

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Ethical Advertising Council Motion  
**Date:** 19 October 2022 09:37:04

---

Cheers [REDACTED]

Apologies, could you send me the synopsis as to what they are proposing to ban? Just so I am 100% clear when speaking to sales.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 19 October 2022 09:36  
**To:** [REDACTED]  
**Subject:** Ethical Advertising Council Motion

[REDACTED]

Thanks again for your time this morning.

As discussed, the two key bullet points from my point of view in the motion are as follows:-

- What products and services are currently being advertised in Council land / property in Edinburgh
- Any potential legal or financial risks for the council related to adopting an ethical advertising and sponsorship policy

Thanks

[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Low carbon advertising policy check in  
**Date:** 03 November 2022 10:33:15

---

Hi [REDACTED],

Hope you're well. Just wanted to check whether you had received the list of past advertising from JCD and if you need any help from me at this stage.

Thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 19 October 2022 09:47  
**To:** [REDACTED]  
**Subject:** RE: Low carbon advertising policy check in

Morning all

I've had a chat with JCD this morning and they will provide info on what products have been advertised across their estate in Edinburgh over the last couple of quarters along with their current policies etc.

In respect of Liverpool, where JCD are part of a framework, no restrictions are being implemented at this stage despite the policy in place due to the potential loss in income to the city.

I'll be in touch when I hear back further.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 17 October 2022 16:51  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Low carbon advertising policy check in

Hi all,

Thanks for the interesting exchange on low carbon advertising.

We talked about the potential difficulty of drawing a line in the sand to decide what would count as a high carbon product.

- As discussed, **the minimum** would be to ban ads showing fossil fuel products (like [French Government did](#)), regardless of the companies' potential sustainability commitments:
  - Ads showing fossil fuel products, energy from coal or hydrogen
  - Ads showing petrol stations, and any ads promoting the price of petrol/diesel
- The **more ambitious** option would be to stick to proposition from the *Badvertising*

campaign, as adopted by Liverpool, North Somerset and Norwich Council.

This is well defined [in this toolkit](#) – see page 8 (this is also in line with what [Amsterdam](#) has adopted)

- Airlines and airports
- Fossil fuel companies (see list [here](#))
- Cars (decide if that includes EVs or not)
- **Going even further** (propositions inspired from the French climate citizen assembly)
  - Add to the list of high carbon products : cruise holidays, junk food, beef
  - Ban advertising which promote excessive consumption e.g. sales
  - Add a mention for all advertising “Do you really need it? Overconsumption harms the planet”
  - Add carbon labelling and comparative messaging like “eating meat once in a day emits as much as x,y,z”

Thanks

█

-----Original Appointment-----

**From:** █

**Sent:** 06 October 2022 12:27

**To:** █

**Subject:** Low carbon advertising policy check in

**When:** 17 October 2022 14:15-14:45 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

**Where:** Microsoft Teams Meeting

This time looks free for us all – this has been raised again. Suggest it needs a discussion between

- sustainable policy team – is this something the council should/wished to pursue
- procurement – impact on existing and future contracts and income generation
- property – contract management of contract which includes advertising sites.

Cllrs could raise it as a motion of course – but suggest best to have a position/information to go back to Greens with?

█

From Cllr █

Several Green Cllrs have received this email which seems like something we would support. I wondered if you would have a view on if this would be something we could push for in Edinburgh?:

**Low carbon advertising policy**

*I'm writing to ask if your council has declared a climate emergency? And if so, would the council be willing to adopt a 'Low Carbon Advertising and Sponsorship Policy' to meet this aim?*

*Advertising fuels the climate crisis by creating demand for high-carbon products, such as polluting flights and fuel-hungry SUVs, as well as promoting fossil fuel companies like Shell and BP.*

*Just as tobacco advertising was prohibited when we realised the harms caused by smoking, many local authorities are now taking action to end advertising for high carbon products in light of the climate emergency. Liverpool, Norwich and North Somerset councils have passed motions to restrict advertising for environmentally damaging products on ad sites those councils control. In August 2022, Sydney council in Australia banned advertising for coal, oil and gas and France passed national legislation prohibiting fossil advertising too. Amsterdam and five other Dutch cities have also implemented tobacco-style restrictions on polluting adverts.*

*Local authorities have control over the advertising billboards and digital screens located on council-*

owned land. Passenger Transport Executives often control advertising policies for bus stop and rail advertising.

A template council motion for a Low Carbon Advertising Policy can be found here:

<https://tinyurl.com/y5wtpho4>

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: CEC / JCDDUK Contract Extension  
**Date:** 29 November 2022 18:09:40

---

[REDACTED]

For background. There was a motion by the Green group to the Council meeting on 27 October as below

*“Council:*

- Notes that the purpose of advertising and sponsorship is to stimulate demand for goods and services, including those which are environmentally damaging*
- Notes that some advertising prohibitions and restrictions already exist across the UK, including for tobacco products and offensive weapons*
- Notes that Councils across the UK – including Liverpool, Bristol, Norwich and North Somerset – have passed versions of ethical advertising policies which use powers available to Councils to prohibit the advertising of environmentally or socially irresponsible goods and services*
- Recognises the contradiction between the Council’s declaration of a Climate Emergency and the continued advertising of environmentally damaging goods and services in Edinburgh*
- Therefore, requests a report to Policy & Sustainability committee within 2 cycles which:*

*o Sets out current council policy towards advertising and sponsorship, including what consideration is given to the advertisement of products and services which undermine the council’s commitment to tackling the climate emergency, ending poverty and making the city a welcoming place for all*

*o Explores the feasibility and process by which an ethical advertising and sponsorship policy could be developed including information about:*

- How other councils have developed their ethical advertising policy*
- What products and services are currently being advertised in Council land / property in Edinburgh*
- Any potential legal or financial risks for the council related to adopting an ethical advertising and sponsorship policy.”*

It wasn’t approved as the Tories put forward the below that was approved:-

*“Deletes all the above and replaces with: Notes that the Council’s Policy on Advertising and Sponsorship held in the Policy Register (which is available on the Council website) [https://www.edinburgh.gov.uk/directory-record/1229205/advertising-and\[1\]sponsorship-policy](https://www.edinburgh.gov.uk/directory-record/1229205/advertising-and[1]sponsorship-policy) was approved on 2nd March 2021 and that it is due for its annual review and that consideration of any changes to this policy should take place as part of the scheduled work programme rather than calling for additional reports which unnecessarily add to the workload of officers.”*

When we take a report in Jan 23, we will be asking members to agree the 5-year extension and RPI cap. We will need to address the financial impact of that to the Council and would prefer to agree with JCD (based in RPI forecasts) what that would be. We will need to be able to defend that doing so is better than the other option for the Council to not agree the extension and retendering the opportunity. The proposal will become further complicated as the above motion will become part of the discussion.

[REDACTED] will draft the report but we need JCD to consider if there will be any further financial impact of the motion above being introduced.

Regards

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 29 November 2022 15:53

**To:** [REDACTED]

**Subject:** RE: CEC / JCDDUK Contract Extension

[REDACTED]

[REDACTED] and I were discussing this morning and the intention is for a report to go to the next available Finance and Resources Committee which will be on 26<sup>th</sup> January.

Regards

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 29 November 2022 14:58

**To:** [REDACTED]

[REDACTED]

**Subject:** RE: CEC / JCDDUK Contract Extension

Afternoon [REDACTED],

Do you have any update to share on the timings of Committee and B Agenda report?

Happy to jump on a call to discuss.

Thanks, [REDACTED]

---

**From:** [REDACTED]

**Sent:** 16 November 2022 17:56

**To:** [REDACTED]

[REDACTED]

**Subject:** FW: CEC / JCDDUK Contract Extension

Evening [REDACTED],

Thank you for confirming that you would agree to the proposal from an officer point of view, however we understand that you would need to make a recommendation to the Finance and Resources Committee at the Council for final approval.

With regard the change in policy we would clearly need to see what the proposed changes would be. Whilst of course we would take a pragmatic view on subtle changes to advertising relating to carbon based fuels, it would have a material affect on revenues if this extended to bans on the promotion of vehicles and the air travel industry. As you are aware some of the main users of power centre around transport networks across the UK. The banning of one mode of transport which is perceived to be environmentally unfriendly would soon extend to other areas. Are you able to share what the proposed changes would be?

We would be keen to agree the extension with you as soon as possible to enable us to focus on the required planning permissions for the additional digital inventory.

I look forward to hearing from you.

Regards, [REDACTED]

---

**From:** [REDACTED]

**Sent:** 15 November 2022 18:02

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: CEC / JC Duk Contract Extension

[REDACTED]

Thank you for your quick response. I can certainly agree to the proposal from an officers point of view but ultimately we will need the sign off from the Finance and Resources Committee of the Council. We would need to link that report to any changes to the Council's advertising policy, i.e., the legal document for the extension would need to document that as well as the change in the RPI cap etc. Any changes wouldn't kick in until the option date commences in 2025.

Hope this is enough for you to proceed to your Board and I will discuss the timings of Committee and report with Graeme tomorrow. I expect any report to be on what we call B agenda which means it isn't public info.

Regards

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 15 November 2022 13:38

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: CEC / JC Duk Contract Extension

Good afternoon [REDACTED],

Thanks for the update and whilst disappointing that you are not in a position to extend the term past the proposed 5yr extension of 2030, I can confirm that from now until 2024 inclusive, the RPI will remain uncapped. Following which the RPI will then be capped at 2% from 2025 until 2030 inclusive.

Upon this confirmation, I will be in a position to make a recommendation to the Board for approval.

This proposal would allow for the additional digital development of the estate, subject to planning permission and at JCDecaux's risk. We will obviously discuss with you at the appropriate time any further changes the council wishes to make to your Advertising Policy and how this may affect revenues based on historic use.

I Look forward to hearing from you.

Regards, [REDACTED]

---

**From:** [REDACTED]

**Sent:** 14 November 2022 08:32

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: CEC / JC Duk Contract Extension

[REDACTED]

Sorry for the delay in getting back to you. The Council's position remains the same as previously discussed

1. The RPI will be capped from the date of the proposed 5-years extensions. This will be subject to Committee approval and will likely be linked to a refresh of the Council's advertising policy next year (there is considerable lobbying around advertising for carbon eg oil, gas, petrol)
2. A five year extension is all we have to offer at this time.

Regards

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 03 November 2022 11:00

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

**Subject:** CEC / JC Duk Contract Extension

Good morning [REDACTED] trust all is well.

Further to our conversation on the 30<sup>th</sup> September and in particular with respect to the extension of the contract, JCDecaux UK have been working on a variety of commercial models, which involve further digital development across the estate, all of which is at our sole risk noting the need for planning permission. However in order for us to progress this forward, please can CEC provide confirmation on the below two key elements:

1. For the RPI to be capped at 2% from 2023 onwards.
2. For the contract to be extended by 2yrs past 2030 to 2032. Whilst it is appreciated from our last discussion that 3yrs was not feasible, it has been normal practice for contracts to be extended for 2yrs given the level of commercial impact felt from COVID-19 and would allow both parties the ability to recoup such losses felt.

If you are able to provide confirmation on these points, that would be greatly appreciated.

I look forward to your response and happy to take a call to discuss further.

Regards, [REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: CEC / JC Duk Contract Extension  
**Date:** 16 November 2022 17:56:25

---

Evening [REDACTED],

Thank you for confirming that you would agree to the proposal from an officer point of view, however we understand that you would need to make a recommendation to the Finance and Resources Committee at the Council for final approval.

With regard the change in policy we would clearly need to see what the proposed changes would be. Whilst of course we would take a pragmatic view on subtle changes to advertising relating to carbon based fuels, it would have a material affect on revenues if this extended to bans on the promotion of vehicles and the air travel industry. As you are aware some of the main users of power centre around transport networks across the UK. The banning of one mode of transport which is perceived to be environmentally unfriendly would soon extend to other areas. Are you able to share what the proposed changes would be?

We would be keen to agree the extension with you as soon as possible to enable us to focus on the required planning permissions for the additional digital inventory.

I look forward to hearing from you.

Regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 15 November 2022 18:02  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: CEC / JC Duk Contract Extension

[REDACTED]

Thank you for your quick response. I can certainly agree to the proposal from an officers point of view but ultimately we will need the sign off from the Finance and Resources Committee of the Council. We would need to link that report to any changes to the Council's advertising policy, i.e., the legal document for the extension would need to document that as well as the change in the RPI cap etc. Any changes wouldn't kick in until the option date commences in 2025.

Hope this is enough for you to proceed to your Board and I will discuss the timings of Committee and report with Graeme tomorrow. I expect any report to be on what we call B agenda which means it isn't public info.

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 15 November 2022 13:38  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: CEC / JCDDUK Contract Extension

Good afternoon [REDACTED]

Thanks for the update and whilst disappointing that you are not in a position to extend the term past the proposed 5yr extension of 2030, I can confirm that from now until 2024 inclusive, the RPI will remain uncapped. Following which the RPI will then be capped at 2% from 2025 until 2030 inclusive.

Upon this confirmation, I will be in a position to make a recommendation to the Board for approval.

This proposal would allow for the additional digital development of the estate, subject to planning permission and at JCDecaux's risk. We will obviously discuss with you at the appropriate time any further changes the council wishes to make to your Advertising Policy and how this may affect revenues based on historic use.

I Look forward to hearing from you.

Regards, [REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 November 2022 08:32  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: CEC / JCDDUK Contract Extension

This email has been received from an external source – please review carefully before clicking on any links or opening attachments.

[REDACTED]

Sorry for the delay in getting back to you. The Council's position remains the same as previously discussed

1. The RPI will be capped from the date of the proposed 5-years extensions. This will be subject to Committee approval and will likely be linked to a refresh of the Council's advertising policy next year (there is considerable lobbying around advertising for carbon eg oil, gas, petrol)
2. A five year extension is all we have to offer at this time.

Regards

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 03 November 2022 11:00

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

**Subject:** CEC / JC Duk Contract Extension

Good morning [REDACTED], trust all is well.

Further to our conversation on the 30<sup>th</sup> September and in particular with respect to the extension of the contract, JCDecaux UK have been working on a variety of commercial models, which involve further digital development across the estate, all of which is at our sole risk noting the need for planning permission. However in order for us to progress this forward, please can CEC provide confirmation on the below two key elements:

1. For the RPI to be capped at 2% from 2023 onwards.
2. For the contract to be extended by 2yrs past 2030 to 2032. Whilst it is appreciated from our last discussion that 3yrs was not feasible, it has been normal practice for contracts to be extended for 2yrs given the level of commercial impact felt from COVID-19 and would allow both parties the ability to recoup such losses felt.

If you are able to provide confirmation on these points, that would be greatly appreciated.

I look forward to your response and happy to take a call to discuss further.

Regards, [REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Scottish Government's consultation on restricting alcohol advertising  
**Date:** 08 March 2023 16:19:12

---

Good afternoon [REDACTED],  
Hope all is well with you both.

Further to our discussions regarding the Scottish Government consultation on restricting Alcohol advertising in Scotland, JCDecaux has been liaising with the OOH industry body, OUTSMART in relation to the industry's response to the SG Alcohol Advertising and Promotion Consultation. As such please see below information of which I hope is of benefit for your internal discussions. Apologies in advance for the detail below, but I feel it pertinent you have it to hand.

### **Advertising's contribution to the Scottish economy**

- Outdoor advertising in Scotland generates £106m per annum. According to the Advertising Association every £1 spent on advertising in Scotland generates, on average £5 for the Scottish economy and supports around 42,000 jobs in advertising and the wider creative industries. JCDecaux has a presence in every major city in Scotland and operates exclusively with yourselves where we provide and manage over 1300 bus shelters and large format advertising for city dwellers and visitors alike.

### **JCDecaux's view on the Scottish Government proposals**

- Whilst we recognise that Scotland has more alcohol consumption harms than England, we are also aware that the situation is improving. Based on Scotgovs own data since 2003-2019, the mean number of units consumed per week among both men and women has decreased. Just 3% of men and 1% of women in Scotland report harmful or possibly dependent drinking behaviour. In addition, there is evidence to suggest that there is a general decline in drinking among younger adults (Burgess et al 2022).
- As the Government proposes in the consultation to introduce bans on alcohol advertising which will include Outdoor Advertising, to protect children and young people and reduce alcohol consumption harms, it seems to be an unwarranted measure given the statistics concerning a general decline in drinking, particularly in young adults. The latest Public Health Scotland figures show a flat growth or declining growth of total volume of pure alcohol per adult drinker, both in off and on-trade over the same period as an increase in ad spend as recorded by Nielsen.
- Scotland is home to some of the world's finest spirits and craft beers. The industry is a sector which employs 88,700 people in Scotland, contributing £6.1bn gross value to the economy each year. A ban in outdoor advertising would compromise revenues and have a negative impact on employment.

### **Evidence**

- There is little or no evidence presented to suggest that there is a correlation between alcohol harms and outdoor advertising. Research recently carried out by Credos, the advertising industry's think tank, finds no relationship between the amount of alcohol advertised and the number of alcohol-specific deaths, hospitalisations, or underage drinking. In fact, there is a negative relationship between them, suggesting that alcohol-specific harms are independent of the amount of alcohol advertising to which the public is exposed. Alcohol brands advertise to promote their brand in the hope that they can

influence choice and not influence over-consumption.

- The consultation itself acknowledges that “There is limited academic evidence on the impact alcohol marketing has on the adult population” The Alcohol Industry brings benefits to the Scottish economy. Alcohol is not inherently bad. In addition, the Scottish Government do not set any targets or measurements of success to support a decision to ban outdoor advertising in order to prove that the ban has reduced alcohol harms. It is difficult to determine therefore how the success, if any, will be evaluated.

### **Protecting Children**

- The Scottish Government also argue that a ban in outdoor advertising is needed to protect children. JCDecaux agrees that, as a restricted product, it is right that children are protected from advertising of unsuitable products. However, a ban to protect children has been in place since 2017.
- Furthermore, the Scottish Government seem unaware that children are already protected outdoors because alcohol advertising on static sites is not permitted within 100 metres of any part of a school boundary (this also applies to HFSS, Lotteries, Gambling, E-cigs, rolling papers or filters).

### **Consequences**


A ban in outdoor advertising means advertising spend lost in outdoor will simply move to media channels where it is not banned. Displacement of advertising, not reduction of advertising. The consultation recognises this.

The Scottish Government’s proposal also fails to note that outdoor advertising is just 3.8% of all advertising spend. This is a very important point. It means 96.2% of ad spend happens in other media channels, such as online and TV where the Scottish Government have no powers (WARC 2021), therefore a ban in OOH will not meaningfully reduce alcohol advertising, but it will damage revenue to local councils and distort fair competition.

Our advertising uniquely funds the installation of valued public infrastructure such as bus shelters and maintains such infrastructure at no cost to the public purse, pays business rates and pays rent and revenue share to public landlords (particularly in public transport). In 2021 PwC calculated that outdoor advertising gives back 31% of its revenues directly to the public purse. In other words, 31p for every pound spent in outdoor advertising goes back into the economy. A ban diminishes this return for Scotland’s local authorities without effectively reducing overall advertising spend or impact on the audience the Scottish Government is wishing to target.

Happy to set up a call to discuss this further as there is a lot to digest.

With respect to the conversation surrounding HFSS, ‘unethical’/fossil fuel advertising, I will email you separately.

Regards, 

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Edinburgh City Council: Alcohol, Fossil Fuel, HFSS Category Spend Analysis  
**Date:** 10 March 2023 11:17:57  
**Attachments:** [CEC Advertising Category Spend Analysis.pdf](#)

---

Good morning [REDACTED],

Further to my separate email regarding SG consultation on Alcohol advertising restriction, we have discussed the Committee have had notions on 'unethical' advertising ban proposals, namely on fossil fuels, travel industry – holiday, airlines and cars) however again, a generic and widespread term and if passed would have high unintended consequences.

With respect to the Commercial element on the contract, please see attached summary of Alcohol, Fossil Fuel, HFSS Category Spend Analysis 2019-2022 across the CEC estate. Please note 2020 is not included, noting COVID-19. This analysis details the Council's share of total spend in Scotland on these categories and as such the respective revenue value & % on the contract across the Large Format and Street Furniture estate. In essence, an average over 36% per annum is spent on these 3 categories.

Furthermore, we have spoken with our colleagues in both Australia and France to better understand advertising policy restrictions in these markets, as well as potential restrictions that are on the horizon. There are of course similarities in all markets, with some politicians seeking to tighten controls in areas familiar to the UK, such as HFSS, alcohol, fossil fuel, gambling, high interest consumer credit etc.

The application of advertising policy differs considerably between the two markets and a brief summary of our understanding is as follows:

**Australia:**

- National restrictions are in place for tobacco products and online gambling services (when provided by non-domicile companies). There is also a national requirement for consistent gambling harm minimisation messaging.
- Voluntary HFSS restrictions are adopted by Australian OOH media owners (similar to Outsmart members in the UK), with no placement of HFSS copy within 150m of schools. However, no national HFSS prohibitions are in place, nor have any provincial governments introduced regulation or legislation to restrict.
- There are some provinces that have sought to restrict alcohol and gambling advertisements for certain advertising formats / locations (beyond national regulations), but these are limited to Western Australia and Victoria, and do not operate across all local highways in these areas.
- With regards to fossil fuels, we have been advised that two small local councils in Sydney introduced partial prohibitions last year, we have been advised that the prohibitions are limited to the fuel provider/retailer rather than the end user; for example Shell/BP would be restricted, whereas all advertising for new petrol or diesel vehicles would be acceptable.

**France:**

National restrictions exist for tobacco, and political advertising, along with some forms of consumer credit and gambling products.

- Advertisements of HFSS products are permitted, but they must be accompanied by a summary of the health impacts of the product.
- French law now prohibits direct advertising and promotion of fossil fuels. For example, fuel retailers cannot advertise their fuel price reductions. However, oil groups and fuel retailers can advertise products coming from renewable sources and representing at least 50% of the final product. Natural gas, meanwhile, benefits from an exemption valid until 30 June 2023.
- From 2028, advertising restrictions for fossil fuel related products will be expanded to prohibit advertisements for any vehicle emitting more than 123g of Co<sup>2</sup> per km. The French parliament recently reviewed a further expansion of this policy, to include categories such as airline travel and tourism, and ruled against implementing further restrictions.

Please note that this information is shared in confidence, and should not be taken as a full and comprehensive review of all applicable policies in each market. Nonetheless, I trust it will be of assistance.

Best regards,



**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Advertising policy  
**Date:** 21 April 2023 18:02:32

---

Just out of a meeting with the Green group. As [REDACTED] knows they are chasing for the updated version of this policy and are after clarity on which committee it's going to and when.

I committed to finding out and ensuring they got a briefing when it's at draft stage.

[REDACTED] told me it's being worked on but grateful someone could fill in the detail and get back to [REDACTED] in due course.

Thanks

[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Advertising policy  
**Date:** 24 April 2023 08:00:36

---

I am meeting with the Green Group next Thursday, so I am happy to pass the update on if someone can let me know by COP Wednesday.

Thanks,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, April 21, 2023 6:03 PM  
**To:** [REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Advertising policy

Just out of a meeting with the Green group. As [REDACTED] knows they are chasing for the updated version of this policy and are after clarity on which committee it's going to and when.

I committed to finding out and ensuring they got a briefing when it's at draft stage.

[REDACTED] told me it's being worked on but grateful someone could fill in the detail and get back to [REDACTED] in due course.

Thanks

[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Draft Advertising Policy  
**Date:** 24 April 2023 19:22:03

---

Thanks [REDACTED], appreciate you sharing. Let me speak with my Finance team and revert back on the most likely negative revenue impact this amend will incur on the estate.

---

**From:** [REDACTED]  
**Sent:** Monday, April 24, 2023 12:05 PM  
**To:** [REDACTED]  
**Subject:** Draft Advertising Policy

Hi [REDACTED]

As discussed when we last met – I have attached the draft revised advertising policy. Please note this is just a draft however could you give me an idea of what financial impact this could have – setting aside the contract we have runs until 2030.

Thanks

[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: Draft Advertising Policy  
**Date:** 04 May 2023 14:33:41  
**Attachments:** [CEC Draft Advertising and Sponsorship Principles 2023.docx](#)  
[CEC Advertising Category Spend Analysis.pdf](#)

---

Hi [REDACTED]

Many thanks for the update on this. The noticeable amends to the Policy appear to be:

- **8. High carbon products:**
  - **Airlines and airports:** all advertising by airports and airlines which might reasonably be deemed to promote more flying
  - **Fossil fuel companies:** all firms and associated sub brands or lobbying organisations that extract, refine, produce, supply, distribute, or sell any fossil fuels
  - **Cars:** exclude all advertising and promotions for petrol, diesel and hybrid vehicles and Plug-In Hybrid Electric Vehicles (PHEV)
  - **Cruise holidays**
- **9. High Fat Sugar & Salts**
- **11. Processed meats**

Please see attached PDF highlighting category spend analysis focussing on Fossil Fuels (the table below details the categories captured under 'Fossil Fuels'), HFSS and Alcohol. In summary, these categories (which are currently accepted under ASA guidelines) account for an average of 36% (£2m) of total advertising gross revenue across the Council estate. As you can appreciate the proposed Advertising Policy amends present significant concern and detrimental impact to the Company and the Council respectively given the financial commitments under this revenue share agreement.

Product Category Group	Product Category Name
<b>BUSINESS &amp; INDUSTRIAL</b>	Industrial - Fuels & Lubricants
<b>AUTOMOTIVE</b>	Motoring - Motability Services
	Motoring - Corporate
	Motoring - Parts/Accessories
	Motoring - Commercial Vehicles
	Motoring - Motorcycles & Accessories
	Motoring - Car Ranges
	Motoring - Car Ranges (Premium Brands)
	Motoring - Car Ranges (SUVs)
	Motoring - Fuels
	<b>TRAVEL</b>
Travel - Taxi Services	
Travel - Corporate	
Travel - Other	
Travel - Airlines (Budget)	
Travel - Bus & Coach	
Travel - Rail Services	

	Travel - Cruises
	Travel - Ferries

To note... the below two restrictions are very vague and open to interpretation. It would be helpful for CEC to specify these further. As you can appreciate these have even further detrimental impact in addition to the above given the wide scope of what category these prohibitions could apply to.

- ***2. promotes business activities/practices which do not align with the Council's values, corporate objectives and strategic goals, such as the Council's net zero target***
  
- ***10. promotes a food or drink brand (including food and drink service companies or ordering services) where no food or drink product is featured directly. These brands and services will only be able to place advertisements if the advertisement promotes healthier options (i.e. non-HFSS products) as the basis of the copy. Examples may include:***
  - *advertisements where the brand's logo is included but no products, such as a brand values campaign,*
  - *directional signage to a store, app or website,*
  - *promotional advertising which is price-led but features no products such as '50% off everything' or similar,*
  - *advertising about a business or its performance;*

I would welcome further conversation with yourself.

Regards, [redacted]

---

**From:** [redacted]  
**Sent:** Monday, April 24, 2023 12:05 PM  
**To:** [redacted]  
**Subject:** Draft Advertising Policy

Hi [redacted]

As discussed when we last met – I have attached the draft revised advertising policy. Please note this is just a draft however could you give me an idea of what financial impact this could have – setting aside the contract we have runs until 2030.

Thanks

[redacted]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Date:** 15 May 2023 16:46:25  
**Attachments:** [image001.png](#) policy and draft note for Debs - review by cop Thurs 18 May pls

---

Hello all

[REDACTED] and I have tidied up the proposed changes to the policy and produced a covering note to brief on considerations, where UK/Scot Gov is at with their developments around HFSS, and whether we consider processed meats/to be discussed with Catering.

Appreciate if you would review/track any amends you think we should make.

[REDACTED] we need you to input JCD view on the proposed changes to the briefing note.

[Policy\\_on\\_Advertising\\_and\\_Sponsorship\\_\\_090523.docx](#)

[Advertising Sponsor considerations v1 090523.docx](#)

[REDACTED] would like to get this to [REDACTED] by Friday this week so comments by cop Thurs 18 May.

Thanks very much.

[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Proposed revisions to Ad/Sponsor policy and draft note for Debs - review by cop Thurs 18 May pls  
**Date:** 16 May 2023 16:45:51  
**Attachments:** [image001.png](#)

Hi [REDACTED],

Thanks for sending this, that's very helpful.

- The proposed revised policy does **not** seek to ban **alcohol** advertising, so if we remove that from the tables, we get that HFSS and fossil fuels advertising account for 30% not 36% (roughly 20% for HFSS and 10% for fossil fuels). I've made the change in the briefing note.
- Would it be possible for you to go back to JCD to **make sure that their fossil fuel category matches with what we propose to ban (Table 1 in the policy)?**  
I've added a column to your table below and noted the advertising that we are not suggesting to ban. So effectively, the estimated 10% of total income for fossil fuels would be in fact much lower.
- Lastly, can you please explain how you calculated the £710,000 figure (highlighted in your email below)? We will need to update this figure with the removal of alcohol in the scope and the revision of the fossil fuel definition.

Thanks

**From:** [REDACTED]  
**Sent:** Tuesday, May 16, 2023 8:13 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Proposed revisions to Ad/Sponsor policy and draft note for Debs - review by cop Thurs 18 May pls

Morning

Not sure which document you wish me to add the JCD info to?

The attached pdf highlights the category spend analysis focussing on Fossil Fuels (the table below details the categories captured under 'Fossil Fuels'), HFSS and Alcohol. In summary, these categories (which are currently accepted under ASA guidelines) account for an average of 36% (£2m) of total advertising gross revenue across the Council estate.

Product Category Group	Product Category Name	Comment
<b>BUSINESS &amp; INDUSTRIAL</b>	Industrial - Fuels & Lubricants	
<b>AUTOMOTIVE</b>	Motoring - Motability Services	Would still be permitted
	Motoring - Corporate	What is this?
	Motoring - Parts/Accessories	What is this?
	Motoring - Commercial Vehicles	Would still be permitted if EV
	Motoring - Motorcycles & Accessories	Would still be permitted if EV
	Motoring - Car Ranges	Would still be permitted if EV
	Motoring - Car Ranges (Premium Brands)	Would still be permitted if EV
	Motoring - Car Ranges (SUVs)	
	Motoring - Fuels	
<b>TRAVEL</b>	Travel - Airlines (Premium)	
	Travel - Taxi Services	Would still be permitted
	Travel - Corporate	What is this?
	Travel - Other	What is this?
	Travel - Airlines (Budget)	
	Travel - Bus & Coach	Would still be permitted

[REDACTED]	Travel - Rail Services	Would still be permitted
	Travel - Cruises	
	Travel - Ferries	Would still be permitted

Due to the contract running until 2030 there would be no immediate impact as we would not be seeking to impose these restrictions. However if we were, and this shortfall in income was passed through to the minimum annual payment currently received, the figure would be a shortfall of £710,000 to the Council each year. Over the remaining term of the contract this would be a loss of income of just under £5.0m.

[REDACTED]

---

**From:** J [REDACTED]  
**Sent:** Monday, May 15, 2023 4:46 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Proposed revisions to Ad/Sponsor policy and draft note for Debs - review by cop Thurs 18 May pls

Hello all

[REDACTED] and I have tidied up the proposed changes to the policy and produced a covering note to brief on considerations, where UK/Scot Gov is at with their developments around HFSS, and whether we consider processed meats/to be discussed with Catering.

Appreciate if you would review/track any amends you think we should make.

[REDACTED] we need you to input JCD view on the proposed changes to the briefing note.

[Policy on Advertising and Sponsorship\\_090523.docx](#)

[Advertising Sponsor considerations v1\\_090523.docx](#)

[REDACTED] would like to get this to [REDACTED] by Friday this week so comments by cop Thurs 18 May.

Thanks very much.

[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** JC Decaux  
**Date:** 02 November 2023 14:16:16

---

Hello,

Sorry to pester you for more facts and figures and I know I'm overdue about getting back in touch re. the commercial events charging stuff.

Can you tell me what the contractual agreement is with JC Decaux? Are there reports which show how much money is made by hiring out the public spaces they have? What we get, etc?

Thanks!

[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Advertising Contract  
**Date:** 23 November 2023 13:10:17

Hi [REDACTED], I was just having quick convo with [REDACTED] about where the policy changes is at – I didn't clock this when [REDACTED] forward the email to me at the start of November but .... JCDcaux is still over-stating the impact on the contract of the changes proposed for the policy – we've not actually added HFSS into the policy (this time – and we've not been asked to). So we need to be clear on the impact on income for that.

Also can we check that by 'fossil fuels' does JCD mean the types of advertising covered in the list of high carbon products we have in proposed changes ie table below?

Thanks

[REDACTED]

Category	Notes
<b>Airlines and airports:</b> all advertising by airports and airlines which might reasonably be deemed to promote more flying	There are no low carbon options for commercial air travel available currently or for the foreseeable future, so air travel per se should be treated as high carbon. <sup>2</sup>
<b>Fossil fuel companies:</b> all firms <sup>3</sup> and associated sub brands or lobbying organisations that extract, refine, produce, supply, distribute, or sell any fossil fuels	This includes, regardless of the companies' potential sustainability commitments advertising or sponsorship: <ul style="list-style-type: none"> <li>• showing fossil fuel products, energy from coal or hydrogen</li> <li>• showing petrol stations, and any ads promoting the price of petrol/diesel</li> </ul>
<b>Cars:</b> exclude all advertising and promotions for petrol, diesel and hybrid vehicles and Plug-In Hybrid Electric Vehicles (PHEV)	Advertising for Battery Electric Vehicles (BEV) and hydrogen fuelled vehicles are still permitted, if these are not Sport Utility Vehicles (SUVs) <sup>4</sup> . PHEVs have been shown not to yield meaningful emissions savings over conventional vehicles. <sup>5</sup>
<b>Cruise holidays</b>	Cruise ships emit more carbon per passenger kilometre than flying. They also generate black carbon and produce a lot of waste which is often discharged into the sea. Their engines run 24/7, often even

at port which has damaging impacts on air quality.

---

**From:** [REDACTED]

**Sent:** Wednesday, October 4, 2023 11:48 am

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** Advertising Contract

Morning

Following our chat yesterday the text below has been agreed with our advertising partner for inclusion in any report.

*“JCDecaux the Council’s advertising partner, estimate that the proposed categories of restriction in advertising content will have an impact of circa 30% ( £1.67m) on the gross revenue obtained on an annual basis. The approximate split of this would be 20% relating to income from HFSS and 10% from fossil fuels.*

*The Council is due to re-tender the advertising contract in 2030. Based on the current minimum guarantee payment of £1.97 million, such an impact could result in reduction of £590,000 per annum in revenue.*

*In addition, JCD has raised the potential wider impact of such a policy. If the content is subject to a number of prohibitions around e.g., fossil fuels, advertisers in the sector (travel companies, motor organisations) may avoid advertising all together on the estate given the potential confusion of what is and isn’t allowed. This could push such advertising to the estate in Edinburgh over which the Council do not have any control.”*

I have also attached the B agenda report on the contract extension from January.

[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Advertising and Sponsorship Policy - Policy and Sustainability Committee  
**Date:** 12 December 2023 15:04:24

---

Thank you very much [REDACTED]

Kind Regards  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, December 12, 2023 2:59 PM  
**To:** [REDACTED]  
**Subject:** RE: Advertising and Sponsorship Policy - Policy and Sustainability Committee

Hi [REDACTED]

I'm waiting on a revised figure to come from JCD, which I have just sked them about again this afternoon. That is all the info that is due to come from me – I think.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, December 12, 2023 2:43 PM  
**To:** [REDACTED]  
**Subject:** FW: Advertising and Sponsorship Policy - Policy and Sustainability Committee

Hi [REDACTED]

Hope you're well.

In [REDACTED] absence I wonder if you could help me. Cllr [REDACTED] was expecting to see the Advertising and Sponsorship Policy on the agenda for January's P&S Committee. Has [REDACTED] been in touch with you about gathering information for this?

Many thanks  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Tuesday, December 12, 2023 2:27 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Advertising and Sponsorship Policy - Policy and Sustainability Committee

Hi [REDACTED]

[REDACTED] was chasing [REDACTED] for the information to be included in this – not sure if you can find out where this got to and also if the report was move off the agenda and if so why, as I was expecting it to come and had briefed [REDACTED] to that effect.

Thanks,  
[REDACTED]

---

**From:** [REDACTED]

**Sent:** Saturday, December 9, 2023 4:25 PM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Subject:** RE: Advertising and Sponsorship Policy - Policy and Sustainability Committee

Hi all

Just picking this one back up as I note that the policy is not part of the APM papers for the P&S meeting on 9<sup>th</sup> January – is there a delay bringing this forward or is this an oversight?

Thanks!

Best Wishes

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Sunday, September 10, 2023 9:22 PM

**To:** [REDACTED]

[REDACTED]

**Cc:** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Subject:** RE: Advertising and Sponsorship Policy - Policy and Sustainability Committee

Hi [REDACTED],

I hope you're well and had a nice weekend?

Thanks for getting in touch re this – and more than happy to meet.

Our suggested updates to the existing policy are intended to bring it more in line with the Business Plan.

We may also have some contractual issues to consider, which [REDACTED] can fill you in on when you meet tomorrow.

Thanks!

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Friday, September 8, 2023 9:20 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED]

[Redacted]

[Redacted]

**Subject:** RE: Advertising and Sponsorship Policy - Policy and Sustainability Committee

That's great, thanks [Redacted]

[Redacted] – it would be good to catch up about this, if that's okay? I'm interested in seeing how the Council could develop an ethical advertising and sponsorship policy, in line with actions other Councils have taken across the UK. [Redacted] may also wish to join for this conversation, but I'll leave that up to them.

I've copied in [Redacted] who helps to manage my diary and will be able to suggest some times.

Best Wishes

[Redacted]

---

**From:** [Redacted]

**Sent:** Thursday, September 7, 2023 3:20 PM

**To:** [Redacted]

**Cc:** [Redacted]

[Redacted]

[Redacted]

**Subject:** RE: Advertising and Sponsorship Policy - Policy and Sustainability Committee

Hi [Redacted],

Please accept our apologies for the delay in coming back to you!

Our colleagues in Communications, [Redacted] have been coordinating with other teams to progress this so they would be best placed to discuss, I think the revised policy is still being worked on but I know there have been a lot of cross service discussion on this so far so they would be best placed to help with this one.

Please do just let me know if there is anything further that I may be able to assist with.

Regards,

[Redacted]

---

**From:** [Redacted]

**Sent:** Thursday, September 7, 2023 2:33 PM

**To:** [Redacted]

**Cc:** [Redacted]

[Redacted]

**Subject:** RE: Advertising and Sponsorship Policy - Policy and Sustainability Committee

Hi [Redacted]

I've not had a response yet so still keen to chat with whoever if you can advise – thanks!

Best Wishes

[Redacted]

---

**From:** [Redacted]

**Sent:** Thursday, September 7, 2023 2:03 PM

**To:** [Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** RE: Advertising and Sponsorship Policy - Policy and Sustainability Committee

Good afternoon [Redacted]

I'm just having a work through of the Exec Director's mailbox and spotted your email; I just wanted to check and see if anyone had got back to you on this?

If not I'm happy to say I can help as our colleagues in the Communications Team have been leading on the recent work to review this policy along with colleagues from Procurement, Estates and the Sustainability Team and I am happy to advise who best to speak to to discuss?

Regards,

[Redacted]

---

**From:** [Redacted]

**Sent:** Monday, August 28, 2023 9:19 AM

**To:** [Redacted]

**Cc:** [Redacted]  
[Redacted]

**Subject:** Re: Advertising and Sponsorship Policy - Policy and Sustainability Committee

Thanks for confirming this, [Redacted]

I'll be wanting to bring something on developing an ethical advertising and sponsorship policy, in line with this motion (10.12) which passed (as amended by the Conservatives) last year:

<https://democracy.edinburgh.gov.uk/ieListDocuments.aspx?Cid=150&Mid=6469&Ver=4>

Do you have an idea of who is best to talk to about this in terms of developing something which will work for officers? Worth noting that we would probably also want to look at this from more than just an environmental angle.

Best Wishes

[Redacted]

---

**From:** [Redacted]  
[Redacted]

**Sent:** Friday, August 25, 2023 2:05 pm

**To:** [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** Committee Services [REDACTED]

**Subject:** Advertising and Sponsorship Policy - Policy and Sustainability Committee

Good Afternoon Committee Members,

Following on from the 22<sup>nd</sup> August Policy and Sustainability Committee I would like to confirm that the Advertising and Sponsorship Policy will be included in the Strategy and Comms Policy Assurance Report. Due to the size of August's agenda, it was agreed this would slip one cycle and come to committee on the 24<sup>th</sup> October.

I apologise for not making this clear on Tuesday.

Kind Regards

[REDACTED]

## Edinburgh City Council Category Spend Analysis

2019	Category	Council share of Total spend in Scotland	Total Council Value	Total Council Revenue	%
	Alcohol	30%	263		
	HFSS	34%	1,004		
	Fossil Fuels	33%	728		
			1,995	5,717	35%
2021	Category	Council share of Total spend in Scotland	Total Council Value	Total Council Revenue	%
	Alcohol	57%	437		
	HFSS	51%	1,398		
	Fossil Fuels	47%	450		
			2,285	5,865	39%
2022	Category	Council share of Total spend in Scotland	Total Council Value	Total Council Revenue	%
	Alcohol	42%	341		
	HFSS	38%	1,121		
	Fossil Fuels	49%	511		
			1,973	5,665	35%
<i>Values are Gross (£k)</i>					