

# LIMITLESS CAR ADVERTISING IN CANADA

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**PRACTICES, REGULATORY FRAMEWORK  
AND RECOMMENDATIONS**

**SERIES**

THE RISE OF LIGHT-DUTY TRUCKS IN CANADA:  
REVERSING THE TREND

équiterre

# LIMITLESS: CAR ADVERTISING IN CANADA

## PRACTICES, REGULATORY FRAMEWORK AND RECOMMENDATIONS

### SERIES

THE RISE OF LIGHT-DUTY TRUCK IN CANADA: REVERSING THE TREND

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## LIST OF ABBREVIATIONS, ACRONYMS AND SYMBOLS

\$	Dollars
CO <sub>2</sub>	Carbon dioxide
EV	Electric vehicle(s)
G\$	Billions of dollars
GHG	Greenhouse gases
M\$	Millions of dollars
SAAQ	<i>Société de l'assurance automobile du Québec</i>
SUV	Sport utility vehicle(s)
ZEV	Zero-emission vehicle(s)

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Figure 1. GHG Emissions from the Transportation Sector in Canada, 1990-2018

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## ABOUT ÉQUITERRE

Équiterre's mission is to propose concrete solutions to accelerate the transition towards a society in which individuals, organizations and governments make ecological choices that are both healthy and equitable. Deeply concerned about climate change, Équiterre has developed significant expertise in public policy aimed at reducing greenhouse gas (GHG) emissions over the years.

Through demonstration, education, awareness-raising, research, coaching and mobilization projects, Équiterre rallies citizens, social groups, businesses, public organizations, municipalities, researchers and elected officials in the fields of food, transportation, fair trade, sustainable energy, sustainable consumption and the fight against climate change.

Given the disproportionate share of GHG emissions due to the transportation sector in Quebec and Canada, Équiterre quickly identified collective and individual mobility choices as well as land-use planning practices as key priorities for action to reduce society's fuel consumption.

Équiterre has 25,000 members and over 130,000 supporters who participate in its actions. The organization, which celebrated its 25th anniversary in 2018, is one of the leading environmental organizations in Québec.

## ABOUT THIS RESEARCH PROJECT

Conducted by Équiterre in collaboration with Polytechnique Montréal and the CIRANO research group, the goal of the study entitled «The Rise of Light-Duty Trucks in Canada: Reversing the Trend» is to understand the Canadian public's growing preference for oversized and fuel-inefficient vehicles in order to come up with possible solutions.

The goal of this project is to identify:

- The historic and socioeconomic factors that explain the phenomenon;
- Key motivations that lead to vehicle purchases;
- The most effective messages for discouraging the purchase of oversized and fuel-inefficient vehicles;
- Automotive industry advertising practices and strategies; and
- The regulatory framework governing automotive advertising.

An in-depth understanding of these various elements led to the identification of action levers adapted to the Canadian situation in order to slow down and ultimately reverse the trend towards increased sales of light-duty trucks in Canada. The results of this research guided the development of public policy recommendations regarding certain practices.

## EXECUTIVE SUMMARY

Transportation is one of the few sectors in Canada where GHG emissions are still on the rise. The alarming rate at which light-duty trucks are proliferating in the Canadian fleet – they accounted for 79.9% of new vehicle sales in 2020, a disturbing record that has been broken annually for the past decade – is a major contributor to this increase. It has therefore become ever more urgent to halt and reverse the rise in sales of sport utility vehicles (SUVs), crossovers, pickup trucks and vans on the road in order to limit their environmental, social and economic impacts.

In addition, the automotive industry's advertising practices are cause for concern. Car advertising is ubiquitous in both the traditional and digital media, and huge sums of money are being invested to promote gasoline-powered vehicles.

The objective of this study is to understand the role of automobile advertising in the increasing numbers of light-duty trucks in Canada through an analysis of advertising content and an analysis of the regulatory framework in order to identify possible levers for action in public policy related to advertising practices.



## Results

The analysis highlights the mismatch between government climate targets and current advertising practices that results from the virtual absence of constraints that benefit the automotive sector.

The auto industry:

- Primarily promotes light-duty trucks in its advertising; and
- Mostly uses various depictions of nature, attractive financing arrangements, technology-related features and safety in its promotion of light-duty trucks.

The report also highlights the more stringent requirements in effect in various other countries that regulate automotive industry advertising practices.

In short, the government needs to implement restrictive and ambitious public policies on advertising if it is to shift vehicle choices to more sustainable modes of transportation.

## Équiterre's recommendations

1. Acknowledge that the increase in the number of light-duty trucks in Canada is a public health and safety issue;
2. Establish an independent advisory committee to advise and guide governments in the development and implementation of public policy on automotive advertising;
3. Use existing advertising restrictions as models;
4. Progressively bring in regulation of automobile advertising and increase the promotion of sustainable mobility.

## INTRODUCTION

In Canada, the transportation sector is responsible for nearly one third of all GHG emissions, more than half of which are produced by light-duty trucks. This reality makes it a high-priority sector for action in the fight against climate change, especially in light of the fact that the country is one of the largest emitters of GHGs in the world. Indeed, Canada is the second-largest emitter of CO<sub>2</sub> per capita of all G20 countries (OECD, 2021).

In addition to being a threat to Canada's climate targets, the increase in light-duty trucks in the Canadian fleet represents a real public health and safety issue. The first part of this report explores the multiple environmental, social and economic impacts associated with the rising number of these vehicles, which justify the urgency for action to counter the phenomenon. It then presents the current state of play regarding the effectiveness of automobile advertising as well as investments in this sector.

In this report, Équiterre analyzes recent light-duty truck advertising practices in Canada to highlight the main themes, messages and incentives used to encourage the purchase of this type of vehicle. The study then assesses the Canadian regulatory framework for automobile advertising by comparing it with other international jurisdictions. The objective of these analyses is to understand the role that advertising plays in the increase of light-duty trucks in Canada in order to identify potential courses of action in terms of public policy.

## INCREASING NUMBERS OF LIGHT-DUTY TRUCKS—AN ALARMING TREND

### 1. What is a light-duty truck?

For the purposes of this study, the term «light-duty truck» refers to four (4) types of vehicles: sport utility vehicles (SUVs), crossovers, pickup trucks and vans. "Standard" or "classic" cars refer to other types of light-duty vehicles, such as sedans, which are generally smaller. More detailed definitions of these four (4) vehicle types can be found in Appendix 1 of the full report<sup>1</sup>.

### 2. A global trend to which Canada is no exception

The rise in the number of light-duty trucks on the road is universal. Between 2010 and 2018, the number of SUVs alone rose by 60% globally, and their share of annual car sales grew from 17% to 39% worldwide (Cozzi & Petropoulos, 2019). Canada has not escaped the phenomenon: here, the number of light-duty trucks grew by 280% between 1990 and 2018, and by 86% between 2005 and 2018, compared to 10% and 7% for standard cars over the same periods (Environment and Climate Change Canada, 2018, 40-42). Furthermore, the phenomenon shows no sign of abating: in 2020, the market share of these vehicles rose to 79.9% (DesRosiers Automotive, 2021).

This growing popularity for light-duty trucks is not specific to any one type of population or region. For example, in Quebec, between 2014 and 2019, the number of light-duty trucks on the road increased by 8.7 percent in Montreal and 9.2 percent in the Capitale-Nationale, figures that compete with those in less densely populated regions. Indeed, over the same period, the number of light-duty trucks increased by 9.2% in the Gaspésie-Îles-de-la-Madeleine region and by 8.4% in the Saguenay-Lac-Saint-Jean region. Similarly, the urban and peri-urban regions of Montréal, Lanaudière and Laurentides also experienced increases in the number of light-duty trucks, ranging from 7.1% to 7.8%. (SAAQ 2020, 164) In Quebec, all types of regions are affected by this phenomenon.

### 3. Wide-ranging consequences

The growing preference of Canadians for oversized, fuel-efficient vehicles brings with it numerous environmental and social impacts. This section summarizes these impacts.

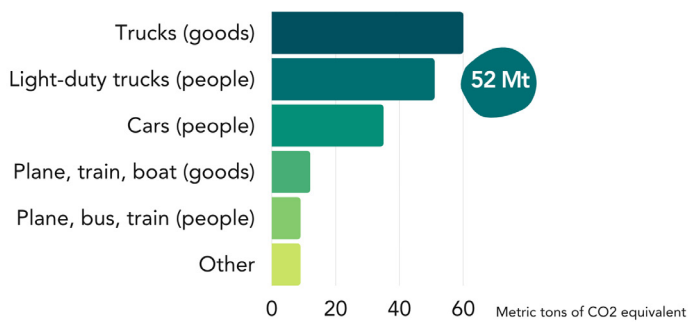
#### 3.1 The transportation sector: an important barrier to achieving climate targets

The increase in the number of light-duty trucks in Canada is inconsistent with government GHG reduction targets. Between 1990 and 2018, total GHG emissions in Canada rose by 20.9%, largely due to transportation. In fact, since 1990, emissions from this sector have increased by 49% and currently account for 30% of Canada's GHG emissions. (Environment and Climate Change Canada 2018, 40; Environment and Climate Change Canada 2020, 5) As shown in Figure 1, this increase is primarily attributable to light-duty trucks and freight transportation.

1

The full report is only available in French.

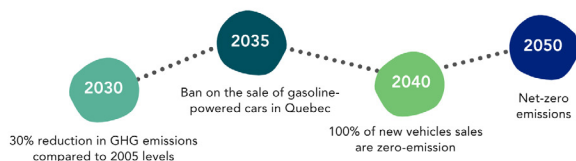
**Figure 1. GHG Emissions from the Transportation Sector in Canada, 2018**



Source : Environnement et Changement climatique Canada 2020

Yet, in signing the Paris Agreement, Canada committed to reducing its GHG emissions by 30% from 2005 levels by 2030. It has since committed to becoming carbon neutral by 2050.

**Figure 2. Climate targets**



While this GHG emissions-reduction target already represents an increase from 1990 emissions, Canada is not even on track to meet this target: as of 2018, emissions had only decreased by 0.1% from 2005 levels (Environment and Climate Change Canada 2020, 5).

**IN 2018, CANADA'S TOTAL GHG EMISSIONS HAD DECREASED BY ONLY 0.1% FROM 2005 LEVELS.**

### 3.2 When the popularity of light-duty trucks undermines electrification efforts

The benefits from meeting federal and provincial zero-emission vehicle (ZEV) sales targets are undermined by the uptrend in light-duty trucks, because the resulting reduction in oil demand is minimized or even negated by these fuel-inefficient vehicles. In recent years, their proliferation has led to a corresponding increase in GHG emissions: between 1990 and 2018, their emissions rose by 156% and, between 2005 and 2018, by 36%. In contrast, those from standard cars

have decreased by 18%. As an example, in 2018, light-duty trucks emitted on average 31% more GHGs per kilometre than standard cars. (Environment and Climate Change Canada, 2018, 40-42) In this context, both the growth in vehicle size and the growth of the entire vehicle fleet must be curbed in order to reduce emissions from the passenger transportation sector.

Additionally, over its life cycle, a light-duty truck is more polluting than other light-duty vehicles. For example, an SUV has a carbon footprint that is five (5) to six (6) times larger than a standard electric car traveling the same number of kilometres, and an electric SUV has a carbon footprint that is two (2) times greater (WWF, 2020a, 10, 13). Thus, over the medium term, the mass adoption of zero-emission light-duty trucks would be an inadequate solution to reducing the carbon footprint of Canada's transportation sector; rather, the share of sales of these vehicles nationwide, whether electric or nonelectric, needs to be reduced.

### 3.3 Significant air pollution vectors

Light-duty trucks represent an increased danger to all road users. First, in fatal crashes in which a vehicle overturns, light-duty trucks – specifically SUVs and pickup trucks – are nearly two (2) times more likely to be involved than standard cars (Islam & al, 2016, 1). Second, accidents caused by SUVs are 10% more numerous than those caused by standard cars; this rate climbs to 27% in the case of particularly large SUV models (Banholzer, 2020).

In addition, accidents caused by light-duty trucks are more dangerous for the person driving the other vehicle than those caused by standard cars. That person's risk of death is 158% higher if the vehicle causing the collision is a pickup truck and 28% higher if it is an SUV. (Monfort & Nolan 2019)

These oversized vehicles are also more dangerous when it comes to pedestrians. When struck by SUVs, they are 20% more likely to be thrown forward than they would be when struck by a standard car. Pedestrians are also nearly twice as likely to suffer hip and leg injuries (IIHS, 2020) and 8% more likely to suffer serious, severe, critical or fatal injuries (Monfort & Mueller, 2020). In the United States, over the past 10 years, the number of pedestrian fatalities involving SUVs has increased more than for other vehicles. Specifically, the number of pedestrians killed by SUVs in the United States rose by 81% between 2009 and 2016 (IIHS, 2020; Monfort & Mueller, 2020). Accordingly, the literature indicates that SUVs and pickup trucks pose a greater threat to public safety



than standard cars.

### 3.4 A threat to public safety

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### 3.5 Road infrastructure under pressure

While light-duty trucks are longer and wider than other vehicles (WWF, 2020b), their expanding share of the Canadian fleet is a concern from a traffic congestion perspective. Indeed, to move 3,500 vehicles on the highway over a distance of five (5) kilometres, it would take nine (9) minutes longer if they were Ford Expedition pickups than if they were all Smart Fortwos. While unrealistic, this example illustrates the impact that the accumulation of oversized vehicles can have on a community (Mobility Chair, 2019, 9). In addition to negatively impacting the well-being of the population, traffic congestion represents billions of dollars lost annually. In 2015, they were estimated at seven (7) billion dollars (B\$) for Toronto and 1.4 B\$ in Vancouver (HDR Inc. 2008; HDR Inc. 2015). Over the

medium term, the continued growth in the number of light-duty trucks on the road would only exacerbate this reality.

### 3.6 A threat to household finances

More expensive than other types of vehicles, light-duty trucks represent an added financial burden for Canadian households. This fact is alarming in a context where the debt load of Canadian families is constantly increasing. In 2008, family debt levels corresponded on average to 108% of their disposable income, while in 2018, this level rose to 175% (Statistics Canada, 2019). Moreover, between 2010 and 2015, the average purchase price of a new vehicle rose by about 14% (Statistics Canada, 2019; FCAC 2016, 3-4). With light-duty trucks costing an average of \$10,000 more than a standard car (Statistics Canada, 2021), it is fair to say that their growing popularity threatens the sound management of many Canadians' pocketbooks.

A comparison between some of the best-selling SUV models in Canada and their equivalent standard-vehicle models shows the price differences between these two (2) categories of vehicles: for a mid-size SUV and a mid-size car from the same company, the price difference is 33%. Similarly, for a compact SUV and a compact car from the same company, the price difference is 22%. (*Le Guide de l'Auto*, 2021).

### 3.6 Summary

The combined impacts of light-duty trucks on the climate, the environment, air quality, safety, traffic flow and the finances of Canadian families make these vehicles a very real threat to public health and safety and, more broadly, to the overall well-being of Canadian society. It is therefore appropriate to examine the advertising practices of the automobile industry as well as the regulatory framework under which it operates. The aim of this approach is to identify possible solutions in order to redirect consumer transportation choices towards alternatives that are compatible with the goal of achieving carbon neutrality by 2050.

## CAR ADVERTISING: A KEY DRIVER OF CONSUMER BEHAVIOUR

As a powerful tool for influencing consumers, advertising can (1) control social interactions, personal perceptions and consumer choices, (2) encourage the purchase of goods that an individual does not need, (3) associate a product with social values, and even (4) promote consumption as a way of life (Buijzen & Valkenburg, 2003; Pollay, 1986; Hall, 2002; Stokes & Hallett, 1997; Leiss et al., 1986; Lasch, 1979). Furthermore, a single product's multiple advertisements appealing to various positive sentiments reinforce the public's enthusiasm for the product. Automobile marketing is no exception to this logic and participates in the formation of people's attachment to their cars. (Stokes & Hallett, 1997) Finally, the effectiveness of advertising in influencing consumer habits has been the subject of scientific consensus for several decades.

Additionally, the Canadian automotive industry invests enormous amounts of money in the promotion of its products. Its total advertising budget, however, is difficult to determine: an imprecise average of spending by companies in various industry sectors suggests a total of at least \$446 million dollars (M\$) (Government of Canada 2018a). Nevertheless, in 2018, the industry led in spending on digital advertising (21%), and in 2019 it accounted for 19% of such spending (Emarketer, 2019; Emarketer, 2020), representing approximately 1.6B\$ for this form of advertising alone (Briggs, 2020).

However, in Quebec alone, for traditional media (television, radio and print), the automotive industry and dealers injected 204 M\$ into advertising in 2017, or nearly 16% of the provincial total of this spending (Infopresse 2019, 29). While these data are difficult to generalize nationally, they do illustrate the size of the automotive sector's promotional budget.

The marketing strategies deployed with the help of these significant amounts of money actually pay off: 47% of new-car buyers say they are influenced by some form of media. A majority of them use newspapers to search for discounts and financing deals or to compare prices. Close to 40% of first-time buyers find daily newspapers useful in helping them make their final purchase decision (Info Canada Media, 2016). In addition, 42% of the same individuals report that they are influenced by magazine ads (News Media Canada, 2017).

Against a climate emergency background, where

GHG emissions from the transportation sector are increasing, this power to influence should instead be leveraged to help achieve Canada's climate targets. Consequently, advertising messages should be subject to greater scrutiny.

### Summary

Explained by **massive investments** and motivated by its proven influence on consumer choices, the pervasiveness of automotive advertising on the various media platforms justifies the need to explore current marketing techniques and to **analyze the regulatory framework** governing advertising practices in Canada.

## WHAT DO WE ALREADY KNOW ABOUT THE CONTENT OF CAR ADS?

According to various research studies and a series of exploratory interviews with experts, vehicle **performance** is a recurring primary theme in automobile advertising, while safety is rarely mentioned (Burns 1999 ; Conley 2009 ; Ferguson, Hardy & Williams 2003 ; Sheehan, Steinhardt & Schonfeld, 2006 ; Shin & al. 2005 ; Watson & al. 2010). However, in Canada, a number of standards and regulations have been put in place in recent years to prohibit messages promoting the dangerous driving associated with this notion of performance. In the context of this analysis, it is therefore to be expected that references to safety will be more frequent than in the past, to the detriment of performance-related messages.

The use of **financial incentives** is also a popular strategy, although fuel economy is rarely mentioned (Conley 2009 ; Ferguson, Hardy & Williams 2003). The vehicle's interior features (comfort, luxury, technology, etc.) as well as its aesthetics are often mentioned in ads, but only in passing (Conley 2009 ; Ferguson, Hardy & Williams 2003 ; Gunster 2004).

Also, light-duty trucks are shown in both urban and natural settings. Moreover, **natural environments** are depicted in many different ways, but are most often portrayed as being dominated and controlled by the vehicle (Conley 2009 ; Gunster 2004 ; McLean 2009). Finally, ads make few direct references to the family, and gendered representations are still

relatively common (McLean 2009 ; Shin & al. 2005). Detailed findings from various prior studies and from exploratory interviews are available in the full report.

Despite the existence of these latter studies, the relevance of this research remains, because (1) many of these analyses do not focus specifically on light-duty trucks, and some present an inadequate body of media content to meet the objective of this report; (2) these studies are more than 10 years old; (3) many of them focus only on specific safety-related messages; and (4) very few of the studies include an analysis of the regulatory framework that governs advertising. This report explores the limitations to which the Canadian automotive industry is subject and assesses how this framework is aligned with government climate targets, environmental protection and the well-being of Canadians.

## OBJECTIVES

The objectives of this study are to:

- Identify the key messages contained in light-duty-truck advertising in 2019 and 2020 in Canada;
- Review the regulatory framework governing automotive advertising in Canada and internationally;
- Provide public policy recommendations applicable to advertising in order to align practices with Canada's climate targets and electrification goals.

## METHODOLOGY

### 1. Analysis of existing advertising

The method used for this study was content analysis. A corpus of 132 ads from Canadian newspapers and magazines published between January 1, 2019 and May 1, 2020 was developed. Ads from national and provincial automotive brands were included in the sample, but ads created by dealerships were excluded. The strategy for analyzing these ads was threefold: develop a multi-variable analysis grid with a code guide, analyze the ads using the grid and codes, and analyze the results. The objective is to identify the most common marketing strategies used by automotive companies in Canada. Details of the methodology used are available in the full report.

## 2. Analysis of regulatory framework governing advertising in Canada

A review of Canadian government and legal documents was conducted to determine the current state when it comes to the regulation of automobile advertising. An overview of the practices of other jurisdictions that have a more comprehensive framework for automobile advertising was also carried out in order to formulate recommendations that could be applied in Canada, particularly in light of the results of the analysis of advertising content.

## CAR ADVERTISING: A LARGELY UNREGULATED PLAYING FIELD

### 1. Findings from the ad content analysis

The next few pages report on the elements identified in the ads analyzed. The content analysis indicates that the automotive industry promotes light-duty trucks more heavily than it does standard cars. To promote these light-duty trucks, it primarily uses representations of nature in multiple forms, various attractive financing terms, and the technological and safety aspects of the vehicles.

#### 1.1 Media types, vehicle types and vehicle models

Automobile advertisements are seen more commonly in newspapers (76.5%) than in magazines (23.5%), which is consistent with consumer preferences to use daily newspapers to inform themselves when contemplating the purchase of a new vehicle. Also, advertisers focused more heavily on light-duty trucks than on other vehicles: in all the newspapers and magazine ads consulted, 79% featured light-duty trucks—an alarming finding given the impacts of their proliferation as discussed above—and when it comes to these vehicles, SUVs are the most frequently advertised (58.3%), followed by crossovers (21.2%) and pickup trucks (12.1%). Vans are featured in only two (2) of the ads, reflecting the fact that they have been gradually replaced by other types of light-duty trucks. For this reason, they are not discussed in detail in this short report.

In addition, there is a correlation between the top-selling brands and models in Canada and those that are the most heavily advertised, providing additional

confirmation of the role advertising plays in the choice of a personal vehicle.

## 79% OF THE CAR ADS IDENTIFIED FEATURE LIGHT-DUTY TRUCKS.

### 1.2 Advertising background

#### References to the season, good market value and scarcity

In its advertising, the automotive industry often makes reference to various annual events or periods in order to sell light-duty trucks: one third of the ads analyzed refer to a specific season or holiday. In fact, the most frequently mentioned times of the year are commercial holidays (Black Friday and Boxing Day).

Many of these advertisements also **associate a season or a holiday with the high market value of a light-duty truck**: 65.9% of the ads that refer to a season or a holiday also make mention of a special offer (additional discounts, included accessories, etc.).

**Scarcity** is often mentioned in daily newspaper ads, as they are of a short-lived duration. In fact, 43.2% of the newspaper ads featured the idea of a time-limited offer or a limited quantity. Scarcity is also quite often linked to a specific time of year.

Again, in newspaper ads, pickup trucks and SUVs are most often promoted with a statement of rarity and/or high market value, unlike crossovers. This suggests that automotive advertisers want to associate SUVs and pickup trucks with a sense of urgency to purchase one, and with financing arrangements that appear competitive.

#### Locations depicted

Nature and its elements figure prominently in the ads for light-duty trucks: 68.2% of them feature element(s) associated with a natural environment, including 53.8% that place moderate or high importance on these elements.

Consistent with some of the findings from the literature, **natural settings are the primary environment with which light-duty trucks are associated**. Similarly, a review of the literature indicates that nature is sometimes found in SUV advertisements, where the vehicle is compared to animals, and that was observed in this analysis. As such, three (3) advertisements for the same automotive brand clearly associated the

attributes of a mountain goat with the promoted vehicle, describing it as being adventurous and powerful.

Light-duty truck ads depicting the city or suburbs are less numerous. They make up 22% and 8.3% of all ads analyzed, respectively. Advertisers are therefore relying more on nature and the environment and its attractions, such as the outdoors, to promote light-duty trucks.

In addition, SUVs are shown in a number of different settings: 58.5% of SUV ads show the vehicle in a natural setting, 27.3% in an urban setting, and 13% in what appears to be a suburban setting. The public's exposure to SUVs in these various settings may lead them to believe that this type of vehicle is versatile and multi-purpose, which may partially explain the increased interest in this type of light-duty truck.

**58,5 %** of SUV ads show the vehicle in a natural setting,

**27,3 %** in an urban setting,

**13 %** in what appears to be a suburban setting.

The other types are shown less often in urban or residential settings than are SUVs. For example, crossovers are almost exclusively featured in a natural setting: 85.7% of their ads show the vehicle in this type of setting.

#### Domination of the environment

As previous studies have indicated, the environment is often presented as something that can be controlled: 31.1% of all ads illustrate this idea in one way or another. In addition, **nearly one out of two (2) advertisements that feature natural elements portrays nature as something that can be dominated or controlled by the light-duty truck**, promoting a land-use pattern that is incompatible with protecting nature and biodiversity. This strategy is therefore inconsistent with the environmental plans, strategies and objectives of governments. **Pickup trucks are the most frequently shown vehicle that has the ability to control nature**: 50% of their ads showcase that idea.

#### Exploration, adventure or discovery

Next, the sense of exploration, adventure, and discovery is present in 22% of ads and is almost exclusively tied to nature: 94.7% of ads that place medium or high emphasis on this feeling also

allocate a medium or high amount of space to one or more natural elements. Crossovers are most often associated with this message, indicating that the auto industry is trying to attach a particular image to the various models of light-duty trucks. On the one hand, there would be pickup trucks and SUVs that would be able to dominate the environment, and on the other hand, there would be crossovers, those vehicles built on a car platform that would have similar capabilities and would allow its owner to explore nature.

#### Families, out-of-town activities and urban-centred activities

**Very few ads explicitly mention families or children (5.3%).** However, families may be attracted to light-duty trucks by a variety of features and other elements portrayed in the ads—storage space, the number of seats, comfort, technology, safety for those in the vehicle, etc. Thus, explicit mention of the family is not necessary to make light-duty trucks attractive to this audience. As such, the number of seats in the vehicle, while not often mentioned, is only displayed in SUV advertisements, something that may appeal to larger families.

Also, a very small proportion of the ads, just 3.8%, refer to urban activities. In these ads, with the exception of one crossover ad, only SUVs are featured. This finding is consistent with previous findings: SUVs are presented in a variety of ways.

In contrast, out-of-the-city activities are much more prevalent (22.7%), a finding consistent with the greater recurrence of scenes involving nature, as opposed to those involving cities, mentioned above. Crossovers are the vehicles most used to represent these activities. This is followed by pickup trucks and then SUVs. Conversely, the occurrence of urban settings and urban activities in the same ad is very low, suggesting that when light-duty trucks are being marketed as city-friendly vehicles, advertisers refer to other features.

Finally, driving for the sake of enjoyment is not a recurring element in ads for light-duty trucks (5.3%), and only SUV and crossover ads include this idea.

### 1.3 Features highlighted in advertisements

#### Safety and performance

**Safety was mentioned in two thirds of the ads and is a strong theme in light-duty truck ads.** Of these, the majority (54.5%) addressed safety in two (2) or more elements (all-wheel drive, safety for people on

board the vehicle and/or those outside the vehicle). Moreover, when only one safety-related element is mentioned in an ad, it is the safety of those in the vehicle that is most often mentioned. **The issue of the safe sharing of the road, both with other vehicles and with individuals using active transportation (walking or cycling), is virtually absent.**

Ads for crossovers and SUVs seem to address the safety aspect more often. 96.4% and 68.8% of their ads, respectively, refer to it, while only 12.5% of pickup truck ads do, and only as a secondary consideration.

Furthermore, ads that refer to a vehicle's performance are few in number (12.2%). They refer mostly in a textual manner to the sporty aspect of the vehicle or the adrenaline rush associated with driving it, rather than depicting images of the light-duty truck traveling at full speed, which used to be the case in the past. As a result, **the regulations governing advertisements depicting illegal or unsafe behaviours appear to have dissuaded the industry from putting out these messages** and, instead, have pushed the industry to focus on various safety-related aspects, which is a testament to the effectiveness of these regulations. It is realistic to believe that a tightening of the regulatory framework for automobile advertising, especially when it comes to supplying accurate information on fuel economy and price, size and the safety-related impact of vehicles could affect advertising content.

#### Practical and/or aesthetic features

When it comes to the practical and aesthetic features of light-duty trucks, **technology is the most recurring feature** in the ads (83.3%), especially those that feature crossovers or pickups.

Comfort is mentioned in 28% of the ads but it is much more present in ads for SUVs (35.1%) and pickup trucks (31.2%) than for crossovers (14.3%). Comfort would therefore be a characteristic more often associated with vehicles with a truck frame (SUVs and pickup trucks) than with vehicles built on a car base (crossovers). Hence, advertising for vehicles with a larger frame would associate it with space and size to convey the idea of comfort.

Next, storage space is a feature that is mentioned in fewer than a quarter of the ads (22.8%). Pickup truck ads refer to it most often, followed by crossover ads, which mention it far more than do SUV ads. These results indicate that crossovers are being promoted as spacious as SUV-classified models, even though they are built on a car frame.

Engine power—the ability to carry loads and/or the horsepower rating of the engine—is another feature that was looked at. Although relatively infrequent in all ads (20.4%), it is more often mentioned when promoting pickup trucks. In fact, 68.7% of their ads mention it, as against 25% in the case of crossovers and 10.4% for SUVs. So once again, the attributes of an SUV now seem to be more often associated with the crossover.

The vehicle's aesthetic appeal is another less frequently recurring feature in the ads (18.9%). None of the crossover ads mention it, while 50% of the pickup truck ads and 19.1% of the SUV ads do. **The concept of luxury is reserved exclusively for SUV ads**, as noted in the literature. However, it remains infrequent in all ads (7.5%).

Thus, as the literature on automotive advertising has shown, the interior, practical, and aesthetic features of light-duty vehicles are often mentioned repeatedly. This study indicates that **light-duty trucks are still sold as more than just a vehicle: they offer the prospect of an experience**. All of these features, such as comfort, space, high technology, and aesthetics, are said to make the vehicle an enjoyable spot to be in, rather than simply a means of getting around (McLean, 2009).

#### Awards and recognition

The inclusion of awards or other forms of recognition received by the promoted brand or model is a relatively common strategy, being seen in just over one-third of ads. **The most frequently mentioned awards are safety-related distinctions**, followed by model- or vehicle-of-the-year awards, although many of the ads that mention an award or recognition mention more than one.

### 1.4 Financial information

#### Fuel economy

**Fuel economy was only mentioned in 5.3% of the ads, so it is not a strong financial incentive**. In addition, some of the messages are vague, referring to the «exceptional fuel efficiency» of the vehicle(s) featured when many other models in the same category consume less fuel. In another ad where the “fuel-efficient engine» is promoted, a quick search reveals that at least three (3) vehicle models in the same class are more fuel-efficient than the one featured (*Le Guide de l'auto* 2021). As a result, high fuel efficiency is sometimes highlighted, even if the vehicles featured are not the most fuel-efficient in

their class.

#### Retail prices and warranties

The vehicle's list price is relatively infrequently displayed in the ads (40.9%), that is, in less than half of them. In addition, 57.1% of crossover ads and 39% of SUV ads displayed the manufacturer's price, and only one (1) pickup truck ad displayed the list price.

Half of the ads displaying the retail price present it as a primary element and the other half as a secondary element. In evaluating this breakdown according to the type of vehicle being promoted, one finding emerges: 75% of ads for crossovers displaying the vehicle's list price do so with a medium or large amount of space, consistent with the idea that these vehicles would be sold as having the same attributes as SUVs, but at a much more affordable price, resulting in a more normal display of the list price. At the same time, less than half (46.7%) of SUV ads that include the retail price give this information a medium or large amount of space. Additionally, 85.2% of ads that displayed the vehicle's list price less prominently also displayed financing terms using a medium or large amount of space. When the retail price is shown in small print then payment-related information is given more space in the ad.

Also, the posting of the selling price generally goes hand-in-hand with the display of financing terms. Still among the ads where the retail price is displayed, but this time in a predominant way, 88.9% of those ads include financing terms. It can in fact be a judicious move to **display a selling price with financing offers that make the vehicle seem more affordable**. Of the crossover and SUV ads that include the retail price, 100% and 90%, respectively, include financing terms, and in the vast majority of the cases give them a medium or high importance.

In addition, the suggestion of saving money is used to attract potential customers, because 62.3% of the ads that devote a medium or large amount of space to the notion of savings or the good market value of the vehicle never mention the actual retail price.

Finally, the warranty, which is mentioned in just over a quarter of the ads, is not a core selling point. The only two (2) types of vehicles that mention a warranty are SUVs and pickups.

#### Financing arrangements

Generally, **financing arrangements feature prominently in ads for light-duty trucks, which**

saw **76.5% mention them**. Of these, they were given medium or high prominence in 89.1% of cases. In addition, there is a significant contrast between the messages contained in daily newspapers and magazines, with the former making much more frequent reference to this strategy.

A number of some more specific financing terms can be seen in the ads. First, 62.4% of ads with financing terms mention an **interest rate**. In addition, 83.3% of pickup ads and 72.7% of SUV ads that include financing terms give this element a medium or high prominence, far more so than the crossover ads (20.8%). When it comes to the **regular payments**, 70.4% of ads that include financing terms provide details on the expected amount and frequency. Also, **most advertisers chose to display the smallest payment amounts, that is, either weekly or biweekly**. In fact, a monthly payment amount is hardly ever shown. As well, the instalment amount is often given greater prominence than the expected frequency. These strategies can make light-duty trucks appear more affordable than they actually are to some consumers.

### DISPLAYING PAYMENTS WITHOUT THE RETAIL PRICE OF THE VEHICLE CAN MAKE LIGHT-DUTY TRUCKS APPEAR MORE AFFORDABLE THAN THEY ARE TO CERTAIN CONSUMERS.

Next, **the offer of the prospect of little or no down payment** is another strategy seen in some ads that feature financing terms. For pickup trucks, which have a relatively high base cost, their ads generally make no mention of a down payment or only show it in small print. On the other hand, crossover and SUV ads that include financing terms use a down payment as bait in 16.7% and 5.5% of cases, respectively. So, since SUVs, on average, are more expensive than crossovers, it's little wonder that a down payment is displayed in smaller print alongside the more attractive financing terms.

With only 14.9% of all ads with financing terms referring to it, **the offer of deferred or skipped payments is a relatively rare strategy**. SUVs were the only vehicle category analyzed to feature this offer. These results reinforce the idea that SUVs, which tend to be more expensive, are marketed in a way that makes them

appear more affordable.

The financial appeal that can come with the offer of savings or good market value is undeniable: nearly 80% of ads featuring financing terms refer to this. All the pickup truck ads use this strategy and 85.4% of SUV ads also feature this notion of potential savings or discounts. While both these vehicle types sell at relatively high retail levels on average, this strategy can allow customers to overlook the list price - especially if it is not displayed - and make the promoted truck seem more attractive. Finally, crossovers use this strategy less often: 58.3% of their ads that feature financing terms display a special offer. Thus, it appears that the auto industry relies more heavily on special offers and discounts in cases when the vehicle price is in the higher range.

In the light of these results, we find there to be a **major imbalance between the frequency of the financing arrangements and the frequency of the retail price**. Also, most of the components of the financing arrangements analyzed are used in a relatively recurrent manner. These findings confirm that the issue of financing is a central element in light truck advertisements designed to attract the attention of the target audience.

#### 1.5 Other elements of light truck ads

Automotive advertisers do not rely on the presence of humans to sell light-duty trucks: only 15.9% of ads contain this element. Also, our analysis reveals that humans are featured more often when a natural setting is used. This finding is consistent with the fact that, of the ads showing humans, out-of-town activities are often depicted, which may require the use of humans. Finally, **families are only depicted in ads showing one or more SUVs** but there is no one particular group or type of individual that stands out in terms of frequency of recurrence.

Reference to a specific group of consumers in the ads is also infrequent: 18.2% of ads include an element aimed directly at a specific group of people, but the industry is tailoring its message to appeal to different groups of people. For example, three (3) ads in the magazine Triathlon Canada show athletes participating in a triathlon, along with a discount offer available to athletes. Another ad in the same magazine even includes the slogan «Swim, Bike, Run, Drive.» Other ads offer discounts for veterans, active military personnel and Costco members. It is clear that automotive **companies are using a variety of marketing strategies to target different segments**

# EXAMPLES OF ADS

**1**

Hoofpower. Horsepower.



**G.O.O.A.T.**  
GREATEST OF ALL TIME

When it comes to capability, the all-new 2020 **Subaru Outback** is a force to be reckoned with. In fact, it's our most agile, advanced and adventurous Outback ever. Well-equipped with standard Symmetrical Full-Time All-Wheel Drive, X-MODE, available turbo BOXER engine and generous ground clearance, the 2020 **Subaru Outback** can go places that would impress even the boldest mountain goat.

EyeSight, DriverFocus, X-MODE

ALL-NEW 2020

**2**

Le Québec, c'est 14 festivals des couleurs.  
Profitez-en.



LA NOUVELLE 2019

100 kilomètres à partir de	48	0*	AWD	25 733\$
an	mois	comptes	avec Motor Assist	à partir de

**25 733\$**

**3**

SOYEZ PRÊT POUR CE QUE LA ROUTE VOUS RÉSERVE  
SYSTÈME DE FREINAGE À RÉDUCTION D'IMPACT\*



TECHNOLOGIES DE SÉCURITÉ ET D'AIDE À LA CONDUITE

LOUEZ LE 2019 À PARTIR DE	OU OBTENEZ UN CRÉDIT JUSQU'À
<b>258\$</b> (hors taxes, assurance, location de mois, acc. et 1 000\$ de caution)	<b>7 000\$</b> (hors taxes, assurance, location de mois, acc. et 1 000\$ de caution)

**5**

LEVÉNEMENT  
**TRACTION INTÉGRALE INTELLIGENTE**

TAUX À PARTIR DE **0,9%**<sup>1</sup> AU FINANCEMENT OU À LA LOCATION SUR LES ROGUE. + **1 000\$**<sup>2</sup> DE RABAIS TRACTION INTÉGRALE SUR MODÈLES SÉLECTIONNÉS.

OU PROFITEZ D'UNE DE NOS OFFRES DE LOCATION AVANTAGEUSES SUR LES MODÈLES À TRACTION AVANT

Modèle	C'est comme payer	Valeur au détail	Location	Valeur au détail	Autres détails
Subaru Outback (4 portes)	59\$	28 208\$	499\$	40 708\$	3 200\$ de caution
Subaru Outback (5 portes)	55\$	24 763\$	499\$	40 708\$	3 200\$ de caution
Subaru Outback (5 portes)	79\$	29 908\$	-	-	-

**4**

SEE THE SUNSET FROM WHEREVER YOU WANT TO.

With the all-new **Subaru Outback**, every route can be the scenic route. Standard **Navigation** lets you head off the beaten path. And with its spacious, well-appointed interior, four-screen infotainment system with Apple CarPlay™ and Android Auto™, and car-like handling, every drive picture is perfect.

FOR LIFE'S AUTHENTIC ADVENTURES

Learn more about **Subaru Outback** at [www.subaru.ca/outback](http://www.subaru.ca/outback)

AWD, X-MODE, EyeSight™, BIG TOP SAFETY™, 100 TOP SAFETY™, 100 TOP SAFETY™, 100 TOP SAFETY™

Sources : 1. Canadian Living, January 2020 - 2. Journal de Montréal, October 2019 - 3. Journal de Montréal, September 2019 - 4. Canadian Cycling, March 2019 - 5. Journal de Montréal, February 2019



of the population and cater to their profile.

Finally, advertisers **only rarely mention environmental or social values**. In the ads where these values are observed, the expression «Partial Zero Emission Vehicles» is found in 10 ads for the Subaru brand, which is over-represented in relation to its market share in the corpus of ads. However, GHG emissions data for the models shown are never mentioned, which means that consumers are only provided with partial information.

### INCOMPLETE INFORMATION IS OFFERED, BECAUSE THE VEHICLES' GHG EMISSIONS AND FUEL CONSUMPTION ARE NEVER MENTIONED.

Finally, **crossovers are sometimes associated with expressions connected with the outdoors**, such as «The feeling of being outside» or «The refined comfort that is like a breath of fresh air,» a finding that is consistent with those presented earlier in this section. However, it is primarily SUVs that are associated with heterogeneous messages, such as success or solidarity.

## 2. Findings from the regulatory framework analysis

Au Canada, les paliers de gouvernement fédéral et provincial peuvent tous les deux (2) légiférer en matière de publicité, selon diverses compétences. Les prochaines sections explorent les lois, règlements et normes en place au pays ainsi qu'à l'international.

### 2.1 Federal regulation

The national regulatory framework governing advertising includes both industry-led standards and federal legislation.

Regarding the industry's self-regulation system, all advertising is governed by Ad Standards, an organization responsible for administering the Canadian Code of Advertising Standards. This is the instrument by which advertisements that are the subject of complaints are evaluated, but the Code has no legal force. Nevertheless, a safety clause restricts the use of certain messages such as depictions of dangerous and illegal driving and/or speeding. The inclusion of this section shows that **advertising standards can evolve in response to societal issues**. Another section of the Code prohibits misleading

representations. In addition, certain sectors—which do not include automotive advertising—have specific codes that must be adhered to, and advertising directed at children must be cleared by Ad Standards prior to broadcast.

If a particular ad fails to comply with the code, it is up to consumers and advertisers to lodge a complaint, after which an independent standard council will evaluate the ad in question (Ad Standards, 2019). Thus, there is no pre-screening of automobile advertisements, except for those directed at children.

In the event a complaint is received, the Ad Standards will first attempt to resolve the dispute between the complainant and the advertiser. If the complaint is not resolved, the Ad Standards will convene a panel to evaluate the complaint and, if substantiated, the advertiser must withdraw or modify the advertisement. If the broadcast period has already ended, the advertiser must not run that ad again. (SAAQ, 2012, 9)

From a legal standpoint, the *Competition Act* prohibits the making of false or misleading representations to the public. However, it is once again up to consumers or other advertisers to lodge a complaint. Penalties for violating the law are provided under both the criminal and civil regimes. (Government of Canada, 2015; Government of Canada, 2018b) Furthermore, **there is no federal legislation dedicated specifically to automobile advertising**, even though other sectors are subject to a more rigorous regulatory and legal framework. For example, tobacco advertising is regulated by federal and certain provincial legislation, and advertising to children is regulated by law. Various sectors have therefore been regulated in recognition of the negative influence their advertising can have on the health and well-being of the population. Light-duty trucks have not been specifically regulated in this regard.

### Summary

At the federal level, there are **no standards or laws to regulate automobile advertising prior to publication**. Furthermore, the industry has no specific code or legislation to follow with respect to advertising, whereas other industries whose activities are detrimental to the public interest are subject to such rules.

## 2.2 A few provincial regulations

In Quebec, the *Consumer Protection Act* prohibits advertising that contains a false or misleading representation or omits a material fact (s. 219), as do Ad Standards regulations and federal legislation.

In the case of automobile advertising, there are several prohibitions regarding how financing terms and conditions can be displayed (*Office de la protection du consommateur*, 2020). In the event of a violation, consumers and advertisers can file a complaint. Also, the *Société d'assurance automobile du Québec* (SAAQ) has established guidelines for automobile advertising that prohibit encouraging reckless, dangerous or illegal actions (*Highway Safety Code*, s. 5.3). Thus, the industry and the government have already taken action to regulate problematic automobile advertising messages. However, none of the measures are aimed at protecting the environment or address the increasing number of light-duty trucks on the road.

### ACTION HAS ALREADY BEEN TAKEN TO REGULATE PROBLEMATIC AUTOMOBILE ADVERTISING MESSAGES IN THE PAST.

Furthermore, under the ban on depicting prohibited behaviours in advertisements, the operation of a motorized vehicle on the banks of a watercourse or in a wetland must not be depicted in advertisements, since it is prohibited under the *Act respecting the conservation and development of wildlife* (s. 128.6). Combining this section of the Act with the various rules that prohibit the depiction of illegal behaviour, promoting a vehicle in these natural environments could be deemed misleading. It gives the impression that driving in these areas is permitted when it is not. At present, however, there does not appear to be a link established between these regulations since there are no fines or constraints applied to advertisers who display a car in these natural areas.

In Ontario, false advertising is also prohibited by the *Motor Vehicle Industry Act* (s. 28). In the event of a violation, the ad in question may have to be discontinued or a correction requested.

A review of other provinces indicates that they all have laws to protect consumers, including through the prohibition of misleading or deceptive advertising

and false statements. In addition to Quebec, some provinces have specific rules governing the promotion of motor vehicles; for example, Manitoba has specific requirements governing the prices that can be shown in automobile advertisements (Government of Manitoba, 2015).

### Summary

In summary, at the provincial level, there is **no process to screen ads prior to broadcast**. Nevertheless, misleading advertising is prohibited, and certain practices, such as the posting of financing terms and conditions, are regulated.

Currently, the **Canadian regulatory framework** governing automotive advertising in Canada is **not aligned with government climate objectives**, although public authorities have the power to regulate advertising messages, as they have done in the past for other societal issues such as speeding and advertising to children. Environmental issues are excluded from the laws, regulations and standards governing the advertising practices of the automotive industry.

## 2.3 International best practices

**Belgian** standards require that the fuel consumption and carbon dioxide (CO<sub>2</sub>) emissions of vehicles be displayed in advertisements (*Code on the advertising of motor vehicles and their components and accessories*, s. 5). These standards also specify that an advertisement may not encourage behaviour that is harmful to the environment (s. 4) and that, if it depicts a location that is not part of the public highway system, it must be clear that this location is closed to highway users. Finally, under the *Belgian Environmental Advertising Code*, advertising may not mislead the public regarding the effects that a product has on the environment (s. 3).

In the **United Kingdom**, print advertisements for automobiles must also include data on the vehicle's fuel consumption and CO<sub>2</sub> emissions (*Vehicle Certification Agency*, 2018, 3; *Vehicle Certification Agency*, 2020). There are rules governing the appearance of the text containing this information, but it is still in very small print.

**Sweden** has rules governing advertising and the environment. The word «environment» may only be used in association with a product if it has significant environmental benefits over comparable products, and the term «environmentally friendly» may only be used if the product does not harm or improve the environment. It is considered misleading to use these terms to describe products that damage the environment. (Friends of the Earth Europe, 2007, 44)

**New Zealand's** advertising standards prohibit advertisements that promote or depict environmental damage in areas of significant conservation value such as beaches, sand dunes, riverbeds, wetlands, peat bogs, lakeshores, and estuaries (Advertising Standards Authority, 2018, 7). Similarly, under **Australian** standards, advertisers must ensure that automotive advertisements do not present deliberate or significant environmental damage (Federal Chamber of Automotive Industry 2020, 5).

Finally, in **France**, a judge has ordered that one car company withdraw its advertisements in which SUVs were shown in the wild. Indeed, he ruled that it was forbidden to depict a vehicle that was not being driven on public roads. This ruling was based on two (2) laws: article L. 362-4 of the Environment Code, which prohibits the depiction of a vehicle in violation of various provisions, including the prohibition of driving a motorized vehicle off the public highway network (art. L. 362-1), and article L. 121-1 of the Consumer Code, which prohibits misleading advertising. In short, because gasoline-powered vehicles cannot be driven off public roads, i.e., in natural areas where there are no official roads, the depiction of such vehicles in these types of locations was deceptive because it led the public to infer that they could drive there. (IREDIC 2012)

In Canada, there are:

- no requirements to display fuel consumption and CO2 emissions data or the retail price of a vehicle;
- no prohibitions on depicting vehicles in certain settings;
- no regulations governing the use of environmental claims to sell a product;
- no standards for the protection of nature and the environment

Further, although false advertising is prohibited in Canada and there is a prohibition on the use of motorized vehicles in certain natural areas, there is nothing to prevent advertisers from showing motorized vehicles in natural areas where they are not permitted to operate.

## *2.4 Inspiring municipal practices in Canada and internationally*

Cities also have a role to play in regulating automobile advertising, since they have certain powers to prohibit or control messages that appear within their jurisdiction.

In 2015, **North Vancouver** was the first city in the world to require the posting of warning stickers on gas station pumps to show the significant contribution that fossil fuels make to climate change and its impacts (Baluja, 2015; Crossan, 2016; Our Horizon, 2020). In 2019, **Cambridge**, Massachusetts passed a bylaw requiring that these warnings be placed on gas pumps as part of its goal to achieve carbon neutrality by 2050 (City of Cambridge, 2020; Guzman, 2020). In doing so, these municipalities have acted at their own scale to enable their citizens in making more informed transportation choices. They are therefore proactive in meeting their climate commitments.

On an even broader front, in December 2020, the City of **Amsterdam** in the Netherlands passed a motion to ban the advertising of fossil and aviation fuels (Daley, 2020). Finally, the UK city of **Bristol** has included in its climate plan the creation of «advertising standards and restrictions to support responsible consumption» (Bristol's One City Environmental Sustainability Board, 2020, 46), which means that the advertising of high-carbon emitting products could be banned. In Canada, no government body has taken similar steps to limit the promotion of pollution-causing industries.

**IN CANADA, NO GOVERNMENT  
AUTHORITY HAS TAKEN ACTION  
TO LIMIT THE PROMOTION OF  
POLLUTING INDUSTRIES.**

## DISCUSSION

Based on the analysis of advertising content and the regulatory frameworks for automotive advertising in effect in Canada and in other countries, the advertising practices observed appear to conflict with various Canadian standards and with various environmental commitments made by governments across the country.

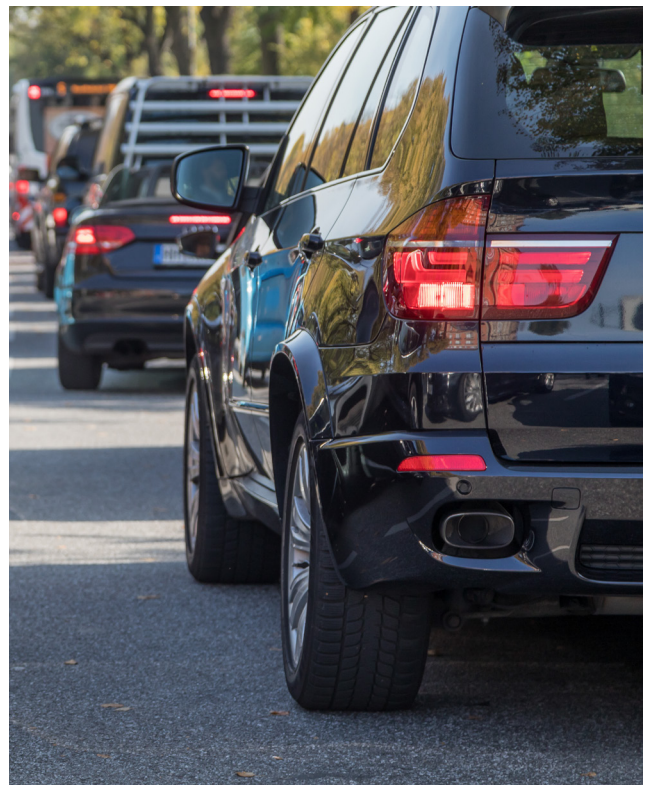
First, **while Canadian advertising standards do not allow the depiction of prohibited behaviour, 24.4% of the ads that depict an element of nature show vehicles in proximity to various waterways**, which are part of the natural areas in which Quebec law prohibits the use of motorized vehicles. Therefore, since they lead the public to believe that these vehicles can be used in these areas when in fact they cannot, it would be interesting to examine whether these ads could be declared false or misleading by a court of law, as has already been done in France.

Further, just under a third of the ads refer to a feeling of dominance of the environment, and some may even encourage damage to the natural environment with the promoted vehicle. For example, there is the mention of «playground» on the snowy hills in the background or the wording «Go wild» with a vehicle in the grass instead of on a road or marked path. These messages imply that it is acceptable to drive a motor vehicle wherever you want, when in fact there are regulations that must be followed. In showing a picturesque natural backdrop, which the increasing numbers of light-duty trucks and the growth in the automobile fleet are helping to destroy, these ads are ironic at best. However, a more in-depth analysis by legal experts would be necessary to assess whether or not they are misleading.

With their standards prohibiting the depiction of environmental damage in certain natural environments, New Zealand and Australia offer consumers an opportunity to take action. Indeed, it is possible to lodge a complaint based on this idea to the relevant authorities, but not so in Canada. If governments were to bring in one or more environmental standards, the public would have an opportunity to take action to limit the dissemination of these ads. However, because this mechanism is reactive and does not allow for advance scrutiny of advertising, any such measures would ultimately have to be incorporated into legislation.

Also, there is no mention of vehicle fuel consumption and/or CO2 emissions figures in any of the ads, highlighting the relevance of the Belgian and British standards. One advertisement even mentions that the company «has been working to reduce emissions since 1948» without any mention of CO2 emissions. This message is inconsistent, to say the least, and could potentially be considered misleading, considering that the transportation sector is a growing source of GHG emissions.

Finally, the emphasis on safety in the ads that were analyzed represents one more element of irony. **Two thirds of the ads mention safety, even though numerous studies have shown the increased danger posed by light-duty trucks to those sharing the road (motorists, pedestrians, etc.).** More specifically, crossovers and SUVs are extensively promoted as safe vehicles, yet they exacerbate numerous societal problems, such as declining air quality and increasing GHG emissions from the transportation sector, not to mention their larger size, which threatens the safety of living environments and the financial health of Canadian households.



## RECOMMENDATIONS

In light of the analysis of light-duty truck ads and the regulatory framework governing automotive advertising in Canada, as well as the multiple negative impacts of the increased number of light-duty trucks and the industry's massive promotional efforts to grow the phenomenon, there is an urgent need to identify solutions.

Governments have a role to play in ensuring better oversight of the marketing strategies used in order to realign the consumption choices made by communities when it comes to transportation and mobility, especially with regard to their ZEV sales targets and commitments under the Paris Agreement. The disconnect between automotive industry marketing strategies and the current climate crisis must be addressed through the adoption of a more stringent regulatory framework for automobile advertising, as has already been done in other countries, to address some of the problematic advertising messages.

Based on the above, Équiterre makes four (4) key recommendations:

1. **ACKNOWLEDGE THAT THE INCREASE IN THE NUMBER OF LIGHT-DUTY TRUCKS IN CANADA IS A PUBLIC HEALTH AND SAFETY ISSUE;**
2. **ESTABLISH AN INDEPENDENT ADVISORY COMMITTEE TO ADVISE AND GUIDE GOVERNMENTS IN THE DEVELOPMENT AND IMPLEMENTATION OF PUBLIC POLICY ON AUTOMOTIVE ADVERTISING;**
3. **USE EXISTING ADVERTISING RESTRICTIONS AS MODELS;**
4. **PROGRESSIVELY BRING IN REGULATION OF AUTOMOBILE ADVERTISING AND INCREASE THE PROMOTION OF SUSTAINABLE MOBILITY.**

Table 1 summarizes these recommendations and the specific actions required. Details of these various recommendations can be found in the detailed version of the study. Primarily applicable by the federal government, these recommendations can also be implemented at the provincial level.

**Table 1. Équiterre’s recommendations**

Recommendations	Additional information and goals
<p><b>1. Acknowledge the increase in the number of light-duty trucks in Canada as an issue of public health and safety</b></p>	<p>Address collective impacts resulting from the size, weight and GHG emissions of light-duty trucks</p>
<p><b>2. Establish an independent advisory committee</b></p>	<p>Provide advice and support to governments as they develop and implement public policy on automotive advertising</p>
<p><b>3. Use existing advertising restrictions as models</b></p>	<p>Gradually change the public’s perception of light-duty trucks</p>
<p>3.1 Promotion of tobacco products</p>	<p>Draw on the increasingly stringent regulations governing the promotion of tobacco products as models</p>
<p>3.2 Public announcements encouraging dangerous driving</p>	<p>Monitor advertising content and link it to public concerns over the climate crisis</p>
<p><b>4. Bring in progressive regulation of automobile advertising and increase the promotion of sustainable mobility</b></p>	<p>Align the regulatory framework for advertising (content and spending) with the various government objectives</p>
<p>4.1 Establish a Canadian code of automobile advertising</p>	<p>Make comprehensive information available to consumers</p> <p><b>Examples</b></p> <ul style="list-style-type: none"> <li>• Require the display of CO2 emissions and fuel consumption data;</li> <li>• Require that the retail price of the vehicle be displayed</li> <li>• Implement a colour-coded system to indicate the vehicle category, for comparison purposes</li> </ul>
	<p>Limit the use of nature and environmental elements in advertising</p> <p><b>Examples</b></p> <ul style="list-style-type: none"> <li>• Restrictions governing the representation and use of nature applied first to natural spaces and spaces of high environmental significance</li> <li>• Prohibit the portrayal of vehicles that are off the public highway system</li> <li>• Prohibit the use of terms referring to protection of nature or the environment</li> <li>• Prohibit the promotion or portrayal of damage to nature or the environment</li> </ul>

4.2 Create a system to archive automobile advertisements	Document practices that, based on evidence, adversely affect the well-being of Canadians and make this information accessible and public
4.3 Create a system to collect data on automobile industry advertising spending	
4.4 Establish a mechanism to review and validate the content of automobile advertisements and a committee to oversee it	<p>Ensure that ads comply with the new automobile advertising code prior to dissemination</p> <p><b>Example</b></p> <p>Children’s advertising review committee</p>
4.5 Support or conduct more campaigns to promote sustainable mobility	<p>Take advantage of the effectiveness of advertising to counterbalance the omnipresence of car ads</p> <p><b>Specifically</b></p> <p>Develop campaigns tailored to various contexts (e.g., based on population density across regions)</p>
4.6 Mandate an increasing share of advertising spending on ZEVs, compared with light-duty gasoline-powered vehicles	<p>Progress effectively toward light-duty vehicle electrification and GHG emission-reduction targets</p> <p><b>Specifically</b></p> <p>Establish terms and conditions in close consultation with the independent advisory committee and based on vehicle emission intensity levels.</p>
4.7 Establish a cap on the advertising of oversized zero-emission vehicles	<p>Take into account the impacts that vehicle size and weight have on safety and highway infrastructure</p> <p><b>Specifically</b></p> <p>Establish terms and conditions in close consultation with the independent advisory committee</p>

## CONCLUSION

With transportation being one of the few sectors in Canada in which GHG emissions are rising, there is an urgent need to reverse the growing trend towards light-duty trucks in Canada. Since the increasing numbers of these vehicles bring impacts that threaten the well-being of the population, it is imperative that the regulatory framework for automobile advertising in Canada be tightened in order to redirect consumer choices towards more sustainable modes of transportation and to work effectively towards the achievement of climate targets.

The two (2) analyses conducted as part of this study, that is, a content analysis of 132 automotive ads airing on Canadian media in 2019 and 2020, and an analysis of the regulatory environment governing automotive advertising in Canada and internationally, revealed the wide range of strategies used by the automotive industry in marketing light-duty trucks. From the use of nature in many forms, to attractive financing terms, to the absence of information on the vehicle's fuel consumption or CO<sub>2</sub> emissions, the freedom enjoyed by this sector is undeniable. The disparity between the regulatory framework on advertising and the government's climate commitments is therefore a major finding that arose out of these analyses.

However, there are a number of rules in effect that govern various aspects of automobile advertising: validation of content prior to release, the requirement to display certain key information in advertisements, etc. In addition, certain other industries have previously seen their regulations tightened, proving that it is possible to implement regulations that are aligned with climate objectives. The crucial role that governments play in this area was also highlighted, particularly when it comes to curbing the influence of automobile advertising on consumer choices, as has already been seen in the case of tobacco products.

Consequently, Équiterre recommends that the rise in the number of light-duty trucks be recognized as a public health and safety issue because of the various environmental and socio-economic issues associated with it. Secondly, it is suggested that an independent advisory committee be established to provide advice and guidance to governments on the development and implementation of public policy on automobile advertising. This advisory committee would be expected to draw on existing advertising restrictions, such as those on tobacco products and unsafe driving messages, as models to provide effective advice to the government. Finally, the gradual tightening of restrictions on automobile advertising and the increased promotion of sustainable mobility represent Équiterre's definitive recommendation from this study.

As advertising strategies for light-duty trucks are not the only reason for Canadians' growing preference for these vehicles, the recommendations developed in this report must be seen as part of a broader government strategy to decarbonize the passenger transportation sector. At a time when the climate crisis is already affecting the most vulnerable communities, encouraging Canadians to make sustainable transportation choices must be a priority.



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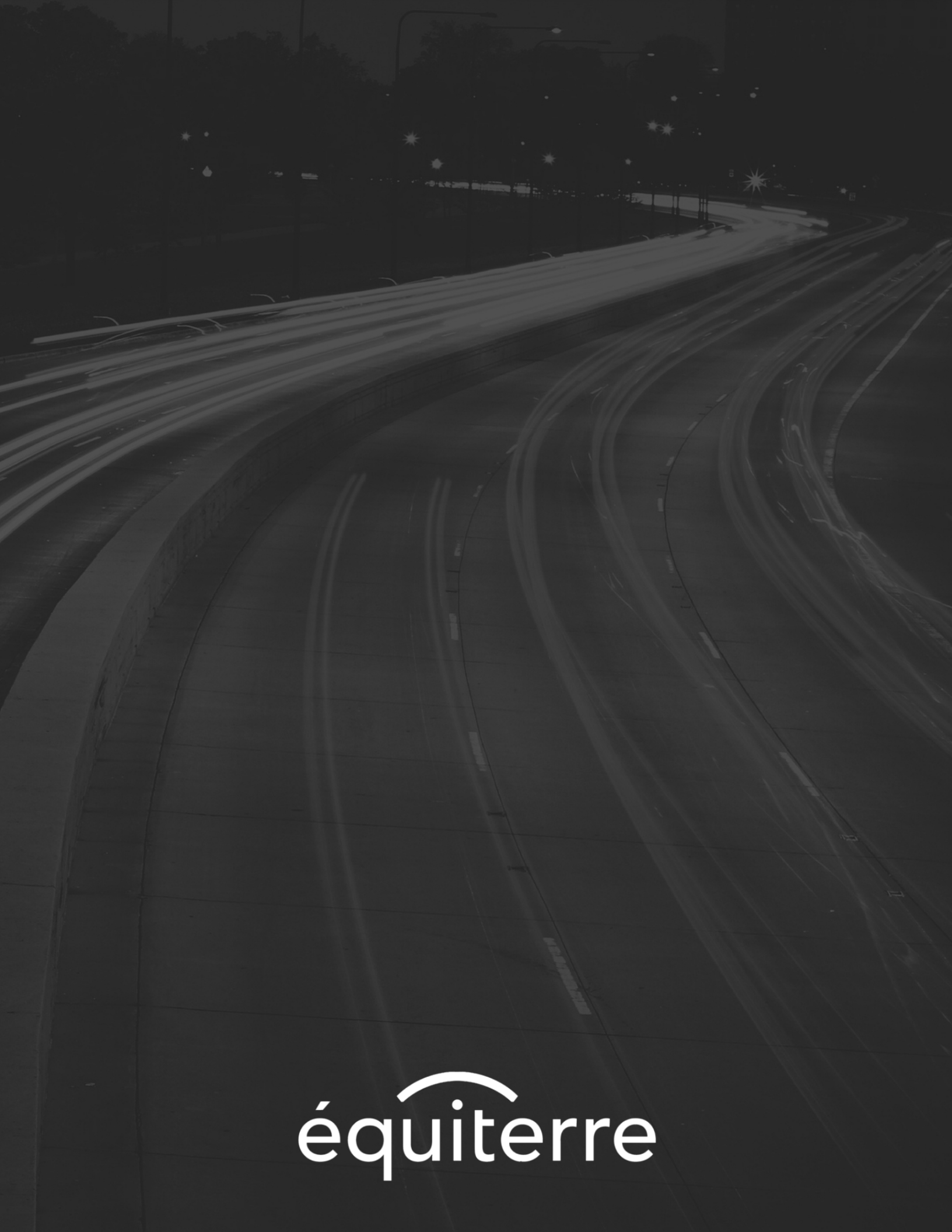
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