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To the Rt Hon Oliver Dowden CBE MP, Secretary of State for Digital, Culture, Media and Sport

Cc: Caroline Dinenage MP (DCMS), Rachel Maclean MP (DfT) & Kwasi Kwarteng MP (BEIS)

Re: advertising for highly polluting vehicles

Dear Secretary of State for Digital, Culture, Media and Sport,

In light of dangerous levels of air pollution in cities and our legally binding commitments to achieving net zero emissions by 2050, we the undersigned are calling for advertising and promotion of the largest and most highly polluting vehicles to be prohibited.

The UK Energy Research Council and the International Energy Agency have both recently warned that the trend towards increasing sales of larger, more polluting vehicles jeopardises critical climate change targets. Since 2016, the average CO2 emissions of new cars sold in the UK have been increasing. This is primarily due to the rising market share of SUVs, which in 2019 accounted for over 4 in every 10 new cars sold in the UK.

Many of these vehicles - over 150,000 new cars sold in 2019 - are physically too large to fit in a standard UK parking space. At a time when the Department for Transport is working hard to reallocate road space from cars to people travelling on foot or by bicycle, these oversized private vehicles are also exacerbating the crisis of urban public space brought on by the pandemic.

Large automotive brands have been concentrating advertising spend on their SUV ranges, helping to shape consumer preferences and driving the trend towards larger, dirtier vehicles which are more profitable to produce. The government's

plans for CO₂ emission performance standards for new vehicles after we leave the EU¹ are welcome, but are not sufficient to meet carbon budgets on their own. Additional measures to counter the rapid increase in sales of larger vehicles will be required to get UK transport emissions on to a net-zero trajectory. We therefore propose that advertising the largest, most polluting vehicles should be prohibited as part of efforts to address the challenge of decarbonising the UK economy and reduce the harmful health impacts of air pollution in our cities.

Specifically, we propose that publishing adverts for new cars with emissions exceeding 160gCO₂/km² or with an overall length exceeding 4.8m should no longer be permitted in the UK in any form. These thresholds would equate to an advertising ban on the dirtiest third of the UK car market in terms of carbon emissions; and on all cars which are too big to fit in a standard UK parking space.

The automotive sector tends to advertise ranges rather than individual models, so we propose using the average emissions of a range, by volume of new UK registrations in the most recent year of sales, to determine whether advertising that range is allowed. Sales of vehicles exceeding the thresholds would remain legal, but adverts for such vehicles would not.

There is clear precedent in the hard won battle to proscribe the advertising of tobacco products. This was ultimately recognised as a necessary measure to meet public policy goals to reduce the harmful health impacts of tobacco addiction, and made law via a number of Acts of Parliament, most notably the The Tobacco Advertising and Promotion Act 2002, which comprehensively bans the advertising and promotion of tobacco products in the UK³. Widespread tobacco dependence made banning sales of cigarettes politically impossible, but curbs on marketing them have prevented the problem from spreading, allowing it to be contained within a shrinking base of users. NHS statistics show that in 2003, prior to the Act coming into force, 15% of 11-15 year olds in England were regular smokers. By 2018, this level had fallen to just 5%⁴.

Today, the government has committed to challenging but vital emissions reduction targets which we are not on course to meet with existing policies. As the Secretary of State responsible for regulating advertising in the UK, you have the opportunity to play a key role in shifting our economy away from fossil fuel dependency by

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<https://www.gov.uk/government/consultations/regulating-co2-emission-standards-for-new-cars-and-vans-after-transition/co2-emission-performance-standards-for-new-passenger-cars-and-light-commercial-vehicles#mainchanges>

² Under the Worldwide Harmonised Light Vehicle Test Procedure (WLTP)

³ <https://www.legislation.gov.uk/ukpga/2002/36/contents>

⁴

<https://digital.nhs.uk/data-and-information/publications/statistical/smoking-drinking-and-drug-use-among-young-people-in-england/2018/part-1-smoking-prevalence-and-consumption>

ensuring the power of marketing to influence consumer behaviour is no longer being used to undermine progress towards these essential goals.

Whilst SUV advertising and concomitant growth in sales represents arguably the most pressing problem requiring remedial action of this nature by government, there are a wide range of products being aggressively promoted to consumers today which are fuelling the unfolding climate crisis. British people growing up today may look back on this period with disbelief at the indifference of legislators towards widespread marketing of extremely carbon intensive goods and services despite the legally binding imperative to rapidly decarbonise our economy. Curbs on advertising these goods would be a relatively light touch way to protect consumers from being pushed to make choices which are manifestly not in their own long term best interests, or the interests of wider society – just as we did with tobacco products in the past.

We would warmly welcome the opportunity to meet with you to discuss these proposals.

Yours sincerely,

Robbie Gillett, on behalf of the petition signatories

High Carbon Campaign Manager

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