



4th of November 2025 (updated)

Complaint

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

Issues Raised

AANA Environmental Code\1 Truthful and Factual

AANA Environmental Code\2 Evidence

AANA Environmental Code\3 Clear and not vague

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's target market is 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. It could also give other Adelaide residents the false impression that gas is good for the environment.

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



CNG Bus Advertisement, 2025

Why Adelaide Metro Claims may breach the Code

The Environmental Claims Code defines an Environmental Claim as:

"any message or representation (including text, images, graphic, audio or symbolic representation) that gives the impression that an industry, business, product or service:

- a) has a neutral or positive impact on the environment*
- b) is less harmful for the environment than alternatives, or*
- c) has specific environmental benefits.*

The Claims are Environmental Claims to which the Code applies because they represent that "clean" and "green" gas has a positive influence on the environment and is less harmful than other bus fuels.

Relevant provisions of the Code

1. Truthful and factual

a. Be truthful and factual. The overall impression created by the advertisement including the Environmental Claim should not be false or inaccurate.

b. Not be or likely to be misleading or deceptive to the Target Consumer.

2. Evidence

Environmental Claims in Advertising must be supported by evidence.

3. Clear and not vague

a. Use clear language, having regard to the Target Consumer

b. Be specific - broad, vague or unqualified claims should be avoided

c. Include important limitations, conditions or qualifications in a way that is clear to the Target Consumer.

False Representation

"Natural Gas – Clean and Green"

This is an overall claim that falsely presents gas as having *no* negative environmental impacts.

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

Ad Standards ruled in February 2025 that Hancock Prospecting's use of the term "clean" in relation to gas was "broad and undefined" and "was misleading or deceptive or likely to mislead or deceive."¹

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."

Truthful and factual

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.

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.

¹ <https://adstandards.com.au/wp-content/uploads/2025/02/0009-25.pdf>

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/>

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.

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

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

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

⁶ <https://www.dcceew.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

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.>

Evidence

The assertion that gas is “Clean and Green” is not backed up or clarified in any materials on the Adelaide Metro website¹³. In fact, Adelaide Metro is replacing its bus fleet with electric vehicles which is says are “better for the environment”¹⁴.

Clear and not vague

“Green” is one of the vague and non-specific claims listed in the Code Practice Note as a term to be avoided unless appropriately qualified. In this case there is no qualification on the ad itself or on the Adelaide Metro website.

Thank you for looking into this matter.

Belinda Noble

Comms Declare

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

¹⁴ <https://www.dit.sa.gov.au/news/feed?a=1487144>