

# TAKE ACTION AGAINST FOSSIL FUEL GREENWASHING

Reporting to Advertising  
Standards and the Competition  
Bureau of Canada

**GREENPEACE**

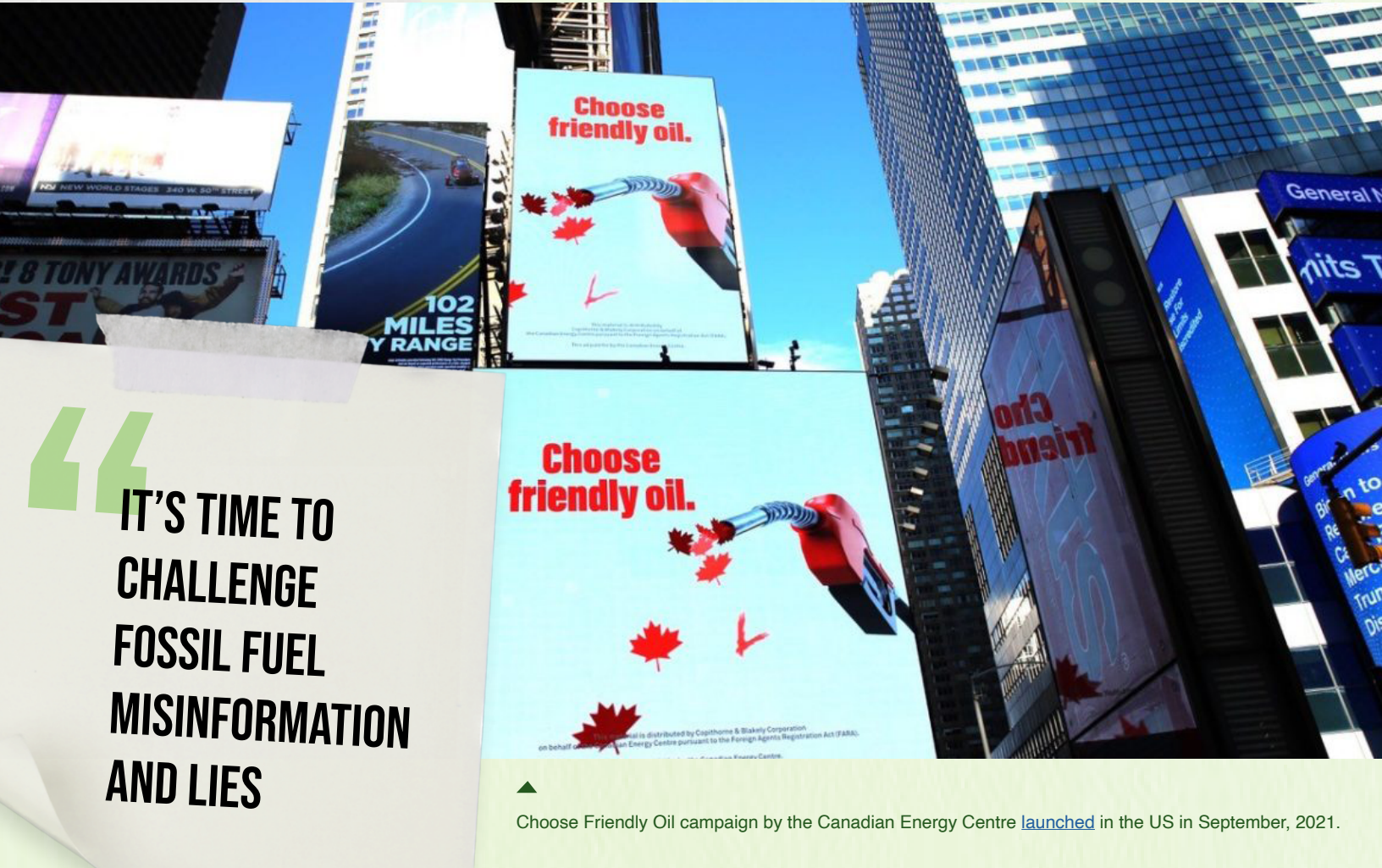
ACME Association canadienne  
des médecins  
pour l'environnement



CAPE Canadian Association  
of Physicians  
for the Environment

# INTRODUCTION

To learn more about greenwashing practices, see our [guide on spotting greenwashing](#) and our [Greenwashing Resources](#).



“IT’S TIME TO CHALLENGE FOSSIL FUEL MISINFORMATION AND LIES

Choose Friendly Oil campaign by the Canadian Energy Centre [launched](#) in the US in September, 2021.

**Greenwashing is nothing new**, but it is more prevalent than ever. Companies know that people in Canada care about their environmental impact, and they will do just about anything to seem green, even if their business operations tell a different story.

[Studies](#) show that fossil fuel companies have spent billions to delay and stall

climate action by misleading citizens and government decision-makers so they can continue to expand production and increase their profits. Luckily, if you spot fossil fuel greenwashing and misinformation, there is something you can do about it by reporting and submitting complaints against misleading ads.

**This guide will show you how.**



Shell's advertising campaign in Bristol, launched in 2022.

## WHY ARE WE REPORTING ADS?

Deceptive ads from fossil fuel companies are everywhere and Canada hasn't done enough to stop it. The government's detailed guidelines on greenwashing has been [archived](#), and was replaced with very [general guidelines](#) which are much more ambiguous. This has left a massive regulatory gap, has allowed for an abundance of greenwashing throughout the country, and has put the onus on citizens to report harmful advertising after it is already out in the world.

We shouldn't have to play whack-a-mole through reporting deceptive advertisements, but until the government steps up with clear, concrete legislation, this is the boat we are in.

**Reporting ads is a strategy to show the government and regulatory bodies that people in Canada are concerned about greenwashing**, hopefully leading to publicized action against greenwashing and eventually, policy change to ban greenwashing and all fossil fuel advertising.

## REPORTING DECEPTIVE ADS IN CANADA

While Canada is lagging behind in actively tackling greenwashing, we can make official complaints in two ways:

1. Report an ad to [Advertising Standards Canada](#) – *recommended for individuals*
2. Report an ad to the [Competition Bureau of Canada](#) – *recommended for organizations*

You can also take action by reporting ads you see online directly to the site you're on, but we'll talk about that more at the end of this toolkit.

	ADVERTISING STANDARDS (AS)	COMPETITION BUREAU (CB)
WHO ARE THEY?	An <a href="#">independent</a> , industry watchdog organization.	An <a href="#">independent</a> government law enforcement agency that is responsible for many areas of business, including <a href="#">deceptive practices</a> and advertising.
BEST AVENUE FOR	Better for individuals who would like to quickly flag misleading and deceptive ads.	Organizations making formal complaints because it requires significant documentation for the six-resident complaint process and allows the organization to publicize the
GUIDING LEGISLATION	The Canadian Code of Advertising Standards, which sets the criteria for acceptable advertising in Canada.	<a href="#">The Competition Act</a> , a Canadian law concerning business practices including advertising.
POWERS	Advertisers can be asked to amend or withdraw the advertisement if it is found to violate the <i>Canadian Code of Advertising Standards</i> . If a company doesn't comply, they can publish the case and company name publicly. If a case is not resolved, they can refer it to other regulatory bodies such as Health Canada or the Competition Bureau.	Can fine companies, require further action by law, require ads be taken down.
ON ENVIRONMENTAL CLAIMS	AS <a href="#">states</a> that many misleading environmental advertisements are evaluated under Clause 1 (Accuracy and Clarity). They also provide <a href="#">interpretation guidelines</a> , with a specific section on Environmental Claims (guideline #3), but this primarily indicates that their main way of judging environmental claims is through the Competition Bureau's <a href="#">recommendations</a> and the Competition Act.	There is a useful page to reference on <a href="#">environmental claims</a> . A more detailed guide on environmental claims for industry and advertisers which is still useful was officially <a href="#">archived</a> in 2021 and hasn't been replaced. The CB is assessing greenwashing claims using general guidelines that apply to all sorts of advertising.
PUBLICIZING YOUR COMPLAINT	You are not allowed to speak publicly about your complaint until after a ruling has been made.	You are allowed to speak about your complaint after having made it.
TIME FRAME	Complaints can take around 6 weeks to be resolved, but may take longer depending on the response from the accused advertiser, number of complaints that AS is reviewing at a time, and whether the case needs to be referred to a regulatory body like the Competition Bureau.	Complaints with the Competition Bureau can take 2 to 3 <a href="#">years</a> for the <a href="#">investigation</a> . During this time, the ads can continue to run.
OTHER	<ul style="list-style-type: none"> <li>• Considers the general impression conveyed, as well as the literal meaning.</li> <li>• An ad cannot be investigated by both AS and the CB simultaneously. If the CB opens an investigation, AS will not pursue any investigations into the same advertisement.</li> </ul>	Considers the general impression conveyed by the advertisement, as well as the literal meaning.

# STEPS AND REQUIREMENTS FOR FILING A COMPLAINT WITH AD STANDARDS

Submitting a complaint to Ad Standards is a great way to quickly address greenwashing that you see day to day.

**To be accepted by Ad Standards, your complaint must be:**

- About a specific advertisement that you have seen within the last 3 months.
- About an advertisement in Canadian media.
- About the content of the advertisement itself, not your experience with the product or service provided to you or the frequency or placement of advertisements.
- NOT about claims or images that you find on a product package or label
- NOT about political or election advertising

**What types of advertisements can you complain about, and what details are needed for each?**

- **Print Advertisements:** name of the publication(s) where the ad appeared; date of publication; a copy of the ad (if possible)
- **Out-of-home Advertisements** (ie. outdoor, transit or similar advertisements): date you saw the ad; exact location; a copy of the ad (if possible)
- **Broadcast Advertisements:** name of the station; time and date on/at which you saw/heard the commercial; brief description of the commercial
- **Cinema Advertisements:** title of the movie; date of viewing; name/location of the movie theatre; brief description of the advertisement
- **Internet Advertisements:** date of viewing; website; and, if possible, a PDF/screenshot of the advertisement and relevant web pages

## STEPS TO COMPLAIN ONLINE:

1. Submit your complaint online at [ecomplaints.adstandards.ca](https://ecomplaints.adstandards.ca) (or by mail at 33 Bloor St. East, Suite 303, Toronto, ON, M4W 3H1).
2. Fill in personal information.
3. Complete information about the ad, including company name, product/service being advertised, details of where & when you saw the ad.
4. Describe advertisement: this is where you can explain what you saw, and what details of the ad will be relevant to the issues you see with it.
5. Add files to the complaint: Attach a copy of the advertisement or any other relevant images describe your concern about the advertisement (see section below for tips on how to write your complaint).

**Note:** You can also write your full complaint to AS in letter-form, rather than filling in the text boxes provided. Simply fill out the personal information section, write something like “Details in Attached Letter” where there are mandatory text box fields, and then attach your letter to the document section.

## SAMPLE LETTER

Dear Advertising Standards,

I am writing to bring your attention to a concerning advertising campaign that involves greenwashing, deceiving citizens with misleading environmental claims. I am reporting this matter for your investigation.

### **Details of the Advertisement:**

Company Name: *[Company Name]*

Product/Service: *[Product/Service Name]*

Nature of Advertisement: *[e.g., TV commercial, online ad]*

Where and when you saw the advertisement

If you aren't able to attach a picture of the advertisement, provide a brief description of the key aspects of the ad

### **Supporting Evidence:**

*[Attach any screenshots, links, or materials that show the ad]*

### **Reasons for Concern:**

The advertised content makes environmental claims that are misleading and deceptive

*[Include any additional information about why you find the claims deceptive. Where possible, draw the Canadian Code of Advertising Standards language & regulations to detail the violations, as outline in this toolkit]*

### **Request for Investigation:**

I kindly request that the Advertising Standards investigate the aforementioned advertisement to ensure its compliance with truth-in-advertising standards and regulations.

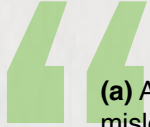
I appreciate your attention to this matter and trust that your agency will take appropriate action to maintain the integrity of advertising practices in Canada.

Sincerely,

*[Your Full Name]*

## REFERENCING RELEVANT POLICIES

Ad Standards [states](#) that many misleading environmental advertisements are evaluated under [Clause 1](#) (Accuracy & Clarity), which states:



- (a) Advertisements must not contain, or directly or by implication make, inaccurate, deceptive or otherwise misleading claims, statements, illustrations or representations.
- (b) Advertisements must not omit relevant information if the omission results in an advertisement that is deceptive or misleading.
- (c) All pertinent details of an advertisement must be clearly and understandably stated.
- (d) Disclaimers and asterisked or footnoted information must not contradict more prominent aspects of the message and should be located and presented in such a manner as to be clearly legible and/or audible.
- (e) All advertising claims and representations must be supported by competent and reliable evidence, which the advertiser will disclose to Ad Standards upon its request. If the support on which an advertised claim or representation depends is test or survey data, such data must be reasonably competent and reliable, reflecting accepted principles of research design and execution that characterize the current state of the art. At the same time, however, such research should be economically and technically feasible, with regard to the various costs of doing business.
- (f) The advertiser must be clearly identified in the advertisement, excepting the advertiser of a “teaser advertisement” as that term is defined in the Code.”

### NOTE:

In assessing the truthfulness and accuracy of an advertisement, the focus is on the general impression that is conveyed by the message, as well as the literal meaning.

#### Important questions that Ad Standards considers when deciding if an ad is misleading:

1. Does the environmental benefit claimed for the product appear to be supported by science-based evidence?
2. Is the scientific evidence that is being used to substantiate the claim generally well-recognized and accepted by authorities on the subject?
3. Is the advertisement unbalanced by singling out one environmentally positive attribute of the product while ignoring other characteristics or issues that may be harmful to the environment?
4. Does the advertisement make absolute and unqualified claims, such as “environmentally friendly” or “not harmful to the environment”? Or does the advertiser qualify its claims by appropriately communicating a product’s limitations?



▲ Shell's advertising campaign in Bristol, launched in 2022.

## KEY DETAILS TO NOTE:

- Complaints submitted to Ad Standards cannot be publicized or they will be dismissed. Be sure to avoid sharing any details of your complaint publicly (on social or traditional media). However do send us an email to [info@cape.ca](mailto:info@cape.ca) / [supporter.ca@greenpeace.org](mailto:supporter.ca@greenpeace.org) so we can track the complaints and make sure Ad Standards is taking action.
- AS makes clear that a complaint submitted by or on behalf of an organization/group that are considered to have a conflict of interest or which AS deems to be “advertisers” under the code will not be investigated under the Consumer Complaint Procedure. Those complaints could only be pursued under the expensive Advertising Dispute Procedure. Therefore, it is recommended that complaints be made by those without public ties to environmental organizations or groups.
- AS states that the number of complaints they receive on a single advertisement is not the critical factor in determining whether an ad should be reviewed. This indicates that it is best to write complaints about different ads, rather than having multiple complaints about the same ad.



## TIPS FOR WRITING A STRONG COMPLAINT TO ADVERTISING STANDARDS

We often know greenwashing when we see it, even if we can't put our finger precisely on the problem. We encourage you to submit complaints about any greenwashed ads that you see – even if you don't know the exact rules it is violating, the key is that you make your submission.

From detailed, in depth reports that reference various codes, to short and personal complaints that simply state that you have serious concerns about the advertisements and why you feel it is harmful – it all helps. Once AS receives the complaint, they will look at the ads you submitted and determine how the ad violates the Code and whether it warrants an investigation.

**Note:** Advertising Standards may also reference the Competition Act. If you are looking for more arguments you can refer to the Competition Bureau reporting section of this report to learn more about what the CB says about environmental claims.

## SUGGESTION FOR WRITING YOUR COMPLAINT

### I am writing this complaint to Ad Standards because...

- This advertisement is not providing truthful information about their operations.
- This advertisement is promoting fossil fuel consumption as having a positive environmental impact, which is demonstrably false.
- This advertisement is promoting a product which has been shown to have serious health impacts and is causing climate change.
- This advertisement is greenwashing, and is using manipulative marketing strategies to give the impression that they are good for the environment.
- This advertisement represents a public health risk and should not be legal.

### This is important and needs to be investigated because...

- This ad is a violation of the Canadian Code of Advertising Standards as it is making a false and misleading claim about their product (and/or service). The ad is neither truthful nor accurate.
- This ad is a violation of the Canadian Code of Advertising Standards because it gives the general impression that fossil fuels are not causing climate change, that burning more fossil fuels is positive for the environment, and that using their product is a way to make positive environmental changes.
- This advertisement is spreading disinformation about a massive public and planetary health issue.
- Fossil fuel companies should not be allowed to lie to the public. People want to make choices that are good for our health and for the future of our planet, and disinformation like this actively prevents us from doing so.
- These ads do not uphold Ad Standards' [principles](#) of truth, fairness, and accuracy.

You can also take language directly from the regulations using the sections above about relevant policies to help with your framing and wording, though this isn't necessary.

## QUESTIONS TO ASK YOURSELF:

- What is the general impression you are left with after seeing this ad?
- Did the company make claims about their approach to an environmental issue? Did they provide any supporting evidence?
- Does the advertisement use green colours, images of natural environments, animals, etc.?
- Does the advertisement make promises about how your use of their product will affect the environment?
- Does the advertisement make promises about 'green' targets they will meet?
- Does the advertisement state that you can use the product but without the known consequences of burning fossil fuels (ie. saying you can "drive carbon neutral")

## RED FLAGS TO WATCH OUT FOR:

- Big, sweeping statements and use of statistics that strike you as unaligned with what you know about the company or product.
- Imagery which doesn't align with what you know about the product's environmental impact.
- Empty language & common environmental phrases such as 'natural,' 'green,' 'sustainable,' or 'clean.'
- Statements about their role in changing the future or promises about the future if we continue using their product.

See our [Greenwashing Big Oil & Gas: The Fossil Fuel Deception Playbook report](#) and our [Greenwashing Resources](#) to learn more about industry advertising tactics.

**Please note: you cannot share details of a complaint to Advertising Standards publicly until it has been resolved, or they will reject the complaint.**

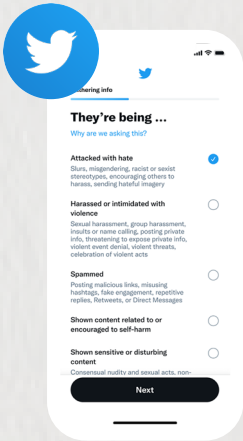
"Fly Responsibly" advertising campaign by Royal Dutch Airlines launched in December 2021.



## OTHER WAYS YOU CAN TAKE ACTION AGAINST MISLEADING ADS

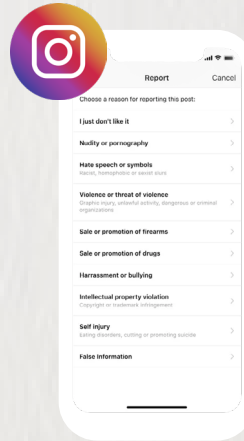
A quick, everyday action that you can take is to report advertisements you see online. Whether on social media or Google, you can quite easily tell the platform that the ads are deceptive, that you don't like them, and that you don't want to see them.

This can lead to the ads being taken down, and companies can be prevented from advertising in the future. It also can impact the algorithm and discourage that type of ad from being shown.



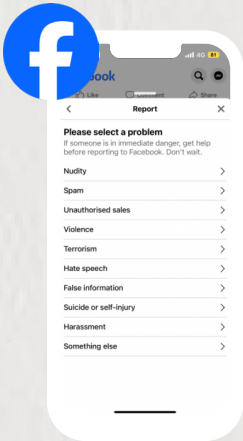
### Report an ad on Twitter

1. Select “Unacceptable Business Practices”
2. Provide company’s Twitter handle, found under their name on their profile page (include the @ symbol)
3. Provide at least one URL to show the ads



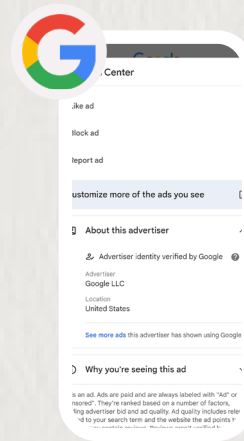
### Reporting an ad on Instagram

1. On post, click the “...” in the top right corner
2. Select “report”
3. When asked why you are reporting, you will most likely select “false information”
4. Select “Social Issue”



### Reporting an ad on Facebook

On Facebook, there are tons of fossil fuel ads to report – a [study](#) found that in a single year in the US, pro-fossil fuel Facebook ads viewed at least 431 million times. Facebook allows you to report an ad when you see it using the same process as Instagram noted above, and also allows you to report an ad after it has run using their [Ad Library](#).



### Reporting an ad on Google

You can report ads whenever you see them on Google. Beware of ads that look like search results (which the industry is [pouring](#) money into)

## Emailing Businesses Directly When You Spot Greenwashing on Their Site

Fossil fuel companies advertise in many places, including on websites where you might be online shopping, getting your news, or otherwise surfing the web. You can send an email to these companies to express your concern over the ads. By introducing yourself as a user of their site, stating why these ads are not in line with your values, and how they may be negatively impacting your view of the business could be effective framing. You can also do some research about the stated environmental values or practices of the company and explain why the advertisement is out of line with those commitments. This simple action might just get a reply and you never know what ball that might get rolling for the future.

## Tag them on social media!

If you've seen an ad and have taken a screenshot, you can also post about it on social media. Tagging the company, and other people/organizations with wide followings that might pick it up, can really get their attention.

# STEPS AND REQUIREMENTS FOR FILING A COMPLAINT WITH THE COMPETITION BUREAU (CB)

We recommend that complaints to the Competition Bureau be submitted through the six-resident application process, rather than through individual complaints. This is a more substantial, rigorous and intensive route and is best suited for organizations with time and financial resources to develop a robust submission, ideally supported by legal professionals.

For examples of six resident submissions to the Competition Bureau, see complaints filed against the [Canadian Gas Association](#), [Pathways Alliance](#), and [Enbridge Gas](#).

### STEPS:

Full details about the six-resident complaint can be found [here](#). Applications made under this process require:

- 1. Contact Information:** Names and addresses of the applicants, as well as the name and address of an attorney, solicitor or council who they have elected to represent them should there be a need
- 2. Your argument:** “The nature of
  - a) the alleged contravention
  - b) the grounds alleged to exist for the making of an order or
  - c) the alleged offence”
- 3. Evidence:** “a concise statement of the evidence supporting their opinion”

### KEY REGULATIONS:

The following information is from the [Competition Bureau’s guidance](#) on environmental claims and greenwashing.

At this time, the *Competition Act* is the Canadian legislation that is most likely to be violated by the fossil fuel greenwashing about which you are submitting a complaint

- “Prohibit businesses from making **false or misleading** claims to promote a service, product or business interest. Such claims include any messages, pictures, or verbal communications, including online and in-store advertisements, social media messages, promotional emails, among other things.”
- **General Impression Test:** When the Competition Bureau is determining whether an ad violates the Competition Act, it will apply the “general impression test.” This means they will consider not only the literal meaning of the ad in question, but also the “general impression” conveyed.

## HELPFUL THINGS TO KNOW WHEN DETAILING YOUR COMPLAINT

- The Competition Bureau [states](#) that businesses “should avoid vague claims such as ‘eco-friendly’ or ‘safe for the environment.’” It also states that claims must not be misleading, must be specific, must not result in misinterpretations, and must not exaggerate the environmental benefits of a product.
- Sufficient reason to open an investigation: Remember that all you have to do is demonstrate to the CB that there is sufficient reason to open an investigation – they are the ones responsible for proving there has been a violation
- Complaints do not have to prove that anyone was actually misled by the ad. It is sufficient to establish that an advertisement is published for public view and that it is untrue or misleading in a material respect. By “material” it is meant that the ad is so pertinent, germane, or essential that it could affect someone’s decision to purchase the product.

It might also be helpful to know what the Competition Bureau [advises](#) businesses to do and avoid when it comes to their green claims:

**“Follow best practices by making sure that your claims:**

- are truthful and aren’t misleading;
- are specific: be precise about the environmental benefits of your product;
- are substantiated and verifiable: claims must be tested and all tests must be adequate and proper;
- do not result in misinterpretations;
- do not exaggerate the environmental benefits of your product; and
- do not imply that your product is endorsed by a third-party organization if it isn’t; and,

If you’re unsure whether a claim will mislead or misrepresent, then don’t make the claim!”

## START SPREADING THE NEWS

After you’ve submitted your complaint to the Competition Bureau, we invite you to share your action on social media. This is a great way to encourage others to think about the greenwashing they see in the world, learn about what can be done about it, and get inspired to take action of their own.

Created by the Canadian Association of Physicians for the Environment (CAPE). Imagery of people outdoors or in other seemingly natural settings is a common tactic used in fossil fuel advertising to greenwash brands and products.





This same image was used in a fossil fuel ad.


Why is that a problem? Find out more.

# GREENPEACE

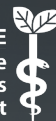
[greenpeace.ca](http://greenpeace.ca)

 [@greenpeaceCA](https://twitter.com/greenpeaceCA)

 [greenpeace.canada](https://www.facebook.com/greenpeace.canada)

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for the Environment \(CAPE\)](https://www.facebook.com/cape.doctors)

 [cape\\_doctors](https://www.instagram.com/cape_doctors)