



**LEGISLATIVE ASSEMBLY**  
FOR THE AUSTRALIAN CAPITAL TERRITORY

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STANDING COMMITTEE ON ENVIRONMENT, CLIMATE CHANGE AND BIODIVERSITY  
Dr Marisa Paterson MLA (Chair), Ms Jo Clay MLA (Deputy Chair), Mr Ed Cocks MLA

## Submission Cover Sheet

Inquiry into Environment Protection (Fossil Fuel Company Advertising)  
Amendment Bill 2024

**Submission Number: 1**

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### **About Comms Declare**

Comms Declare is an incorporated charity that represents hundreds of communications professionals, advertising agencies and organisations that have declared they will not promote:

- the growth of fossil fuels
- high greenhouse gas pollution as 'business as usual'
- deception, distraction or spin around science or climate actions.

Comms Declare encourages agencies to work for the good of the climate. In recognition that Australia is a major exporter of fossil fuels, it runs the annual F-list awards and maintains a list of agencies working with fossil fuel clients. It also runs the Fossil Ad Ban campaign for restrictions on advertising and sponsorships of fossil fuels and high emissions products.

Belinda Noble, President

Comms Declare

[www.commsdeclare.org](http://www.commsdeclare.org)

Thank you for the opportunity to write a submission on the [Environment Protection \(Fossil Fuel Company Advertising\) Amendment Bill 2024](#) banning fossil fuel advertising at ACT stadiums.

I am writing as the founder of [Comms Declare](#). We are in support of the Bill and think it should be expanded to include all ACT government property, corporate sponsorships and events.

Comms Declare runs the [Fossil Ad Ban](#) campaign for tobacco-style restrictions on advertising and sponsorships for fossil fuel companies and products.

Globally, air pollution from burning fossil fuels kills more people than smoking and the campaign is backed by more than 200 health professionals and organisations who have signed an [open letter](#) outlining the devastating health and climate impacts of burning coal, oil and gas.

Since our launch 16 councils have voted for fossil ad ban motions, including the City of Sydney.

Overseas France, Amsterdam and Stockholm are among dozens of jurisdictions that are also enacting restrictions on fossil fuel promotions, for our health and planet.

I believe the ACT led the country, and possibly the world, by banning fossil fuel advertising on its light rail vehicles many years ago. However, it is still possible for fossil fuels to be promoted on light rail stops and other ACT infrastructure. In addition, fossil fuel companies can still sponsor major Territory events such as Floriade and can programs in ACT schools.

This is at odds with the desires of ACT residents and the Territory's aim to be net zero. You cannot meet your net zero goals while allowing unregulated promotions of the companies undermining the energy transition. These advertised emissions increase demand and normalise high-carbon products and should be included in your Scope 3 emissions.

The IPCC has recognised that legislation and widespread behaviour change are required for societies to reach net zero emissions targets and 'can result in a

40-70% reduction in greenhouse gas emissions by 2050'<sup>1</sup>. It has also identified advertising regulation as a policy that can shift consumer behaviour to support net zero emissions objectives, as consumers will be better informed as to the environmental benefits of a product when making purchasing decisions<sup>2</sup>.

Any ban need not affect current commercial operations or contracts. Where there is a current commercial agreement covering a property (ie: light rail stops) the ban can come into place at the end of that agreement. This has been successfully done by several Australian councils including Merri-Bek, Lane Cove, Waratah-Wynyard and Yarra - all of which have banned fossil fuel advertising.

In addition to legislative changes, I ask you to consider the following amendments to Sponsorship Policies, as marked in red below.

Research by Comms Declare has found that coal, oil and gas companies sponsor more than 60 programs that are targeted at school children. These include national awards and STEM incursions. These programs are in addition to numerous arts and sports programs also sponsored by big polluters.

The programs are acquisition channels for fossil fuel companies that allow them to influence the next generation of consumers, legislators and workers and give them the false impression that fossil fuel products and companies are an overall positive influence in their lives.

Our kids will not be prepared for future challenges if their education includes greenwashing from big fossil fuel companies.

Please do not hesitate to contact me if I can be of further assistance.

Yours Sincerely

Belinda Noble

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<sup>1</sup> Sixth Assessment Report, 4 April 2022, Chapter 15, page 31:  
[https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC\\_AR6\\_WGIII\\_Chapter\\_15.pdf](https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_Chapter_15.pdf).

<sup>2</sup> [https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC\\_AR6\\_WGIII\\_FullReport.pdf](https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_FullReport.pdf)

## **SPONSORSHIPS**

**Amend the [ACT Sponsorship Policy](#) (Suburban Land Agency A26874887) as below.**

*Unsuitable activities may include:*

- o projects/activities involving gambling;*
- o any activity that may be construed as being sexually, racially or otherwise discriminatory;*
- o events heavily branded by previous sponsors;*
- o political activities;*
- o religious activities;*
- o activities that promote fossil fuel products or companies.*

**Amend the [Corporate Sponsorship Policy](#) (Education CSP200109) as below.**

*3.2 Direct sponsorship agreements will only be negotiated with organisations whose public image, products and services are consistent with the values, corporate purpose and specific policies of schools, the Directorate and the ACT Government. Any company or organisation whose name is associated with the manufacture, distribution or sale of tobacco products, alcoholic beverages, pornography, **fossil fuels** or armaments is not regarded as an appropriate sponsor.*

**Amend the [Sponsorship Policy](#) (City Renewable Authority zA1070890) as below.**

*Unsuitable activities include:*

- o any activity that may be construed as being sexually, racially or otherwise discriminatory;*
- o political activities*
- o any activities involving gambling;*
- o any activities whose interests may pose an actual or perceived conflict of interest with the integrity of the Authority;*

*o activities that promote fossil fuel products or companies.*

**Amend the [Major Event Fund guidelines](#) (Visit Canberra) as below.**

#### 7. FUNDING ELIGIBILITY

*VisitCanberra will not provide funding for the following:*

- *Conferences.*
- *Events and activities that have limited capacity to meet relevant evaluation criteria.*
- *Applications from individual persons.*
- *Capital projects, equipment, staffing and capital costs associated with the conduct of the event.*
- *Events that are proposed to be predominantly staged outside of Canberra.*
- *Events or organisations that have previously failed to acquit funds provided by the ACT Government.*
- *Underwriting support for an event.*
- *Retrospective event activity.*
- *Events that promote environmentally unsustainable business or products such as fossil fuels.*