

BANYULE CITY COUNCIL

Draft Sporting Facilities User Guide
Comms Declare Submission
August 2026

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About Us

Comms Declare is a network of more than 100 organisations and hundreds of communications and media professionals across Oceania who have committed not to promote fossil fuels and to support responsible communications that advance climate action.

We lead the regional **Fossil Ad Ban** campaign, working with councils, governments and public institutions to reduce fossil fuel advertising and sponsorship and align public communications with climate and public health objectives.

Summary

Banyule City Council has demonstrated significant leadership on climate action. Council declared a Climate Emergency in 2019, has committed to eliminating direct Scope 1 emissions by 2028 and is working towards eliminating Scope 3 emissions associated with goods, services and its supply chain by 2035. Banyule also has a broader goal of supporting the municipality to become carbon neutral by 2040.

Council's Corporate Emissions Reduction Plan commits to embedding climate action across its services, operations and decision-making.

This consultation provides a practical opportunity to ensure those climate objectives are also reflected in the policies governing Council-owned community facilities.

Comms Declare supports sporting clubs having appropriate opportunities to raise revenue through sponsorship. As Banyule considers increasing the flexibility and visibility of sponsorship advertising on Council-owned sporting facilities, we believe this should be accompanied by stronger safeguards around what can be advertised, ensuring that advertising displayed on public assets is consistent with Council's climate commitments and the values it seeks to uphold across the Banyule community.

Recommendation

Comms Declare recommends that “fossil fuel companies and products” (coal, oil and gas) be added alongside gambling, alcohol and political advertising in Section 5.2 of the final Sporting Facilities User Guide and Allocation Policy.

The draft already recognises that not all forms of sponsorship and advertising are appropriate in community sporting environments. Match-day and permanent signage cannot advertise gambling or alcohol and cannot contain political advertising.

Extending these existing restrictions to fossil fuel advertising and sponsorship would be a simple and consistent addition to the framework.

Aligning sporting facilities with Banyule’s climate commitments

The Sporting Facilities User Guide itself encourages clubs to reduce energy consumption and greenhouse gas emissions. It would be inconsistent for those same Council-owned facilities to be used to advertise or promote fossil fuel companies, products or services.

The burning of fossil fuels is the primary driver of human-caused climate change. Ensuring public community assets are not used to promote companies whose core business is producing fossil fuels would be a practical way for Banyule to translate its climate commitments into its day-to-day policies and operations.

Importantly, this proposal does not seek to restrict sporting sponsorship generally. Clubs would remain able to seek sponsorship from a wide range of businesses and organisations. It would simply establish an additional safeguard around the kinds of commercial promotion permitted on Council property, consistent with the safeguards already applied to alcohol and gambling. This would include restrictions on coal, oil and gas company logos on sporting fields and player uniforms.

A straightforward and workable approach

A fossil fuel advertising restriction does not require a complicated new regulatory or compliance system.

For the purposes of the policy, a fossil fuel company could be simply defined as: *A company whose primary business involves the exploration, extraction, production, refining or sale of coal, oil or gas.* The restriction could then be incorporated directly into the existing signage provisions, with the existing traffic-light compliance framework applying in the same way as it does to other breaches of signage requirements.

We strongly support the draft's clearer compliance system. It provides a proportionate and understandable mechanism for clubs and Council to address signage requirements without the need to create a separate enforcement process.

Victorian local government precedent

There is clear Victorian local government precedent demonstrating that this approach is practical.

Merri-bek City Council

In 2023, Merri-bek City Council resolved not to permit advertising on Council land that promotes fossil fuel companies, including companies directly involved in the extraction, production or processing of coal, oil and gas.

Importantly for this consultation, Merri-bek specifically resolved to incorporate the prohibition into its Allocation and Use of Sporting Facilities, Grounds and Pavilions Policy and accompanying User Guide. Merri-bek's own policy review identified that its existing sporting-facility signage provisions could simply be updated to add fossil fuel companies to categories of advertising already prohibited.

Merri-bek also consulted Council tenants before adopting the change. Of the 22 organisations that responded, none reported having existing fossil fuel advertising and 87 per cent supported prohibiting advertising and promotion by fossil fuel companies.

Victorian local government precedent

Yarra City Council

The City of Yarra provides another nearby precedent. In July 2023, Yarra City Council unanimously resolved not to permit advertising on Council property that specifically promotes fossil fuels or companies that extract, produce or refine fossil fuels. Council determined that the expected impact on community groups and businesses would be minimal and phased the change in as existing commercial agreements expired.

These examples demonstrate that Banyule would not be developing an untested policy approach. Comparable Victorian councils have already established workable mechanisms for ensuring Council property is not used to promote fossil fuel companies while continuing to support community organisations and sporting clubs.

Proposed amendment

We recommend amending each of the relevant signage categories in Section 5.2 so that the existing provisions: “No advertising of gambling or alcohol” are expanded to read:

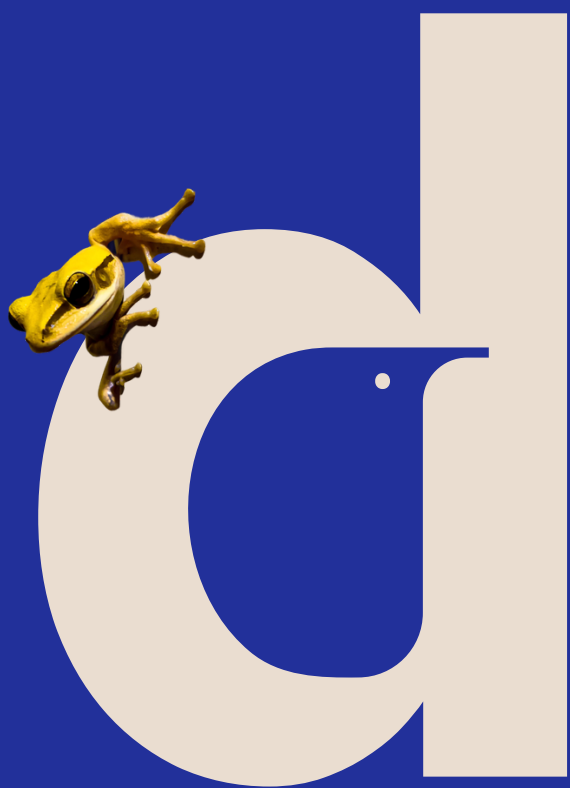
“No advertising of gambling, alcohol, or fossil fuel companies, products or services.”

A definition of “fossil fuel company” could be included in the policy or User Guide as:

“A company whose primary business involves the exploration, extraction, production, refining or sale of coal, oil or gas.”

This would be a modest, practical amendment to the draft policy that strengthens its consistency with Banyule’s Climate Emergency declaration and emissions-reduction commitments, while preserving sporting clubs’ ability to pursue appropriate sponsorship opportunities.

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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.

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AI Disclosure

This document was developed by Comms Declare and reviewed by subject matter experts. Artificial intelligence tools were used to assist with information consolidation and tone refinement to support clarity, accessibility and consistency across jurisdictions. All content has been reviewed and approved for accuracy and appropriateness.