

Decision of the ADVERTISING REGULATORY BOARD

Advertiser	CNG Holdings (Pty) Ltd
Complainant	Consumer organisation
File reference	4592 - Compressed Natural Gas – Fossil Free SA
Outcome	Upheld
Date	11 May 2026

The Directorate of the Advertising Regulatory Board has been called upon to consider a complaint lodged in respect of various environmental claims made by CNG Holdings (Pty) Ltd (“the Advertiser”) on its website.

Description of the advertising

The complaint concerns a series of environmental and sustainability-related claims made across the website of CNG Holdings (Pty) Ltd, situated at <https://cngholdings.co.za/>, particularly in respect of its NGV Gas division and its compressed natural gas product (“CNG”). The claims appear on multiple pages, including the “CNG Media” page, the “About” page and various press-release-style articles published on the site.

The Complainant identifies the following statements as forming part of the Complaint:

- “CNG is a cleaner, greener fuel option that promotes a sustainable future” (displayed prominently on the Advertiser’s Media landing page);

- descriptions of CNG as “clean”, “cleaner”, “greener”, “environmentally friendly”, “one of the cleanest forms of energy” and “a clean, cost-effective energy solution”;
- statements that CNG “reduces greenhouse gas emissions”, produces “virtually no particulate matter or sulphur oxides”, enables businesses to “grow sustainably” and is a “fuel of the future”;

(hereinafter collectively referred to as “the Claims” or “the Advertising”).

The Claims appear on the website in various promotional articles and informational pages discussing CNG’s role in transport, industrial applications and sustainability-related initiatives.

Complaint

The Complainant submits that, taken together, the Claims create an overall impression that CNG is environmentally beneficial or that it is aligned with sustainability goals in a manner that is misleading and contrary to Appendix G of the Code.

The Complainant submits that the Claims, taken together, create an overall impression that CNG is environmentally benign or inherently sustainable, despite being a fossil fuel with significant lifecycle greenhouse gas emissions. It argues that the Claims constitute absolute environmental claims presented without qualification and, therefore, breach Appendix G of the Code, which requires environmental claims to be accurate, specific and not misleading.

It further argues that the Advertising omits material information regarding lifecycle emissions, including methane leakage and CO₂ emissions from combustion and that this omission contributes to a misleading impression of environmental benefit.

The Complainant requests that the ARB investigate the claims, determine whether the descriptors used are misleading under Appendix G and require the Advertiser to withdraw, amend or qualify the claims.

Response

The Advertiser submits that, although it is not a member of the ARB, it has chosen to participate in the process in good faith.

The Advertiser submits that the environmental-related statements on its website are intended to be understood in a comparative and contextual manner, rather than as absolute environmental claims.

The Advertiser explains that the website content discusses CNG in the context of relative emissions performance when compared to conventional liquid fuels such as diesel and petrol. It states that references to CNG being “*cleaner*” or “*greener*” relate specifically to lower particulate matter and nitrogen oxide emissions in applicable engine configurations and are not intended to imply that CNG is emission-free, carbon-neutral or environmentally benign in an absolute sense.

The Advertiser further submits that terms such as “*environmentally friendly*”, “*fuel of the future*” and “*promotes a sustainable future*” are used within the broader discourse of energy transition, where natural gas is commonly described as a transitional or lower-emission option in sectors where full electrification is not yet feasible. It states that these phrases are not intended to convey full lifecycle environmental neutrality.

Regarding the complaint that the Advertising omits information about lifecycle emissions, including methane leakage and CO₂ emissions, the Advertiser submits that the claims made on the website relate specifically to operational tailpipe emissions and that the Advertising does not purport to present a lifecycle assessment. It argues that lifecycle emissions considerations are complex and typically addressed in technical or policy documentation rather than in marketing communications.

The Advertiser states that the comparative emissions claims are supported by widely published scientific and policy literature, including publications by the United States Environmental Protection Agency (EPA), the OECD and peer-reviewed academic studies on CNG engine emissions. It submits that these sources consistently indicate reductions in particulate matter, NOx and sulphur oxides relative to diesel combustion.

The Advertiser acknowledges that certain terms, such as “*green*”, “*environmentally friendly*” and “*sustainable*” may be open to broader interpretation if read in isolation. It states that it is undertaking a review of its website wording to ensure that the comparative and application-specific nature of the claims is made clearer and more explicit.

Application of the Code of Advertising Practice

The following clauses were considered in this matter:

- Substantiation – Clause 4.1 of Section II
- Misleading claims – Clause 4.2.1 of Section II
- Environmental Claims - Appendix G

Decision

Having considered all the material before it, the Directorate of the ARB issues the following finding.

Jurisdiction

The Advertiser submitted that it is not a member of the ARB.

For the purpose of clarity, the Directorate notes that Clause 3.3 of the Memorandum of Incorporation of the ARB states:

“3.3 The Company has no jurisdiction over any person or entity who is not a member and may not, in the absence of a submission to its jurisdiction, require non-members to participate in its processes, issue any instruction, order or ruling against the non-member or sanction it. However, the Company may consider and issue a ruling to its members (which is not binding on non-members) regarding any advertisement regardless of by whom it is published to determine, on behalf of its members, whether its members should accept any advertisement before it is published or should withdraw any advertisement if it has been published.”

This position has been confirmed by the Supreme Court of Appeal, in a judgement against which leave to appeal to the Constitutional Court was refused.

The ARB will therefore proceed to consider this matter for the guidance of its members.

Merits

The Directorate considered the complaint with reference to Clause 4.2.1 of Section II of the Code, which prohibits advertising that is likely to mislead consumers by implication, omission, ambiguity, inaccuracy, exaggerated claim or otherwise. The Directorate also considered Appendix G of the Code, which governs environmental claims and requires that such claims be accurate, specific, appropriately qualified and not presented in a manner that exaggerates environmental benefits or omits material information.

The Directorate deals with the issues under separate headings below.

1. Whether the environmental descriptors constitute unqualified or absolute environmental claims

Appendix G requires that environmental claims be clear, specific and not presented in a manner that exaggerates environmental benefits. Broad descriptors such as “green”, “environmentally friendly” and “sustainable” are recognised as potentially absolute environmental claims unless they are clearly qualified.

Across the Advertiser’s website, the claims appear as general statements about the environmental attributes of CNG. They are not framed as comparative claims limited to specific pollutants or operational contexts. The Advertiser submits that the terms are intended to refer to relative reductions in particulate matter and nitrogen oxide emissions when compared to diesel and petrol combustion. However, the Directorate must assess the advertising as presented, not the Advertiser’s internal interpretation.

The Directorate notes that the claims are presented prominently and without qualification. A reasonable consumer encountering statements such as “cleaner, greener fuel option”, “environmentally friendly energy source” and “promotes a sustainable future” is likely to interpret these as broad environmental benefits, not as limited references to specific tailpipe emissions categories.

The Advertiser itself acknowledges that terms such as “green”, “environmentally friendly” and “sustainable” may be interpreted more broadly than intended when read in isolation. This acknowledgement reinforces the Directorate’s view that, as currently presented, the claims are capable of conveying a broader and more absolute environmental message than the Advertiser intends and, therefore, require qualification to avoid misleading consumer

In previous matters involving environmental descriptors (see [3291 – TotalEnergies](#) and [3510 - Mori Cape Town](#)), the Directorate has held that broad environmental claims must be supported by clear contextualisation or qualification, and that unqualified claims such as “eco-friendly” or “sustainable” may mislead consumers where the underlying product or activity has material environmental impacts. The same principle applies here.

Accordingly, the Directorate finds that the unqualified environmental descriptors used in the advertising are likely to create an impression of overall environmental benefit and, therefore, breach Clause 4.2.1 and Appendix G.

2. Substantiation for the environmental claims

Clause 4.1 of Section II requires advertisers to hold documentary evidence to support all claims capable of objective verification. Appendix G further requires that environmental claims be supported by appropriate evidence and not exaggerate environmental benefits.

The Advertiser refers to EPA publications, OECD analyses and peer-reviewed literature indicating that CNG engines may produce lower particulate matter and NOx emissions than diesel engines. However, the Advertiser does not provide expert verification linking this evidence to the specific claims made on the website, nor does it provide substantiation for broader claims such as “environmentally friendly”, “green”, “sustainable” or “fuel of the future”.

The Directorate notes that the comparative emissions data cited by the Advertiser may support limited claims relating to specific pollutants. However, the Advertising does not present the claims in this limited manner. Instead, the Claims are broad and unqualified and, therefore, require substantiation of a correspondingly broad nature. The Advertiser has not provided evidence demonstrating that CNG is environmentally friendly or sustainable in an overall or lifecycle sense.

The Directorate has, in the past, held that where an advertiser uses broad environmental descriptors, it must hold substantiation commensurate with the breadth of the claim [see cases cited above]. The Advertiser has not done so here.

Accordingly, the Directorate finds that the claims are unsubstantiated in breach of Clause 4.1 and Appendix G.

3. Omission of material information

Appendix G requires that environmental claims not omit material information in a manner that distorts the overall impression. The Complainant argues that the Advertising omits information regarding lifecycle greenhouse gas emissions, including methane leakage and CO₂ emissions from combustion.

The Directorate accepts that the Advertising does not purport to present a lifecycle assessment of CNG. However, when broad environmental claims are made, the omission of material lifecycle impacts may contribute to a misleading overall impression. This is particularly relevant where the product is a fossil fuel and the omitted information relates directly to climate-relevant emissions.

The Directorate finds that the omission of lifecycle emissions information is not, on its own, determinative. However, when combined with the unqualified environmental descriptors, the omission contributes to an impression that CNG is environmentally benign or aligned with sustainability goals in a general sense. This impression is misleading.

Accordingly, the Directorate finds that the advertising omits material information in a manner that contributes to a misleading overall impression, in breach of Clause 4.2.1 and Appendix G.

Instruction to members

ARB members are instructed not to accept or publish any advertising for CNG Holdings (Pty) Ltd, including its NGV Gas division, that uses broad or unqualified environmental descriptors such as “clean”, “cleaner”, “green”, “greener”, “environmentally friendly”, “one of the cleanest forms of energy”, “fuel of the future” or “promotes a sustainable future”, unless such claims are clearly and prominently qualified or contextualised.