



## Proposed Publishers' Sustainable Advertising Policy

### Introduction:

The PPA expects its members to already have policies and/or other documentations that describe their values/core principles and that cover terms and conditions for advertisers and other business partners. PPA's understanding however is that these documents do not currently greatly address requirements with regards to environmental sustainability. This Sustainable Advertising Policy document is not intended to replace any existing publishers' own advertising policy, advertising terms and conditions, contracts, ethical policies or code of conducts. Rather it was developed for publishers to consider integrating environmental sustainability, when not currently covered, into existing policies/documents. Although the PPA Action Net Zero Pathway focuses on climate, the PPA encourages his members to extend this policy to also include social and human rights requirements, if those are not already covered elsewhere.

The PPA does not require publishers to use this document in its entirety but encourages its members to review it and add ethical and environmental sustainability requirements into existing policies.

### Purpose:

The Sustainable Advertising Policy sets the organisation's requirements with regards to 'sustainable' advertising. The aim is to ensure that advertising avoids greenwashing and promotes genuine sustainable products, services or solutions.

The PPA recognises that advertising represents an important source of revenue for publishers and that it is not in the publishers' interest to turn down advertising opportunities. However, publishers have the responsibility to ensure that their content and the ads they accept are not misleading. To do this, publishers should review their commercial partners and other stakeholders and work collaboratively with them to prevent greenwashing in ads and any other marketing resources.

This proposed sustainable advertising policy was developed to help publishers implement this.

The sustainable advertising policy covers online & printed advertising and any associated campaigns, awards, sponsorships and events.

The Advertising policy includes:

1. Ethical Advertising Guiding Principles: The organisation's aspirations in terms of sustainable advertising
2. What the organisation expects from its commercial partners (e.g. clients and sponsors) and other collaborators (e.g. awards judges and entry participants, guest speakers)
3. What the organisation expects from the ads it publishes (printed and online) and from award entries
4. Decision tree to assess stakeholders, ads, awards, sponsorships and events

### 1. Ethical Advertising Guiding Principles:

Advertising, online or in print publications, at events or in any other form, must meet various legal requirements and comply with the Advertising Standards Authority (ASA) and the Committee of Advertising Practice' Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing (the CAP Code).

Ads must be clear, accurate and not misleading.

## Action 5: Promote sustainable solutions through advertising



Ads that contain 'green' claim(s) should be checked against the CMA (Competition & Markets Authority)'s Green Claims Code and the CAP Code and effort should be made to ensure claims are not misleading.

Ads should be legal, decent, honest and truthful.

Ads should be ethical, respectful of all people, inclusive and should not encourage, either explicitly or implicitly, any indecent or harmful behaviour.

### 2. Requirements with regards to commercial partners and other collaborators

Publishers expect their commercial partners and collaborators to comply with applicable environmental laws, regulations and standards.

Publishers expect their commercial partners and collaborators to work ethically and to take action to reduce the environmental impact of their work.

Publishers encourage commercial partners and collaborators to have a clear strategy to identify and eliminate or reduce harmful activities and to be transparent about their progress with regards to human rights and environmental sustainability.

Publishers may reserve the right to refuse ads from sectors that may be deemed to cause harm to people and/or the environment.

#### Checklist to assess commercial partners (customers and sponsors), awards applicants and collaborators (awards judges and guest speakers) internally:

**For awards judges and guest speakers**, consider asking yourself the following questions:

- Does the organisation operate in a sector that is controversial and/or deemed to cause harm?
- Has the organisation ever been accused of greenwashing?
- Has the organisation or its product/service received negative press or been taken to court for an environmental matter?
- Has the organisation been linked to potential human rights infringement, either through its own activities or through its business relationships?

If the answer is yes to at least one of these questions, the stakeholder should be seen as high risk. If the answer to all is no, then the stakeholder represents a lower risk and can be approved.

**For customers, sponsors and awards applicants**, consider asking yourself the same questions as for awards judges and guest speakers and, if the answer is no to all, then also ask yourself these additional questions:

- Is the organisation a signatory of the United Nations (UN) Global Compact which encourages positive advancement in Human rights, Labour, Environment and Anti-corruption?
- Has the organisation set net zero targets or any other targets to reduce its greenhouse gas emissions?
- Does the organisation have a sustainability strategy in place and clear targets and KPIs?
- Does the organisation publicly publish sustainability reports?

If the answer is yes to two or more questions, the stakeholder represents a low risk and can be approved.

If the answer is yes to none or one question only, then the stakeholder represents a medium risk and a deeper assessment is recommended if the stakeholder is considered for an event, award or an ad that relates to sustainability.

Note:

Best practice is to assess every partner and collaborator; however, the PPA recognises that publishers may not have the resources available to do this. In that case, publishers should first assess priority partners and collaborators, based on:

- the revenue that these stakeholders bring; and
- the reputational (and potentially legal) risk to publishers and their brands that these stakeholders may bring if they are or perceived to be unethical and responsible for green washing.

As the process of assessing 'higher risk' partners and collaborators become more mainstream and automated, the PPA expects publishers to gradually extend this assessment to all stakeholders they work with and for all their brands.

3. What the organisation expects from their customers' ads and from award entries

**For customers' ads:**

When customers' ads include environmental claims or give the impression (through the way the ad is presented e.g. product's name, colour and images used) that the product, service, brand or organisation provides an environmental benefit, publishers expect these ads to comply with the UK Green Claims Code.

Therefore, when receiving ads' propositions from their commercial partners, publishers will ask, when relevant, if the ads were assessed against the Green Claims code. If this is not the case, publishers will encourage their customers to implement a process to ensure their 'green' ads are assessed against it in the near future.

Publishers will review any assessments and/or any supportive documents from their customers before approving the ad. Publishers will also assess the ad against the Green Claims Code checklist. When no assessment was done by the customer, publishers will need to assess the ad themselves before publication.

Note:

The PPA recognises that publishers may not have the capacity nor sufficient knowledge of their customers' products or services to assess ads against all the criteria listed in the Green Claims Code and in the associated checklist. However, publishers should assess each 'green' ad against the Green Claims Code as best as they can. When unable to assess some criteria or when in doubt, publishers should ask their customers to provide the required information.

**Checklist to assess ads against the Green Claims Code**

When making green claims, your business must comply with consumer protection law. It is also essential to comply with any sector or product specific laws that apply to your product or service. Before making a green claim, you should understand how your product, brand or business has an impact, both positively and negatively, on the environment for its whole life cycle.

When making a green claim, your business should be able to answer 'yes' or agree to each of the following statements:

1. The claim is accurate and clear for all to understand.
2. There's up-to-date, credible evidence to show that the green claim is true.
3. The claim clearly tells the whole story of a product or service; or relates to one part of the product or service without misleading people about the other parts or the overall impact on the environment.
4. The claim doesn't contain partially correct or incorrect aspects or conditions that apply.



5. Where general claims - for example “eco-friendly”, “green” or “sustainable” are being made, the claim reflects the whole life cycle of the brand, product, business or service and is justified by the evidence.
6. If conditions or caveats apply to the claim, they’re clearly set out and can be understood by all.
7. The claim won’t mislead customers or other suppliers.
8. The claim doesn’t exaggerate its positive environmental impact, or contain anything untrue – whether clearly stated or implied.
9. Durability or disposability information is clearly explained and labelled.
10. The claim doesn’t miss out or hide information about the environmental impact that people need to make informed choices.
11. Information that really can’t fit into the claim can be easily accessed by customers in another way, for example a QR code, website etc.
12. Features or benefits that are necessary standard features or legal requirements of that product or service type, aren’t claimed as environmental benefits.
13. If a comparison is being used, the basis of it is fair and accurate, and is clear for all to understand.

Source: [CMA’s Green claims checklist](#)

**For sustainability awards:**

Whether the awards entry is related to a product, an initiative or a business strategy, the Green Claims Code’s six principles apply. These principles as well as the checklist are a good way to assess the entry from a clarity and impact viewpoint and whether it is backed by credible evidence or not.

4. [Decision Tree to assess stakeholders, ads, awards, sponsorships and events](#)

A simple decision tree was developed to summarise sections 2 and 3 of this guidance.

[Add link to PowerPoint slides](#)