

[Addressees REDACTED. The letters were sent to eight United Kingdom-based cruise travel agencies.]

Sent by email only

28 October 2025

Dear Sir/Madam,

Open letter regarding misleading liquified natural gas adverts for MSC Cruises

1. We are writing regarding environmental claims made in advertising on your website pertaining to liquefied natural gas (**fossil LNG**) in relation to the sale of tickets for fossil LNG-powered cruises operated by MSC Cruises (**MSC**). **We ask that you take action to remove these claims from your website.** By way of a brief overview, your website contains claims about MSC's fossil LNG-powered cruises being environmentally friendly. The Advertising Standards Authority (**ASA**), the UK's advertising regulator, has recently ruled that the same or substantially similar advertising made by other cruise travel agencies is likely to mislead consumers, and therefore must be removed. This is because fossil LNG detrimentally affects the environment. We explain this in more detail below.
2. Opportunity Green is a charity registered in the United Kingdom (registered UK charity number: 1199413) with charitable objects of the promotion and advancement of the conservation, protection and enhancement of the environment.
3. On 3 September 2025, the Advertising Standards Authority (**ASA**), the UK's advertising regulator, made multiple rulings concerning misleading advertisements by cruise travel agents, including two rulings following complaints by Opportunity Green.¹ The advertisements related to cruises offered by MSC and made environmental claims about MSC World Europa and MSC Euribia, cruise ships powered by fossil LNG. These included claims that fossil LNG is "eco-friendly", "new green technology", "the world's cleanest marine fuel", and "cutting-edge environmental technology". A previous complaint

¹ The rulings can be found at the following links: (i) ruling against Cruise Circle (following a complaint by Opportunity Green): <https://www.asa.org.uk/rulings/travelcircle-ltd-a25-1284422-travelcircle-ltd.html>; (ii) ruling against SeaScanner (following a complaint by Opportunity Green): <https://www.asa.org.uk/rulings/www-cruise-co-uk-ltd-a25-1284421-www-cruise-co-uk-ltd.html>; (iii) ruling against Sunshine Cruise Holidays: <https://www.asa.org.uk/rulings/sunshine-cruise-holidays-ltd-a25-1288069-sunshine-cruise-holidays-ltd.html>

against MSC Cruises on similar grounds was settled informally in 2024, where MSC Cruises agreed to remove its fossil LNG adverts and comply with the CAP Code in future.²

4. In September 2025, the ASA ruled that the advertisements breached UK advertising rules, namely the Code of Non-broadcast Advertising and Direct & Promotional Marketing (see Annex 2 to this letter for more information on the Code). The ASA highlighted that LNG is a fossil fuel which has “potentially negative environmental impacts, such as methane slip and leakage, which was the emission of unburned methane into the atmosphere, at all stages of the fuel’s life cycle, from production through to burning”. The ASA further stated that “LNG produced reduced, but still significant, CO2 emissions over its full life cycle”. It therefore determined that the content of the ads outlined above, and which appear in certain forms on your website, was likely to mislead consumers.
5. Methane is a greenhouse gas that is over 80 times more potent than carbon dioxide over a 20-year period. A strong body of evidence shows that fossil LNG, compared to conventional fuels such as marine gas oil, can cause an increase in greenhouse gas emissions when used in cruise ships due to its high methane content.
6. The ASA ruled that the relevant ads must be removed and must not appear again in the format complained of. Further, it ruled that the basis of future environmental claims, and comparative claims, must be made clear, and, unless an ad clarified otherwise, the advertiser must hold robust substantiation relating to the full life cycle of a cruise to support an environmental claim. All material information must be stated when making environmental and comparative claims.
7. We note that, as of the date of this letter, the advertising copy which was ruled likely to mislead consumers by the ASA, or claims which are very similar in substance, remain publicly displayed to consumers on your website. This means that consumers using your website are at risk of being misled in contravention of UK consumer law and the CAP Code. The specific claims we have identified are attached in Annex 1 to this letter. Using these claims therefore exposes your company to the risk of legal action from consumers who have been misled about the environmental attributes of their cruise holiday.
8. **Please remove these claims from your website promptly and, in any event, no later than 14 days following the date of this letter (i.e., by 11 November 2025).** We should be grateful for confirmation of the same from yourselves. Please do reach out to us if you have any questions or concerns. We reserve all our rights and remedies under law.

Yours faithfully



David Kay
Legal Director
Opportunity Green

² See Opportunity Green’s press release: <https://www.opportunitygreen.org/press-release-asa-regulator-msc-cruises-remove-greenwashing-adverts>

Annex 1

[REDACTED]

Annex 2

The rules applicable to advertising in the UK are set out in consumer protection law and self-regulatory advertising codes of practice. The [UK Code of Non-broadcast Advertising and Direct & Promotional Marketing \(CAP Code\)](#) contains rules for online advertisements as well as other forms of non-broadcast media. This applies to advertisements and marketing communications made by companies on their own websites in connection with the supply of goods or services. Of particular relevance, the CAP Code provides that:

- (a) marketing communications must not materially mislead or be likely to do so (Rule 3.1);
- (b) marketing communications must not mislead consumers by omitting material information or presenting it in an unclear, unintelligible, ambiguous, or untimely manner (Rule 3.3); and
- (c) environmental claims must have a clear basis, be supported by a high level of substantiation if absolute, and must be based on the full life cycle of the advertised product (Rules 11.1, 11.3 and 11.4).

The Advertising Standards Authority (**ASA**) is responsible for ensuring that adverts comply with the CAP Code. To this end, the ASA can receive [complaints](#) from members of the public about advertising and direct and promotional marketing (i.e., ‘ads’) in non-broadcast media.