



To: Federal Trade Commission: Division of Enforcement, Bureau of Consumer Protection

Gas Leaks is writing to encourage the Federal Trade Commission to consider publishing updated guidance on the marketing of natural gas in the agency's updated Green Guides, particularly "alternative" gasses like "renewable natural gas."

The scientific consensus around the ways fossil fuels like natural gas are contributing to climate change has advanced by leaps and bounds since the agency last updated its Green Guides in 2012. Studies by energy modeling experts like [the International Energy Agency](#) now show that in order to avoid catastrophic climate outcomes, we need an urgent transition away from fossil fuels like natural gas and towards clean electricity — including [no new oil and gas drilling](#) and [no new gas furnaces installed by 2025](#)

Recent years have also seen a growing body of evidence showing that the extraction and burning of gas poses significant threats to public health. A majority of gas in the United States is produced by fracking, which has been linked to [premature births](#), [heart disease](#) and [cancers like leukemia](#). Gas appliances in homes are also a significant source of indoor air pollution. [Studies have found](#) that gas stoves leak carcinogenic pollutants like benzene, [even when turned off](#). And they release large amounts of asthma-causing nitrogen dioxide when they're on. Studies show gas stoves are responsible for nearly [13% of childhood asthma cases](#) nationwide.

Given the growing evidence of the harms of gas, the gas industry shouldn't be allowed to describe their product as "clean" "natural" or "renewable" in advertising to the public. These kinds of descriptors give the public an inaccurate understanding of the risks that gas poses to public health and the climate. They also contribute to confusion about the kinds of changes that consumers can make in order to reduce their personal contribution to the climate crisis.

For decades, the public has been [blanketed with advertising](#) calling gas "[natural](#)," "[clean](#)" and even "[renewable](#)" and promoting the [supposed benefits of gas appliances](#) over electric ones. The industry's "natural" marketing campaign has been shockingly successful. [Polling has shown](#) that 77 percent of Americans have a favorable view of natural gas, while less than 30 percent approve of methane gas — even though they're the exact same product.

A century ago, "natural" was once used to distinguish gas extracted from underground with "town gas" or "[coal gas](#)" — methane that was a byproduct of burning coal in industrial boilers. That practice ended in the 1950s, but the industry invested heavily in advertising to ensure that the "natural" tag remained connected to their product in the minds of the public, even as evidence mounted of its impacts to the climate and public health.



There is nothing “natural” about fracking, which is linked to [higher rates of childhood leukemia](#) and [earthquakes](#). There’s nothing “natural” about gas pipelines, which [routinely leak and explode](#), causing millions in damage and [more than 122 deaths](#) since 2010. Allowing the industry to describe their product as “clean” or “natural” obfuscates the real threats of methane gas.

Misleading methane gas advertising is on the rise

In recent years the methane gas industry has been repeatedly caught advertising their product in ways that mislead consumers:

- Sponsoring [social media](#) and [television influencers](#) to promote methane gas, often [without disclosing](#) the [industry’s involvement](#).
- [Distributing childrens’ books](#) in elementary schools [promoting gas](#) as “clean.”

The abundance of recent examples of this kind of misleading advertising speaks to the importance of updated FTC guidelines that will help consumers make informed decisions and provide industry more guidance on appropriate advertising practices.

“Renewable natural gas” use misleads the public

The FTC should pay particular attention to one of the industry’s newest marketing campaigns: the addition of small amounts of “alternative” gasses like “renewable natural gas” (biogas) to the methane gas pipeline system.

Biogas – or as the industry calls it, “renewable natural gas” – is methane captured from garbage dumps, sewage treatment plants and animal manure from industrial agriculture. The gas is processed and injected into gas pipelines alongside existing methane, which [mostly comes from fracking](#).

The industry’s [own optimistic estimates](#) suggest that even in a best case scenario, biogas could only displace somewhere between 6 and 13% of gas use by 2040 – not anywhere near enough to avoid the worst climate scenarios or keep up with the current steady rate of expansion of the gas pipeline system. (The gas industry in the United States hooks up a new home to the gas system [once a minute](#).)

Independent studies suggest the actual amount of biogas that could replace existing gas is even smaller – a maximum of 5 percent [according to the Department of Energy](#). Even these inadequate goals may be difficult to reach: according to [reporting from Reuters](#), biogas currently makes up just 0.2% of current gas use nationwide.



Despite the inherent limitations around biogas, the industry invests heavily in advertising its use. [Gas utilities](#), [industry front groups](#) and [oil and gas giants like Chevron](#) all advertise the addition of “renewable natural gas” to the gas system. But the ads almost always omit any contextual information about how miniscule biogas use is compared to the rest of the conventional fracked methane gas in the system. Waste Management, a garbage provider for hundreds of cities across the country, was recently [forced to remove “renewable natural gas” ads](#) from the sides of their trucks in Seattle after revelations that the local fleet was running almost entirely on conventional methane gas.

The industry’s advertising of “renewable natural gas” leads the public to believe that the gas system is somehow getting “cleaner,” even though the end product being sold to consumers isn’t significantly different and it’s unclear if the industry can add enough biogas to offset the additional conventional methane gas it is adding to the growing pipeline system.

The public deserves honesty about the viability and limitations of this supposed solution for reducing pollution from the gas system. Please consider updating the agency’s Green Guides to prevent the industry from confusing the public about the role that biogas — and the gas system more broadly — can feasibly play in a climate-safe future.

Signed,

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