


ASA Ruling on 4AIR LLC

 Upheld | Search (paid) | 30 August 2023

Background

This Ruling forms part of a wider piece of work on climate change and the environment. The ad was identified for investigation following intelligence gathered by our Active Ad Monitoring system, which uses AI to proactively search for online ads that might break the rules.

Summary of Council decision:

Three issues were investigated, all of which were Upheld.

Ad description

A paid-for Google ad, for 4AIR LLC, seen on 21 November 2022, stated, “Eco-Friendly Aviation – Future of Sustainable Aviation” and “Learn How To Turn Flying Into A Force For Good With A 4AIR Rating. Industry-Leading Standard For Sustainability In Private Aviation. Sustainability. Aviation Industry.”

Issue

The ASA challenged whether the following claims gave a misleading impression of the environmental impact of the service:

1. “Eco-Friendly Aviation”;
2. “Sustainable Aviation”; and
3. “Turn Flying Into A Force For Good”.

Response

1., 2. & 3. 4AIR LLC said they were a sustainability solutions provider that sought to address climate impacts of all types. Their target customers were primarily aviation operators. Their programmes addressed the operational impact of their customer's aircraft and offered solutions for related ground emissions. Their approach simplified reporting on metrics as part of environmental, social and governance (ESG) frameworks and aligned with industry standards set by the International Civil Aviation Organisation (ICAO) and the Greenhouse Gas Protocol (GHG).

They said that they used a variety of mechanisms to help an operator implement a sustainability programme and their carbon credits were quantified and verified through bodies such as the American Carbon Registry, Climate Action Reserve, Verified Carbon Standard (VERRA), and The Gold Standard. In addition to carbon credits, they assisted customers with locating airports with physical supplies of Sustainable Aviation Fuel (jet fuel made from non-fossil sources such as used cooking oil or grease), which they stated could reduce emissions by as much as 80%.

Regarding their advertising, 4AIR said their use of the claims "Eco-Friendly Aviation", "Sustainable Aviation", and "Turn Flying Into A Force For Good" was substantiated by their programmes where Sustainable Aviation Fuel was used to reduce customers' life-cycle emissions. In addition to Sustainable Aviation Fuel, they used a more comprehensive approach that went beyond 'carbon neutral'. In relation to the claim "Turn Flying Into A Force For Good", they facilitated contributions made by their customers to the non-profit Aviation Climate Fund (ACF), which conducted research to develop future technologies needed to reduce the dependency of aviation operators on fossil-based fuels.

On the question of the full life cycle of the products associated with their services, 4AIR stated they did not own, manufacture, maintain or operate any aircraft.

Assessment

1., 2. & 3. Upheld

The CAP Code required that absolute environmental claims must be supported by a high level of substantiation.

The ASA considered that the claims "Eco-Friendly Aviation", "Sustainable Aviation" and "Turn Flying Into A Force For Good" read together in the context in which they appeared would be understood by businesses to mean that 4AIR offered services that could ensure aviation operations did not cause environmental damage. While we acknowledged the use of "future" in the "Future of Sustainable Aviation", which could refer to an aspirational goal, the claim

was immediately followed by the text “Learn How To Turn Flying Into A Force For Good” which would be understood by businesses to mean that by using 4AIR’s services their business would be capable of having an immediate positive impact on the environment.

We therefore expected to see a high level of evidence that substantiated the claims, taking into account the full life cycle of the products and services associated with 4AIR’s services. While we accepted that 4AIR did not own or operate any aircraft, its services were directly linked with aviation, and we therefore considered the claims in the context of the full life cycle of aviation operations.

We acknowledged that Sustainable Aviation Fuel produced lower emissions than traditional aviation fuel. However, we understood that aviation, even with the use of Sustainable Aviation Fuel, produced high levels of CO2 and non-CO2 emissions which contributed to climate change. We further acknowledged that 4AIR gave businesses the opportunity to support the Aviation Climate Fund’s research into future technologies related to reducing the negative environmental impact of the aviation industry. We understood, however, that the results of that initiative would be delivered decades into the future and therefore concluded that support of it was not adequate substantiation to evidence the claim “Turn Flying Into A Force For Good” as it would be understood in the context of the ad.

Furthermore, we understood that at the time the ad appeared, there were no initiatives or commercially viable technologies in operation within the aviation industry which would adequately substantiate absolute claims such as “Eco-friendly Aviation” and “Sustainable Aviation” as we considered businesses would interpret them in the context of the ad.

We concluded that the claims were likely to mislead businesses in relation to 4AIR’s capability to ensure that aviation operations which purchased its services did not negatively impact the environment, and the ad therefore breached the Code.

The ad breached CAP Code (Edition 12) rules 3.1 (Misleading advertising), 3.7 (Substantiation), 11.1, 11.3 and 11.4 (Environmental claims).

Action

The ad must not appear again in the form complained about. We told 4AIR LLC to ensure it did not mislead businesses by understating the environmental impact of their service, including by using absolute claims such as “Eco-Friendly Aviation”, “Sustainable Aviation”, and “Turn Flying Into A Force For Good”.

CAP Code (Edition 12)

3.1 **3.7** **11.1** **11.3** **11.4**