

Case Report

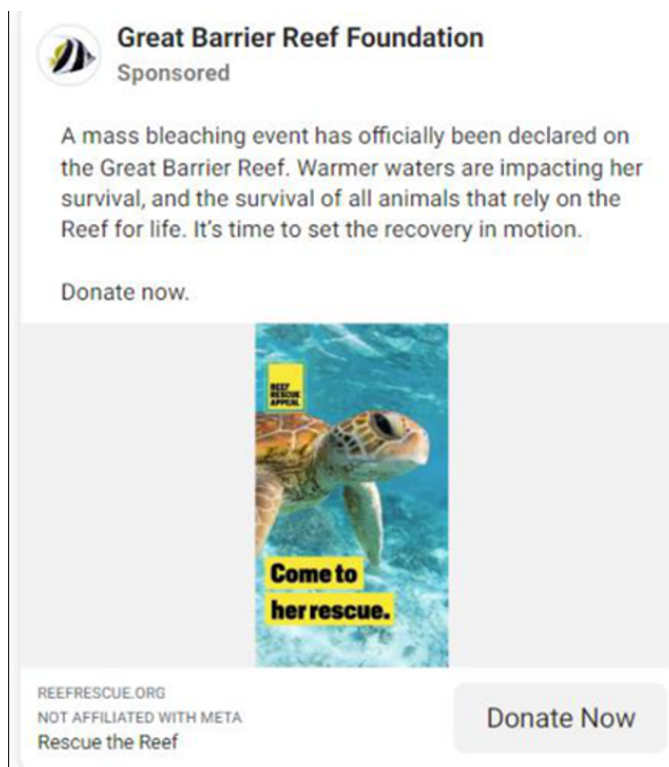
1. Case Number :	0112-24
2. Advertiser :	Great Barrier Reef Foundation
3. Product :	Community Awareness
4. Type of Advertisement/Media :	Internet - Social - Facebook
5. Date of Decision:	1-May-2024
6. Decision:	Dismissed


ISSUES RAISED

AANA Environmental Code\1 Truthful and Factual

DESCRIPTION OF ADVERTISEMENT


This Facebook advertisement features a picture of a turtle swimming over dead coral, with the wording "Reef Rescue Appeal. Come to her rescue".



 **Great Barrier Reef Foundation**
Sponsored

A mass bleaching event has officially been declared on the Great Barrier Reef. Warmer waters are impacting her survival, and the survival of all animals that rely on the Reef for life. It's time to set the recovery in motion.

Donate now.


REEF RESCUE APPEAL
Come to her rescue.

REEFRESCUE.ORG
NOT AFFILIATED WITH META
Rescue the Reef

Donate Now

THE COMPLAINT

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

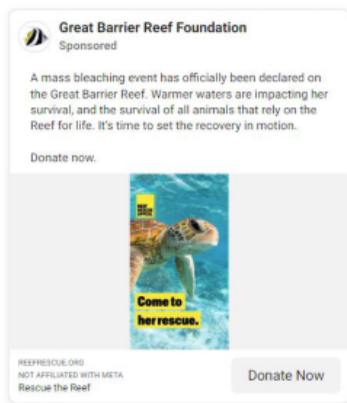
Comms Declare ask that Ad Standards investigate The Great Barrier Reef Foundation for a potential breach of the Code of Ethics (the Code) adopted by the Australian Association of National Advertisers (AANA).

The advertisement (below) was placed on Facebook in several different versions as part of a large 'Reef Rescue' fundraising campaign launched in March 2024, at the time the Great Barrier Reef (Reef) was officially found to be in a bleaching event.

Their target market is environmentally minded people that are worried about the Reef and would give money to 'rescue' it.

The ad can be found via this link

<https://www.Facebook.com/ads/library/?id=729665152607684>



Claims

Comms Declare believes the ad makes the following overstated and misleading claims;

1. 'Reef Rescue'

That the Great Barrier Reef Foundation can help the Reef survive current and future bleaching events and can restore the Reef from bleaching events.

2. 'Donations'

That people donating to the Great Barrier Reef Foundation will contribute to helping the Reef survive the current and future bleaching events.

Relevant provisions of the Code

s 1.2, which provides that advertising shall not be misleading or deceptive or be likely to mislead or deceive;

s 1.4, which provides that advertising shall not exploit community concerns in relation to protecting the environment by presenting or portraying distinctions in products or services advertised in a misleading way or in a way that implies a benefit to the environment which the product or services do not have.

Why these claims may breach the Code

1. 'Reef Rescue' claim

The Great Barrier Reef is 349,000 square kilometres and contains around 600 species of corals. The current bleaching event is the fifth in eight years and may be the largest ever, affecting 75% of the area. [1]

The bleaching is caused by warming oceans – which are overwhelming caused by burning fossil fuels. [2]

The Great Barrier Reef Foundation claims the following techniques, among others, that are relevant to ‘rescuing’ the Reef from bleaching;

- *Produce baby corals*
- *Increase heat tolerance of some corals in the lab*
- *Plant coral fragments*
- *Grow corals in shipping containers*
- *Spraying aerosols in the air to reduce heat*
- *Using probiotics on corals*

These technological fixes are either not proven, or not proven at the scale required to ‘rescue’ the hundreds of species of coral on the Reef. For example, only 29 species of coral ‘sperm’ have been frozen.[3]

Scientists agree that reef restoration projects are insufficient to protect reef ecosystems, may be doing more harm than good and that conservation efforts should be focussed on stopping the harm from global warming in the first place.[4]

Professor Terry Hughes, from the ARC Centre of Excellence for Coral Reef Studies says the 2024 bleaching event has caused extreme or severe bleaching to every restoration site.[5]

In addition, the ‘Reef’, as most would understand it, is a complex ecosystem and more than coral. It homes 1500 types of fish, 240 birds and 4000 species of molluscs among others. The Foundations’ main interventions do not protect the thousands of other sea creatures that are under threat from global warming.

In addition, ocean heating is literally off the charts and accelerating,[6] meaning more bleaching events in future that make small interventions such as ‘coral IVF’ virtually meaningless.

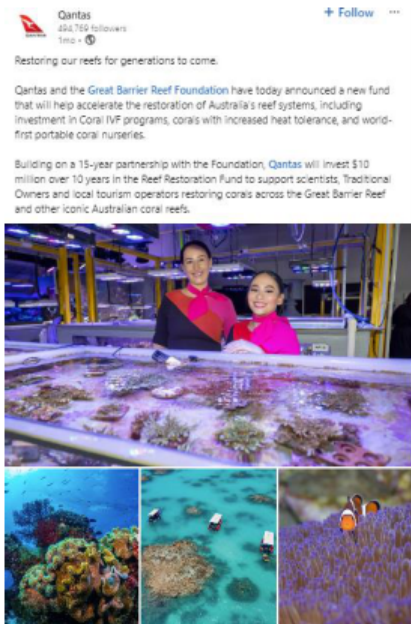
The term ‘rescue’ refers to delivering from harm, or saving something from a threat. This claim is overstated and not supported by the evidence.

2. ‘Donations’ claim

The Great Barrier Reef Foundation itself recognises that “Climate change is the greatest threat facing the reef”[7] however they offer no solutions to this threat. Worse still, it promotes several large companies that are recklessly burning fossil fuels including Qantas, and BHP, Australia’s 2st and 22nd largest greenhouse gas polluters.[8]

Qantas’emissions are increasing, contributing to Australia’s overall increase in emissions last year.[9] Qantas is planning on increasing this with more growth – making the Reef’s future worse, not better.[10]

Qantas’ sponsorship arrangement with the Great Barrier Reef Foundation allows it to cover up this fact by promoting itself as caring about the Reef.[11]



Therefore, we contend that anyone who donates to the Great Barrier Reef Foundation, with its associations to large climate polluters, is doing more harm than good to the future of the Reef.

Conclusion

We believe that the Great Barrier Reef Foundation is exploiting community concerns about Reef bleaching to raise funds. They are doing this by portraying their activities and Foundation in an overstated way, which implies a benefit to 'Rescue the Reef' which they cannot deliver.

[1] [https://www.Canberra times.com.au/story/8582376/coral-bleaching-hits-75-percent-of-great-barrierreef/](https://www.Canberra%20times.com.au/story/8582376/coral-bleaching-hits-75-percent-of-great-barrierreef/)

[2] <https://www.un.org/en/climatechange/science/causes-effects-climatechange#:~:text=Fossil%20fuels%20E2%80%93%20coal%2C%20oil%20and,the%20trap%20the%20sun's%20heat.>

[3] <https://link.springer.com/article/10.1007/s00338-021-02202-x>

[4] [https://www.cell.com/one-earth/pdf/S2590-3322\(23\)00189-6.pdf](https://www.cell.com/one-earth/pdf/S2590-3322(23)00189-6.pdf)

[5] <https://x.com/ProfTerryHughes/status/1777145346478821682>

[6] <https://www.theguardian.com/environment/2024/jan/11/ocean-warming-temperatures-2023-extremeweather-data>

[7] <https://www.barrierreef.org/the-reef/threats>

[8] <https://cer.gov.au/markets/reports-and-data/nger-reporting-data-and-registers/corporate-emissionsand-energy-data-2022>

[9] <https://www.voanews.com/a/researchers-detail-decline-in-australia-s-environmental-health-in2023/7533452.html>

[10] <https://www.reuters.com/business/aerospace-defense/qantas-forecasts-higher-capital-expenditurefiscal-2024-2023-05-30/>

[11] <https://www.linkedin.com/feed/update/urn:li:activity:7171440931311640577/>

THE ADVERTISER'S RESPONSE

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

The claims made within the Great Barrier Reef Foundation's (the Foundation) Reef Rescue Appeal advertisement are truthful and evidence-based.

As stated within the advertisement, the Foundation is seeking donations to help respond to the impacts of mass bleaching across the Great Barrier Reef.

Funds raised will be directed towards best practice Reef management and evidence-based conservation activities to achieve three goals:

- *Rapid response to bleaching: immediate response actions that assess damage and map affected sites to identify priority locations for intervention and determine the most appropriate restoration techniques*
- *Restoration: repairing damaged areas of the Reef through programs such as coral fragment planting and Coral IVF*
- *Resilience: building resilience into our reef systems through research and deployment of corals with increased thermal tolerance*

Together, these scientific and in water activities will enhance the overall resilience of the ecosystem, providing a greater chance for the Great Barrier Reef to survive warming temperatures, when delivered in hand with climate mitigation actions.

The Foundation strongly refutes the claim that scientists believe reef restoration activities may be doing more harm than good.

Addressing specifically Ad Standards Environmental Claims Code: 1 Truthful and Factual Presentation. a) Environmental claims in advertising or marketing shall not be misleading or deceptive or be likely to mislead or deceive, the Foundation provides the following factual information.

Scientific evidence shows that warming ocean temperatures are locked in and emissions reduction alone cannot guarantee coral reef survival. The need to deploy reef protection, restoration and adaptation interventions, in addition to addressing the underlying causes of climate change, is clearly supported by a two-year feasibility study funded by the Australian Government(1). This study was the world's most rigorous and comprehensive investigation into small, medium and large-scale reef interventions, drawing on more than 150 experts from more than 20 organisations

across the globe. The study found that a range of intervention methods are necessary to help the Reef build resilience to climate change impacts, in addition to ongoing best-practice reef management and emissions reduction.

The specific conservation activities to be funded by the Reef Rescue Appeal have been developed and will be delivered in partnership with Australia's leading scientific bodies (including the Australian Institute of Marine Science, CSIRO and leading universities) and reef management agencies (such as the Great Barrier Marine Park Authority). The success of these interventions has been scientifically verified and results published in a plethora of scientific journals.

Examples of results are listed below:

- Large coral colonies born through Coral IVF have survived subsequent bleaching event and reproduced (2)*
- Scientists and engineers have pioneered new techniques to mass produce healthy baby corals, which provides the critical step-change needed to achieve coral reef restoration at scale and give real hope for the future of the world's reefs (3)*
- More than 50 journal articles support the Reef Restoration and Adaptation Program's work to help the reef resist, recover from and adapt to warming ocean temperatures (4)*

Furthermore, the Foundation's responsible stewardship of funds is underpinned by a strong governance structure. The International Scientific Advisory Committee (or ISAC) advises the Foundation and plays a critical role in the selection, development and implementation of significant projects. Membership of ISAC includes executive level representation from GBRMPA, AIMS, CSIRO, QUT, JCU and UQ. Additionally, specific to the Reef Rescue Appeal, the Foundation's allocation of donated funds will be overseen by a Reef Rescue Appeal advisory team made up of scientists, Traditional Owners and Reef stakeholders. Together they will assess where the need is greatest, which conservation activities have the highest chance of success and which reefs have the greatest chance of recovery.

The Foundation worked with Marlin Communications who are an experienced nonprofit communications specialist. Marlin Communications are a CommsDeclare (complainant) member. The Foundation and Marlin Communications undertook a robust development process to ensure the public understanding of this campaign was clear and ethical and that there was strong adherence to Ad Standards Environmental Claims Code: 1 Truthful and Factual Presentation. a) Environmental claims in advertising or marketing shall not be misleading or deceptive or be likely to mislead or deceive.

Marlin have provided the following to support this submission;

"Emergency situations and the resulting appeals that have caught the public's attention over the last five years or so have been susceptible to using messaging that

could mislead the public. This has been especially true when celebrities have caught onto the need to support the charities responding to the crisis. For this reason, we were very careful to ensure that every person who is preparing to donate to the Reef Rescue Appeal is exposed to the explicit message of how their gifts will be used for the future.

“Funds raised for the Reef Rescue Appeal will be used by the Great Barrier Reef Foundation to help the Reef recover and build its resilience for the future.”

This is compliant with guidance offered by the Fundraising Institute of Australia and their Code of Conduct.”

In conclusion, the Foundation’s Reef Rescue Appeal advertisement is not misleading or deceptive. By supporting this appeal, Australians will support best-practice reef management and evidence-based conservation activities that help ‘Rescue the Reef’ by responding to coral bleaching, repairing damaged areas of the reef and helping build the resilience of the Reef to climate change impacts.

Footnotes:

1) RRAP Investment Case ([gbrrestoration.org](https://gbrrestoration.org/wp-content/uploads/2022/08/RRAP-Investment-Case_2022.pdf)): https://gbrrestoration.org/wp-content/uploads/2022/08/RRAP-Investment-Case_2022.pdf

2) Coral IVF babies breed for first time ever on the Reef - Great Barrier Reef Foundation: <https://www.barrierreef.org/news/blog/coral-ivf-babies-breed-for-first-time-ever-on-the-great-barrier-reef>

3) Mass coral breeding methods amidst raft of breakthroughs to protect reefs - Great Barrier Reef Foundation): <https://gbrrestoration.org/wp-content/uploads/2023/08/ENHANCED-CORALS.pdf>

4) Journal Articles - Reef Restoration and Adaptation Program (gbrrestoration.org): <https://gbrrestoration.org/rrap-about-us/publications/journal-articles/>

THE DECISION

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 complainant’s concerns that the advertisement contains misinformation.

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

Is an Environmental Claim being made?

The Panel noted that the Environment Code applies to 'Environmental Claims' in advertising and marketing communications.

The Panel noted that 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 makes general claims about the Great Barrier Reef, including that there is a mass bleaching event caused by warmer waters. The Panel considered that these statements are not claims relating to the advertiser’s products and as such are not environmental claims under the Code.

The Panel considered that the combination of describing the risk and damage to the reef and calling for donations to “rescue the reef” the advertisement was making a general environmental claim that the organisation will use donations to take positive action to help the reef.

1 a) Environmental Claims in Advertising or Marketing Communication...shall not be misleading or deceptive or be likely to mislead or deceive

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

“It is not intended that legal tests be applied to determine whether advertisements are misleading or deceptive, or likely to mislead or deceive, in the areas of concern to this Code. Instead, consideration will be given as to whether the average consumer in the target market would be likely to be misled or deceived by the material.

Factors to consider include:

- An advertisement may be misleading or deceptive directly or by implication or through emphasis, comparisons, contrasts or omissions. It does not matter whether the advertisement actually misled anyone, or whether the advertiser intended to mislead – if the advertisement is likely to mislead or deceive there will be a breach of the Code.*
- The target market or likely audience of the advertising or marketing communication should be carefully considered when making environmental claims. Therefore all advertising should be clear, unambiguous and balanced, and the use of technical or scientific jargon carefully considered.”*
- Environmental claims relating to future matters or commitments should be based on reasonable grounds as at the time the claim was made, even if the future matter does not come to pass. The fact that a person may believe in a*

particular state of affairs does not necessarily mean that there are reasonable grounds for the belief.”

The Panel noted the advertiser’s response that they intend to use funds raised towards best practice Reef management and evidence-based conservation activities. The Panel noted the advertiser provided information on how they plan to use the funds and what activities they plan to undertake.

The Panel considered that the average member of the target audience (people on Facebook) would not be misled or deceived by the general claim in the advertisement that the organisation will use donations to take positive action to help the reef.

Section 1 a) conclusion

The Panel determined that the advertisement did not breach Section 1 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.