

# comms declare



## SUBMISSION

AANA Code of Ethics  
Review

January, 2026

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## Introduction

Thank you for the opportunity to make a submission on the AANA Code of Ethics.

The Code of Ethics is the overarching set of principles to which Australian advertisers should comply. While they need to reflect current community standards, they are also the clearest and most public demonstration of the ethics of the industry itself.

Because of this we submit that they should a commitment to climate and environmental sustainability.

While the Environmental Claims Code stops misleading green advertising, it does not mandate that environmentally sustainable advertising should be the industry norm.

We submit that the Code of Ethics be updated to reflect

1. The overwhelming interest that the public has in maintaining Australia's unique environment and a safe climate
2. The interest and responsibility that people and brands have to model sustainable practices
3. Government procurement requirements

On behalf of its hundreds of members, Comms Declare asks for the following changes in red.

## The Objectives of the Code of Ethics

*"Ensure that advertisements and other forms of marketing communications are legal, honest, truthful and have been prepared with respect for human dignity, an obligation to avoid harm to the **community and environment**, and a sense of fairness and responsibility to competitors."*

## Section 2.6 - Health and safety

*"Advertising shall not depict material contrary to **the health and safety of the community and environment**."*

Practice Note – suggested addition

**Advertising should represent behaviour that is sustainable. It should not show behaviour contrary to the protection of the environment, the climate and natural resources on which people depend. For example, damage to natural wilderness, the creation of pollution or waste.**

## Rationale for changes

Australia has one of the most unique and vulnerable environments on the planet.

A university report commissioned by the Biodiversity Council in 2023<sup>1</sup> found:

- 97% of Australians want more action to conserve biodiversity, and most consider that 'every person in Australia' has a responsibility to act, including all levels of government.
- 85% of Australians are moderately or highly concerned about threats to nature, particularly:
  - Increasing levels of waste and pollution;
  - The impact of climate change on biodiversity;
  - The loss of pollinator species and natural places;
  - The extinction of native plants and animals; and
  - Land clearing.

A 2025 poll by IPSOS<sup>2</sup> found that six in 10 (64%) of Australians are concerned about climate change and 53% agree that if businesses do not act now to combat it, they will be failing their employees and customers.

In addition, climate change is one of the biggest concerns for people working in the advertising industry.

A poll of people aged under 30 who worked in advertising in 2021 found 91% think climate is one of the most important issues they face, and 70% actively want to work in a more climate-friendly company.<sup>3</sup>

This interest is further demonstrated by the formation of climate interest groups in the industry including Ad Net Zero, which the AANA is signed up to. Action 5 of Ad Net Zero is to "support more sustainable behaviours"<sup>4</sup>.

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<sup>1</sup> Borg, K., Smith, L., Hatty, M., Dean, A., Louis, W., Bekessy, S., Williams, K., Morgain, R. & Wintle, B. Biodiversity Concerns Report: [97% of Australians want more action to protect nature](#). The Biodiversity Council, June, 2023.

<sup>2</sup> <https://www.ipsos.com/en-au/climate-change-study-2025>

<sup>3</sup> [Fuelling Fantasies](#), Comms Declare, Nov 2021

<sup>4</sup> <https://adnetzero.com/the-ad-net-zero-action-plan/>

## Precedents

The International Chamber of Commerce notes sustainability in the second point of its Advertising and Marketing Communications Code<sup>5</sup>:

*"Marketing communications should not appear to condone or encourage actions which contravene the law, self-regulatory codes or generally accepted standards concerning climate change, sustainable and environmentally responsible behaviour."*

The Autorite de Regulation Professionnelle de la Publicite in France has an extensive Sustainable Development Code<sup>6</sup> that the ANNA could also use as a reference.

It adopts ESG principles including that:

*"a/ Advertising must ban any evocation or representation of behaviour contrary to the protection of the environment and the preservation of natural resources (waste or degradation of natural resources, damage to biodiversity, air, water or soil pollution, climate change, etc.), except in the case of denunciation." (Google translation)*

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<sup>5</sup> [https://iccwbo.org/wp-content/uploads/sites/3/2024/09/ICC\\_2024\\_MarketingCode\\_2024.pdf](https://iccwbo.org/wp-content/uploads/sites/3/2024/09/ICC_2024_MarketingCode_2024.pdf)

<sup>6</sup> [https://www.arpp.org/nous-consulter/regles/regles-de-deontologie/sustainable-development-code/#toc\\_0\\_1](https://www.arpp.org/nous-consulter/regles/regles-de-deontologie/sustainable-development-code/#toc_0_1)

## **Sustainability Requirements**

Australia is signatory to the Paris Agreement and has legislated reducing climate pollution in line with reaching net zero by 2050. The mandatory Australian Sustainability Reporting Standards are being phased in.

The Australian Government Department of Finance procurement principles<sup>7</sup> require that energy consumption, greenhouse gas emissions, climate change impacts and other sustainability indicators must be assessed when awarding government contracts.

Therefore, the AANA should make it clear to the industry that reducing climate pollution is necessary for business to be compliant and to win business in the clean energy economy.

Thank you again for the opportunity to make a submission. I am eager to assist in any other way.

Yours Sincerely

A handwritten signature in black ink that reads "Belinda Noble". The script is cursive and elegant, with the first letters of each word being capitalized and prominent.

Belinda Noble

Founder, CEO

Comms Declare

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<sup>7</sup> <https://www.finance.gov.au/government/procurement/buying-australian-government/incorporating-sustainability>



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## CHANGING THE INFORMATION CLIMATE

Comms Declare promotes sustainable communication, and is dedicated to shifting the narrative around climate action. We exist to reduce the social licence of climate polluters and champion those that integrate sustainability into their communications practice.

At our core is our unwavering belief in the power of communications to create cultural change and shape a safer, healthier future for each of us and our planet.

We represent dozens of communications agencies and hundreds more professionals across advertising, marketing and media.

Comms Declare is a registered charity and member of CANA.

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