

**Submission  
No 1**

## **INQUIRY INTO EMISSIONS FROM THE FOSSIL FUEL SECTOR**

**Organisation:** Comms Declare

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# Submission to the Joint Standing Committee on the Net Zero Future

**Inquiry into the scale and nature of current and likely future direct greenhouse gas emissions from fossil fuel projects and related infrastructure in New South Wales**

## **About Comms Declare**

[Comms Declare](#) is an incorporated not-for-profit organisation representing more than 360 communications professionals, agencies, and organisations who have pledged not to promote:

- the expansion of fossil fuels
- high greenhouse gas pollution as 'business as usual'
- deception, distraction, or spin around climate science or climate action.

Our mission is to encourage agencies to prioritise the wellbeing of the planet in their communications. Comms Declare advocates for restrictions on advertising high-emissions products at every level of Government. Recognising Australia's role as a major fossil fuel exporter, Comms Declare also runs the [annual F-List](#) and maintains a public list of agencies working with fossil fuel clients. Comms Declare is a member of [Climate Action Network Australia](#).

## **Introduction**

Thank you for the opportunity to contribute to this important and timely inquiry.

**Comms Declare submits that the state of New South Wales is uniquely positioned to lead the nation in legislating restrictions on the advertising and sponsorship of coal, petroleum, and gas products, mirroring Labor's world-beating precedent in tobacco advertising bans.**

NSW is already feeling the serious impacts of climate change, including increasing frequency and severity of heatwaves, droughts, bushfires, storms, and floods. These events are directly linked to the accelerated burning of greenhouse gas emissions, largely through fossil fuels such as coal, oil and gas.

One measure to reduce the severe impacts of fossil fuels is cultural, and pertains to communications that continue to extend social licence to high-polluting industries and delay

the urgently needed transition to renewable energy. While New South Wales has recently reduced its emissions per capita, it remains significantly higher than the global average. On the plus side, up to 72% of emissions come from household consumption<sup>1</sup>, offering a sizable opportunity for NSW to reduce climate pollution and fossil fuel dependence via behavioural changes.

Governments have long restricted advertising and sponsorship of harmful products such as tobacco, gambling, and alcohol. Yet fossil fuels - arguably the most destructive products of our time - are still widely promoted. This undermines public health, climate goals, and public trust.

As Australia's second largest polluter, accounting for one quarter of the Australia's emissions<sup>2</sup> NSW has both the moral imperative and strategic opportunity to lead by removing fossil fuel promotions from government infrastructure and advertising spaces. This action would align with the NSW Government's net zero goals, reduce the risk of those climate goals appearing disingenuous, and would meet growing community expectations for climate leadership.

### **Fossil fuels are the new tobacco**

Fossil fuels are the new tobacco, and their promotions must be regulated accordingly.

Like the connection between accelerating climate change and fossil fuels, the connection between cigarette smoking and lung cancer was already evident decades ahead of public health and safety efforts to curb its use. While the first epidemiological studies showing an association between smoking and lung cancer were published in 1950,<sup>3</sup> It was not until 1973 that, at the Federal level, the Whitlam government decided to phase out tobacco advertising.<sup>4</sup> In Australia today, it's illegal to publish or broadcast messages that encourage people to smoke or vape, or advertise tobacco products or e-cigarettes.<sup>5</sup>

As recently as January this year, Australian researchers found that bans on tobacco advertising, promotion and sponsorship bans showed upwards of a 1 in 3 potential cigarette smokers would not take up cigarette smoking as a result of these bans, suggesting that, decades on from their introduction, bans of this kind continue to positively influence behaviour.<sup>6</sup>

By way of contrast, air pollution from the combustion of fossil fuels is a significant and preventable public health problem. It is estimated to cause the premature deaths of approximately 11,000 Australians each year, a figure that dwarfs the annual national road

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<sup>1</sup> [It starts at home? Climate policies targeting household consumption and behavioral decisions are key to low-carbon futures](#), ScienceDirect, June 2019

<sup>2</sup> Climate Council. [Submission: NSW Net Zero Commission](#). July 2025.

<sup>3</sup> University of Western Australia. [History of tobacco and health. 2003](#). Accessed July 2025.

<sup>4</sup> National Archives of Australia. [Tobacco advertising ban in Australia](#). The move to a ban on tobacco advertising. Accessed July 2025.

<sup>5</sup> Australian Government, Department of Health, Disability and Aging. [Advertising and sponsorship bans](#). Accessed July 2025.

<sup>6</sup> Griffith University. [Effectiveness of tobacco advertising, promotion and sponsorship bans on smoking prevalence, initiation and cessation: a systematic review and meta-analysis](#). January 2025, accessed July 2025.

toll, which stands at just over 1,000 deaths.<sup>7</sup> Fossil fuels cause hazardous air pollution that is implicated in 8.1 million deaths globally per year - more than smoking - and is increasing the rates of asthma, heart disease, cancer, learning delays and poor pregnancy outcomes.<sup>8</sup>

The parallels and public health rationale between the curbs to tobacco advertising and fossil fuel advertising are clear. Just as we no longer tolerate tobacco advertising, we must now take similar action against high emissions products. This includes phasing out fossil fuel advertising, sponsorships, and promotions, particularly where they influence young people, communities, and public institutions. The health of our climate, ecosystems, and future generations depends on it.

### **What Could Fossil Fuel Marketing Restrictions Look Like?**

Comms Declare recommends that the NSW Parliament legislate a comprehensive ban on fossil fuel advertising and sponsorship on government land, institutions such as schools and advertising assets such as transport.

Such a law would prohibit advertising that directly or indirectly promotes the production, sale, or consumption of coal, petroleum, and gas. Crucially, the focus should be on reducing the promotion of fossil fuel products, rather than silencing fossil fuel companies per se. This ensures the law is targeted, practical, and aligned with public interest.

This move would:

- send a strong market signal about NSW's climate commitment, especially ahead of COP31
- reduce unnecessary consumption of fossil fuel products
- support the cultural shift required for a zero-emissions future, *and*
- protect young people and communities from misleading messages.

### **Momentum Is Building**

The concept of restricting fossil fuel advertising is gaining traction across Australia and internationally.

- In **NSW**, Greens MLC Sue Higginson introduced the [Public Health and Safety \(Fossil Fuel Advertising\) Bill 2022](#), proposing a tobacco-style ban based on public health and emissions concerns.
- The [ACT Legislative Assembly passed a](#) policy in 2025 banning fossil fuel sponsorships in public schools, effective from 1 January 2026.
- More than **18 local councils** across Australia, including Blue Mountains, Byron Bay, Mosman, Ryde, Inner West Council and the City of Sydney, have enacted or are progressing similar bans.
- **Internationally**, countries such as France, the Netherlands, Spain, Canada and the UK have introduced or are pursuing restrictions on fossil fuel advertising.

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<sup>7</sup> NewsGP. [Vehicle-related pollution may cause more than 11,000 deaths a year](#). March 2023. Accessed July 2025.

<sup>8</sup> Doctors for the Environment Australia. [Report: Fossil Fuels Are A Health Crisis](#). 25 August 2024. Accessed July 2025.

- In June 2024, **United Nations** Secretary-General António Guterres called coal, oil, and gas companies the “godfathers of climate chaos” who had “distorted the truth and deceived the public for decades”. He drew a direct parallel with tobacco industry practices and called for all governments to enact fossil fuel advertising bans to protect public health and the planet.<sup>9</sup>

### Case Study: Glencore Coal: “Coal Helps Make Electricity” campaign



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<sup>9</sup> Guardian UK. [‘Godfathers of climate chaos’](#): UN chief urges global fossil-fuel advertising ban. 6 June 2024.

In January 2025, billboard and bus shelter advertising from fossil fuel giant Glencore Coal was spotted in Sydney, as part of a multi-year brand campaign across Australia. Unsurprisingly these advertising efforts discount that coal is the most polluting way to produce electricity,<sup>10</sup> releasing massive amounts of pollution, damaging our health and contributing to intensifying climate change.

Despite a need for urgent climate action, coal expansion remains at the heart of Glencore's strategy.<sup>11</sup> As one of the world's biggest coal exporters, Glencore's emissions are estimated at around 22 million tonnes CO<sub>2</sub> since 2016 - equivalent to those emissions of 1.1 million Australians in a year.<sup>12</sup> Glencore is now stepping back from a previous commitment to decarbonise in line with the International Energy Agency's (IEA) only Paris-aligned scenario, the Net Zero Emissions by 2050 (NZE) scenario.<sup>13</sup> Notably, despite making a total income of \$16.6 billion AUD in 2020-2021, Glencore Coal paid \$0.00 AUD in company tax.<sup>14</sup>

Additionally, cities like Amsterdam, Toronto, Canberra and Montreal have moved to prevent fossil fuel ads on their transport network.

### **Case Study: Australian Energy Producers, "Natural Gas" campaign**

This billboard, sponsored by Australian Energy Producers, was placed in Mosman in January 2025. Formerly known as the Australian Petroleum Production and Exploration Association (APPEA), Australian Energy Producers has consistently advocated against robust regulatory measures to address climate change and actively opposed policies aimed at transitioning the Australian economy away from fossil fuel dependence.<sup>15</sup>

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<sup>10</sup> Climate Council. 2023. [Killer Coal Report](#). Accessed July 2025.

<sup>11</sup> Banktrack. 20 May 2025. [Glencore's coal expansion fueled by European banks](#). Accessed July 2025.

<sup>12</sup> Climate Council. February 2023. [Report: Introducing The Dirty Dozen: Australia's Filthiest Fossil Fuel Polluters](#). Accessed July 2025.

<sup>13</sup> Australian Centre for Corporate Responsibility. 18 April 2024. [Analysis: Glencore's 2024-2026 Climate Action Transition Plan](#). Accessed July 2025.

<sup>14</sup> Climate Council. February 2023. [Report: Introducing The Dirty Dozen: Australia's Filthiest Fossil Fuel Polluters](#). Accessed July 2025.

<sup>15</sup> InfluenceMap. [LobbyMap Scores Australian Energy Producers](#) (Formerly APPEA) - Climate Policy Engagement. Accessed July 2025.



## Conclusion

Comms Declare urges the Joint Standing Committee to consider the implementation of targeted and sensible restrictions on coal, oil and gas promotions as an effective tool to reduce overconsumption of fossil fuels and to help pave the way for a renewable energy future in NSW.

This measure would contribute to reducing emissions, accelerating the clean energy transition, and protecting public health and safety for future generations.

We thank the Committee for considering this submission and are available to provide further information or appear before the Committee if required.

## Contact

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