-level rating could undermine.

The voting result suggested upstream emissions of a product or service should be an important consideration in assigning ratings. Views were divided on whether company-wide emissions, or the emissions of other products in the same class, should be considered (see figure 2).

Figure 2. Attitudes regarding the factors that should be considered in the labelling system
(Taken from the final voting booklet. Respondents could pick all that apply)



A lot of participants were concerned it would prove difficult to measure supply chain emissions. This led to the view that labelling should focus on a subset of products and services most relevant to the net zero transition.

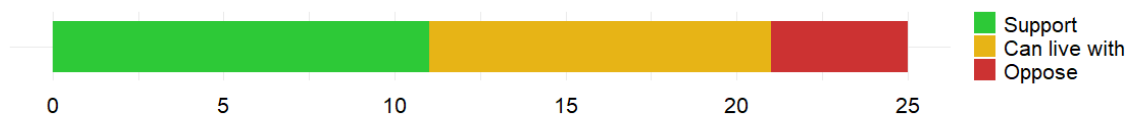
Proposal 2

A levy or charge on advertising high carbon products and services, with revenue reinvested into green initiatives

Proposal:

A charge would be levied against advertising high carbon products and services, following the traffic light labelling system. High carbon products and services would be in the red category, so they would pay a higher charge than amber or green rated products and services. Revenues generated would go into grants to support green initiatives.

Jury vote:



This proposal developed by the jury garnered less support at the voting stage than labelling, with 11 expressing support, ten saying they 'could live with it' and four voting against.

Participants suggested that the funds raised could be used to lower the costs of green alternatives. However, there was no detailed discussion about whether the amounts raised would be sufficient to make a meaningful difference to the price of a heat pump or electric vehicle, for example. An alternative option mentioned was the use of the funds to support education initiatives to inform people about climate change and green choices.

Linked to the labelling system, participants thought companies would be incentivised to reduce the emissions of the products they sell to avoid paying the levy. Several people expressed a preference for this approach over the labelling alone, because it would impose greater pressure on producers to innovate and create lower carbon products and services.

"...it's more of an incentive for companies to start thinking of greener, of creating greener products, because they've got that tax charge on their advertising."

Concerns were raised over how the levy would work, and whether it would be difficult or costly to administer. For some, this concern turned them against the proposal. If structured as a tax, some thought it would be very unlikely that it would be spent specifically on green initiatives. This concern motivated several to vote 'can live with'.

Several participants said that any additional costs on producers would be passed onto consumers in the form of higher prices. Though some saw this as positive, as it would

decrease demand for products or services with a red label, it was also a reason for some to vote against the proposal. There were also significant worries about the impact on smaller companies:

"...if you levy a small business the same as you levy a large business, you'll drive the small businesses out and you'll end up with the bigger businesses who can afford the levies."

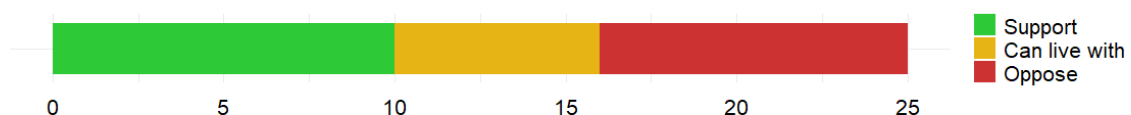
Proposal 3

Restrict advertising of high carbon products and services to children and introduce informative advertising and education on climate change.

Proposal:

Advertising high carbon products and services to children would be restricted, particularly on social media and through influencers. Social media companies would be held responsible and could be fined. There would also be ways of encouraging people to buy less, such as subsidies for advertising of second-hand shops and refurbished goods.

Jury vote:



This proposal consisted of two related ideas: first, that advertising to children should be restricted, and, second, that there should be ways of encouraging people to buy fewer new products.

These two ideas are discussed in turn. Some participants wanted to split the two ideas out into separate recommendations, but there was no consensus on this and participants eventually voted to keep them together. Some of those who had wanted the proposal to be split then voted against the proposal overall, which may explain why votes against were higher than for the other proposals.

The proposal reflected views and concerns about young people's exposure to social media (see section 5.1). Social media influencers were seen as having a major impact on the views and attitudes of younger people. They were, therefore, seen as a leverage point for changing attitudes to high carbon consumption.

"Influencers could have a massive impact on changing people's opinions on climate change, a lot more than your standard advertising. Especially with the younger generation, I think the use of social media and influencers, people with a big social following, could potentially have quite a big impact on changing people's perspectives."

There was also a widespread, though not universal, view that focusing on the younger generation is important because they are the ones that will have to do something about climate change. One participant pushed back by noting that it is too late to leave the issue to the next generation.

"I completely agree that it's important with the kids, but I think some people would argue that it's already a bit too late and we need adults now to make changes."

A focus on children was also justified through the view that they are more likely to consider environment and climate issues, and to bear them in mind in their buying choices. Reducing advertising of high carbon products and services to children would, therefore, help to ensure they remained committed to lower carbon lifestyles.

Some participants suggested children had an influence over their parents' consumption choices and could provide leverage for embedding lower carbon consumption patterns. However, there were also comments that children are inconsistent, supporting the cause but still choosing or asking for high carbon products or services.

There were concerns over how this proposal would work, as people thought it was difficult to set enforceable age restrictions on online content. For example, many thought the idea of a watershed was meaningless in the context of social media. There was also a view amongst some that, however the restrictions were set up, children would find a way around them. This lack of potential to enforce was often cited by those who voted against the proposal. There was also significant discussion over which age limit to set. Opinions ranged from 12 to 25, and there was no clear consensus.

Some did not support the focus on children, as they are normally not the ones making high carbon consumption choices:

"Children aren't the ones buying cars or booking holidays. When you're children, your actions most of the time are influenced by your parents. Your parents book holidays. Your parents buy cars. And I think, in the future, children will have smaller carbon footprints anyway. So I don't think this is the way to go. I agree with using advertising to influence children and inform them. But not with restricting advertising to children."

There was a strong view that parents should control the content their children are exposed to. For some, this was a case of simply ensuring there are tools available to parents as part of a wider package of measures to restrict children's exposure to advertising. Others had a more values-based opinion that parents, not the state, should be deciding what children view.

"I think the restrictions [...] should be dealt with by the parents or guardians, not the state. So if there is an advert on the telly, it is the guardian to say 'you are not watching that'. Not the state. It should be a choice."

The second part of this proposal included additional support for advertising by reuse and refurbishment companies, such as Vinted and BackMarket. For some, this was linked to the need to instil in younger generations a post-war ethos of 'make do and mend'. However, for most, this was not an age specific issue, but related instead to a widely held, but not universal, view among jury members that overall consumption should be reduced, as discussed in section 5.1. This, along with a general sentiment that additional restrictions on advertising were a good thing, were common reasons cited by those who supported this proposal in the final voting. Several of the 'can live with it' votes suggested that support for second-hand and refurbishment companies should be general, not just targeted at children.

5.3 Polling results

In this report, we present the headline findings from the polling. We will publish a more detailed analysis subsequently.

For the polling questions, proposal 3 was divided into two. Respondents were asked separately about the idea of additional restrictions for children and providing subsidies for advertising by companies selling second-hand or refurbished goods.

In addition to the four proposals, we included a 'no change' option, and an option to introduce a ban on all adverts of high carbon products and services. As we have noted, jury participants discussed 'no change' and bans but did not work on either option in detail.

Poll respondents were also asked about the political party they identify most closely with, and how concerned they are about climate change.

We use two different levels to report on the poll findings here. First, we report the proportions of respondents who support (score of 6 or above) or don't support (score of 4 or below) each proposal. Second, we report the proportions that strongly support (8 or above), or strongly disagree with (score 2 or below) each proposal.

Key findings

As with the jury, the polling indicated support for further regulation of adverts for high carbon products and services.

The order of popularity of the proposals in the polling matched the jury's. The labelling system attracted the most support, then the levy, followed by restrictions on advertising to children and subsidies for second-hand and refurbished products.

Support for action is lower amongst those on the right of centre of politics, though all proposals still attracted more 'support' than 'don't support' scores from this group.

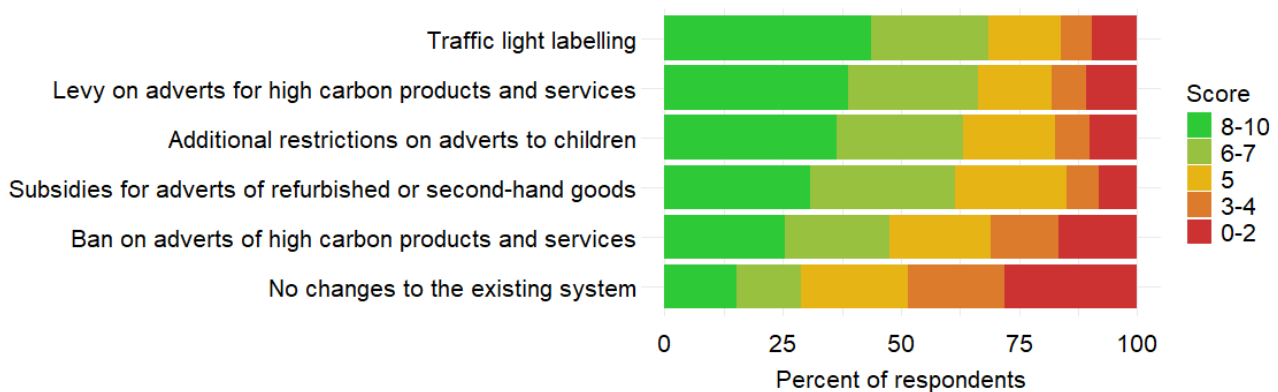
There was much less support for all proposals from those who were least concerned about climate change.

There is clear support for change

'No change' options were supported by 29% of respondents, against 49% who rejected this option. Responses to the specific proposals showed higher support for action. All proposals received at least 60% support, and all had at least 30% strong support (see figure 3).

Figure 3. Levels of support for each of the recommendations in the polling

A labelling system was the most popular



The red-amber-green labelling system was the most popular proposal in the poll, with 69% of people supporting it and 44% strongly supporting it. This was a lower level of support than the jury gave to this option. The difference in support between this and the second most popular option was also much smaller in the polling. These differences are not surprising, as deliberation is designed to give people space for learning and reflection. Those with concerns about the labelling system may have been willing to back it, if they had a chance to voice their concerns and consider the benefits. Regardless of the reason for this difference, it is revealing that poll respondents and the jury both identified labelling as their most preferred option.

The order of popularity of proposals matched those of the jury

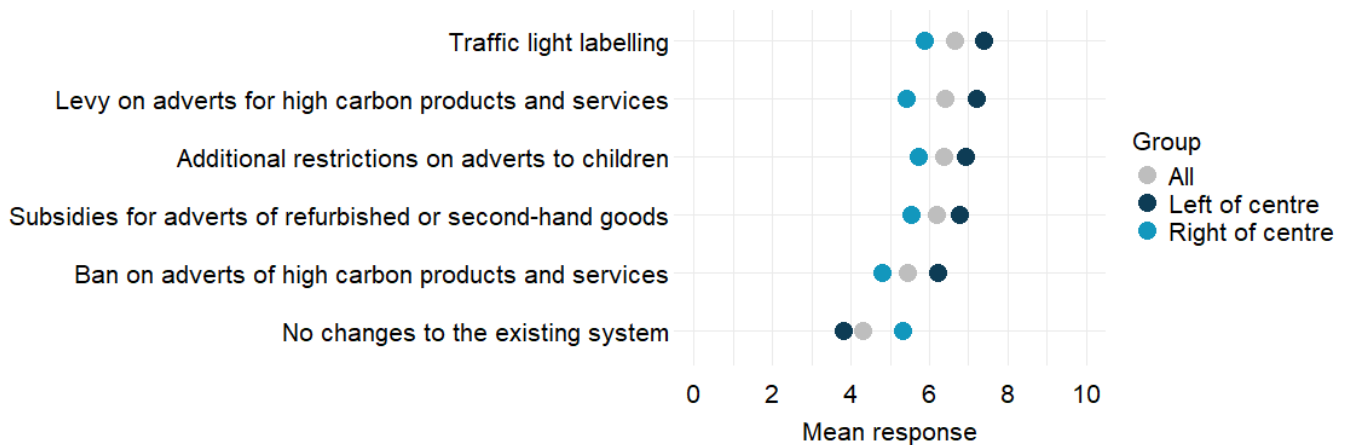
The levy (proposal 2) was the second most popular proposal (66% supported, 39% strong supported), followed by additional restrictions for children (63% supported, 37% strongly supported). Subsidies for adverts of second-hard or refurbishment companies was the next most popular proposal (62% supported, 31% strongly supported). The order of popularity of the proposals in polling matched that of the jury.

The jury chose not to develop the option of a ban on advertising high carbon products and services. This again matches the findings of the polling, in that the ban was the least popular option after 'no change'. However, the ban did receive support from almost half of the respondents (47%), significantly more than those who did not support it (31%).

The influence of political worldview

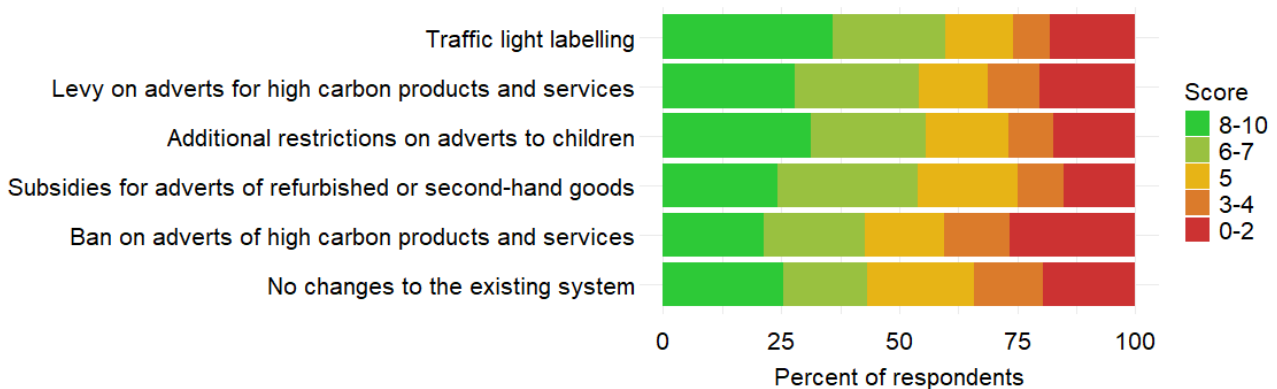
We defined those who said they generally support the Conservative Party, UK Independence Party or Reform UK as on the 'right of centre' of politics (n=498). We defined those who generally support the Labour Party or the Green Party as on the 'left of centre' (n=678). Average scores from the right of centre group were lower for all proposals, and correspondingly higher for the 'do nothing' option (figure 4).

Figure 4. Average scores given to each of the options by right of centre respondents, left of centre respondents and all respondents



Though support was lower amongst those right of centre, all proposals still had over 50% support from this group. Traffic light labelling also was the most popular proposal amongst this group, with 60% supporting it, and 36% strongly supporting it (figure 5).

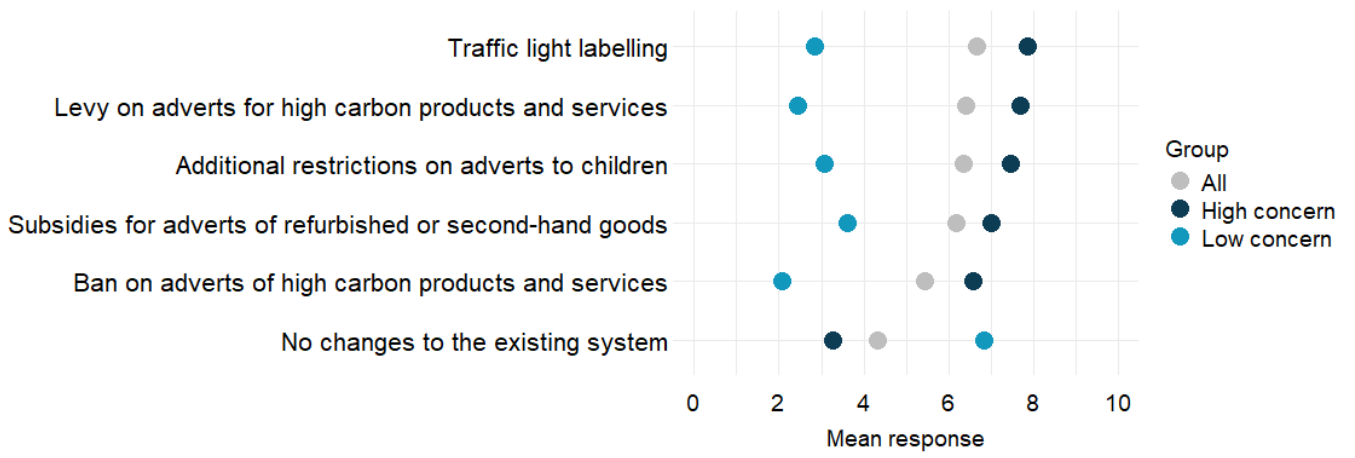
Figure 5. Levels of support for each of the recommendations amongst right of centre respondents



Influence of concern about climate change

We classified those who scored their concern about climate change as two or lower (on the same 11-point scale) as having low concern (n=190). Those with scores 8 or higher were classified as having high concern (n=999). The mean scores for the low concern group were substantially below the average for the whole group. Average scores for the high concern group were slightly higher than the whole sample (figure 6).

Figure 6. Average scores given to each of the options by those with low and high concern about climate change, and all respondents



6 Discussion and conclusions

The findings of both the citizens' jury and the polling suggest clear support for managing the advertising of high carbon products and services, which we summarise here and compare with the current situation.

People want clear information about the climate impact of products and services they buy, hence their proposal for a labelling scheme. They feel underinformed about the climate crisis and how they can contribute to addressing it. They see changes to the regulation of advertising as part of a wider effort toward better information and education. This is a consistent finding in public opinion research on climate ^{14,15}.

The current approach of the ASA, and particularly its work preventing misleading environmental claims or greenwashing, can contribute to this by reassuring people about the validity of environmental claims ⁴. However, our research participants also developed proposals to label high carbon products and services to signal their negative climate impact, which goes beyond current ASA practice and would probably require additional legislation.

Despite the ASA's active approach to preventing misleading environmental claims, our participants expressed distrust in existing advertising. They were surprised to discover that adverts were required to be "legal, decent, honest and truthful".

There was a widespread assumption that adverts were, by their nature, deceptive. This chimes with related research that shows low trust in advertising, and the potential benefits of improving awareness of the ASA's role ²⁰. Our findings suggest that distrust in advertising should be seen as a symptom of a wider lack of trust in both government and businesses, described in section 5.1 above.

Support, both by jury participants and poll respondents, for the red-amber-green labelling system can be understood in this context. People thought it would provide information about climate impacts. It would also build trust, if overseen by an independent organisation. The jury had strong views that the design and implementation of this system should be overseen by a body independent of the industry. This is different from the current approach, where codes are largely drawn up by industry representatives.

Jury participants did not choose to discuss or work on proposals for an overall ban of adverts for high carbon products and services, despite having received information about bans as an approach. As we outline in section 3, some municipalities in the UK and elsewhere have implemented such a ban, and some campaign groups advocate them. Amongst our jury participants there was some, though limited, support for this approach. The polling revealed that 49% of people were in favour of a ban, which was lower than support for other proposed changes.

One possible reason why participants favoured labelling over an outright ban could be that, as discussed above, people were concerned about a lack of information about

climate change in general, and about what the 'right' consumption choice is. The focus was, therefore, on providing information through a labelling system, rather than an outright ban. However, evidence suggests that information-based interventions rarely impact on consumption choices alone²¹, which participants acknowledged when suggesting that advertising restrictions would need to be accompanied by other measures.

More generally, participants appeared to think of the effects of advertising in terms of individual consumption choices, rather than in terms of driving social norms (the information sessions included talks on the influence on social and cultural norms). Participants did refer to the importance of social norms, such as it being 'normal' to fly on holiday, and jury members regularly criticised what they saw as a culture of over consumption. Yet, when it came to designing interventions, such considerations were not generally at the fore.

The issue of disentangling individual consumption choices from social norms is echoed in the wider debate about regulating advertising of high carbon products and services. Advertising professionals typically focus on individual choices. Organisations campaigning for further restrictions focus on the role of advertising in creating or sustaining social norms, but our findings indicate this is not foremost in people's minds, possibly because, by their very nature, social norms are not easily noticed.

Finally, it was clear that people had modest expectations about the impact of any intervention on advertising high carbon products and services. The jury did not see advertising as the key determinant of people's consumption choices, with issues such as cost and convenience playing a larger role.

Support for the proposals was predicated on them forming part of a wider package of measures to achieve net zero. This accords with existing research on the determinants of low carbon behaviour change. Organisations calling for advertising reform see this as working alongside, and supplementing, other measures. Campaigners for reform may seek to make this point more explicitly in their public engagement.

Crucially, though, participants did support managing advertising as part of a package of measures and they did not think the current system was adequate. Most importantly, they thought advertising was an opportunity to inform and educate people about climate impacts, as part of a wider effort to lead the transition to net zero emissions.

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