

Case Report

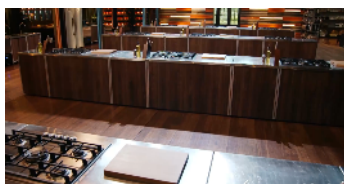
1. Case Number :	0108-25
2. Advertiser :	Australian Gas Networks
3. Product :	Energy/Resources
4. Type of Advertisement/Media :	TV - Free to Air
5. Date of Decision:	21-May-2025
6. Decision:	Upheld – Modified or Discontinued

ISSUES RAISED

AANA Environmental Code\1. Truthful & Factual

DESCRIPTION OF ADVERTISEMENT

This television advertisement features the MasterChef kitchen and a close up of a gas burner cooking a pan of food. A voice-over says "It's not just the innovative dishes that come out of this kitchen that will surprise you, it's also the gas. The MasterChef kitchen is cooking with renewable gas again, and at AGN we're working towards a future where renewable gas could one day be used in your kitchen. With all the control you love. To find out more, head to renewable-gas.com.au."



THE COMPLAINT

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

Masterchef Australia and Australian Gas Networks (AGN) are advertising the use of 'renewable gas' in the cooktops. There is no such thing as 'renewable gas'. The gas they are promoting is methane. When produced and when burned, methane and its burned byproduct, carbon dioxide, are greenhouse gases. Pure and simple: the gas product is being misrepresented, greenwashed. Masterchef Australia and Australian Gas Networks (AGN) are attempting to fool their audience with factually inaccurate statements about their product.

Te add during master chef claims natural gas is renewable. This claim is a patent false hood, all gas presently available in Australia has a fossil fuel non renewable origin. Weather LPG (propane butane hydrocarbon) or natural gas CH₄, methane) This is a deliberately miss leading and faulted claim.

THE ADVERTISER'S RESPONSE

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

Thank you for notifying Australian Gas Networks Limited (AGN) of the above complaint and for providing the opportunity to respond. AGN takes its obligations under advertising standards and the Australian Consumer Law (ACL) seriously. We endeavour to ensure that the relevant guidelines are followed, in particular the Environmental Claims Code, as well as the ACL.

The complaint relates to our current advertising campaign for renewable gas.

The complaint specifically refers to a television advertisement in which the voiceover states:

It's not just the innovative dishes that come out of this kitchen that will surprise you, it's also the gas.

The MasterChef kitchen is cooking with renewable gas again, and at AGN we're working towards a future where renewable gas could one day be used in your kitchen. With all the control you love.

To find out more, head to renewable-gas.com.au

[Renewable gas logo] [Australian Gas Networks logo]

[SUPER] To find out more head to renewable-gas.com.au

In the complaint, the reason for concern is stated as being:

i. There is no such thing as renewable gas.

ii. The gas promoted in the advertisement is methane and when burned, methane and its burned byproduct, carbon dioxide, are greenhouse gases.

Our response addresses the updated AANA Environmental Claims Code, which the complaint has initially been assessed against by Ad Standards, and also all sections of the Advertiser Code of Ethics which the Community Panel will also consider.

RESPONSE TO COMPLAINT RECEIVED

AANA Environmental Claims Code for Advertising and Marketing

Section 1. Truthful and Factual Presentation

Environmental Claims in Advertising or Marketing Communication:

a) Be truthful and factual. The overall impression created by the advertisement including the Environmental Claim should not be false or inaccurate.

The statement “the MasterChef kitchen is cooking with renewable gas again” is true and accurate, and the advertisement which includes this claim is not false or inaccurate because:

The advertisement highlights to consumers that the type of gas used in the MasterChef kitchen is renewable gas and is being used again, as was used in 2024 for season 16.

The renewable gas used in the stoves in the MasterChef kitchen is 100% biomethane.

According to the Australian Renewable Energy Agency (ARENA), “renewable energy” is produced using natural resources that are constantly replaced and never run out. There are many natural sources of energy and many renewable energy technologies. This also includes bioenergy, of which biomethane is a type, and hydrogen when powered by renewable energy. What is renewable energy? - Australian Renewable Energy Agency (ARENA)

Biomethane is clearly defined and widely accepted as a renewable gas by multiple external industry bodies including the International Energy Agency (www.iea.org/energy-system/renewables) and GreenPower (an independent organisation backed by Government - www.greenpower.gov.au) who state on their website that “renewable gases are made from renewable energy sources like agricultural waste, food waste, wastewater or renewable electricity.”

Biomethane is created by capturing waste gases (biogas) produced by existing industries such as wastewater treatment, landfill and food, organics and agricultural waste. This biogas is then upgraded into biomethane suitable for use in homes via a cleaning and filtering process.

While biomethane is made up of ‘methane’ which has carbon emissions, it does not contribute any additional emissions because when it is produced and burned, it releases only the carbon dioxide that was absorbed from the air by organic matter (like plants) within the existing carbon lifecycle.

The biomethane used on MasterChef was sourced from Jemena’s Malabar Biomethane Injection Plant, the first demonstration project in Australia to produce it and inject it into a gas network. Malabar is Australia’s first biomethane-to-gas-network injection plant, and the gas supplied to the Jemena network has been

formally certified by GreenPower – a government managed renewable energy certification program.

Further, any emissions from the transport of the biomethane to the Melbourne Showgrounds where MasterChef Australia is filmed were completely offset by the purchase of Australian Carbon Credit Units (ACCUs) approved by the Clean Energy Regulator. The ACCUs purchased offset 10t CO₂e emissions. This covered the transport emissions of the biomethane. Actual emissions from these activities were calculated at 5.32t CO₂e. The ACCUs purchased far exceeded this amount.

While not specifically called out in the complaint, the advertisement also includes a claim “at AGN we’re working towards a future where renewable gas could one day be used in your kitchen.”

This is also truthful and factual as Australian Gas Infrastructure Group (of which AGN is a part) is targeting a volume of 10% renewable and carbon neutral gas in its distribution networks by 2030, and targeting 100% renewable and carbon neutral gas and net zero by 2050 (in line with Australia’s net zero commitments). The transition to renewable gas involves both renewable hydrogen and biomethane. The vision is being pursued through a number of projects already underway including Hydrogen Park South Australia, Hydrogen Park Gladstone and Hydrogen Park Murray Valley. These projects, together with projects being pursued by other gas networks are detailed on the website renewable-gas.com.au which is referenced in the advertisement.

As can be seen from the above:

*The gas provided to the MasterChef kitchen was 100% renewable gas.
Biomethane is a certified form of renewable gas, as defined by a number of independent external agencies (many of whom are backed by Government).
The advertisement is factually correct and accurate.*

Accordingly, we consider the advertisement to be truthful and factual.

b) Not be or likely to be misleading or deceptive to the Target Consumer.

The advertisement itself is not likely to be misleading or deceptive to the Target Consumer. The intended Target Consumer is adult Australians with an interest in cooking.

For the reasons explained above in Section 1 a), the advertisement’s message to consumers, that the type of gas used in the MasterChef kitchen is renewable is true and accurate.

We refer to a previous Ad Standards Community Panel decision case number 0156-24 under the previous Environmental Claims Code, which considered similar issues with understanding renewable gas in AGN’s radio advertisement for MasterChef. The Panel

considered that the average consumer in the target market would be Australian adults, who would understand “renewable” to mean gas sourced from a resource which can be replenished in a reasonable timeframe.

Other relevant Sections of the AANA Environmental Claims Code

While the Ad Standards notification of the complaint has only been assessed as raising issues under Sections 1 a) and 1 b) of the Code, this response addresses other potentially relevant Sections for the Panel to consider.

Section 2. Evidence

Environmental Claims must be supported by evidence.

For the reasons set out in Section 1 a), all claims asserted in the advertisement are substantiated and verifiable, and we have reasonable grounds for making them. In particular:

The gas used in the stove cooktops in the MasterChef kitchen is 100% biomethane, a type of renewable gas.

AGN did not need to provide any supporting information with the advertisement as all statements are true and accurate. For the consumer, there is reference to AGN’s relevant website for consumers to obtain more information about how AGN sourced its renewable gas for MasterChef.

We consider the advertisement is compliant with this requirement of the Code.

Section 3. Clear and not vague

Environmental Claims in Advertising or Marketing Communication: Use clear language, having regard to the Target Consumer,

The advertisement uses clear language, with regard to the Target Consumer. In particular:

the gas used in the stove cooktops in the MasterChef kitchen is renewable.

For the reasons set out in Section 1 above, the statement in the advertisement that the MasterChef kitchen is cooking with renewable gas is relevant, specific and clearly explained and would be understood by the Target Customer.

Accordingly, we consider that the advertisement is compliant with this section of the Code.

Be specific - broad, vague or unqualified claims should be avoided

The advertisement refers only to the cooking stoves in the MasterChef kitchen using renewable gas, and no other energy devices or equipment. Careful consideration was

given to the reference to stoves in the advertisement to ensure the description of the gas used in the MasterChef kitchen was clear. The statements in the advertisement are accordingly entirely true and accurate, and not vague or unqualified.

Include important limitations, conditions or qualifications in a way that is clear to the Target Consumer.

The advertisement includes limitations where it concerns where the renewable gas is being used (in the kitchen, overlaid with visuals of the stovetops).

When referring to the future use of renewable gas in kitchens, we have been mindful to not overstate the certainty of when it can be delivered at scale (noting that an up to 10% blend of renewable hydrogen with natural gas is currently available to a small number of properties as part of demonstration plants in Gladstone and in the south of Adelaide). We consider that the Target Consumer is extremely unlikely to be misled into believing that all, or a significant quantity of gas is currently renewable, or that this will happen in the near future. The advertisement was worded to make clear that as a business we are working towards this future (as identified in Section 1) so that it could be available one day.

Section 4. Genuine benefit

Environmental Claims in Advertising or Marketing Communication:

a) Be about a genuine benefit to the environment

Please also refer to answers above in Section 1. Biomethane is essentially interchangeable with natural gas and can be used in existing gas networks and appliances without modification, but, in contrast to natural gas, it is a renewable resource that does not contribute any further carbon emissions when burned.

Further, in the MasterChef series there will also be a one-off appearance of hydrogen BBQs that run on 100% renewable hydrogen, which is also a type of renewable gas. Renewable hydrogen is made by splitting water and hydrogen using an electrolyser powered by renewable electricity. The hydrogen does not produce any carbon emissions when combusted for heat. Hydrogen can be used in AGIG's existing gas pipelines in much the same way as natural gas does today.

The statement in the advertisement "at AGN we're working towards a future where renewable gas could one day be used in your kitchen." is relevant and significant to consumers who may be considering the long-term future of the two main sources of residential energy in Australia (electricity and gas) and seeking to understand more about the renewable potential of gas in order to make informed consumer decisions for their energy usage. Sections 1 and 5 refer to the ways in which AGN is working

towards a renewable gas future, through its low carbon vision and low carbon projects.

b) Not overstate the environmental benefit

The assertion that the MasterChef kitchen is using renewable gas is not an overstatement, as all 22 cooktops (and the backend kitchen) were powered by 100% biomethane throughout the filming of the series, the transport of which was also offset.

Further the statement, 'at AGN we're working towards a future where renewable gas could one day be used in your kitchen.' is not an overstatement. AGN is pursuing its low carbon vision in a number of ways:

through various renewable gas projects, which have included significant government funded projects (both State and Federal);

by undertaking research and development, including feasibility and technical studies undertaken in association with the Australian Hydrogen Centre;

through customer engagement, ensuring customers are informed and involved in the transition process;

by developing relationships with third parties and supporting connection of renewable gas projects, such as the recent agreement with Delorean for the transport of biomethane in the South Australian gas network.

We believe that the advertisement is compliant with this section of the Code.

Section 5. Future claims

Environmental Claims in Advertising about future environmental objectives must be based on reasonable grounds at the time the claim is made.

The advertisement also refers to 'at AGN we're working towards a future where renewable gas could one day be used in your kitchen.' This claim is based on reasonable grounds. Australian Gas Infrastructure Group (of which AGN is a part) is targeting a volume of 10% renewable and carbon neutral gas in its distribution networks by 2030, targeting 100% renewable and carbon neutral gas and net zero by 2050 (in line with Australia's net zero commitments.) This vision is being pursued through a number of projects already underway including Hydrogen Park South Australia, Hydrogen Park Gladstone and Hydrogen Park Murray Valley. These projects (together with projects being pursued by other gas networks) are detailed on the website renewable-gas.com.au which is referenced in the advertisement.

This above substantiation is available on our website renewable-gas.com.au which makes up the call to action of the advertisement.

All of the above also supports the notion that renewable gas is a real commodity, is supported by government, and that AGN's plans are not only well developed, but are being implemented.

AANA Code of Ethics for Advertising and Marketing

We have also addressed Section 2 of the AANA Code of Ethics for Advertising and Marketing, which relates to Consumer Complaints.

Section 2.1 Advertising or Marketing Communications 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 preference, religion, disability, mental illness or political belief.

Our advertisement does not breach this section of the Advertiser Code of Ethics as it does not depict material that discriminates or vilifies a person or section of the community as identified in section 2.1.

Section 2.2 Advertising or Marketing Communications 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.*

Our advertisement does not breach this section of the Advertiser Code of Ethics as it does not employ sexual appeal against Minors or in a manner that is exploitative or degrading to any individual or group of people as identified in section 2.2.

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

Our advertisement does not breach this section of the Advertiser Code of Ethics as it does not present or portray violence as identified in section 2.3.

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

Our advertisement does not breach this section of the Advertiser Code of Ethics as there is no sex, sexuality or nudity present.

Section 2.5 Advertising or Marketing Communications 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.

Our advertisement does not breach this section of the Advertiser Code of Ethics as there is no strong or obscene language used.

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

Our advertisement does not breach this section of the Advertiser Code of Ethics as it does not depict material contrary to Prevailing Community Standards on health and safety.

Section 2.7 Advertising or Marketing Communications shall be clearly distinguishable as such to the relevant audience.

Our advertisement does not breach this section of the Advertiser Code of Ethics as our advertisement is clearly distinguishable to its relevant audience.

We trust the above response addresses any concerns regarding the advertisement and provides the Community Panel with sufficient information for their review.

Additional response

Thank you for notifying Australian Gas Networks Limited (AGN) of this further complaint and for providing AGN the opportunity to respond.

In this complaint, the reason for concern is stated as being:

- i. The advertisement on MasterChef claims natural gas is renewable*
- ii. Renewable gas is not possible because all gas in Australia has a fossil fuel, non-renewable origin.*

As we state in our response dated 9 May 2025, the advertisement does not breach the AANA Environmental Code as is not misleading or deceptive. We refer to the relevant sections in our response to assist the Community Panel in reaching its decision. In response to the concerns in this further complaint:

- 1. We do not claim that natural gas is renewable; (refer to Section 1 a))*
- 2. The gas used in MasterChef (kitchen stovetops and 100% hydrogen bbq) was renewable gas in the form of 100% biomethane, and 100% renewable hydrogen; (refer to Section 1 a) and Section 4 a))*
- 3. We have not overstated the certainty of renewable gas (refer Section 3 c) and Section 4 a) and b)).*

We trust the above response addresses any concerns regarding the advertisement and provides the Community Panel with sufficient information for their review.

THE DECISION

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

The Panel noted the complainants' concerns that the advertisement is making misleading environmental claims.

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

Does the advertisement make an Environmental Claim?

The Panel noted the Environmental Code provides the following definition:

"Environment Claim means any message or representation (including text, images, graphic, audio or symbolic representation) that gives the impression that an industry, business, product or service:

- a. has a neutral or positive impact on the environment*
- b. is less harmful for the environment than alternatives, or*
- c. has specific environmental benefits."*

The Panel considered that the phrase 'renewable' implies that it is sourced from a resource which can be replenished in a reasonable timeframe, and as such is less harmful for the environment than other gas alternatives.

The Panel considered the phrase "at AGN we're working towards a future where renewable gas could one day be used in your kitchen". The Panel considered that the audience for the advertisement could reasonably infer from this statement that AGN are taking proactive steps towards renewable gas being available in any kitchen as an alternative to non-renewable gas, and gave the impression that the business would have a less harmful impact on the environment.

The Panel considered that the advertisement is making two environmental claims:

- Claim one: that the gas used in the MasterChef kitchen is renewable.
- Claim two: that the advertiser is taking steps towards similar renewable gas being available in any kitchen.

Section 1: Environmental Claims in Advertising must:

- a. Be truthful and factual. The overall impression created by the advertisement including the Environmental Claim should not be false or inaccurate.**
- b. Not be or likely to be misleading or deceptive to the Target Consumer.**

The Panel noted that the Practice Note for the Environmental Code says:

“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 in this Code.

Instead, consideration will be given as to whether the Target consumer would likely be misled or deceived by the Advertising.

Any Environmental Claim should be accurate, true and factually correct.

Even claims that are factually correct can sometimes still mislead consumers. Advertisers should consider the overall impression created by the claim and within the overall context of the Advertising, including through use of visual and audio elements. Advertising can be found in breach of this provision if the overall impression is false, inaccurate, misleading or deceptive even if each individual claim can be substantiated.”

Claim one

The Panel noted the complainants’ concern that the use of the term renewable is misleading as the gas is not renewable, and that it produces fossil fuels when burnt.

The Panel considered that the average consumer in the target market for this advertisement would be Australian adults, who would generally understand that most gas currently in use in kitchens is not renewable. The Panel considered that the average consumer in the target market would interpret ‘renewable’ in this context to mean gas sourced from a resource which can be replenished in a reasonable timeframe.

The Panel noted the advertiser’s response that the stoves in the MasterChef kitchen used 100% biomethane gas and considered that an average consumer in the target market would understand this to be a renewable source of gas and would not be misled or deceived by the claim.

The Panel considered that the advertiser had substantiated the claim that the gas used in the MasterChef kitchen was renewable, and the claim was truthful and factual.

Claim two

The Panel considered that the audience for the advertisement could reasonably infer from this statement that AGN are taking proactive steps towards renewable gas being available in any kitchen as an alternative to non-renewable gas, in the same way that it was available in the MasterChef kitchen.

The Panel noted the advertiser's response that this claim is based on reasonable grounds with AGN aiming to supply 10% renewable and carbon neutral gas through its distribution networks by 2030, and 100% renewable by 2050.

The Panel noted that most of the trials currently being undertaken by the advertiser involve blended hydrogen gas, rather than biomethane. The Panel further noted that the advertiser's website mentions one biomethane trial blending renewable gas into existing networks, but that this represents a limited component of the overall initiative.

The Panel acknowledged that the advertisement uses the phrase "could one day be" and considered that this is not a definitive statement. The Panel considered that this is vague and does not make it clear that the plan to fully transition to renewable gas, sourced from hydrogen and biomethane, is not expected to be realised until 2050. While the Panel noted that the advertisement references a website with further information, the Panel considered that the absence of this qualification in the advertisement itself contributes to an overall impression that renewable gas was more widely available than it currently is, and that it could be available to consumers in the near future, rather than in 25 years.

The Panel considered that the advertisement was likely to be misleading or deceptive to the average consumer.

Section 1 conclusion

The Panel concluded that the advertisement did breach Section 1 of the Environmental Code.

Conclusion

Finding that the advertisement breached Section 1 of the Environmental Code the Panel upheld the complaints.

THE ADVERTISER'S RESPONSE TO DECISION

Thank you for notifying Australian Gas Networks Limited (AGN) of the outcome of the Community Panel's decision.

We acknowledge the Panel's assessment of two claims made in the advertisement. First, that AGN had substantiated claim one that the type of gas used in the MasterChef kitchen was renewable, and that it was truthful and factual. Second, that AGN had not substantiated claim two that it is taking steps towards "similar renewable gas" being available in any kitchen.

AGN response to Community Panel Claim two finding

AGN respectfully disagrees with the Panel's finding that the advertisement wording "at AGN we're working towards a future where renewable gas could one day be used in your kitchen" was likely to be misleading or deceptive to the average consumer, and that a similar renewable gas is more widely available than it currently is. Further, the Panel considers that the consumer would likely be misled in that renewable gas "could be available to consumers in the near future, rather than in 25 years."

AGN stands by the accuracy of the information provided and that this claim is based on reasonable grounds. As set out in our response, our low carbon vision is being pursued through a number of projects already underway including Hydrogen Park South Australia, Hydrogen Park Gladstone and Hydrogen Park Murray Valley. These projects (together with projects being pursued by other gas networks) are detailed on the website renewable-gas.com.au which is referenced in the advertisement. Further, our projects are supported by significant government funding (both State and Federal).

AGN has always made clear that the supply of renewable gas to the MasterChef kitchen showcases a demonstration of what can be possible in the future with no immediate timeframe.

AGN submits that the consumer is not likely to be misled because:

1. We believe the average consumer understands that transitions take time (for example, the uptake of renewable electricity over decades); and
2. The customer understands renewable gas (which may be either/both green hydrogen or biomethane) is currently not widely available; and
3. A renewable gas transition would involve an incremental increase over time in percentage blends of renewable gas with natural gas, rather than an immediate switch over to 100% renewable gas in 25 years' time; and
4. The use of "one day could be used in your kitchen" wording is consistent with our low carbon vision and our plans to meet our targets to transition to 100% renewable gas over time by 2050. We consider this is the impression given without the need for qualification.

Our response to the complaint already states how AGN (as part of Australian Gas Infrastructure Group) is working towards its stated targets for a renewable gas future and we remain of the view our progress towards those targets entirely supports the statements made in the advertisement.

AGN also considers that there is already appropriate qualification to this claim two in that the advertisement provides reference to AGN's relevant website (renewable-gas.com.au) for consumers to obtain more information about how AGN is working

towards a renewable gas future, including its current projects. This website makes up the call to action to find out more about the advertisement.

Next Steps

We have always endeavoured to provide access to and transparency about our low carbon vision and timelines. We believe the average consumer understands transitions take time. Having said that, we acknowledge Ad Standards' decision and have taken the following steps:

- we have removed the advertisement from publication effective immediately; and,
- we are giving further consideration to the feedback from Ad Standards and next steps, including whether to modify the advertisement, for example, by referencing to our targets, and/or updating the relevant referenced website.

We appreciate the time and effort that went into this review. If you require any further information, please do not hesitate to contact me.