

COMPLAINT NUMBER	19/294
COMPLAINANT	F Hore
ADVERTISER	NZ Wood
ADVERTISEMENT	NZ Wood Television
DATE OF MEETING	24 September 2019
OUTCOME	Not Upheld No further action required

Description of Advertisement

The voiceover for the television advertisement for NZ Wood says “The time to stop runaway global warming – it’s running out. Fast growing trees are the only effective way, at this time, for us to fight climate change, through sucking carbon from the atmosphere...”. The last shot of the advertisement shows the NZ Wood logo with the phrase “NZ Wood – For a better world”.

Summary of the Complaint

The Complainant was concerned the advertisement was misleading because it suggests there is only one solution to stop global warming - farms should be sold, and forests planted.

Issues Raised:

- Advocacy Advertising
- Truthful Presentation
- Environmental Claims

Summary of the Advertiser’s Response

The Advertiser disagreed with the Complainant. The Advertiser said the statement in the advertisement should be qualified with reference to the following points:

- Forestry is the only means to effectively capture carbon
- The advertisement says “at this time”
- The advertisement only refers to the role of “fast growing trees”
- There are several reports which support their view

The Advertiser also suggested this advertisement should be regarded as advocacy advertising, to enable a more liberal interpretation of the Advertising Standards Code.

Summary of the Complaints Board Decision

The Complaints Board did not uphold a complaint about a television advertisement for NZ Wood which said “The time to stop runaway global warming – it’s running out. Fast growing trees are the only effective way, at this time, for us to fight climate change, through sucking carbon from the atmosphere”. The Board said in the context of advocacy advertising, the advertisement was not misleading.

Relevant ASA Codes of Practice

The Chair directed the Complaints Board to consider the complaint with reference to the following codes:

Principle 2: Truthful Presentation: Advertisements must be truthful, balanced and not misleading.

Rule 2(c): Use of data: Advertisements must not use tests, surveys, research results or quotations from technical and scientific literature in a manner which is misleading or deceptive.

Rule 2(e): Advocacy Advertising: Advocacy advertising must clearly state the identity and position of the advertiser. Opinion in support of the advertiser's position must be clearly distinguishable from factual information. Factual information must be able to be substantiated.

Rule 2 (h): Environmental Claims: Environmental claims must be accurate and able to be substantiated by evidence that reflects scientific and technological developments.

Complaints Board Discussion

Consumer Takeout

The Complaints Board agreed the consumer takeout of the advertisement was planting fast growing trees is the only way "for us" to address climate change. The Complaints Board said it was not clear from the advertisement whether the "us" referred to was the forestry industry or society in general.

Is it an advocacy advertisement?

The Complaints Board discussed the Advertiser's suggestion the complaint be regarded as advocacy advertising, to enable a more liberal interpretation of the Advertising Standards Code.

The Complaints Board agreed the advertisement fitted the definition of an advocacy advertisement and should therefore be considered under Rule 2(e) – Advocacy Advertising. The Complaints Board said the identity and opinion of the Advertiser, NZ Wood, was sufficiently clear. The Complaints Board said it would have been even clearer if the Advertiser had included their website or relevant social media addresses in the advertisement.

Does Rule 2(c) Use of Data apply?

The Complaints Board agreed Rule 2(c) – Use of Data did not apply in this case. This is because the advertisement did not use tests, surveys, research results or quotations from technical and scientific literature in a manner which was misleading or deceptive.

Is the advertisement making environmental claims?

The Complaints Board agreed the advertisement was making an environmental claim.

Is the advertisement misleading?

A majority of the Complaints Board said the advertisement was not misleading, when considered in the context of an advocacy advertisement, made by an organisation representing forest owners. The majority said it was acceptable for NZ Wood to say fast growing trees are the only effective way for them to fight climate change, through sucking carbon from the atmosphere.

A minority disagreed. The minority said the advertisement was misleading because the consumer takeout of the advertisement was not totally clear. It was possible for some viewers to receive the message that growing trees is the only effective way for anyone to fight climate change. This interpretation would mean that other possible methods of fighting climate change, such as reducing livestock or banning the use of fossil fuels, would be ineffective, and this was misleading.

In accordance with the majority the Complaints Board ruled the complaint was Not Upheld.

The Complaints Board said taking into account context, medium, audience and product the advertisement was not in breach of Principle 2 or Rules 2(e) and 2(h) of the Advertising Standards Code.

Outcome

The Complaints Board ruled the complaint was **Not Upheld**.

No further action required.

APPEAL INFORMATION

According to the procedures of the Advertising Standards Complaints Board, all decisions are able to be appealed by any party to the complaint. Information on our Appeal process is on our website www.asa.co.nz. Appeals must be made in writing via email or letter within 14 days of receipt of this decision.

APPENDICES

1. Complaint
2. Response from Advertiser
3. Response from Media

Appendix 1

COMPLAINT FROM F HORE

This advert is a flagrant breach of Principle 2, Climate change is a given fact - The issue is that they state there is one solution They state that farms should be sold for trees They ignore the range of research and select one point of view and deliver it as fact. This is a gross breach and the advert should be removed.

Appendix 2

RESPONSE FROM ADVERTISER, NZ WOOD

The New Zealand Forest Owners Association is writing on behalf of NZ Wood in response to Complaint 19/310 and Complaint 19/294 received by the Advertising Standards Authority ("**Authority**") concerning a television commercial prepared by NZ Wood that highlight forestry's role in fighting climate change in New Zealand ("**Advertisement**").¹

Summary of the Complaint

We have reviewed Complaint 19/310 from L Neeson and Complaint 19/294 from F Hore.

We understand that the complaints can be summarised as follows:

Complaint 19/310 contends that the TVC's assertion that forestry employs more people than agriculture is "not true", on the basis that "it employs people for a short time during planting and harvesting".

Complaint 19/294 argues that the TVC states that forestry is the "one solution" to climate change and that the Advertisement "ignore[s] a range of research and select[s] one point of view and deliver[s] it as fact".

NZ Wood

NZ Wood is a major promotional and development programme to promote, and advocate for, New Zealand forests and wood resources to improve New Zealand's economy, society and the way of life of its communities. It was launched in 2008 and its partners include the New Zealand Forest Owners Association, The Wood Processors & Manufacturers Association, the New Zealand Farm Forestry Association, the Douglas-fir Association and the Timber Design Society. Funding for NZ Wood's activities is provided by a range of partners.

NZ Wood's programme of work involves a range of projects and initiatives managed by a cross section of the forestry and wood industry, with the aim of encouraging New Zealand forests and increasing the consumption of wood and wood-based products. A key component of its work is the promotion of wood and forestry, as this is in the national interest

¹ As explained from paragraph 3, NZ Wood is a promotional brand supported by a range of forestry and wood processing organisations.

from a social, economic and environmental perspective. The Advertisement forms part of this advocacy work stream, by promoting forestry to New Zealand's farming community in particular.

The Advertisement

As noted above, the Advertisement was prepared for NZ Wood for the purpose of promoting benefits of forests to the farming community and as part of NZ Wood's broader promotional and advocacy activities

The Advertisement opens with a range of shots focused on the damaging effects of climate change (including images of drought and severe weather events). It then progresses to a range of images and forestry scenery and forestry workers. Workers are represented engaged in a number of activities, including water testing, planting trees across land generally suited to sheep and beef farming, operating harvesting machinery and pruning. The Advertisement ends with a depiction of the NZ Wood logo.

Over the imagery, the following script is read:

The time to stop runaway global warming – it's running out.

Fast growing forest trees, are the only effective way, at this time, for us to fight climate change though sucking carbon from the atmosphere.

That's a really big environment plus. And for employment as well – there's more jobs, and income, in forests - than farming that same land

That's why so many smart farmers are so bullish, planting out so many trees.

And loving our forests.

Overview of response

The Authority has raised Rule 2(b), 2(c) and 2(h) of the Advertising Standards Code ("**Code**"). We have set out the relevant rules below.

Rule 2(b) of the Code states:

Advertisements must not mislead or be likely to mislead, deceive or confuse consumers, abuse their trust or exploit their lack of knowledge. This includes by implication, inaccuracy, ambiguity, exaggeration, unrealistic claim, omission, false representation or otherwise.

Obvious hyperbole identifiable as such is not considered to be misleading.

Rule 2(c) of the Code states:

Advertisements must not use tests, surveys, research results or quotations from technical and scientific literature in a manner which is misleading or deceptive.

Rule 2(h) of the Code states:

Environmental claims must be accurate and able to be substantiated by evidence that reflects scientific and technological developments.

For the reasons set out below, we consider that the Advertisement does not breach these Rules.

We also wish to raise the relevance of Rule 2(e) of the Code, which enables advocacy advertising. Broadcast of the Advertisement is intended to serve the purpose of informing the public at large of the capacity of forestry to achieve effective carbon sequestration and that 'smart' New Zealand farmers are responding to both market signals and social responsibility by planting plantation forests.

The Advertisement exists in the context of other advertising campaigns backed by the farming community seeking to curtail the ability of landowners to plant trees, based on similar sentiments to those raised in the Complaints. In that context, it is reasonable and appropriate for NZ Wood to exercise its freedom of expression under s 14 of the Bill of Rights Act 1990 to impart information and opinions as part of the debate as to the role of forestry in New Zealand.

Having regard to the Authority's Guidance Note on Advocacy Advertising, we submit that the Advertisement should be considered advocacy advertising – and, accordingly, a more liberal interpretation of the Code is appropriate – because:

The identity and position of the advertisers must be obvious and easily recognised

The name and logo of the advertiser, NZ Wood, is clearly shown at the end of the Advertisement. The NZ Wood brand is well known within the primary industry community. In relation to the general public, a Google search of that advertiser's name ("NZ wood" or "New Zealand wood") renders a first hit for the NZ Wood website, and identifies the entity as a promotional and development body. That website includes full details as to the nature of the body, members, sponsors, activities and contact information. This is more than sufficient to identify the advertiser to the consumer and provide them with further information about NZ Wood's position and advocacy activities.

NZ Wood's position is clearly recognisable through the script of the advertisement that it is advocating the benefits of New Zealand forestry and is not seeking to sell a product or service.

It must be clear in the advertisement what view the advertiser advocates and ideally this should be clear in their identity:

The script of the Advertisement is unambiguous and presents a clearly favourable view of forestry, including as an important tool for fighting climate change.

The name of the advertiser also clearly demonstrates the advertiser's position and interest, being a body interested in New Zealand wood products and industry.

On this basis, while we do not consider that the Advertisement breaches the Code even on a strict interpretation, we submit that the Complaints Board should apply a more liberal interpretation of the Code to the Advertisement, in accordance with the guidance presented in the Authority's Guidance Note on Advocacy Advertising.

We address each of the specific complaints and the relevant Rules below.

Complaint 19/310: Claim that employment in forestry is greater than compared to farming the same land

Forestry as short term employment

Complaint 19/310 contends that the TVC's assertion that forestry employs more people than farming the same land is "not true", on the basis that forestry involves only short term activities (being planting and harvesting). We understand this to be an alleged breach of Rule 2(b) (truthful representation).

We disagree that forestry cannot employ more people than farming the same land on the basis that forestry involves only short term activities (eg planting and harvesting).

While we agree that forest activity is dependent on the duration of a rotation of harvest at which time work is at its most concentrated, the complainant has failed to account for the rotation of forestry operations. Trees planted in different years will be harvested in different years, and businesses may also shift schedules in a manner that takes into account weather events, log prices and other differentials. In a broader forested region, harvesting and other in-forest activities are ongoing and continuous in different parts of that region at different times.

We note as well that downstream processing accounts for further employment opportunities. Downstream processing is a generally accepted facet of employment statistics in the forestry industry (and other industries).² Accordingly, the reference to "forestry" reasonably captures not only harvesting and planting activities, but also employment related to processing eg at sawmills.

Accordingly, we consider that the Advertisement has provided a truthful representation of employment in the forestry industry, and submit that Rule 2(b) has not been breached. The extent of additional full time equivalents ("**FTEs**") is referred to below.

Comparison of farming and forestry employment rates

A comparison of the employment data in the forestry and farming industries demonstrates that forestry employment exceeds that of farming on land that is suitable for conversion to forestry (beef and sheep). Further, Government projections indicate that forestry employment rates will grow significantly in the coming years.

Statistics New Zealand's labour survey figures show that in 2016, forestry employment FTEs exceeded the red meat and wool sector:³

	Area m/ha	Fulltime workforce	Workers per 1,000 ha	Exports in Billions \$ 2018	Export value per ha
Meat and Wool	8.5	30,890	3.6	9.54	\$1,122
Forestry	1.7	7,500	4.4	6.38	\$3,753

² See for example Ministry for Primary Industries *Human capability in the primary industries data: Part 1 2002 to 2016 – an overview* (March 2019). Available at <<https://www.mpi.govt.nz/dmsdocument/17638-human-capability-in-the-primary-industries-part-1-2002-to-2016-an-overview>>

³ *Human capability in the primary industries*, above n 1.

Statistics New Zealand also indicated that there is a total of 35,000 employed in the total forest industry if downstream processing is included, though this total does not include the construction sector. The total for red meat farming, if downstream processing is included, is 66,405, though this total includes such inappropriate categories as 'Synthetic Fibre Textile Manufacturing'.

In addition, we note that a range of reports prepared by forestry industry participants and third parties over the last ten years have estimated higher in-forest FTEs as compared to the Statistics New Zealand data. These reports show ratios of 5 to 7 FTEs per 1000 hectares.⁴

Employment projections also support the claim there are greater employment opportunities in the forestry industry as compared to sheep and beef farming. In 2014, the Ministry for Primary Industries indicated it expected that the labour force for sheep and beef farming would need 5,100 fewer workers by 2025.⁵ The same survey estimated that the forestry workforce would need to increase by 5,300.

While not part of the complaint, we note that dairy farming has been excluded from the above statistics as the Advertisement covers farming land that is suitable for conversion to forestry. This is because dairy farming land is not the same land that is used for forestry. We note specifically that the reference to "that same land" in the Advertisement reflects the land shown in the imagery, which would be commonly understood as not being dairy farming land (as it is too steep and barren). Specifically, the land depicted is Land Use Class 7-8 in inland Hawkes Bay. Its depiction was a carefully selected filming and editing choice as that land is entirely unsuited to dairy farming.⁶ Further, the Advertisement would have ended with the word "farming" (and not included the words "that same land") if it was intended to compare forestry with all types of farming.

Taking the Advertisement as a whole, we do not consider that a reasonable viewer (particularly the farming community at whom the Advertisement is targeted) would conclude that dairy farming was the same land that would be converted to forestry or that these employment rates were at issue.

To the extent the Complaints Board considers that the reference to sheep and beef farming is unclear, we note that the Advertisement will no longer air on television in its current form. In relation to the online form of the Advertisement (accessible at the Southern Wood Council website), text below the link is prominently displayed and states "A 2019 video campaign from NZFOA and NZ Wood that highlights forestry's role in fighting climate change. *Please note that the land type depicted is sheep and beef country and not to be understood as a comparison of forestry returns or employment with those of dairy farms.*"

Complaint 19/294: Forestry the sole solution to climate change and the Advertisement presents a selective range of information

Complaint 19/294 argues that Advertisement TVC states that forestry is the "one solution" to climate change. We understand this to be an allegation that the Advertisement breaches the following Code Rules:

⁴ See Chris Nixon, Dion Gamperle, Daniel Pambudi, and Peter Clough *Plantation forestry statistics: Contribution of forestry to New Zealand* (New Zealand Institute of Economic Research, March 2017). Available at <<https://www.nzfoa.org.nz/resources/file-libraries-resources/discussion-papers/602-nzierreport-2017/file>>; Institute for Business Research University of Waikato *Economic Impact Assessment of the Forest Industry in the Gisborne Tairāwhiti Region* (2013). Available at <<https://nz.pfolsen.com/market-info-news/wood-matters/2013/november/economic-impact-assessment-of-the-forest-industry-in-the-gisborne-tairawhiti-region/>>. The New Zealand Forest Owners Association has a variety of internal reports which indicate FTEs per 1000 hectares for large-scale forest owners ranges from 5 to 7 FTEs.

⁵ Ministry for Primary Industries *People Powered- Building capabilities to keep New Zealand's primary industries internationally competitive* (June 2014). Available at <<https://www.mpi.govt.nz/dmsdocument/3892>>

⁶ A description of the New Zealand land classification system can be viewed at <https://www.landcareresearch.co.nz/data/assets/pdf_file/0017/50048/luc_handbook.pdf>.

Rule 2(c), which requires that information is used or communicated in a way that is not misleading or deceptive or distorts its meaning.

Rule 2(h), which requires that environmental claims must be accurate and able to be substantiated by evidence that reflects scientific and technological developments.

Rule 2(c) use of data

We submit that the Advertisement responsibly utilises data to support its claims.

The Complainant suggests that the Advertisement is making an absolute claim that forestry is the sole means of addressing the climate crisis. We disagree with that characterisation. We note the specific area of text that addresses forestry's role in climate change is as follows:

Fast growing forest trees, are the only effective way, at this time, for us to fight climate change through sucking carbon from the atmosphere.

In the context of the Advertisement, the use of the word "only" cannot be read to convey an absolute claim that forestry is the one solution to climate change. Rather, it is qualified by its reference to:

the mechanism by which forestry combats climate change (ie, through carbon sequestration). This does not include other measures to fight climate change, including by reducing emissions (through reduced gas use, for example). Rather, the Advertisement states that forestry is the only means to effectively capture carbon.

the phrase "at this time". As discussed below, it is well accepted that, at present, the only viable option for removing carbon from the atmosphere in the fight against climate change is through forestry sequestration via fast growing forest trees.

"fast growing forest trees". Not all forestry is fast growing or sequesters carbon at the same rate as fast growing trees such as *Pinus Radiata*. The Advertisement concerns the role of fast growing trees only.

The Advertisement's statement (as described above) relies on well-accepted scientific findings (in studies and reports) that forestry carbon sinks are currently the only way to sequester carbon in the atmosphere at this time. NZ Wood, its sponsors or members, have not commissioned these studies or reports.

By way of recent example, we refer to the following reports and studies which are consistent with the Advertisement, are independent, and in the case of the Productivity Commission ("**Commission**"), prepared by trusted public bodies:

The Commission, which identifies forestry sequestration as especially important to the meaningful reduction of emissions.⁷

A 2019 study led by Tom Crowther at ETH Zurich, which found that a worldwide planting programme could remove two-third of all the existing emissions.⁸

⁷ New Zealand Productivity Commission *Low-emissions economy* (August 2018). See for example Figure 3-8 at 59. Available at <https://www.productivity.govt.nz/assets/Documents/4e01d69a83/Productivity-Commission_Low-emissions-economy_Final-Report.pdf>.

⁸ Jean-Francois Bastin et al, 'The global tree restoration potential', *Science* (July 2019) Vol 365 Issue 6448 at 76-79.

A 2019 report by ANZ, which acknowledges that in order to meet the 2020 emissions target, New Zealand will require a significant reductions in emission and/or a significant increase in carbon sinks (ie land in forestry).⁹

Key findings from the Commission report, together, clearly outline how accelerated afforestation (that is, fast growing trees) is the only effective mechanism in the short term for sequestration of carbon in order to assist New Zealand transition to a low-emissions economy. For example:

"[A]ccelerated afforestation will play a key role in New Zealand transitioning to a low-emissions economy".¹⁰

The Commission commissioned modelling of New Zealand's transition to a low-emissions economy and in all but one of the pathways modelled, the expansion of forestry was found to be "by far the largest single contributor to net emissions reductions". In the outstanding model, forestry contributed to 25% of the reduction in net emissions in any event.¹¹

In relation to modelling of pathways to net zero or very low net emissions by 2050, the Commission noted that all the scenarios will require a substantial shift in land use. For instance, between 1.3 million hectares and 2.8 million hectares of new forest will need to be planted; land devoted to sheep and beef farming will fall by similar amounts; and horticultural land could double or even triple in area.¹²

Accelerated afforestation would give New Zealand time to put in place economically and technologically more difficult options to lower emissions (both in land use and in other parts of the economy). Comparatively, the Commission acknowledge that the knowledge, technologies and resources for afforestation already exist. That is, "at this time" and pending development and adoption of other mechanisms, fast growing forests is the only effective mechanism for sequestration of carbon.¹³

The Commission addressed the possibility of sequestering carbon in non-forest sinks.¹⁴ It covers sequestration in soils, miscanthus, wetlands, peat swamps and other marine environments. Particularly as it relates to soil sequestration, the Commission noted this has real potential to store a vast amount of carbon, through a change in the way land is used and by improving farming practices. **However**, the Commission explained that the effect of different practices in different situations is not well understood and that further research is currently underway to better understand how farm management practices influence soil carbon. The clear message is that forestry is by far only effective and well understood sequestration mechanism at this stage.

In summary, the claim made by the Advertisement is that fast growing forest trees are the only existing effective means by which to remove carbon from the atmosphere. This is supported by independent evidence. That is, this claim does not rely on research results, scientific literature or other data in a manner that is misleading or deceptive, and therefore is not in breach of Rule 2(c) of the Code.

⁹ ANZ Research *The role of forestry in meeting New Zealand's climate change obligations* (June 2019). Available at <<https://comms.anz.co.nz/static/pobb/pdf/ANZ-AgrilInsight-20190607.pdf>>.

¹⁰ *Low-emissions economy*, above n 6, at 325.

¹¹ *Ibid* at 57.

¹² *Ibid* at 303.

¹³ *Ibid*.

¹⁴ *Ibid* at 328.

Demonstrating the strength of the evidence, we note that the studies and reports (the Commission's report in particular) has guided the New Zealand Government's carbon neutrality work programme and its promotion of forestry as a tool to meet New Zealand's climate change obligations.¹⁵

Further, we note that the Advertisement does not "ignore" other scientific evidence or findings that support alternative means of fighting climate change (for example, through reduced emissions) in a manner that is misleading or deceiving. Rather, such evidence or findings are irrelevant to the Advertisement's message: that fast growing forest trees are the only existing effective means by which to remove carbon from the atmosphere. The Advertisement does not promote forestry as the only solution for climate change, nor does it seek to misapply evidence as to the effectiveness of emission-reduction mechanisms. Accordingly, further scientific evidence is not required and the Advertisement cannot be found to be in breach of Rule 2(c) for its failure to reflect that evidence.

Accordingly, we submit that the Advertisement does not breach Rule 2(c) of the Code. To the extent that the Authority considers any questions remain, we refer to our submission above in relation to the advocacy nature of the Advertisement.

Rule 2(h) Environmental claims

Rule 2(h) requires that environmental claims must be accurate and able to be substantiated by evidence that reflects scientific and technological developments.

We submit that the Advertisement does not breach Rule 2(h), for the reasons set out in paragraphs 0 to 0.

Further matters

Finally, we note that Complaint 19/310 contends that the claims made by the Advertisement are made more inappropriate in the current context where "forestry is being subsidised by government and carbon polluters". It is unclear which Rule of the Code upon which the complainant makes this claim. We submit that this comment is irrelevant and should not be considered by the Complaints Board, as it is a matter of Government policy which is outside of the control of the advertiser.

Conclusion

In light of the above, we ask that the Complaints Board determines that the Complaints are not upheld and finds that Rules 2(b), 2(c) and 2(h) of the Code have not been breached.

We would welcome the opportunity to respond to any further comments or queries that you may have.

¹⁵ Increasing forestry is a key factor in a number of significant Government policies including, for example, the billion trees programme and New Zealand's Emissions Trading Scheme policies.

Date advertisement began	28 July 2019
Where the advertisement appeared (all locations e.g. TV, Billboard, Newspaper Website)	TVNZ as the broadcast medium. Southern South Island Wood Council website.
Is the advertisement still accessible – where and until when?	No further broadcast scheduled. See link below for the only other available public viewing.
A copy of digital media file(s) of the advertisement – if the complaint relates to on-screen graphic, please send a broadcast quality version.	https://www.southernwoodcouncil.co.nz/
Who is the product / brand target audience?	The NZ public at large and sheep and beef farmers.
Clear substantiation on claims that are challenged by the complainant.	See attached cover letter.
For Broadcast advertisements:	
A copy of the script	See attached cover letter.
A copy of the media schedule and spot list (Please remove all financial information)	See Appendix.
CAB key number and rating	CAB #: 90719015 TVC Key #: FOA030CAR030

Appendix

Media Schedule

8987314 - NZFOA Q1 2020 (AP 25-54)

8987314	30	N1	NZ Forest Owners Associat	6/08/2019	Tue	18:53	37334826	FOA030CAR030	1 News At 6pm
8987314	30	N1	NZ Forest Owners Associat	7/08/2019	Wed	22:37	37336109	FOA030CAR030	Coronation Street 2019

Appendix 3

RESPONSE FROM COMMERCIAL APPROVALS BUREAU

We have been asked to respond to this complaint under the following codes:
Advertising Standards Code - Principle 2, Rule 2(c), Rule 2(h)
CAB approved commercial in the Advocacy category.

This ad makes the uncontroversial claim that trees convert CO₂ into oxygen – a well-known fact.

The ad further claims that planting more trees will convert more CO₂ – no so much a claim as a statement of mathematical truth.

It states that air quality will benefit more from the planting of trees within farmland than just farming by itself. Very clearly true.