



Ad Standards Community Panel
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AdStandards.com.au

Ad Standards Limited
ACN 084 452 666

Case Report

1. Case Number :	0070-22
2. Advertiser :	Suncorp Ltd
3. Product :	Finance/Investment
4. Type of Advertisement/Media :	TV - Free to Air
5. Date of Determination	13-Apr-2022
6. DETERMINATION :	Dismissed

ISSUES RAISED

AANA Environmental Code\2 Genuine Environmental Benefit

DESCRIPTION OF ADVERTISEMENT

This television advertisement features a man lying on a couch crying as he watches videos relating to climate change. He says, 'We're doomed'.

Another man sitting in the room is handed a guitar and begins to sing, "Look I'm not being funny. But where we choose to put our money can mean that our transactions ripple into climate action."

The two men are then seen standing on top of a wind turbine as he continues to sing, "Cleaner air. Calmer weather. The power's green. The outlook's better".

The two men are then seen riding on top of a whale, as he continues to sing, "and if the fish are all a-grazing, life abounds." The other man whispers, "you're amazing" to the whale.

The men are then back in the house as the man sings, "People prosper. You and me. And this bad news, won't spoil your tea."

THE COMPLAINT

Comments which the complainant/s made regarding this advertisement included the following:



The underlying idea is that it is important to bank with a Suncorp because they will allay your fears over the degraded environment. The job of business claiming to help the environment is to list those achievements not to merely say “don’t worry it will all be fine”

THE ADVERTISER’S RESPONSE

Comments which the advertiser made in response to the complainant/s regarding this advertisement include the following:

Advertiser Response to Section 2 of AANA Code of Ethics and Environmental Claims Code

Section 2: Customer Complaints

2.1 Advertising shall not portray people or depict material in a way which discriminates against or vilifies a person or section of the community on account of race, ethnicity, nationality, gender, age, sexual orientation, religion, disability, mental illness or political belief.

Substantiation:

The ad does not portray any person in a way that discriminates or vilifies them based on their race, ethnicity, nationality, gender, age, sexual orientation, religion, disability, mental illness or political beliefs.

2.2 Advertising shall not employ sexual appeal: (a) where images of Minors, or people who appear to be Minors, are used; or (b) in a manner which is exploitative or degrading of any individual or group of people.

Substantiation:

- (a) Minors are not portrayed, seen or talked about in this ad.*
- (b) The advertisement does not employ sexual appeal and there is no exploitation or degradation of any individual or group of people in the advertisement.*

2.3 Advertising shall not present or portray violence unless it is justifiable in the context of the product or service advertised.

Substantiation:

The ad does not display any acts of verbal or physical violence.

2.4 Advertising shall treat sex, sexuality and nudity with sensitivity to the relevant audience.

Substantiation:

The ad does not include any references to sex, sexuality or nudity.



2.5 Advertising shall only use language which is appropriate in the circumstances (including appropriate for the relevant audience and medium). Strong or obscene language shall be avoided.

Substantiation:

The ad does not contain any expletives or adult language as evidenced by our G ClearAds rating.

2.6 Advertising shall not depict material contrary to Prevailing Community Standards on health and safety.

Substantiation:

The ad was scripted and produced in line with the community health and safety standards in effect at time of filming and in line with ClearAds standards prior to and after filming.

2.7 Advertising shall be clearly distinguishable as such.

Substantiation:

The film is clearly distinguishable as an ad based on storytelling through song with clear branding on the end frame.

Environmental Claims Code

1. Truthful and Factual Presentation

Environmental Claims in Advertising or Marketing Communication:

(a) shall not be misleading or deceptive or be likely to mislead or deceive;

Substantiation:

The ad supports Suncorp Bank's commitment to the Suncorp Climate Change Action Plan which is publicly available. There is no misleading material or deceptive content. Suncorp Bank's commercial lending portfolio has no exposure to fossil fuels via either extraction or power generation. Suncorp will continue to lend to companies whose business is clearly consistent with the transition to a net-zero emissions economy by 2050. Suncorp will seek to increase exposure to businesses that have a positive environmental impact, including renewable energy generation and technology. The transition to a net-zero emissions economy offers commercial opportunities to grow our business while at the same time supporting environmental objectives. This information forms part of our Sensitive Standards and is available on our website.

(b) shall display any disclaimers or important limitations and qualifications prominently, in clear, plain and specific language;

Substantiation:

Disclaimer of 'Banking products issued by Suncorp Bank.' appears under the Suncorp logo on the end frame. The disclaimer complies with the minimum font size as



stipulated by ClearAds. The content of the ad does not require any additional disclaimers.

(c) shall represent the attributes or extent of the environmental benefits or limitations as they relate to a particular aspect of a product or service in a manner that can be clearly understood by the consumer.

Substantiation:

The ad supports Suncorp Bank's commitment to the Suncorp Climate Change Action Plan which is publicly available. Progress towards the Climate Change Action Plan is reported annually via the Suncorp Annual Report.

*2. A Genuine Benefit to the Environment
Environmental Claims must:*

- (a) be relevant, specific and clearly explain the significance of the claim;*
- (b) not overstate the claim expressly or by implication;*
- (c) not imply that a product or service is more socially acceptable on the whole.*

Substantiation:

Suncorp Bank is committed to providing banking services that are good for our customers world and the world. In other executions we show further evidence of this including:

- Suncorp Bank's debit cards are made from 82% recycled material collected and re-purposed from post-industrial sources.*
- Suncorp Bank is rewarding our customers for their clean energy commitment by giving them \$3,000 with their home loan for properties with solar power systems installed.*

Suncorp's Climate Change Action Plan, Environmental Performance Plan and Waste Reduction Strategy clearly articulates the Group & Bank's actions related to climate as well as lowering greenhouse gas emissions or carbon equivalents. Progress on these plans (including towards our net zero commitment) is reported (and independently assured) annually via the Taskforce for Climate-related Financial Disclosure (TCFD) in line with the Annual Reporting process. As such, a customer who chooses to 'put [their] money' into 'an [account]' is choosing to engage an organisation taking action focused on lowering carbon equivalents.

Suncorp is committed to a 51% absolute reduction in Scope 1 and 2 greenhouse gas emissions by 2030. We have also joined the RE100 initiative, and have committed to source 100% of our electricity from renewable energy sources by 2025. Progress towards emissions reduction and sourcing of renewable energy is reported annually via the Taskforce for Climate-related Financial Disclosure (TCFD) in line with the Annual Reporting process. Suncorp will continue to invest in infrastructure and energy transformation required to facilitate a global economic transition to net-zero and meet the Paris Agreement's Climate Change goals.



3. Substantiation

Environmental Claims in Advertising or Marketing Communication:

(a) shall be able to be substantiated and verifiable. Supporting information shall include sufficient detail to allow evaluation of a claim;

Substantiation:

Information to substantiate and verify Suncorp's commitments and climate action are publicly available on our website and have been attached to this submission. Progress towards commitments is reported in Annual Reporting.

(b) shall meet any applicable standards that apply to the benefit or advantage claimed;

Substantiation:

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(d) containing testimonials shall reflect the genuine, informed and current opinion of the person giving the testimonial.



Substantiation:

The ad does not contain any testimonials given by real people or customers. The people in the ad are paid talent.

For further substantiation on the claims and supporting information please refer to the following documents:

Climate Change Action Plan

- *Refer to Page 4 for our Climate Action Plan-on-a-page*
- *Refer to Page 11 for carbon emissions reduction target*

THE DETERMINATION

The Ad Standards Community Panel (the Panel) considered whether this advertisement breaches the AANA Environmental Claims in Advertising and Marketing Code (the Environmental Code).

The Panel noted the complainants' concerns that the advertisement claims the service will allay all fears about the environment but does not state how it will do so.

The Panel viewed the advertisement and noted the advertiser's response.

Is an environmental claim being made?

The Panel considered whether the advertisement made an Environmental Claim.

The Environment Code applies to 'Environmental Claims' in advertising and marketing communications.

The Code defines Environmental Claims as *“any express or implied representation that an aspect of a product or service as a whole, or a component or packaging of, or a quality relating to, a product or service, interacts with or influences (or has the capacity to interact with or influence) the Environment”*.

The Panel noted that the advertisement includes the statement that “where we chose to put our money can mean that our transactions ripple into climate action”.

The Panel considered that this is making the Environmental Claim that if people chose to bank with the advertiser this will contribute in some way to climate action.

2 a) Environmental Claims must... be relevant, specific and clearly explain the significance of the claim

The Panel noted that the Practice Note for this Section includes:



“Environmental claims should only be made where there is a genuine benefit or advantage. Environmental benefits should not be advertised if they are irrelevant, insignificant or simply advertise the observance of existing law. Advertising and marketing communication should adequately explain the environmental benefits of the advertised product or service to its target audience. It is not the intent of the advertiser making the claim that will determine whether it is considered misleading; it is the overall impression given to the consumer that is important. Advertising therefore should not inadvertently mislead consumers through vague or ambiguous wording. Providing only partial information to consumers risks misleading them. Generally a claim should refer to a specific part of a product or its production process such as extraction, transportation, manufacture, use, packaging or disposal.”

The Panel noted that the wording in the advertisement is vague and not particularly specific in detailing how climate action will be achieved by Suncorp. However, the Panel noted that the additional information provided by Suncorp and available in their Climate Action Plan did show that the brand was taking steps which would be considered by ordinary and reasonable people of the target audience, to be ‘climate action’.

The Panel considered that while the claim made in the advertisement is broad, the overall impression of the claim in the advertisement is that the brand is taking climate action, and this has been substantiated. The Panel further noted that information on the advertiser’s climate action is available to consumers through the Suncorp website.

The Panel considered that the environmental claim that Suncorp is taking part in climate action is relevant and specific, and that the significance of the claim is easily accessible through the Suncorp website.

Section 2 a) conclusion

The Panel determined that the advertisement did not breach Section 2 a) of the Environmental Code.

Conclusion

Finding that the advertisement did not breach the Environmental Code on any other grounds the Panel dismissed the complaint.