



environmental  
defence

## Letter of Support for IE16.8 - Fossil Fuel Advocacy Advertising on City Assets

September 27, 2024

To the members of the Infrastructure and Environment Committee,

Environmental Defence Canada would like to express support for the motion put forward by Councillor Dianne Saxe to ban fossil fuel advocacy advertising on city assets.

Environmental Defence Canada (EDC) is a registered charity and non-profit environmental advocacy organization. For 40 years EDC has worked at the municipal, provincial and federal level to safeguard our freshwater, create livable communities, decrease Canadians' exposure to toxic chemicals, end plastic pollution, tackle climate change and build a clean economy. EDC is non-partisan and our work is based on research and the consultation of experts and peer-reviewed science. We have established our expertise on issues that matter to Canadians about threats to our health, climate and environment, and on good solutions. Our work is supported by over 260,000 people across Canada, with a large presence in Toronto.

Climate change is a growing risk to Canadian cities, and a devastating and existential threat to people around the world and the places we hold dear. Greenwashing obscures consumers' ability to make choices based on their concern about climate change and the environment, and negatively impacts the public discourse on climate action.<sup>1</sup> Greenwashing has become pervasive, with 72% of companies based in North America surveyed in a Harris Poll admitting to having overstated their sustainability efforts and engaged in greenwashing.<sup>2</sup>

While greenwashing can occur in any sector, it has been perniciously used by the fossil fuel industry. The fossil fuel industry has a well-documented history of spreading misinformation and disinformation about climate change.<sup>3,4,5</sup> For example, in 2024 the US House Committee on Oversight and Accountability released a report called *Denial, Disinformation and Doublespeak: Big Oil's Evolving Efforts to Avoid Accountability for Climate Change*.<sup>6</sup> It shows a pattern of fossil fuel businesses failing to

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<sup>1</sup> United Nations, "Greenwashing - the deceptive tactics behind environmental claims"

<https://www.un.org/en/climatechange/science/climate-issues/greenwashing>

<sup>2</sup> Ekaterina Aristova (2023) "Greenwashing Exposed: A Close Look at the Existing Case Law (Part 3)" in University of Oxford Faculty of Law Blogs

<https://blogs.law.ox.ac.uk/oblb/blog-post/2023/12/greenwashing-exposed-close-look-existing-case-law-part-3>

<sup>3</sup> Climate Investigations Centre (2019). Imperial Oil Document Trove"

<https://climateinvestigations.org/imperial-oil-document-trove/>

<sup>4</sup> Rex Curry "Exxon's Climate Denial History: A Timeline"

<https://www.greenpeace.org/usa/fighting-climate-chaos/exxon-and-the-oil-industry-knew-about-climate-crisis/exxons-climate-denial-history-a-timeline/>

<sup>5</sup> ClientEarth, (2021). Revealed: 9 examples of fossil fuel company greenwashing

<https://www.clientearth.org/latest/news/revealed-9-examples-of-fossil-fuel-company-greenwashing/>

<sup>6</sup> Joint Staff Report, "Denial, Disinformation and Doublespeak: Big Oil's Evolving Efforts to Avoid Accountability for Climate Change", US House Committee on Oversight and Accountability, 2024. Accessible at

[https://www.budget.senate.gov/imo/media/doc/fossil\\_fuel\\_report1.pdf](https://www.budget.senate.gov/imo/media/doc/fossil_fuel_report1.pdf)

tell the truth about their products, intentionally sowing public confusion, and using advertising and their positions of power to deter climate science from being broadly accepted and acted on. While this report was undertaken in the US, a number of the oil companies or their subsidiaries investigated in the report operate in both the US and Canada. There is also evidence of a similar history of greenwashing being employed in Canada.<sup>7</sup> As just two recent examples, the Competition Bureau is currently investigating cases of greenwashing brought against Enbridge Inc. and the Pathways Alliance.<sup>8</sup> Environmental Defence Canada was involved in putting forward both cases.

Enbridge owns the largest gas pipeline network in North America and is actively trying to expand in Ontario. While the Bureau's investigation into Enbridge for misleading advertising is ongoing, the company continues to promote gas as low-carbon, clean energy. "Natural gas" is a fossil fuel, which is often extracted through fracking and is primarily composed of methane - a potent greenhouse gas. Enbridge also makes claims about the relative affordability of gas versus other heating options, while omitting that heat pumps are the most cost effective option for home heating. In addition, the customers who have been on the receiving end of the misleading advertising claims have not received notice that Enbridge is under investigation, nor have they been sent information detailing some of the potentially misleading elements of Enbridge's marketing materials. This will have material impact, as Enbridge is seeking to persuade potential customers to spend thousands of dollars to convert to gas, a decision that is not only costly but will have long lasting impacts, given the average lifetime of a gas furnace.

Given the influence of the fossil fuel industry's advertising on our ability to address the climate crisis, steps to limit fossil fuel advertising on the city's assets would be a step toward addressing the problem of greenwashing and would demonstrate genuine climate leadership in Canada. Toronto would also be joining municipalities and entities around the world that are moving to ban or limit fossil fuel advertising.

Environmental Defence is supportive of the federal government's efforts to regulate greenwashing, but more needs to be done. As previously noted, greenwashing is pervasive. The fossil fuel industry in particular has intentionally used misinformation and greenwashing tactics to delay climate action and effectively worsen the climate crisis. This history, and the severity of harms caused by climate change from fossil fuel emissions, demonstrates the need for not only rigorous enforcement of anti-greenwashing regulations; to truly address greenwashing with the urgency and seriousness that the climate crisis should demand we need to ban fossil fuel advertising.

Toronto has an opportunity to be a leader on this issue, and I urge you to support this motion.

Sincerely,

Emilia Belliveau,  
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**Environmental Defence Canada**  
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<sup>7</sup> The Narwhal (2013). A Short History of Greenwashing the Tar Sands, Part 1. Available at: <https://thenarwhal.ca/short-history-greenwashing-tar-sands/>

<sup>8</sup> Carl Meyer & Fatima Syed, (2024). "What do 'clean' and 'green' actually mean? Canadian watchdog receives complaints about environmental claims by Shell, RBC, Enbridge" <https://thenarwhal.ca/competition-bureau-greenwashing-investigations/>