



Complaint to the Belgian advertising ethics panel regarding the "carbon neutrality" communication of the 2022 FIFA World Cup.

Advertising Complaint

Target page:

<https://www.fifa.com/fr/social-impact/sustainability/climate-pledge/what-is-climate-change>

Screenshot 1 from the FIFA website:

Compenser l'empreinte

La compensation consiste à annuler les émissions effectuées à un endroit en extrayant ou en évitant les émissions à un autre endroit via le financement de projets susceptibles de réduire les émissions. Cette démarche positive pour l'environnement offre aussi des avantages aux communautés, qui ont accès à des opportunités d'emploi, des formations et des financements.

La FIFA, FIFA World Cup Qatar 2022 LLC et le Conseil suprême pour la remise et l'héritage compenseront intégralement les émissions associées à la Coupe du Monde de la FIFA, Qatar 2022™. Cette compensation inclut également les émissions correspondant aux déplacements, à l'hébergement, à la restauration et aux boissons des détenteurs de billets. Il s'agira donc de la première Coupe du Monde de la FIFA neutre en carbone.

Screenshot 2 from the FIFA website:

Mesurer notre empreinte

La Coupe du Monde de la FIFA™ est le plus grand événement sportif unidisciplinaire au monde. Si elle influe favorablement sur le tissu socioéconomique du pays organisateur, elle a également des conséquences indéniables sur l'environnement mondial.

La FIFA, FIFA World Cup Qatar 2022 LLC et le Conseil suprême pour la remise et l'héritage sont bien déterminés à organiser une Coupe du Monde de la FIFA 2022™ neutre en carbone ainsi qu'à proposer un modèle de gestion environnementale responsable via la mise en œuvre des standards actuels de construction durable, des meilleures pratiques en matière de gestion de l'eau et des déchets, et des solutions énergétiques à faible taux d'émission. Nous aspirons à laisser au Qatar et dans la région un héritage de gestion environnementale de premier plan, composé de technologies, d'entreprises et de normes novatrices.

Advertising character

This complaint relates to FIFA's advertising of the 2022 World Cup in Qatar as "carbon neutral". We find that this communication by FIFA constitutes advertising to the public, is misleading and false, and violates the rules and codes of the JEP.

The webpage targeted by this complaint is one of the different pages on which the "carbon neutral" World Cup mention is found. This page contains general information about climate change and the actions taken by FIFA in this regard. Among these actions, the "carbon neutral" nature of the 2022 World Cup is highlighted, in vague terms and without sufficient information to enable the consumer to understand the scope of this advertisement.

The "definitions" section of the ICC Code specifies advertising as *"any form of commercial communication diffused through the media, usually in exchange for payment or other valuable consideration"* and *"commercial communication" as including "advertising and any other techniques, such as promotion, sponsorship as well as direct marketing, and digital commercial communications, and should be interpreted broadly as meaning any form of communication produced directly by or on behalf of a trader and intended primarily to promote a product or to influence consumer behaviour."*

Furthermore, as stated in the "ecological advertising code", available on the JEP website, an advertisement is defined as: *"any communication with the direct or*

indirectly to promote the sale of products or services [...] regardless of the place or means of communication used (article 22 of the law of 14 July 1991)".

The FIFA communications referred to in this complaint fall squarely within the definition of commercial communication and advertising as defined in the ICC Code and JEP rules.

The campaign to promote the "carbon neutrality" of the World Cup in Qatar has intensified over the past two years, which marked the acceleration of the World Cup preparation phase, with FIFA publishing a set of documents on the Qatar World Cup sustainability strategy. These are available in English on the FIFA website, and there is also a wealth of other content in English on social networks. The messages in the advertisements in question are part of this campaign to promote the World Cup. They appear on the FIFA website, which also includes commercial links to ticket and merchandise purchases.

In view of the above, the allegations on the FIFA website constitute promotional advertisements insofar as :

- They are aimed at consumers, i.e. ticket buyers who will then also consume inside and outside the stadiums in shops and bars run by FIFA;
- They promote the World Cup and, through this, the sale of tickets which is carried out on the same site;
- They promote the climate action of FIFA and its partners;
- this promotion aims to or at least helps to influence consumers who are increasingly sensitive to the ecological impact of their consumption.

Furthermore, FIFA's website can be accessed in Belgium, where the allegations are therefore deemed to have been "diffused".

Misleading nature of advertising

The cited page emphasizes the "carbon neutral" nature of the 2022 World Cup, including the following wording: "FIFA, FIFA World Cup Qatar 2022 LLC and the Supreme Council for Delivery and Legacy are fully committed to hosting a carbon neutral 2022™ FIFA World Cup" and "FIFA, FIFA World Cup

Qatar 2022 LLC and the Supreme Council for Delivery and Legacy will fully offset the emissions associated with the Qatar 2022™ FIFA World Cup. This offset also includes emissions corresponding to travel, accommodation, food and beverage for ticket holders. It will therefore be the first carbon-neutral FIFA World Cup."

These affirmations are misleading for the reasons set out below, and violate the ICC Code sections mentioned below.

First, the "carbon neutral" nature of this World Cup has not been certified or validated by any independent body. It is an affirmation by FIFA, without any certification. It is true that the greenhouse gas (GHG) emissions balance for the World Cup was prepared by a consultancy firm (South Pole), and that carbon credits were purchased from a carbon credit certification body. However, it should be noted that, for the reasons described below, these two components of "neutrality" (i.e., the carbon footprint on the one hand, and offsetting on the other) are both insufficient to promote the "carbon neutrality" of this World Cup. Especially since the GHG emissions balance is not clearly mentioned in FIFA's communications about the "carbon neutrality" of this competition. The consumer is therefore not properly informed.

With regard to the GHG emissions balance, our May 2022 study clearly demonstrated the weakness of the methodology used for emissions accounting, resulting in a significant underestimation (see Carbon Market Watch (2022): 'Poor Tackling: Yellow card for the 2022 FIFA world cup's carbon neutrality claim':

<https://carbonmarketwatch.org/publications/poor-tackling-yellow-card-for-2022-fifa-world-cups-carbon-neutrality-claim/>).

The main problem with the FIFA report is the massive underestimation of GHG emissions from the construction of new stadiums. Instead of accounting for all of the emissions associated with 6 new stadiums, FIFA decided to attribute only a very small portion of the total construction emissions to itself. Assuming that these stadiums will have a lifespan of 60 years, and that they will only be used for 2 months for the World Cup, the emissions for which FIFA is responsible, according to their report, are only a fraction (2 months divided by 60 years) of the total emissions. FIFA has published a total GHG balance of 3.6 million tCO₂e, yet we estimate that this figure should be at least 5 million tCO₂e.

In any case, beyond this underestimation of the competition's carbon footprint, FIFA has also largely failed to meet its obligations in terms of offsetting to support its carbon neutrality communication. Assuming that the total GHG footprint is indeed 3.6 million tCO₂e (FIFA's estimate, which we dispute), FIFA would then have to obtain 3.6 million carbon offsets. However, according to the public information available to date, FIFA has only made an agreement to purchase 1.8 million, i.e. half. For these 1.8 million credits, FIFA has turned to the Global Carbon Council, a new "standard" in the voluntary carbon market, i.e. a new body responsible for verifying the quality of carbon credit emitting projects and issuing these credits.

Only, this body, the "GCC", was set up by the 2022 World Cup organisers, including FIFA (see our aforementioned "Yellow card" report for details). It is therefore not credible as an independent body. Moreover, this body has only registered 6 carbon credit emitting projects to date. The 2022 World Cup organizers hold, according to the GCC's public information to date, less than 200,000 credits. This is a far cry from the 1.8 million they are supposed to buy from the GCC, and even farther from the 3.6 million that the World Cup organizers should be using to offset their emissions (which, we remind you, are underestimated).

Enfin, the carbon credits purchased by the World Cup organisers so far are of very low quality, and it is very unlikely that their purchase will have any impact on the overall level of GHG emissions. This is noted in this article, among others:

<https://www.source-material.org/qatar-world-cup-relying-on-flawed-carbon-offsets/>

In short, this carbon neutrality communication is based on erroneous GHG emissions accounting and a purchase of low-quality carbon credits, in vastly insufficient numbers, and certified by an organization directly linked to the World Cup organizers, i.e., the buyers of the credits.

In addition to this flagrant lack of clarity, and the exaggeration of a "neutral" impact, FIFA is mis-communicating by presenting this World Cup as the "first" carbon neutral World Cup. In effect, this implies a notion of progress; an indication of positive evolution. Yet, it is notable that the carbon footprint of this world cup is incomparable to that of previous tournaments, as the reports published by FIFA use different methodologies. These reports

themselves say that they are incomparable. It is therefore impossible to objectively observe whether the emissions from the 2022 tournament will be higher, lower, or equal to the emissions generated by previous tournaments.

Violations of YIP codes and rules

This advertisement violates multiple sections of the ICC Code, namely:

- Article 1 (excerpt) "No communication shall be of such a nature as to degrade the confidence which the public should be able to bear in marketing."

In view of the obviously misleading and abusive nature of this communication, it clearly degrades the public's confidence in marketing. This is evidenced by the number of press articles that have been published highlighting the deceptive nature of this communication.

- Article 4 (excerpt): "Commercial communication shall be designed so as not to abuse the confidence of consumers or exploit consumers' lack of experience or knowledge."

FIFA's "carbon neutrality" advertisement clearly exploits consumers' lack of knowledge. FIFA provides very little information about this supposed carbon neutrality. From the page we are complaining about, there is only one link that is supposed to point to "more information", and that link does not work. Moreover, in order to understand the fallacious dimension of FIFA's affirmation, a consumer would have to find the GHG emissions balance sheet published by FIFA (so far only available in English), understand how a carbon offset mechanism works and thus look after the origin of the carbon credits used. This consumer would then (perhaps) find the organization that issues carbon credits (the Global Carbon Council). He would then have to conduct a detailed search to finally understand that this organization is 1) directly linked to the organizers of the World Cup, and 2) only generated less than 200,000 credits for FIFA when at least 3.6 million would be needed for the carbon neutrality affirmation to be correct (at least from a purely arithmetic point of view). It is unreasonable to expect this kind of knowledge from a consumer, and so this communication clearly exploits this lack of knowledge.

- Section 6 (excerpt) "Any description, assertion or illustration relating to a verifiable fact in a commercial communication shall be capable of being substantiated."

The claim that the 2022 World Cup is carbon neutral is not supported. Firstly, because, according to public information, FIFA has not purchased

than less than 200,000 carbon credits to offset the tournament's emissions, when it should have 3.6 million, and furthermore because the carbon footprint is both flawed, and based on calculation assumptions that are not public. In effect, the GHG balance document published by FIFA does not detail the assumptions and calculations used to establish the final chiffre.

- Section 9 (excerpt) "Commercial communication shall not [...] use scientific terminology or vocabulary in such a way as to falsely suggest that a claim about a product has a scientific basis."

The concept of "carbon neutrality" is a scientific terminology, still widely debated. The use of this concept suggests that a precise calculation has been made afin "to cancel out the emissions effected at one location" (as FIFA incorrectly writes on its website). There is no robust scientific basis for this FIFA publicity, given the underestimation of total emissions, the lack of carbon credits to offset these emissions, and the general lack of transparency and objective information to prove the affirmation.

- Article 11 "Commercial communication containing a comparison must be designed in such a way that the comparison is not likely to mislead the consumer and it must comply with the principles of fair competition. The elements of comparison must be based on objectively verifiable facts which must be chosen fairly."

FIFA's message that this is the first carbon-neutral World Cup implies a comparison to past tournaments, and misleads the consumer into thinking that the 2022 tournament will have a lesser impact on the environment. This is not supported by "objectively verifiable facts" as the GHG emission data from previous tournaments is incomparable to this year's (due to changes in calculation methodologies). Furthermore, the affirmation of "carbon neutral" is itself false and therefore there is no need to highlight this element in a comparison.

- Article 22 (excerpt) "[Commercial communication] shall comply with the principles set out in Chapter D, Environmental Claims in Commercial Communication".

These principles are not all respected, see below ("Articles D...").

- Article D1 (excerpt) "Commercial communication shall be designed in such a way as not to take unfair advantage of consumers' interest in the environment or exploit their possible lack of knowledge about

the environment. The commercial communication shall not contain any affirmation or visual treatment likely to mislead consumers in any way as to the environmental aspects or benefits of products or as to actions undertaken by the trader in favour of the environment."

This article is violated in multiple ways. Firstly, because the carbon neutrality communication exploits consumers' lack of knowledge. Secondly, because the communication misleads people about what FIFA is doing on the environment. It suggests that the emissions from this World Cup are low, or lower than past competitions, yet there is no objective public data to prove this.

- Article D1 (excerpt) "In particular, a claim such as "environmentally friendly", "environmentally safe", "green", "sustainable", "low carbon" or other claims implying that a product or activity has no - or only a positive - impact on the environment, should not be used without explanation, unless there is a very high level of evidence."

FIFA's communication is one that implies that an activity has zero impact on the environment. Yet there is neither explicitness nor a very high level of evidence to support this affirmation. For example, the GHG footprint of the competition (itself imperfect) is neither referenced as part of the "carbon neutrality" advertisement, nor available in the language used for that advertisement.

- Article D1 (excerpt) "Any explanatory statement must be clear, prominent and easily understandable; it must appear in close proximity to the qualified claim afin order to ensure that the two elements are read together. There may be circumstances in which it is appropriate to use an explication referring the consumer to a website where specific additional information can be obtained."

At the time of filing this complaint, the link to a page with more information about the carbon neutrality of the 2022 World Cup is not working. Even if it were working, the information there is highly unlikely to suffice for an average consumer to understand the scope of this affirmation. Beyond understanding the offset logic, the consumer should understand how the GHG balance was calculated, and why it is likely to be underestimated. In addition, he or she should understand how carbon credit certification standards work, and note the link between the Global Carbon Council and the organizers of the

World Cup. Finally, it should vérifier how many carbon credits were actually purchased by the tournament organizers, and from which projects they came. The quality of these projects and credits should then be analyzed afin order to better understand the veracity of the carbon neutrality affirmation. This information is not available on the FIFA website, nor on the (English) 2022 World Cup website. Therefore, there is no "prominent and easily understandable" explanation.

- Article D2 (excerpt) "Environmental jargon or scientific terminology is acceptable, provided that such language is relevant and used in a manner that can be readily understood by those to whom the message is directed."

As explained above, the jargon of "carbon neutrality" is not easily understood by the people the message is aimed at. This is all the more problematic because, very often, the people targeted *think they* know what it means, when in reality they do not grasp the real meaning of this affirmation.

- Section D3 (excerpt) "Any comparative claim must be specific and the basis for the comparison must be clear."

The affirmation that this is the first carbon-neutral World Cup is not based on a clear foundation since the GHG emission balances of previous tournaments are incomparable to that of 2022. Yet any form of "neutrality" must first focus on a reduction in emissions in absolute terms - which is impossible to vérifier here.

- Article D3 (excerpt) "Comparative claims, whether the comparison is with a previous process or product of the same trader or those of a competitor, must be worded in such a way as to make it clear whether the claimed advantage is absolute or relative."

The affirmation that this World Cup is the first to be carbon neutral is an affirmation floue and difficile to understand. It is an absolute comparison, but based on an offset logic that is, by definition, relative since it implies the creation of positive impacts proportional to the negative impacts generated by an event.

Enfin, this advertisement also violates multiple articles of the "Green Advertising Code", available on the JEP website, namely Article 1 (not exploiting a lack of knowledge), Article 3 (not containing an affirmation of such a nature as to mislead as to the properties of a service regarding its effets on the environment), Article 7 (absolute affirmations implying that a service has no effets on the environment are prohibited, unless proven), Article 8 (in case of comparisons making reference to

a reduction, what has been reduced must be clearly stated); Article 10 (scientific or environmental terminology is acceptable provided it can be easily understood by consumers). These articles largely echo those of the ICC Code, and the reasons why they are breached by this advertisement are therefore identical to those listed above.

For these reasons, we believe that FIFA's "carbon neutral" World Cup advertising is highly misleading, false, and abusive. It directly harms the ecological transition because it encourages the public to continue consuming according to historical practices, while a change in consumption habits is one of the major factors for the transformation of the global economy.

This advertisement is misleading and should be withdrawn immediately.

Contact

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