

ASA Ruling on Shell UK Ltd

🔗 Upheld | Radio | 08 July 2020

Ad description

A radio ad for energy company Shell, heard in January 2020, featured the voice of a young girl who stated, “I spy, with my little eye, something beginning with ‘b’”. A woman, intended as the young girl’s mother, responded by stating “bike”. The young girl then stated, “Nope. Banana tree”. The mother responded “Of course, we must have missed it”. A further voice stated, “Although you might not be able to see it, your small actions can have a real impact with Shell. Drive carbon-neutral by filling up and using Shell Go+ today. Make the change. Drive carbon-neutral”.

Issue

Seventeen complainants challenged whether the claim “Drive carbon-neutral” was misleading.

Response

Shell UK Ltd said the Shell Go+ scheme was a loyalty proposition that launched in 2019. Members had the ability to enjoy savings on selected categories such as hot drinks, car wash and motor oils by scanning their Shell Go+ app or card when they made a purchase. The “Drive carbon-neutral” programme was introduced into the scheme in October 2019. They said that the “carbon-neutral” claim was supported by balancing (offsetting) carbon emissions to the atmosphere associated with the lifecycle, known as “well-to-wheel”, of petrol/diesel fuels through the purchase and retirement of nature-based carbon credits.

Shell said that the volume of fuel purchased by a customer, in litres, was recorded for the purposes of carbon offsetting and providing customers with their own personalised carbon statement. They then determined the total quantity of emissions that were associated with the fuel purchase using the “well-to-wheel” basis, taking account of oil extraction, fuel refining and transportation and the emissions associated with fuel use, and worked out what quantity of CO₂ was required to be avoided or removed from the atmosphere to offset those emissions. They then engaged in a transaction to ensure that the applicable amount of carbon credits were purchased to compensate for the associated emissions for that customer. One carbon credit represented the avoidance or removal of one tonne of CO₂ from the atmosphere. They purchased those credits from a global portfolio of nature-based projects, including the Katigan Peatland Restoration and Conservation Project in Indonesia, the GreenTrees Reforestation Project in the USA and the Cordillera Azul National Park Project in Peru, and each carbon credit was subject to a third-party verification process for certifying carbon emission reduction.

Shell said that in 2018 they commissioned qualitative research to understand better consumers’ comprehension of the concept of “carbon offsetting”, and established that it was a less familiar term than “carbon neutrality”. The research indicated that consumers understood carbon neutrality to mean taking out as much carbon dioxide from the atmosphere as they were putting in, so they decided that was the most suitable term to use. Shell said they did not believe that consumers could be confused into thinking that Shell Go+ was a new carbon-neutral fuel, and believed that the ad made a clear distinction between the fuel and the loyalty scheme by stating “Drive carbon neutral by filling up and using Shell Go+ today”, thereby avoiding any confusion. The ad also directed consumers to Shell’s website for more details, which they said was appropriate to do given the complex background to the principles of carbon offsetting.

Radiocentre said Shell demonstrated to them that the Shell Go+ offer was a carbon offsetting scheme, rather than a fuel that was carbon neutral in and of itself.

Assessment

Upheld

The ASA understood that Shell Go+ was a loyalty scheme to which consumers were required to sign-up and then show their membership card when they made a purchase. In those circumstances the carbon emissions related to that fuel purchase would be offset by Shell.

While we did not consider that a radio ad, which was naturally limited by time, needed to include a full explanation of that scheme we noted that there was in fact nothing in the ad at all which might indicate to listeners that what was being advertised was a loyalty programme. In that context we considered that listeners were likely to infer from the claims “although you might not be able to see it, your small actions can have a real impact with Shell. Drive carbon-neutral by filling up and using Shell Go+ today”, that Shell Go+ was a fuel for which Shell would offset the carbon emissions related to that fuel purchase such that the customer could “Drive carbon-neutral”. Because that was not the case we concluded that the ad was misleading.

The ad breached BCAP Code rules [3.1](#) (Misleading advertising), [9.2](#) and [9.3](#) (Environmental claims).

Action

The ad must not appear again in the form complained of. We told Shell UK Ltd to ensure they made clear that carbon offsetting was contingent on membership of a loyalty scheme.

BCAP Code

[3.1](#) [9.2](#) [9.3](#)

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