



28th of October 2025

Complaint

Adelaide Metro – *'Natural Gas - Clean and Green'* Bus advertisement

Issues Raised

AANA Environmental Code\1 Truthful and Factual

AANA Environmental Code\3 Substantiation

Description of Advertisement

The ad appears on roofs of Adelaide Metro Compressed Natural Gas (CNG) buses and alleges that the buses have no adverse environmental or health impact.

The ad is aimed at prospective passengers to make them feel positive towards Adelaide Metro and its environmental credentials. This could make potential passengers choose to buy tickets on CNG buses rather than take a more environmentally friendly transport option such as bikes or walking.

We believe the claim that natural gas is "Clean and Green" is false, misleading and not substantiated.



CNG Bus

Why Adelaide Metro Claims may breach the Code

The AANA Code of Ethics defines advertising as:

Any material which is published or broadcast using any Medium or any activity which is undertaken by, or on behalf of an advertiser or marketer, over which the advertiser or marketer has a reasonable degree of control, and that draws the attention of the public in a manner calculated to promote or oppose directly or indirectly a product, service, person, organisation or line of conduct.

Meaning of Environmental Claim

1. The Code defines 'Environmental Claim' as:

any express or implied representation that an aspect of a product or service as a whole, or a component or packaging of, or a quality relating to, a product or service, interacts with or influences (or has the capacity to interact with or influence) the Environment.

2. The Claims are Environmental Claims to which the Code applies because they represent that "clean" gas has a positive influence on the Environment (as defined in the Code).

Relevant provisions of the Code

- (a) s 1(a), which provides that Environmental Claims shall not be misleading or deceptive or be likely to mislead or deceive;
- (b) s 1(b), which provides that Environmental Claims shall display any disclaimers or important limitations and qualifications prominently, in clear, plain and specific language;

- (c) s 2(a), which provides that Environmental Claims must be relevant, specific and clearly explain the significance of the claim; and / or
- (d) s 2(b), which provides that Environmental Claims must not overstate the claim expressly or by implication.

False Representation

"Natural Gas – Clean and Green"

This is a blanket statement that falsely presents gas as having *no* negative environmental impacts.

The Marriam-Webster Dictionary defines the word "clean" as having multiple meanings, including¹:

- **Adjective:** Free from dirt or pollution, or free of objectionable behaviour or language:
 - **Free from dirt or pollution:** "Clean clothes"
 - **Free of objectionable behaviour or language:** "Led a clean life"
 - **Not harmful:** "Clean drinking water"
 - **Not illegal:** "A clean driver's license"
 - **Fair:** "It was a tough but clean game"
 - **Accurate:** "The plane made a clean takeoff"
 - **Taste or smell:** "The wine has a clean taste and a lovely golden colour"

We believe the use of word "clean" in the ad is falsely asserting that gas is a) free of dirt or environmental pollution, and b) not harmful.

Ad Standards ruling against APPEA in 2023 found a claim that 'gas is 50% cleaner' was "not sufficiently specific and did not clearly outline the significance of the Claim."²

In 2020, Ad Standards found in a ruling against Australian Gas Networks, that it is misleading to call gas 'cleaner and greener', stating "the Panel considered that this claim is misleading as there are other energy sources which would be considered cleaner and greener than gas."³

The ACCC's guideline 'Green marketing and the Australian Consumer Law' recommended: "When making claims about a particular characteristic or part of a product, you should also consider the whole product life cycle."

¹ <https://www.merriam-webster.com>

² <https://adstandards.com.au/sites/default/files/reports/0119-23.pdf>

³ <https://reneweconomy.com.au/regulator-rules-it-is-misleading-to-claim-gas-is-cleaner-and-greener-56914/>

a) Gas is free of dirt or environmental pollution

The ad refers to the buses being powered by compressed natural gas (CNG) - a highly compressed form of natural gas – composed mostly of methane. In comparison to the technology CNG has been replacing (diesel buses), the emissions profile is very similar.

CNG emits substantial amounts of environmental pollutants throughout its extraction, transport and when it is burned for energy.

In various studies of city/transit buses around the world, CO₂ emissions per km travelled has been found to be similar in CNG buses as compared to diesel⁴: only 4.8% less emissions with CNG in Victoria, Canada; 6.3% less with CNG in Oporto, Portugal; ~10% more with CNG in Finland and California; no consistent difference in a meta-analysis⁵.

Gas production and combustion creates pollution including oxides of nitrogen, sulfur dioxide, carbon monoxide and mercury, which are all listed on the Australian Government National Pollutant Inventory.⁶

b) Gas is not harmful

The Australian Journal of General Practice reports that gas, when burned in the home, has “substantial negative health impacts, and the widespread use of gas in domestic settings is an avoidable health risk.”⁷

A 2013 meta-analysis of 41 studies found that gas cooking increases the risk of asthma in children and that NO₂ exposure is linked with currently having a wheeze. Most recently, a study found that 12.7 percent of childhood asthma cases in the U.S. can be attributed to gas stove use.⁸

Portable gas heaters release excessive quantities of NO_x into the indoor environment; they also pose risks for carbon monoxide poisoning.⁹

Gas is flammable and is also a cause of injury and death through accidents and explosions.¹⁰

Communities that live near gas plants and gas workers are more prone to heart disease, cancer, respiratory problems, sleep disturbances, cognitive problems and reproductive harm.¹¹

⁴ Pourahmadiyan A, Ahmade P, Kjeang E (2021). Dynamic simulation and life cycle greenhouse gas impact assessment of CNG, LNG, and diesel-powered transit buses in British Columbia, Canada. Transportation Research Part D 92:102724.

⁵ Hesterberg TW, Lapin CA, Bunn WB (2008). A Comparison of emissions from vehicles fuelled with diesel or compressed natural gas. Environmental Science and Technology 42:6437-6445.

⁶ <https://www.dcccew.gov.au/environment/protection/npi/substances/fact-sheets>

⁷ <https://www1.racgp.org.au/ajgp/2022/december/health-risks-from-indoor-gas-appliances>

⁸ <https://www.scientificamerican.com/article/the-health-risks-of-gas-stoves-explained/#:~:text=A%202013%20meta%20analysis%20of,attributed%20to%20gas%20stove%20use.>

⁹ <https://www.who.int/teams/environment-climate-change-and-health/healthy-urban-environments/housing/health-risks>

¹⁰ <https://www.abc.net.au/news/2023-07-01/canberra-men-burned-gas-explosion-speak-pain-trauma/102545330>

¹¹ https://envhealthcenters.usc.edu/wp-content/uploads/2020/05/natural_gas_USCEHC_eng.pdf

Gas (methane) is also a potent fossil fuel, and one of the largest contributors to global heating, causing death and destruction across the planet, as the United Nations says, "This poses many risks to human beings and all other forms of life on Earth." ¹²

Substantiation

The assertion that gas is "Clean and Green" is vague, not relevant or specific, has no disclaimers and is not backed up or clarified in any materials on the Adelaide Metro website¹³.

Thank you for looking into this matter.

Belinda Noble

Comms Declare

¹² <https://www.un.org/en/climatechange/science/causes-effects-climate-change#:~:text=Fossil%20fuels%20%E2%80%93%20coal%2C%20oil%20and,of%20all%20carbon%20dioxide%20emissions.>

¹³ <https://www.adelaidemetro.com.au/about-us/go-green>