

 ACT LEGISLATIVE ASSEMBLY COMMITTEE OFFICE	
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**Submission to Inquiry into Billboards in the ACT:**

**Full Wrap Advertising on Public Transport**



In the last few years the ACT Government has taken to covering windows of ACTION (now Transport Canberra) buses with full wrap advertising. These advertisements often cover the entire side of a bus, and as such constitute mobile billboards by any reasonable definition of the word. The Concise Oxford Dictionary, for instance, defines “billboard” as a “large, outdoor board for advertisements”. It therefore seems appropriate for the enquiry to address the issue of full wrap advertising on government operated public transport in the ACT.

The purpose of this submission is to present the case that full-wrap advertising is not appropriate for Canberra buses or for the forthcoming light rail, and should be discontinued. Specifically, we argue that (1) full wrap advertising constitutes the unjustified introduction of billboards to the ACT by stealth and cannot be justified on economic grounds, (2) full wrap advertising has a detrimental effect on passengers and therefore also on the effectiveness of public transport in Canberra, and (3) wrap advertising is inconsistent with the visual aesthetics that make Canberra a unique city.

1) Full wrap advertising appeared on ACTION buses a few years ago without any consultation with the public. The Access Canberra web page states that: “advertising on ACTION buses is managed by an independent advertising company”. In other words, the windows of our public transport system have been rented out to private companies for their own commercial gain at the expense of passenger comfort. The clear message being sent is that the primary purpose of public transport is not to provide transport for Canberra citizens; instead it is to provide portable billboards for the advertising industry. Total annual revenue from all bus advertising was \$545,000 in 2014-2015<sup>1</sup>. This is less than one half of one percent of the cost of running the bus system in Canberra. It is hard to believe that uncovering the windows would make a significant difference to funding the city’s public transport. On the other hand, it leads to the conclusion that the ACT Government is more influenced by a powerful advertising industry than by consideration for the comfort of bus passengers.

The advertising revenue generated does not seem a sufficient argument in favour of full wrap advertising, when weighed against the detrimental effect of such advertising. It is conceivable that the existence of wrap advertising on buses, which has never been agreed to by the public, will be used as a precedent to argue that billboards in general are an acceptable form of visual pollution in Canberra.

2) The Wikipedia page on Wrap Advertising states that “A significant problem associated with wrap advertising is that it can distort the view from inside the wrapped vehicle, to the extent that passengers may be unable to see where they are, especially in certain weather or light conditions”. The photo adjoining and confirming this statement on the Wikipedia page appears to be genuine and is certainly consistent with the experience of many passengers. In his blog, the Berlin public transport consultant Jarrett Walker<sup>2</sup> comments that full wrap advertising is “an example of transit agency decision which is disrespectful to the consumer” and that it is “an unpleasant sensation to get off a bus and realise you’ve been looking through a billboard that isn’t even intended for you”. A post on the BrizCommuter<sup>3</sup> blog says that “Queensland Rail and Brisbane Transport seem to think it is acceptable to prevent passengers from seeing out of windows ...”, and goes on to list complaints by passengers regarding poor visibility at night and during/after rain, problems faced by passengers with poor eye-sight and reports of passengers missing their stops. The Public Transport Users Association of Victoria<sup>4</sup> has listed visibility through wrap advertisements as a problem, as have a number of private contributions to blogs<sup>5</sup>. Typically, these complaints have been fobbed off by local authorities<sup>6</sup>. People catching buses can be elderly, may have visual impairment, may be tourists or new to Canberra, or may find the experience of having their view restricted genuinely claustrophobic. Any limitation on seeing from a bus is unacceptable for these people. One wonders if those who approve wrap ads have ever attempted to locate the correct stop at night in a new city.

It is particularly difficult to understand why the windows of the Route 101 City Loop are covered, or TC Canberra’s own self-congratulatory advertisements covering the windows of some of commuter buses. Full wrap advertising is more likely to discourage commuters and tourists from using the public transport system. Why would a tourist pay to use a bus that they cannot see out of?

3) Canberra is a beautiful city, and it is a pity to see it blighted by mobile billboards. Recently Canberrans chose overwhelmingly that “The Bush Capital” should be our new number plate slogan. Far from this name being the pejorative label the developers would have us believe, the title is an acknowledgement that what makes Canberra unique in the world is our access to trees, parks, and natural bushland. It is a city carefully laid out to take advantage of the surrounding landscape. It is not Times Square or Piccadilly Circus. Billboards are the absolute antithesis of what Canberra is. One would hope that billboards will never be permitted either side of Northbourne Avenue. However, there is every prospect that the main road into Canberra will become a crass parade of moving billboards when light rail is introduced if wrap advertising on public transport continues to be allowed.

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### References

<sup>1</sup> 'Ghost ACTION buses cost ACT government nearly \$12 million in one year', Canberra Times, October 5, 2015

<sup>2</sup> <http://humantransit.org/2009/09/berlin-seen-through-a-buswrap.html>

<sup>3</sup> <http://brizcommuter.blogspot.com.au/2017/01/advertising-wraps-rapped.html>

<sup>4</sup> <http://www.ptua.org.au/2011/08/15/potd-adverts-reduce-visibility/>

<sup>5</sup> <http://www.danielbowen.com/2013/12/12/train-window-ads/> and several responses at the foot of the page,  
<https://railbotforum.org/mbs/index.php?topic=10971.0>,  
<http://tdu.to/202178.msg>,  
<https://www.communityrun.org/petitions/ban-advertising-on-the-windows-of-our-public-transport>,  
<http://peoplesrepublicofbrunswick.blogspot.com.au/2010/01/getting-off-bus.html>

<sup>6</sup> <http://www.brisbanetimes.com.au/queensland/council-defends-bus-advertising-slammed-by-resident-20151103-gkpzph.html>