

# When the Streams Align: A Multiple Streams Analysis of Nijmegen's Fossil Fuel Advertisement Ban

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## Colophon

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## Preface

This master thesis was written to finalise the master programme Environment and Society Studies with the specialisation Global Environment and Society in Nijmegen, the Netherlands. The research was conducted from September 2025 to February 2026. The thesis was a part of an internship at the municipality of Nijmegen. During the writing of this master thesis, I have expanded my knowledge on local policy making, the legal boundaries of policy making and the importance of stakeholder perceptions.

I want to thank my supervisor Sander Chan for his useful feedback, guidance during the research process and his patience given my personal struggles the past few months. In addition, I want to give special thanks to Floor Hubers for making my internship both pleasant and educational. Her support and patience gave me the confidence and motivation to finish this thesis. I also want to thank the participants in the interviews for taking the time out of their busy schedules to contribute to my research. This thesis would not be possible without your help. Finally, I want to thank my mother, brothers and close friends for their unwavering support.

I hope you enjoy my thesis,

Jelle Vianen

## Executive Summary

High-carbon lifestyles are a big driver of climate change and the constant pressure from fossil fuel advertisements in outdoor spaces is impeding the consumer from making sustainable choices. To solve this, the municipality of Nijmegen (hereafter Nijmegen) introduced an advertisement ban. The literature on advertisement bans focuses almost solely on a national or international level with limited attention to local level governance. This thesis analysed why and how the municipality of Nijmegen adopted a fossil fuel outdoor advertisement ban and under what conditions an expansion could occur. This was done using the Multiple Streams Framework by Kingdon (2014). The thesis is based on the idea that fossil fuel advertising (aviation, cruise holidays, gasoline cars, energy contracts, gas contracts) is normalising high-carbon lifestyles. This makes behavioural and normative change more difficult. The decision of the municipality of Nijmegen to implement an advertisement ban is therefore a suitable case study to understand how municipalities can use policies to shape normative change in public spaces.

The research uses a qualitative case study design. Data consists of nine semi-structured interviews with key stakeholders such as city council members, alderman, NGOs and industry representatives. Additionally, a document analysis of motions, council documents and position papers was performed. The data were analysed using the MSF streams. The streams were: Problem stream, Policy stream, Politics stream.

The findings show that the policy process was not driven by disagreement over climate urgency but by the contestation over whether fossil fuel advertising represented an actionable policy problem. Opponents framed the ban as marginal in climate mitigation and found the ban to be patronising. Supporters of the ban framed it as a norm-setting measure and as a way to keep policy coherence. In the policy stream, the effectiveness was heavily debated. Critics highlighted the substitution to online media, limited impact of a local ban, legal uncertainty, enforcement issues and financial risks. Supporters emphasise the symbolic and normative value of the ban and compared the long-term mechanisms to the successful tobacco advertisement ban. In terms of the MSF, a policy window opened after a court ruling in The Hague. The ruling changed the perceived legal possibilities and reduced the first mover risk and helped policy diffusion. Advocacy groups and receptive political parties acted as policy entrepreneurs and coupled the streams and maintained momentum. Expansion of the ban is possible but uncertain. Adding new product categories, such as meat, dairy, unhealthy food or fast fashion, or extending the ban to other media types such as tv, radio, social media, would likely intensify the already contested definitional clarity, proportionality and enforceability. For an extension to happen, on local or national scale, it would likely require a new policy window.

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# 1. Introduction

*“The annually averaged global mean near-surface temperature in 2024 was 1.55 °C ± 0.13 °C above the 1850–1900 average used to represent pre-industrial conditions”*

(World Meteorological Organization, 2025, p. 3).

This was one of the key messages of the annually World Meteorological Organization (WMO) state of the climate report. Every year, global temperature records are shattered according to this report. Despite scientific consensus on what causes climate change and having viable solutions available, insufficient and inadequate action is taken worldwide. The climate agreement of 2015 urged to pursue efforts to keep the temperature increase below 1.5 degrees Celsius above pre-industrial levels (Unfccc, 2015). To meet the goal set by the Paris agreement, greenhouse gas emissions need to be reduced drastically. This means a massive reduction in the consumption of fossil products and services. The high consumption fossil products and services are called high-carbon lifestyles. High carbon lifestyles are characterised by carbon intensive consumption patterns that include frequent flying or a high level of meat consumption and contribute significantly to greenhouse gas emissions (Cass et al., 2023).

According to Pettifor et al. (2023), lifestyles constitute of contextual factors like socio-economic settings, demographic factors and cultural identities. Lifestyles cannot be changed overnight but need to be reshaped. There are a multitude of factors that slow down or alter the adaptation of a new low-carbon lifestyle (Cass et al., 2023). Behaviour change is slow but subsequently of the utmost importance to lower greenhouse gas emissions. This raises a critical question; what can policymakers do to change high-carbon behaviours that still seem to be normalised patterns of behaviour to so many people? One new potential strategy that is gaining popularity in the Netherlands is to ban advertisements in public spaces that promote high-carbon lifestyles in order to make them socially less desirable. Public space is shaped by commercial communications. Advertising in the streets, bus stops or billboards repeatedly represent harmful products and lifestyles as normal and socially desirable (Bouman et al., 2023; Kaupa, 2021).

The idea of restricting fossil fuel advertisements gained the interest of the UN secretary general. UN Secretary General António Guterres pushed for a ban on advertisements from fossil fuel companies (Guterres. A, 2024). Such a ban is not a comprehensive solution but could be an integral part of changing high-carbon lifestyles. This conclusion is confirmed by an independent scientific inquiry report on a ban on fossil advertisements ordered by the Dutch minister of climate and energy (Bouman. T et al., 2023). The consult argues that a ban on fossil advertisements is essential but not sufficient on its own to reduce greenhouse gas emissions of high carbon lifestyles (Bouman et al., 2023).

A recent example of the implementation of a fossil ad ban is the municipality of The Hague. Since January 1<sup>st</sup>, 2025, there is a ban on fossil fuel advertisements (RTL Nieuws, 2025). This local law bans advertisements in public spaces from polluting activities like airplane and cruise ship holidays, gasoline cars, grey energy contracts and gas producers. The ban was realised through a municipal law called an APV (General Municipal Ordinance) (Gemeente 's-Gravenhage, 2024). The Hague is the first city that has successfully implemented such an advertisement ban using an APV. This ban faced some resistance from the tourism sector. Dutch tourism association ANVR and tour operator TUI started a lawsuit against the municipality of The Hague as they found the ban to conflict with the rights of freedom of speech and entrepreneurship (Rechtbank Den Haag, 2025). Despite the objections, a judge ruled in favour of the municipality and the advertisement ban remained in place. Following this example, the municipality of Wageningen went even further and wanted to ban all advertisements from bus stops (Gemeente Wageningen, 2025). These local initiatives raise questions that are central to this thesis about the fossil fuel advertisements and the normalisation of seeing advertising that promotes high-carbon lifestyles. How and why do fossil fuel advertising bans become politically feasible at a local level and how do actors structure the debate? Furthermore, could this development open opportunities for expanding the advertisement ban to include other climate damaging behaviour patterns like eating meat and dairy or to be expanded to other media types.

## 1.1 Problem statement

As stated earlier, high-carbon behavioural patterns are still normalised in society. This is maintained by the presence of advertising that promote high-carbon activities and products. Advertising by airlines, car manufacturers and fossil energy companies creates the perception that carbon intensive choices are desirable and harmless. This normalisation poses a challenge to international climate mitigation efforts as goals set by the Paris Agreement (UNFCCC, 2015) are not attainable if consumption patterns are not addressed. Especially if the drivers of consumption are not adequately confronted. There is consensus in scientific literature on the environmental effects of high-carbon carbon lifestyles (Cass et al., 2023; Duncan et al., 2023; Pettifor et al., 2023), and urgent action is needed to reshape the norms that sustain them. Influencing social norms is seen as a powerful tool to promote behaviour change (Schneider & van der Linden, 2023). However, now, the fossil fuel industry is still actively shaping social norms that normalise climate damaging behaviours.

Outdoor advertising plays a key role in this process. Research shows that outdoor advertising is one of the factors that influence consumer decision making (Madlenak et al., 2023), and is therefore seen as an important instrument in shaping behaviour change and social expectations. Advertisement bans on tobacco products are already socially accepted and widely implemented. Similar advertisement bans in public spaces on climate damaging behaviour patterns are new and contested. While the health

risks of tobacco use are regulated through advertisement bans, similar health issues and other dangerous climate risks continue to be publicly promoted. This signifies the inconsistency in public policy. Bouman et al. (2025) note that the fossil fuel advertisement ban is not just a policy instrument but an important message that challenges conventional norms and can spark political and public debate. This raises important questions about how policy can evolve to address not just the overall consumption related to high-carbon lifestyles but also to change the normalisation surrounding it. To get there, research is needed to understand how existing policies on fossil fuel advertising emerged before new policies can be formed.

## 1.2 Research aim and RQs

This research aims to gather insight into how the recent fossil fuel advertisement ban in the municipality Nijmegen emerged and what the possibilities are for an expansion of the current ban. The Multiple Streams Framework (MSF) will be used in this research. Based on this, the following research question has been formulated:

*How did the recent fossil fuel advertisement ban in Nijmegen emerge and under what conditions could expansion of this policy occur (based on the Multiple Streams Framework)?*

SRQ's:

1. How was fossil fuel advertising identified and framed as a pressing environmental and social problem among municipal policymakers in Nijmegen and other stakeholders?
2. Which policy options, such as advertising bans or other policy alternatives, were considered and how were these alternatives evaluated in terms of feasibility and effectiveness?
3. What political factors shaped the support and opposition to the fossil fuel advertisement ban in Nijmegen?
4. Based on the Multiple Streams Framework, how plausible is an expansion of the fossil fuel advertisement ban in Nijmegen either by adding additional high-carbon lifestyle categories or by extending the ban to other media types, and what stream conditions would enable or obstruct this?

### 1.3 Scientific relevance

The field of policymaking has already received significant attention from researchers with an increasing focus on climate policies and consumption-based approaches. This thesis contributes to the academic understanding of local environmental policymaking by applying the Multiple Streams Framework (MSF) to a novel and underexplored policy domain. In this case, the municipal level bans on fossil fuel advertisements that promote high-carbon lifestyles. While advertising bans are established policy instruments, their specific use in addressing fossil fuel advertising is new. A growing number of studies have already examined advertisement bans (Kaupa, 2021, 2024; McDowall & Underthun, 2025; Saffer, 1996; Saffer & Chaloupka, 2000) but most of the literature comes from a legal or governance perspective and originate from other sectors such as the tobacco advertisement ban. There is a limited understanding of the policy process behind the fossil fuel advertisement bans about how they emerge, are contested and how they become politically feasible policy options. Peer reviewed research on fossil fuel advertisement bans are still emerging and remain limited in scope. Existing academic work are recent publications and are often produced in Dutch policy and legal contexts, which means there is limited empirical research about how these bans develop and become feasible in different municipal settings.

In addition, the current policy recommendation papers would benefit from more interdisciplinary perspectives as most research discussed are based on a psychological theoretical lens. As Hartmann et al. (2023) mentioned, in current research there is a focus on individual level decision making that insinuate that the responsibility for climate change lie with individuals. Research on the role of governments in limiting the systemic adverse effects is scarce. Furthermore, the isolated effect of outdoor fossil fuel advertisements has not been investigated sufficiently.

To address these gaps, this thesis employs the Multiple Streams Framework (MSF) by Kingdon (2014) to explore the complexities of policymaking on a municipal level. It allows for a systematic analysis of how fossil fuel advertising emerged as a recognised public problem, what policy solutions were evaluated and how political factors shape the implementation and acceptance of the fossil fuel ban. In doing so, this thesis contributes to the theoretical and empirical understanding of the MSF theory and to discussions surrounding the implementation of fossil fuel advertisement bans. This approach is strengthened by extending the framework to a governance level that is relatively underexplored. Critiques made by Zohlnhöfer & Rüb (2016) that question the application of the MSF on other cases outside of Kingdons (2014) original cases are addressed through the case study of Nijmegen. The application of the theory on a municipal level, especially within the environmental policy domain, remains limited. As stated by Zohlnhöfer et al. (2015), the MSF has been applied at various levels of policy making at the national or international stage but there are few examples of research that have

applied the MSF to subnational levels. By addressing these critiques, this thesis does not only improve the theoretical understanding of the MSF in municipal contexts but also provide empirical insights into how municipalities are shaping local climate governance through normative interventions such as advertisement bans.

## 1.4 Societal relevance

The societal relevance of this thesis is expressed in a multitude of ways. Firstly, climate change still forms an unequivocally large problem to our existence on earth. The earth is warming at an alarming rate, and the effects of climate change are increasingly visible in our daily life. The advertising of products or services imperative to a high-carbon lifestyle are a big contributor to environmentally damaging behaviours. Subsequently, consumers with a high-carbon lifestyle play a significant role in emitting damaging greenhouse gas emissions (Cass et al., 2023). Therefore, challenging the normalisation of environmentally damaging behaviour like cruise holidays and driving/buying petrol or diesel cars can be a significant step in reducing the greenhouse gas emissions and promote long-term behaviour change. Furthermore, advertising is not a neutral information strategy. The constant overstimulation of advertising that is urging you to keep buying stuff is creating an environment that is constantly pushing for unhealthy and unsustainable behaviour (Renes, 2025). Systemic change is needed to improve the relationship between consumers and sustainable behaviour patterns. Therefore, Bouman et al. (2023) plead for a fossil fuel advertisement ban. This is not just to reduce the greenhouse gas emissions in a single city or municipality but serves as an example for other regions and countries to follow. Nijmegen, being a frontrunner in innovative sustainable urban policy, provides an interesting case study on opportunities for municipalities to lead the national and global sustainability transition. Especially in taking a leading role in reducing the advertising noise on the streets of Nijmegen. Not only from an environmental perspective but to protect the consumer. Better understanding of under what circumstances and within what policy windows policies that counter unsustainable consumer behaviour are formed can lead to a more rapid and effective adoption of such policies in the future.

## 2 Literature review and theoretical framework

This literature review discusses the relevant literature concerning fossil fuel advertisement bans. The definition of fossil fuel advertisements is explored, the role of fossil fuel advertising on perpetuating unsustainable behaviours and norms is studied, valuable conclusions from tobacco and alcohol advertising bans are discussed and lastly the role of the municipality in climate governance is discussed. Additionally, in the theoretical framework, the Multiple Streams Framework (MSF) and its relevance to this thesis is explained.

### 2.1 Fossil Fuel Advertisements

#### *2.1.1 Introduction and logic to the Fossil Fuel outdoor advertising ban*

As mentioned before, The Hague was the first municipalities to legally prohibit fossil fuel advertisements in public spaces on a municipal scale through an APV (Bouman et al., 2025). Within its Algemene Plaatselijke Verordening (APV or in English, General Local Regulation), the municipality of The Hague defined fossil fuel advertisements as advertisements on the products and services of fossil fuel, airplane holidays, airplane tickets, grey electricity contracts, gas contracts, cruise ship holidays and cars with a combustion or hybrid combustion engine (Gemeente 's-Gravenhage, 2024). This definition of fossil fuel advertisements is also adopted in the APV of the Nijmegen municipality (Lauret et al., 2025). Advertisement methods in public spaces that are included in this context are public transport stations, shelters at public transport stops, freestanding display cases, billboards, light poles, roundabouts and scaffold banners (Lauret et al., 2025). These forms of advertising are categorised as outdoor advertising and are aimed at increasing brand awareness and stimulating consumer demand (Madlenak et al., 2023). There are examples from other countries where they have implemented similar kinds of advertisement bans, such as France, the city of Edinburgh, Sidney, Stockholm, Florence and many more (Reclame Fossielvrij, n.d.; The Washington Post, 2024; World Without Fossil Ads, n.d.). However, most of these have regulations through contract and private law as opposed to the Dutch municipalities that have adopted the ban.

According to the municipality of Nijmegen (Lauret et al., 2025), advertising for fossil fuel products and services stimulates consumption that contributes to the worsening of the climate crisis. This conclusion finds support in a report from the Dutch government and other academic literature that similarly states that fossil fuel advertisements promote unsustainable consumerism and greenwashing (Bouman et al., 2023; Hartmann et al., 2023; Stuber et al., 2026). However, most papers do not mention the specific effect of outdoor advertisements on consumer behaviour. A recent report from the Wetenschappelijke Klimaat Raad (WKR, Scientific Climate Board) they recommend the government to focus on behaviour change to reduce emissions (Klimaatraad, 2026). Within this report, the Climate Board emphasises the

importance and necessity of an outdoor fossil fuel advertisement ban to reach the desired behaviour change.

Product advertisers often use misleading claims on their products or dismiss the environmental impact of their products completely (Hartmann et al., 2023). A ban on advertisements in public spaces limits the opportunities companies have to greenwash and to improve the image of polluting companies or products (Bouman et al., 2025). Although the effectiveness of an advertisement ban is subject to criticism, the impacts of this ban are expected to unfold over time as advertising high-carbon products and services are embedded in social norms (Bouman et al., 2025). Empirical research on the effects of fossil fuel advertisement bans on consumer behaviour is still lacking. Moreover, a ban is not seen as an effective way of achieving policy goals by economists (Green, 2018). Despite the criticisms, multiple Dutch municipalities have now implemented similar advertisement bans with slight variations. This includes the municipality of Leiden, Amsterdam, Utrecht, Wageningen, Delft, Zwolle, Haarlem to just name the most important municipalities (*Gemeenten Weren Fossiele Reclame - Reclame Fossielvrij*, n.d.). According to a survey done by Climate Action Against Disinformation (2025), this is in line with the general opinion of Dutch citizens, as 71% of Dutch citizens believe that a ban on misleading advertisements would reduce misinformation and greenwashing. As Bouman et al. (2025) stresses, the advertisement ban won't have the biggest effect on local emissions, but is a powerful message. The unequivocal rejection of the normalisation of fossil fuel products and services challenges the notion that public promotion of such products is socially acceptable (Bouman et al., 2025). Strong symbolic politics show how dedicated a city, in this case Nijmegen, can be in climate initiatives. As Green (2018) states, fossil fuel bans are motivated by what is right, expected or legitimate and are not by efficiency of outcome.

### *2.1.2 Impacts on consumer behaviour and social norms*

Outdoor advertising has significant impact on consumer behaviour (Bouman et al., 2025; Bouman et al., 2023; Bouman & Steg, 2022; Hartmann et al., 2023). Not only does it have a big impact on consumer behaviour in terms of brand image and shopping behaviour (Madlenak et al., 2023), outdoor advertising partly determines social norms and values associated with the climate. Furthermore, as S. Green & Temper (2026) argue, companies use advertising to entrench product use and delay climate and health policies. Independent research that was ordered by the Dutch Minister of Climate and Energy concluded that fossil fuel advertisements increase the preferences of consumers towards unsustainable products and services (Bouman et al., 2023). A paper by Bouman & Steg (2022), argues that a majority of people do care about the environment and are willing to change but are held back by psychological and social barriers and subsequently resort to inaction. One of these barriers is the normalisation and legitimisation of unsustainable practices, which is maintained by the frequent

exposure to fossil fuel advertisements in outdoor spaces (Bouman & Steg, 2022). While the papers by Bouman & Steg (2022) and Bouman et al. (2023) offer valuable insights, they do leave room for empirical research. The papers advocate for advertising bans and lack some critical analysis of different perspectives relating to advertising companies or how consumers interpret such changes in advertising. Nevertheless, as Bouman & Steg (2022) argue, people often do not act according to their environmental values and that leads to inaction. They made a theoretical framework called the 'spiral of inaction'. The framework calls upon the fact that inaction reinforces itself and results in more inaction (Bouman & Steg, 2022). The lack of visible sustainable action of others leads to the belief that people do not care about the environment and this in turn reinforces their own passivity. This demotivates consumers to change their behaviour. The spiral is sustained by situations where environmental norms are made less of a concern. Fossil fuel advertisements make consumers focus on financial outcomes, status or comfort instead of environmental values (Bouman & Steg, 2022). Fossil fuel advertising is therefore emphasizing self-interest and social norms that contradict internal environmental values and thus reinforce the spiral of inaction (Bouman et al., 2023; Bouman & Steg, 2022). The spiral of inaction demonstrates that action is needed to stimulate the change of social norms. People are led by what they think that others do and approve of. Those norms are not reflected in statistical data or reports but are interpreted from the signals all around us like advertisements and other media. When the action is not initiated by the consumers themselves, a municipality for example could help guide or inform about sustainable options and solutions. This emphasises the need for a municipality to intervene in normative change.

### *2.1.3 Limitations of a fossil fuel advertising ban*

In a paper about how banning advertising harmful products can incentivise product innovation in alternative products, McDowall & Underthun (2025) concluded that banning advertising for harmful products, in this case beer, would promote an increase in the advertising of benign products. They argue that they see no reason why this would not be applicable for advertisement bans with an environmental motive. While there still is a lack of empirical evidence, in the context of fossil fuels this could mean an increase in advertisements on electric cars, public transport or sustainable tourism alternatives. Furthermore, McDowall & Underthun (2025) and Green & Temper (2026) comment that advertisement bans on its own will not be enough and it should be used within a wider policy mix that includes other policy approaches.

A reason for this as mentioned in Bouman et al. (2023) is how companies that emit a significant number of greenhouse gasses might use greenwashing in their advertising. Companies that are harmful to the environment could make focussed advertisements that show that they are sustainable while the opposite might be true. Associating positive sustainability claims with a company that is unsustainable

is called unjustly by Bouman et al. (2023). For instance, Exxon (now Exxonmobile) used to promote its algal biofuel development programme even though that constituted only a small fraction of their corporate operations (McDowall & Underthun, 2025). When advertising is already focussed on creating a positive brand image, an advertising ban on the harmful products of Exxon or other companies will likely not be as effective and will result in only minor changes in advertising strategy (McDowall & Underthun, 2025). This signifies the need for advertisement bans to be included in a more complete policy mix and not stand on its own.

#### *2.1.4 Advertisement bans in alternative sectors*

The concept of advertisement bans is not new. The tobacco ban for example is already widely accepted. There are a number of valuable insights into how bans on tobacco and alcohol influence consumer behaviour. As other papers already mentioned, the effectiveness of advertisement bans depends on the complementary policies that are implemented. Saffer & Chaloupka (2000) found that, in the context of tobacco advertisements, having a limited set of advertisement bans will not result in any real change in consumption patterns. However, having a more comprehensive advertisement ban will result in a decrease in tobacco consumption (Saffer & Chaloupka, 2000). Moreover, banning outside advertisements will not immediately result in less advertising spending. Within the case of alcohol advertising, *“online advertising could reduce the effectiveness of attempts to regulate offline advertising channels because online advertising substitutes for (rather than complements) offline advertising”* Goldfarb & Tucker, p. (2011, p. 207). The effect of both tobacco and alcohol advertising bans could be diminished by an increase in online advertising on the internet and social media (Goldfarb & Tucker, 2011; Saffer & Chaloupka, 2000). Note that both tobacco and alcohol have an addictive factor that binds consumers to products (Green & Temper, 2026) therefore, this is not directly applicable to the fossil fuel advertising case. However, there is a dependency on fossil fuels for transportation and heating etc. and there is a possibility that the effect of local outdoor advertising bans will be countered by the availability of online advertisement and therefore limiting the normative change that the ban is supposed to bring. This conclusion could mean the outdoor advertisement ban is not sufficient for the desired norm change and a policy extension concerning an online advertisement ban would need to be explored.

Another perspective was explored by Liu et al. (2022) about the exposure of harmful advertisements such as alcohol, unhealthy food, and gambling to children. This was also concluded by Coleman et al. (2022) as they found that children younger than eight years old were more susceptible to unhealthy food marketing than older children or adults. They found that harmful advertisements frequently appears in close approximation of each other and that targeted advertisement bans could improve child health. Especially when paired with community-based interventions and other policies that target

the root cause of unhealthy consumption (Coleman et al., 2022). To counter this perspective, Lancaster & Lancaster (2003) concluded through a literature review study across 35 studies on tobacco advertising that advertising and advertising bans have little to no effect on the total consumption of tobacco. The addictive aspect of tobacco might be irrelevant in the context of high-carbon lifestyles but the effect of an advertising ban on fossil fuel advertising might only have a limited influence on the total consumption of unsustainable products or services. However, the study by Lancaster & Lancaster (2003) does not consider the effect of norm change or any symbolic effect that may lead to long term behavioural change. Nevertheless, there is research supporting that bans on tobacco advertisements will lead to decreased smoking prevalence and a reduced risk of smoking initiation in the long run (Saad et al., 2025). So, Advertising bans, as seen in the context of tobacco and alcohol, can reduce overall consumption and shift norms but under some key conditions. The ban will need to be comprehensive and paired with complementary policies. If well designed, advertisement bans can stimulate long-term behavioural and normative change.

#### *2.1.5 Municipality in climate governance*

Recent years there has been a growing interest for the development of sustainable cities. The responsibility of creating sustainable cities and municipalities increasingly rests on the shoulders of local policymakers (Bulkeley & Betsill, 2005). Especially in high income countries, urban areas are responsible for a majority of the greenhouse gas emissions and therefore play a key role in climate mitigation (Bulkeley & Betsill, 2005; Sippel & Jenssen, 2009; Van der Heijden, 2019). A review paper of urban climate governance literature by Van der Heijden (2019) argues that cities are considered to have a significant potential for social and economic innovation. Still, they recognise that literature on cities in the global south and smaller cities in the global north need more attention. The current literature is based on only a few highly active cities in the global north (Hoppe et al., 2016; Van der Heijden, 2019). With Nijmegen being a scientifically relevant case study to fill this research gap on how mid-sized municipalities engage in climate governance. A recent study from Stuber et al. (2026) demonstrated the relevance when they analysed how municipal officials from multiple Dutch municipalities perceived the restrictions on outdoor advertising for unhealthy and unsustainable products. They showed that municipalities do treat an advertisement ban as a feasible policy instrument while also highlighting the practical and legal concerns such as existing contracts and the increased workload for implementation and enforcement.

Furthermore, as Bulkeley & Betsill (2005) argue, a more multilevel governance perspective is needed to examine the ways in which local environmental governance is constructed and contested. The influence of municipalities reaches beyond just urban environments and is part of a multilevel system of climate governance. The actions of municipalities contribute to and are shaped by the multilevel

governance system. The advertisement ban of The Hague, for instance, has inspired the implementation of similar bans in more than a couple other municipalities (*Gemeenten Weren Fossiele Reclame - Reclame Fossielvrij*, n.d.). Local policy transfer makes a municipality an integral part of a wider regime change on other levels of governance (Bernstein & Hoffmann, 2018).

Catalysing normative change is one of the mechanisms subnational actors can use to change political dynamics (Bernstein & Hoffmann, 2018). This can be done through, in this case, advertising bans which fall under the category of legal and regulatory instruments (Keskitalo et al., 2016). These instruments play a role in constituting certain actions as socially acceptable (Keskitalo et al., 2016). By using a ban on fossil fuel advertising, the municipality communicates that advertising high-carbon products and services are socially unacceptable and also shape the values that influence everyday behaviour. The ban in The Hague and Nijmegen is implemented through a local regulation called a *Algemene Plaatselijke Verordening* which is the strongest legal tool available for municipalities (gemeente 's-Gravenhage, 2024; Lauret et al., 2025). This signals that the seriousness of the measure serves as a model for other municipalities.

## 2.2 Theoretical Framework

### 2.2.1 The Multiple Streams Framework

The Multiple Streams Framework (MSF) by Kingdon (2014), is one of the most cited frameworks in policy analysis literature (Zohlnhöfer & Rüb, 2016). The theory finds its origin in the book called 'Agendas, Alternatives, and Public Policies' by John W. Kingdon in 1984 and has found itself to be a respected approach for policy analysis (Hoefer, 2022). The Multiple Streams Framework was originally based on the U.S presidential system and was designed to explain how certain issues were picked up onto the political agenda while other issues were not (Kingdon, 2014). Scholars were initially worried that the framework would not be applicable outside this scope. However, the theoretical richness and wide applicability of the MSF has allowed it to be used and adapted to fit a wide variety of policy and governmental settings. Evidently, the framework has been used in hundreds of published journal articles (Béland & Howlett, 2016; Fowler, 2022; Hoefer, 2022; Smith, 2023; Zohlnhöfer & Rüb, 2016). Over time, scholars, notably Zahariadis (1995), have not only applied the MSF across a multitude of varying policy domains but have also adapted and expanded the framework to include the decision-making processes (Sabatier, 2007; Zahariadis, 1995; Zohlnhöfer & Rüb, 2016). *"Thus, Kingdon's model is broadened here to cover not only agenda setting - that is the process by which issues become the focus of the governments' attention - but also decision making - that is, an authoritative choice among a limited universe of alternatives"* (Zahariadis, 1995, p. 6). Zohlnhöfer et al. (2015), argue that these adaptations have only increased the relevance of the MSF in explaining contemporary policy processes.

Scholars have explored the wider utility range of MSF in parliamentary systems, supranational governance and increasingly on local and subnational policy processes including municipalities (Henstra, 2010; Zohlnhöfer et al., 2015). The broad applicability is important for this thesis as it focusses on policy developments at the municipal level in the Netherlands, which has not gotten much attention.

The Multiple Streams Framework operates at the system level and thus includes an entire system in its analysis (Zahariadis, 2007). Policy decisions are based on the “*collective output formulated by the push and pull of several factors*” (Zahariadis, 2007, p. 66). The framework operates under some key assumptions. The first one is that governments act under conditions of ‘ambiguity’ rather than rationality (Fowler, 2022; Hofer, 2022; Kingdon, 2014; Zohlnhöfer et al., 2015; Zohlnhöfer & Rüb, 2016). Zohlnhöfer et al. (2015), refer to ambiguity as unclear goals and uncertainty about the means and ends. Meaning that both problem defining and problem solving are considered complex processes and governments find themselves navigating between policy possibilities without the certainty of effectiveness. Additionally, MSF highlights the issue of time constraints in policymaking. Policy makers often find themselves under time pressure and must act quickly due to the acceleration of economic and social change (Hofer, 2022; Zahariadis, 2007; Zohlnhöfer et al., 2015; Zohlnhöfer & Rüb, 2016). This sense of urgency limits the deliberation and rationality under which policymakers make decisions. Another assumption brought up by Zahariadis (2007), is the concern for processing capacity in decision making. Especially in (local) governments with less resources, there is only a limited number of problems and policies that can be dealt with simultaneously. The number of policies actively being considered are small. Moreover, Zahariadis (2007) also argues that given the limited cognitive and institutional capacity of policymakers to deal with multiple issues simultaneously, the order in which proposed solutions are dealt with has a significant impact on policy outcomes. The final assumption is that the three streams operate independently of each other (Hofer, 2022; Kingdon, 2014; Zahariadis, 2007). In each of the streams, there could be changing conditions that do not affect the other streams and there is no clear connection between the streams. The next part will be about those three streams and how they work.

### 2.2.2 The three streams

Kingdon (2014), conceptualised the three streams of the policy making process. The Problem stream, the Policy stream, and the Politics stream. In the following paragraphs, the three independent and interdependent streams will be explained and discussed in detail. On top of that, the role of policy entrepreneurs and the conditions for the opening of a policy window are discussed.

### 2.2.2.1 Problem stream

Within the problem stream there are various situations that, according to policymakers and citizens, are required to be addressed. Examples of such situations include environmental change, inflation, rising medical costs etc. (Zahariadis, 2007). According to Zahariadis (2007) and Kingdon (2014), the problems come to light through three ways, the first one being certain indicators. Examples of such indicators can be statistical data like rising pollution levels or obesity rates. Policymakers use the indicators for two reasons. To investigate the size of the problem and to monitor if there are any changes in the problem (Kingdon, 2014; Zahariadis, 1995). However, interpreting the indicators and convincing others of its importance can be quite challenging (Kingdon, 2014) and not all 'conditions' become problems (Zahariadis, 2007). A second way the conditions can be identified is through 'focusing events' as Zahariadis (2007) called them. Focusing events are certain crisis or dramatic events that direct the attention to a specific problem (Zahariadis, 2007). Expanding on this point, Kingdon (2014) argued that the problem that is brought to attention through a focusing event, was already 'in the back of people's minds'. Otherwise, the focusing event would not be picked up by the political agenda. Meaning that problems already existed but were not urgent or interesting enough for policymakers to pick them up. The third way is through feedback from existing policies. The (local) government monitors the active policies in place and receive feedback about the implementation and effectiveness of the policies (Kingdon, 2014; Zahariadis, 1995, 2007). The problems that arise from existing policies can help define certain conditions as problems. Kingdon (2014) stresses the importance of feedback between implementation and legislation.

As Zohlnhöfer & Rüb (2016) note, policymakers frequently have trouble formulating what policy goals they want to achieve and even if they do know, they are unaware of how to attain them. Therefore both Zohlnhöfer & Rüb (2016) and Kingdon (2014) argue that solutions 'look out for' a problem they solve and subsequently get coupled together. This also demonstrates that there is no connection between problems and solutions.

### 2.2.2.2 Policy stream

Based on Kingdon (2014), the characteristics of the policy stream have been summarized by Béland & Howlett (2016):

*"The policy stream is filled with the output of experts and analysts who examine problems and propose solutions. In this stream, the myriad possibilities for policy action and inaction are identified, assessed, and narrowed down to a subset of ostensibly feasible options."* (Béland & Howlett, 2016, p. 222)

The policy stream is the 'soup' of ideas and solutions that compete to solve problems (Kingdon, 2014; Zahariadis, 2007). According to Zahariadis (1995), there often are an abundance of possible policy

solutions but only a few of these solutions receive any consideration. Some ideas are rejected quite instantly, and others are taken more seriously (Kingdon, 2014). The policy stream operates in the subsystem level. Arguing and discussing are the main interaction types that are used (Zohlnhöfer & Rüb, 2016). The so called 'soup' of ideas float around in what Kingdon (2014) calls policy communities. Which are communities existing of specialists in a certain policy area and are specialist from inside and outside of government systems. Specialist can be anyone from a government employee to consultant, academics or interest groups to name a few (Kingdon, 2014). The specialists often know each other and each other's ideas or are more divers and fragmented and Kingdon (2014) noted that political events and other changes only minimally effect the policy community. The survivability of ideas is dependent on a few factors. Namely, the *"technical feasibility, their fit with dominant values and the current national mood, their budgetary workability, and the political support or opposition they might experience"* (Kingdon, 2014, p. 19). Zahariadis (2007), only mentioned the technical feasibility and value acceptability. Nevertheless, Zahariadis (2007) talks about different forms of policy networks. The institutional configuration or the 'integration' of a policy network alters the speed at which ideas emerge and stay afloat. Nonetheless, if policy proposals fail to meet the criteria as described by Kingdon (2014), the proposals are not likely to be accepted and are not taken seriously. It is hard to describe what policy makers mean with the technical feasibility but Kingdon (2014) stresses that 'working out' the idea is significant. A good policy proposal also depends on the relationship between the idea and the implementation. An idea might be good but if it does not ultimately reach the policy goal as intended, the proposal might be discarded (Kingdon, 2014; Zahariadis, 2007). Which is the same for the other criteria. If a proposal is not compatible with the values of specialists in the policy community, there is less chance of survival (Kingdon, 2014). Successful policies are not policies that are the best ideas but policies that are ready, acceptable and align with important values when policy windows open.

### *2.2.2.3 Politics stream*

The politics stream consists of three main elements according to Zahariadis, p. (2007, p. 73), *"the national mood, pressure group campaigns and administrative or legislative turnover"*. Originally, Kingdon (2014) also used 'partisan and ideological distributions in congress' but given that his research was based on the U.S.A presidential system, that aspect has no relevance in this research. Béland & Howlett (2016) also used the three aspects as mentioned by Zahariadis. The national mood is about how the majority of the population are thinking along the same lines (Kingdon, 2014; Zahariadis, 2007). In simple terms the national mood can be described as a widespread public opinion. The national mood shifts from time to time and changes in the mood have impacts on policy agendas and policy outcomes as items that reside within that mood receive more attention (Kingdon, 2014). Pressure group

campaigns are important as politicians tend to see support from pressure groups as a measure of consensus (Zahariadis, 2007). Pressure group campaigns from NGOs, unions or activist groups for example, use lobbying or media to influence policy. If many groups like the Dutch NGO Reclame Fossielvrij, support a fossil fuel advertisement ban for instance, politicians see that as a form of consensus and there is a higher chance that such policies appear on the political agenda. Nevertheless, if a policy topic is considered controversial, and support is divided, then the issue might receive less priority (Zahariadis, 2007). Administrative or legislative turnover includes election results and the constant change of legislators and policymakers (Zahariadis, 1995, 2007). This can seriously impact the direction of decision making. In the context of municipalities, this would mean a new mayor, councillors or changes of prominent political parties would significantly alter the political agenda. As Zahariadis (2007) states, the national mood and the legislator and policymaker turnover have the most impact on the political agenda.

#### *2.2.2.4 Policy windows & Policy Entrepreneurs*

Policy output is the result of the coupling of the three streams. The coupling of the streams is called a policy window and is an opportunity for policymakers or advocates of a policy to push their preferred policy on the policy agenda (Kingdon, 2014). Herweg et al. (2015) argue that the opening of a policy window can be the result of a development in the problem stream or in the politics stream. In the problem stream when events or other sudden developments like a crisis or a court ruling take place a problem is pushed forward on the agenda. In the politics stream, a change of government or elections may cause the opening of a policy window (Herweg et al., 2015; Kingdon, 2014; Zahariadis, 1995, 2016). However, the opening of a policy window is not enough to invoke policy change. A policy entrepreneur that couples the streams and advocates a policy is required. For policy entrepreneurs to be successful, *“they must be able to attach problems to their solutions and find politicians receptive to their ideas”* (Zahariadis, 2007, p. 74). Policy entrepreneurs have the highest chance of succeeding if they have connections to important decision makers (Herweg et al., 2015; Zahariadis, 2007). However, a policy window can close quickly if the streams are not coupled correctly or when no action is taken. According to Kingdon (2014), policy windows are open very shortly and close due to a few reasons: If participants feel like the problem is addressed sufficiently (even if it is not), participants fail to get action, events that opened the window are not relevant enough anymore, if a personnel change opened the window than another personnel change might close the window, window closes because there is no available alternative. To conclude, policy windows can open due to different reasons and are only shortly open. Policy entrepreneurs need to be active and effective, or the policy window might close without substantial change.

### 2.3 The conceptual framework

A conceptual model is used to show the key concepts relating to the theoretical framework. The framework as presented by Zahariadis (2007) is the most accurate and complete framework for this thesis. As explained earlier, the problem stream and the politics stream can cause the opening of a policy window. Policy entrepreneurs advocate a policy from the policy stream and attempt to couple the three streams within a policy window to achieve the preferred policy output. The framework from Zahariadis (2007) is shown below in figure 1.

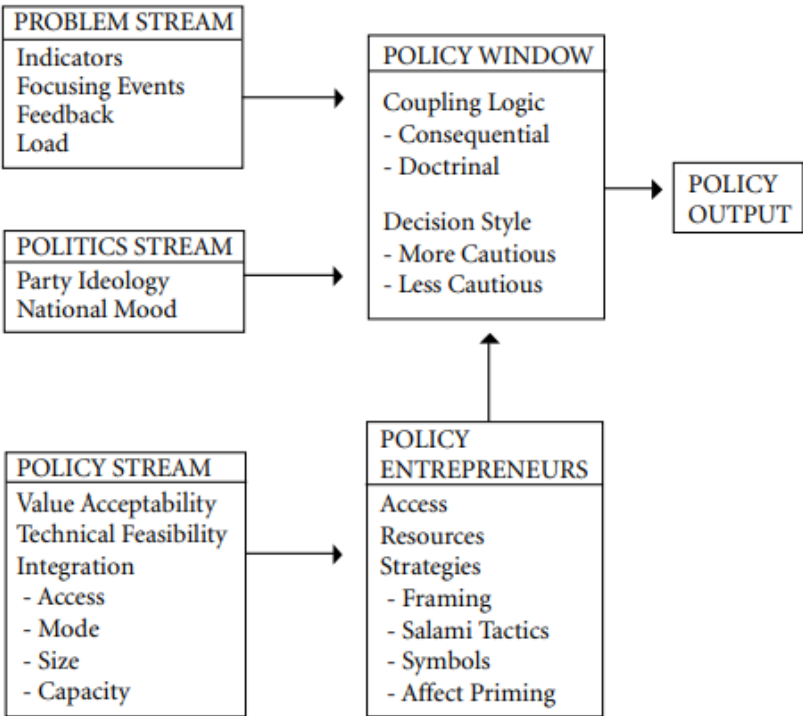


Figure 1: Diagram of the Multiple Streams Framework. (Zahariadis, 2007)

## 3 Methods

### 3.1 Research philosophy and strategy

This thesis will build on an interpretivism philosophy, which assumes that reality is shaped by individual experiences and meanings (Saunders et al., 2019; Schwartz-Shea & Yanow, 2013). In the case of policymaking, it assumes that policymaking is shaped by individual meanings that stem from an individual their beliefs, circumstances, and cultural background. With every policymaker creating and experiencing their own social reality. This fits the study of local policymaking because controversies around environmental measures are rarely only a technical debate. They are struggles over interpretation and ideologies. Struggles about problem definition, effectiveness, fairness, and proportionality. The policy debate cannot be understood adequately by only measuring outcomes because the debate itself is shaped by competing understandings of reality. These interpretations are shaped by stakeholders' beliefs, institutional roles, personal experiences and other socio-political contexts (Saunders et al., 2019; Schwartz-Shea & Yanow, 2013).

Rather than attempting to find universal laws, interpretivism is concerned with creating a new, richer understanding of the social world. In this case the aim is to understand the complexity of different social worlds through developing a context sensitive explanation of how different problem framings and narratives were picked up and others were sidelined. This enables a richer understanding of policymaking as a process of meaning-making and persuasion. Methodologically, an interpretivist approach fits the use of in-depth research that includes interviews and document analysis because these methods allow the access of stakeholders own framings, justification logic, and meanings (Alharahsheh & Pius, 2020; Saunders et al., 2019; Schwartz-Shea & Yanow, 2013). Interviews provide insight into how stakeholders interpret and experience the policy making process, while the document analysis shows how these experiences and interpretations appear in official settings. Lastly, the interpretivism approach aligns with the use of the Multiple Streams Framework. The MSF also assumes ambiguity and contestation over problem definitions and solutions in which meanings are central. This thesis treats the streams not as structural and bordered categories but as active debates where stakeholders compete over problem definitions, policy preferences and political ideologies. For example, by presenting fossil fuel advertising as a serious problem, emphasising the economic risks or framing the ban as symbolic versus impactful.

## 3.2 Research methods

### 3.2.1 Data collection

For answering the first three secondary research questions, semi-structured interviews form the primary data collection method. Additionally, a document analysis has been performed on policy documents, meeting notes, transcripts from debates and other relevant documents related to the advertising ban. The results from the first three secondary research questions were used to answer secondary research question 4. For clarity, the research questions are restated:

*How did the recent fossil fuel advertisement ban in Nijmegen emerge and under what conditions could expansion of this policy occur (based on the Multiple Streams Framework)?*

SRQ:

1. How was fossil fuel advertising identified and framed as a pressing environmental and social problem among municipal policymakers in Nijmegen and other stakeholders?
2. Which policy options, such as advertising bans or other policy alternatives, were considered and how were these alternatives evaluated in terms of feasibility and effectiveness?
3. What political factors shaped the support and opposition to the fossil fuel advertisement ban in Nijmegen?
4. Based on the Multiple Streams Framework, how plausible is an expansion of the fossil fuel advertisement ban in Nijmegen either by adding additional high-carbon lifestyle categories or by extending the ban to other media types, and what stream conditions would enable or obstruct this?

#### 3.2.1.2 Interviews

The interviews were conducted with relevant stakeholders concerning the advertising ban. Stakeholders included different policymakers, civil servants at the municipality, city council members of two different political parties, municipal alderman, NGOs advocating for fossil fuel advertising bans, a branch organisation for outdoor advertising and an industry organisation for advertisers. These stakeholders were found relevant given their occupation and differing perspectives on the advertisement ban. Stakeholders from outside of the municipality all had high-ranking positions within their company and therefore had relevant knowledge about their organisation's perspective. The complete list with names and occupational positions of the interviewees can be found below in Table 1. This wide scale of interviewees from most stakeholders involved made sure almost every perspective was taken into consideration. Since the MSF encompasses an entire system, having a wide variety of different stakeholders participate in this study is imperative (Zahariadis, 2007). The interviews with the different civil servants, NGOs, branch organisation, industry association and advertising companies

were treated as expert interviews. This was given their position of expertise on certain aspects of the advertising ban debate. The interviews with the alderman and council members were treated as elite interviews given their high-ranking authoritative position within policy making. The interviewees were contacted through email. Given the interviewers' position as intern at the municipality of Nijmegen, possible interviewees were recruited using the internal network of the municipality and were contacted through email and phone calls. Possible interviewees from outside of the municipality were contacted through email addresses found on company websites and even through contacts given to the interviewer from the municipality network and other interviewees. In total, there were nine interviews conducted with an average duration of 60 minutes. This was also the aim given the time constraint for the writing of this thesis. The interview questions were organised by theme. The themes were based on the three streams of the MSF. The themes: The problem stream, the policy stream, the politics stream, policy entrepreneurs and policy windows/policy entrepreneurs.

#### *3.2.1.2 Document analysis*

The documents were acquired mostly through the public portal of the municipality of Nijmegen called iBabs. This information is available online to the public. Some documents were obtained directly through email from interviewees. The documents included in the analysis are listed below in Table 2.

#### *3.2.1.3 Methodological justification and research design*

This structure of both interviews and document analysis follows the example of Øvald (2023), who conducted 26 elite interviews with different key political actors which were complemented by a document analysis of official documents, transcripts from debates, news articles and correspondence between relevant institutions. The research of Øvald (2023) aimed to advance the MSF through a case study of the issue of integrating ethics into the Norwegian oil fund strategy. By doing so, it demonstrated that the use of semi-structured interviews was suitable for discovering subjective meanings of relevant individuals. Moreover, it demonstrates how to operationalise the Multiple Streams Framework. The current research took a similar approach using the MSF and conducting interviews to gather data and complementing it with a document analysis. Similar designs have been used in other MSF applications to capture actor interpretations (Asante, 2023; Cooper-Searle et al., 2017).

<b>Name:</b>	<b>Title:</b>	<b>Date:</b>
1. Ritse Leendertz	Contract manager and product owner municipality Nijmegen.	19-09-2025
2. Femke Slegers	Founder of civil movement Reclame Fossielvrij	23-09-2025
3. Lonneke Vullings	Senior legal policy advisor municipality Nijmegen	01-10-2025
4. Eliane van Heck	Contract manager of advertising operator JCDecaux	07-10-2025
5. Tobias van Elferen	Alderman (Wethouder). Responsible for finance, sustainability (energy and environment), cultural heritage, digitalising & ICT, personnel and organisation	08-10-2025
6. Sita Bakker	Director branch organisation Outreach	23-10-2025
7. Paul Eigenhuijsen	Council member Stadspartij Nijmegen	27-10-2025
8. Henriette van Swinderen	Director Bond van Adverteerders (BvA)	31-10-2025
9. Diede Beumer	Council member Groenlinks Nijmegen	05-11-2025

*Table 1: List of interviewed stakeholders and job titles*

Document	Date
Motie Reclames fossielvrij in de APV	17-12-2025
Raadsinformatiebrief	09-09-2025
Motion: Reclameregulering voor een beter klimaat	28-05-2025
Motion: Stop het kapitaliseren van klimaatverandering: Reclames fossiel en bio-industrie vrij	02-11-2022
Motion: Verken wat telt: reclame die de toekomst niet smelt	28-05-2025
Memo Dilemma's reclamerestricties	19-05-2025
Letter Outreach	28-01-2025
Final ruling court The Hague	25-04-2025
Maatregelenpakket: vervuilend vervoer ontmoedigen (Reclame Fossielvrij)	No date
Position statement Outreach	12-2025
Inspraak Ecolytico	03-12-2025

Table 2: List of documents used in the analysis.

### 3.2.2 Data analysis

The interviews and documents were analysed using thematic analysis as described in (Braun & Clarke, 2006). *“Thematic analysis is a method for identifying, analysing and reporting patterns (themes) within data”* (Braun & Clarke, 2006, p. 79). The analysis was structured following the six phases of thematic analysis by Braun & Clarke (2006): familiarising yourself with your data, generating initial codes, searching for themes, reviewing themes, defining and naming themes, producing the report. The analysis combined deductive and inductive coding. The deductive coding was based on the categories from the MSF: Problem stream, Policy stream, Politics stream, coupling of streams and policy windows. Inductive coding was used to let relevant themes emerge naturally from the data as they were not bound to predetermined codes based on the MSF. These concerned themes about values, framing or tensions in the data, for example. The coding has been done by hand, and no programme has been used.

The interview data were assigned to any of the streams based on the predetermined definitions and indicators from the framework. Statements were coded as problem stream when they concerned problem definition, problem framing, focusing events and feedback from existing policies. As policy stream when they entailed policy alternatives, effectiveness (legal feasibility, economic considerations, symbolic value, implementation and enforcement), political support or opposition. As politics stream when they related to the national mood, pressure group campaigns, and administrative/legislative turnover. References to timing, triggering events, or moments of heightened decision-making were

coded as Policy window. References to actors that were active in coalition building and agenda setting were coded as Policy entrepreneurs.

The document analysis of key policy documents, council minutes and advocacy reports and other documents was used as a form of triangulation (Carter et al., 2014). To reduce bias, confirm findings, identify gaps in the data and increase the richness of the data. This was done with special attention to how fossil fuel advertising is framed, how problems are prioritised and how political support is documented or contested. The document analysis was integrated into the interview results and the same codes as the interviews were applied in the analysis. The data from the interviews was mainly focused on perceptions and strategies related to the advertising ban. The document analysis is used to show the formal positions of stakeholders and formal decisions.

### 3.2.3 Ethics

Ethical research is a priority in every study. The rights and well-being of the participants should be respected. Before the interviews, the interviewees were given an informed consent form with detailed information about the research objective, their contribution and their rights as participants (see Appendix II). All consent forms were signed and every participant agreed to the usage of their name in this study through written permission. Because of this, no part of the data needed to be anonymised. The interviews were transcribed verbatim, so the meaning of the quotes were not changed. Because the interviews were held in Dutch, the quotes used in the results section are directly translated into English. Sometimes these quotes may be changed slightly compared to the raw data to improve clarity. However, the quotes will not be changed in a way that the meaning of the quote changes. This preserves the integrity of the study.

As a researcher, there are always potential biases that may influence the research and its outcomes. I was positioned as an intern at the municipality of Nijmegen. This position may have influenced the study. For example, being an insider might, without intending, lead me to interpret information through a municipal lens. My positioning may have also affected the sampling, as municipal stakeholders were easier to reach than external actors. Municipal stakeholders may also see me as partially representing the municipality rather than an independent researcher and this can affect the content of the responses. To counter the biases, this study includes a broad range of stakeholders inside and outside of the municipality to ensure that contesting perspectives were included. Additionally, the interviews were triangulated using a document analysis to check the responses with official documents.

### 3.3 Validity and reliability

The validity and reliability of research are crucial as they determine the credibility and trustworthiness of the research. The validity refers to the accuracy of the findings and the reliability indicates the consistency of the methods being used (Creswell & Poth, 2023). The validity is split between internal and external validity. Internal validity examines the trustworthiness of the internal research design and external validity is the generalisability of the findings in this study (Andrade, 2018). The internal validity was enhanced through the use of triangulation, using both semi-structured interviews and a document analysis. This approach is more widely used and thus provides a scientifically sound design (Asante, 2023; Cooper-Searle et al., 2017; Øvald, 2023). The external validity requires some more explanation. Since this was a qualitative research, statistically representative findings are not relevant. Therefore, this research aimed to provide a detailed, rich description of the context and the phenomenon of fossil advertising bans. However, the application of a well-known framework (MSF) that has been applied in a multitude of different contexts contributes to the analytic generalisation of this thesis. The analytic generalisation means that it does not seek to generalise to a whole population but rather applies the findings to a theoretical framework, such as the Multiple Streams Framework and creates a better understanding of the given theory (Wikfeldt, 2016).

The reliability of research indicates the consistency and transparency of the researchers' approach (Creswell & Poth, 2023). It was important in the research process that transparency was applied so that others could assess how conclusions were made. To ensure the reliability of this research, the interviews were transcribed verbatim so interpretations from the researcher were kept to a minimum. The thematic analysis of the transcription was done according to a codebook based on the deductive and inductive nature of the coding process.

## 4 Results

This section will show the relevant results from both the interviews and the document analysis. Interesting quotes from the interviews and the documents will be outlined and reflected upon. The structure of the results will be based on the three streams of the MSF: Problem, Policy, Politics and Policy window/Policy entrepreneurs. Each stream contains multiple codes. The results from each stream and code will be explained using excerpts and quotes from the interviews. Supplementary to the interviews, relevant information given in the interviews can be backed up or contradicted by text from certain documents from the document analysis.

### 4.1 Problem

#### 4.1.1 Problem definition

The different stakeholders defined the societal problem that the advertisement ban should address differently. While almost all parties recognise that climate change is an issue, they differ in the extent to which they consider fossil fuel advertising to be a part of the climate problem and therefore an adequate target for municipal policy. A council member from a political party that voted against the advertising ban argues that fossil fuel advertising is just a very marginal part of climate change. *“The problem of climate change is much larger than just fossil fuel advertising.... Is an advertising ban the solution for it? It is not”* (P. Eigenhuijsen, interview 7). Even going as far as to call the ban patronising, as they do not see fossil fuel advertising as a societal issue related to climate change. Therefore, they do not see the advertising ban as a viable solution to climate change. In the same vein, Sita Bakker from Outreach emphasises that fossil fuel advertisements are only a small portion of the total outdoor advertising. The effect of these few ads is grossly overestimated, according to her. *“We talk about only a limited portion of the outdoor advertisers being a car brand or an airline”* (S. Bakker, Interview 6). According to her, the expected impact of the advertising ban would be overstated in the argumentation supporting the ban.

In contrast, some supporters and neutral stakeholders also define the problem as the symbolic and communicative effects of fossil fuel advertisements in outdoor spaces. *“It is crooked if you say, well, we are a climate-neutral municipality while fossil fuel advertising is still being made”* (R. Leendertz, interview 1). By allowing fossil fuel advertising, the municipality is undermining their own climate-friendly narrative towards its civilians. Actively pursuing ambitious climate goals while simultaneously allowing and profiting from advertising that promotes fossil fuel-intensive practices is highly inconsistent and ethically ambiguous. *“Why are we allowing this to happen and why do we still financially profit from fossil advertising? Subsequently, we are using that money for our sustainability goals. It does not feel right to me.”* (D. Beumer, Interview 9). Stakeholders argue that there is a risk of losing legitimacy in other climate initiatives and of being perceived as hypocritical. To conclude, these

arguments show that the disagreement among stakeholders is not about whether climate change is a real problem but about whether fossil fuel advertisements form a relevant part of the problem. Furthermore, it questions whether banning fossil fuel advertisements is only an effective intervention for the climate problem or is aimed at creating a coherent climate communication strategy towards citizens.

#### 4.1.2 Framing

The framing of the issue that the advertising ban would need to address is mostly based on reaching climate goals and stopping climate change. Almost all stakeholders were aware that climate change was the biggest driver behind the advertisement ban. In two motions aimed at addressing fossil advertisements, council members stated the ambition of the municipality. *“We in Nijmegen have ambitions to reduce the use of fossil fuels and have committed ourselves to meeting the objectives of the Paris Climate Agreement and the national Climate Agreement.”* (Beumer et al., 2022; Beumer & de Gram, 2025). However, one of the initiative takers of the advertising ban in Nijmegen expands the framing to a health issue and a broader critique of the economy. *“This ban is also about our health and clean air. It is about activities that are just not healthy for both humans and nature”* (D. Beumer, Interview 9). Besides this, the Alderman of the municipality argues that this is not just a problem of climate change but also a question of the normative boundaries in the public space of the municipality. *“But besides climate and sustainability, it is of course also about our public space, and which advertising is allowed”* (T. van Elferen, interview 5). Framing the ban as not just as a climate policy but also a normative decision about what message the municipality should give off in their public space.

Another perspective that is seen as central by supporters of this ban is the perceived normality of fossil fuel-intensive behaviours. *“Fossil fuel advertisements undermine climate policy if there are advertisements of airplane holidays for example. It keeps such carbon-intensive behaviours normal and as a result it is harder to gain support for climate policies”* (F. Slegers, interview 2). Fossil fuel advertisements are seen as a form of climate obstruction that lowers, or makes it harder to gain, support for climate policies. This undermines not just the message but the speed at which change can happen as it delays behavioural change. The ban is subsequently framed as a meaningful intervention in cultural normative behaviour change. *“An advertising ban can do a lot about what society perceives as normal and what is not”* (F. Slegers, Interview 2).

Opponents used a more liberal framing where the responsibility of normative behaviour change is up to the individual citizens. *“But I do not think that politics should be about moral interests anyway, that is up to the individual.”* (P. Eigenhuijsen, interview 7). This framing does not deny the issues of climate change but relocates the responsibility for regulating change from politics to the individual.

#### 4.1.3 Focusing events

The debate about a fossil fuel advertising ban started a few years ago. The exact starting date according to the stakeholders differs. Some say as early as 2020 or 2021. The first motion on advertising restrictions in the municipality of Nijmegen was submitted on 02-11-2022 (Beumer et al., 2022). The debate surrounding fossil fuel advertisements has resurfaced multiple times over the last few years. One of the first instances that gained national attention was when the municipality of Haarlem, as the first city in the world, introduced advertisement restrictions that included meat and fish. *“What gained national attention was the municipality of Haarlem. They said that they did not want fossil advertisements and even added meat to that ban. They got a lot of attention and so we immediately responded to it.”* (H. van Swindelen, interview 8). In this instance, the municipality of Haarlem demonstrated that municipalities could begin to set boundaries on what advertisement types are found to be normatively accepted in public spaces without the help of the national government.

In the interviews it came up that the lawsuit in the municipality of The Hague, where tourism operator TUI and the ANVR branch organisation sued the municipality of The Hague because of their ban on fossil fuel advertising, was seen by almost all interviewees as a focusing event. This focusing event was identified more consistently than the ban in Haarlem. Given that the court’s decision was in favour of The Hague, the ban became legally defensible. This made the debate shift from legally questionable to normatively desirable and practically feasible. This motivated multiple municipalities to follow The Hague and implement advertising bans themselves. *“The reason was to say, if this ban is approved by a judge, then we would like to put it in place as well.”* (L. Vullings, interview 3). Although the idea of similar advertisement bans has been brought up multiple times over the last 5 years, this legal basis opened real possibilities for new municipal policies.

Besides national developments, internationally, this issue got a lot of attention on account of other events, according to Femke Slegers. *“Last summer, Antonio Guterres (Secretary General of the UN) said ‘I urge every country to ban fossil fuel advertising’. So that was super important”* (Femke Slegers, interview 2). This was an external signal that amplified the relevance of the debate. These events show that the debate did not start from one event but was an accumulation of a series of events that led to the eventual implementation of the ban in multiple municipalities in the Netherlands and in Nijmegen. The (inter)national call for action, the legal precedent, the national debate and the first municipalities that stepped towards implementation all contributed. However, the lawsuit in The Hague is still described by interviewees as the most notable focusing event that led to the advertisement ban in Nijmegen.

#### 4.1.4 Feedback from existing policies

Since this is a very recent policy development, there are not many advertising restrictions concerning carbon-intensive consumer behaviour. However, as noted by several interviewees, this type of advertising ban can be compared to the nationwide advertisement ban on tobacco. *“And what about the tobacco industry? They were also involved in a lot of marketing aimed at children and a lot of advertising. And that has, of course, been banned from our public space and newspapers”* (F. Slegers, interview 2). The tobacco advertisement ban served as an example how regulation could change normative and socially desirable behaviour over time. Additionally, this showed how advertisement restrictions can be justified as a policy that is aimed at protecting the public against the normalisation of harmful products that damage their health.

The dominant critique from the interviewees was given on the recently changed private contract law policies. This policy entailed that only new advertising contracts were given new regulations. The new regulations included a restriction on fossil fuel advertisements. The main critique was that this gradual way of changing the regulations was too slow. Both Reclame Fossielvrij and Groenlinks were very firm on the great sense of urgency when making climate policies. When asked why the current policy was not sufficient, Femke Slegers said the following: *“So, you don’t have to wait another 12 years until the current contract expires while the city might be flooded already. Climate change is happening very fast”* (Femke Slegers, interview 2). Contracts with advertisement operators span multiple years so it could mean that it would take a few years before all fossil fuel advertisements have been banned from the public spaces in Nijmegen. In the case of the municipality of Nijmegen a motion aimed at banning fossil advertisements stated the following: *“Contractual agreements can only be revised once the final contract for advertising in public space expires in 2028”* (Beumer & de Gram, 2025). So, it would take 2 or 3 years in this case and not 12 years as F. Slegers argued. With the change to the APV, all operators will need to stop placing fossil fuel advertisements in a very short timeframe. This adequately addresses the critique. To summarise, the feedback was mainly focused on the lack of urgency within the implementation of the current advertisement restrictions.

Another argument brought up in the interviews and document analysis was that the current private/contract law policy creates an uneven playing field. Some contracts and operators will have to adhere to the new regulations that exclude fossil advertising, but some contracts and operators would not have to comply with the new regulations for a few more years. This is presumed to be unfair by some operators. The new regulations implemented in the APV would address this critique. *“An APV-rule would create an even level playing field for all operators”* (Beumer & de Gram, 2025).

## 4.2 Policy

### 4.2.1 Policy alternatives

Several interviewees emphasise that the municipality of Nijmegen already has multiple policies and strategies that are aimed at reducing greenhouse gas emissions. These policies have been proven to be effective in reducing greenhouse gas emissions, whereas the effect of the advertisement ban is still debated. *“Last year we discussed the local energy strategies in the municipal council and people are enthusiastic about it. When you can take big steps in that area, you are doing more than with this ban”* (T. van Elferen, interview 5).

A recurring theme within the alternatives given by interviewees was behavioural change through education, information and strategic use of marketing. When used correctly, advertising can potentially be effective in fast-tracking consumer behaviour change. *“We absolutely see the need for consumer behaviour to change. We think that advertising can play an important role in this because advertising is meant to seduce people to certain behaviours”* (Henriette van Swindelen, interview 8). Along the same lines Lonneke Vullings highlighted the importance of education and information tactics. *“I think that education is very important”* (L. Vullings, interview 3). In practice, this alternative could look like the following according to Eliane van Hecke: *“you could also use the medium of outdoor advertising to contribute to that behavioural change, right? So that people see campaigns saying, for instance, ‘you can also take a holiday closer to home,’ or ‘take the bike a bit more often.’”* (E. van Hecke, interview 4).

Another critical component of this alternative policy is a coherent message in government and corporate communications. According to Henriette van Swindelen, this could increase the strength and effectiveness of the campaigns. *“If you have a government campaign, and at the same time Eneco is running a campaign about the impact of setting your heating to 19 degrees, showing which meter you can use to track it and how much money it saves, then you’re giving much more consistent, unambiguous messages. And I think that could create an extra boost in behavioural change.”* (H. van Swindelen, interview 8). Some supporters of the ban stress the value of having a combination of restriction and promotion. The ban should not be the only policy instrument as that will limit the effect on behavioural and normative change. *“You have the ban, and you also have the opposite. That is stimulating better choices. I think those should exist alongside each other.”* (D. Beumer, interview 9).

In a letter to the municipalities, the branch organisation Outreach proposed three examples of alternatives to the advertisement ban that would address behavioural change. *“1. A discount for advertising campaigns that contribute to the municipalities’ objectives, including sustainability, vitality, and health. 2. A specific rate for campaigns aimed at changing behaviour. These may include (inter)national initiatives such as Earth Hour, Mental Health Day, and ‘Da’s zo gefietst’, as well as campaigns developed in cooperation with municipalities. 3. Making airtime available on digital screens*

*for, still to be defined, campaigns that contribute to behavioural change.*" (Majoor-Scholten & Tilman, 2025).

In addition to these communication-based alternatives, almost all interviewees argued that a national approach to advertisement bans would be more appropriate. Alderman van Elferen advocated strongly for national regulation. While doing so, again comparing this ban to the tobacco ban. *"In my opinion, it would be better if this were national legislation, like we already have for alcohol or cigarettes."* (T. van Elferen, interview 5). Likewise, Bakker reasoned that national policies would be more effective, especially when using self-regulatory instruments such as the Reclame Code Commissie (Advertising Code Commission). *"We are in talks to address this at the national level with advertisers, but also with the Advertising Code Committee. Especially to clarify the guidelines and to make it apply to all types of media, which would be much more effective than only that tiny little island you might address with outdoor advertising."* (S. Bakker, interview 6). This way, the ban could be extended to apply to all types of media and not exclusively to outdoor advertising.

#### 4.2.2 Effectiveness

The effectiveness of the ban is still untested, and it is hard to prove how much consumer behaviour changes and if that is the result of the ban. Interviewees express their scepticism. *"Advertising is, of course, mainly an unconscious trigger. But then Instagram still goes on with influencers who do go to Thailand, and then we would have to prove that the percentage of people flying more or less is not dependent on the fact that we have removed those ads here."* (T. van Elferen, interview 5). Interviewees also critique the limited effect size of just outdoor advertising. While some stakeholders predict that the advertising budgets will remain the same, other stakeholders expect that advertising budgets will shift to other media types. *"What we do see in terms of effect is that it simply shifts to another media type. A media type that yields much less for you and is much less sustainable. So, you immediately get a counter-effect."* (H. van Swinderen 8). This displacement argument was highlighted by E. van Hecke as she noted that consumers will still be exposed to fossil fuel advertisements on other media types. *"Of course, online. When you open your laptop or you're on your phone then all the advertisements still come in."* (E. van Hecke, interview). Other interviewees similarly argued that large companies have the capacity to change their strategies in order to reach consumers. *"They have a certain name recognition so they will find other ways{....} they are creative enough to spend the money in a way that still works for them."* (R. Leendertz, interview 1). Several interviewees point out that outdoor advertising is merely a small part of the total advertising budget. An estimated 5% of the total media and advertising budgets is spent on outdoor advertising. The municipality will thus only have an influence on 5% of the total advertisements. This is not seen as very effective. S. Bakker (interview 6) noted that the impact of such a ban on municipal level would make a limited impact in comparison to a national ban. *"The point is*

*that the effect from the Nijmegen perspective seems very valid, but from a national perspective it is not at all.*" (S. Bakker, interview 6). Expanding on this argument, she argued that if you really want to make an impact on consumer behaviour, then the ban would need to be scaled up and expanded beyond just outdoor advertising. *"If you really want an effect, if that is your objective, then you would of course also have to extend this to other forms of advertising."* (S. Bakker, interview 6).

#### *Symbolic value*

As argued in the paragraph above, some interviewees doubt the measurable effects of the ban. The effectiveness of the ban is more about sending a signal and functions as a form of norm-setting. This is recognised by van Swinderen. *"This is exactly what is happening, politics want to use the ban as a signal function"* (H. van Swinderen, interview 8). According to F. Slegers, this does not mean that the ban is not effective. She talks about the importance and power of symbolic interventions. *"Symbols are enormously powerful, you know. That a government says: we ban tobacco advertising because it is unhealthy. That has so much power, because the government does not ban ads every day"* (F. Slegers, interview 2). She implies that the ban serves as a normative cue. The municipality communicates what is socially acceptable to protect citizens from the adverse effects of unsustainable consumption.

Interviewees additionally linked the role of the ban to the role that the municipality can play in wider regional and national politics. Even if the effect would only become substantial with national regulations, the municipality signals a preferred norm change to politics beyond the local level. This demonstrates leading by example. D. Beumer compares the advertising ban in the context of norm setting to the firework ban in Nijmegen. *"Setting a good example, because you see it here with New Year's as well: we said we have to set norms, and we know the impact will only really be there once it happens nationally. But maybe we should set the good example ourselves: we will implement a ban."* (D. Beumer, interview 9). Local action is used as a step to build momentum and legitimacy for the implementation of the ban on a national level.

Building on this idea, Alderman T. van Elferen explained a possible way in which a municipality can lobby at the national government. He argued that large municipalities can use their collective political power to send a strong signal to the national government. *"Imagine that we, with the 40 largest municipalities in the Netherlands, the G40, send a letter to Parliament. That would really do something. So, I don't want to make our role smaller"* (T. van Elferen, interview 5). To summarise, the value of the ban lies not only in a direct effect on consumer behaviour or emissions reductions but also in its symbolic and normative setting power. Additionally, according to multiple interviewees, the ban can be used as part of a broader norm-setting strategy that is used to accelerate a national fossil fuel advertisement ban.

### *Legal feasibility*

The legal feasibility was a recurring concern with the interviewees. The concerns were focused on the likelihood of opponents of the ban taking further legal action and the criteria the municipality would need to meet to legitimise the ban. Several interviewees stated that the vague definitions would cause confusion among advertisers and result in litigation. *“There is a higher probability of legal disputes because it is often unclear what is allowed and what is not?”* (E. van Hecke, interview 4).

There was also discussion about what legal routes to use. There are the private/contract law route and the public law route through the APV (Algemene Plaatselijke Verordening). The APV is a stronger legal instrument. *“The APV prevails over contracts. The operators will then have to comply with the new laws”* (R. Leendertz, interview 1). Lonneke Vullings, a senior legal advisor of the municipality, expressed that advertisement bans can restrict the freedom of expression but therefore require a clear demonstration of the effects and societal interest. *“There are a number of reasons why you may restrict freedom of expression. The court looked at this and said well, you have to demonstrate the necessity. What is the societal interest and what is the exact effect of the ban?”* (L. Vullings, interview 3). Proving the exact effect of the ban on consumer behaviour or emission reductions can form a problem.

The lawsuit in The Hague was seen as a precedent for future policy-making by several of the interviewees. However, the interviewees differed in opinion on how solid a legal basis this is. The alderman van Elferen warned for further legal escalation. *“The problem is it is just a civil case at the lowest court. Everyone is expecting this case to be appealed and explored to a much further extent”* (T. van Elferen, interview 5). In the conclusion of a legal inquiry L. Vullings stated that it is not certain how an administrative judge would rule in this case and that a ruling could take another couple of years (L. Vullings, 2025). However, Slegers argued the contrary and said that the precedent is strong and detailed enough to prevent further legal disputes. *“This ruling is so detailed, and the travel industry has been found wrong on all fronts. We think that a higher court will come to the same conclusion”* (F. Slegers, interview 2). The ruling of the lawsuit in The Hague confirms that the municipality of The Hague has been proven right on all aspects (Rechtbank Den Haag, 2025). In addition to interviews, a legal view of the matter by Ecolytico (a high-end legal service) was sent to the council on December third, 2025. In their view, the legality of the advertisement ban could be legally defended, and they argue that using the public law route has certain advantages compared to private law. The APV is in effect faster, applies more broadly across advertising in public space, creates transparency and an even level playing field and enables public enforcement mechanisms (Ecolytico, 2025). This legal argumentative brief was written to influence the legal discussion and to strengthen the justification for using an APV route.

### *Economic considerations*

The advertisement ban comes with some economic implications. The interviewees differ in the importance they give to the income generated from the fossil fuel advertisements. The advertisement operators are economically responsible for the advertising stands. So, when bus stops are damaged, the operator pays the repair costs. E. van Hecke explained that the municipality is relieved of such investments but also receives financial compensation. *“For the fact that an operator is allowed to display advertising, the municipality is not only relieved of the investments for the advertising stands but additionally receives a sum of money.”* (E. van Hecke, interview 4). As a consequence of the ban, the operator might have a decline in revenue, and that would result in less compensation given to the municipality. Expanding on this, she sketched a scenario where all outdoor advertisers move to different media types and relocate their budget towards other media types. Within this scenario, the operator would not be able to maintain and repair the advertising infrastructure. The municipality will not receive any financial compensation from the operator and subsequently will need to make costs to repair and maintain all the advertising infrastructure. This scenario frames the ban as a measure that could leave the municipality exposed to significant financial burdens. This perspective is shared by Outreach. *“These initiatives pose a threat to the continuity of municipal and industry revenues, as the resulting fragmentation and uncertainty lead to a significant decline in advertising expenditures”* (Majoor-Scholten & Tilman, 2025).

At the same time, other stakeholders are more dismissive of the economic consequences. Arguing that operators should not make their business model rely on advertisements that have been part of controversy for some years now. *“They could have seen it coming for a long time. There has been a lot of discussion about this advertising. So, they definitely shouldn’t make their revenue model dependent on it. And it’s only something like 4.3% of all advertising, so it’s very manageable.”* (F. Slegers, interview 2). Additionally, she positions the advertisement ban as a low-cost policy measure compared to other more expensive demands of the climate transition. *“If you look at the transition, at all the extremely difficult and expensive tasks, an advertising ban is actually one of the easiest and cheapest.”*

In contrast, van Elferen suggested that the debate is ultimately more of a normative consideration and not an economical one. *“This is a fairly ideological discussion that really is about what role you want to play as a government. In the end it has nothing to do with money.”* (T. van Elferen, interview 5). The role of the government is central to this debate and not the economic considerations.

### *Implementation and Enforcement*

Interviewees raise practical concerns about the implementation and enforcement of the ban. One frequently mentioned concern was the difficulty national advertisers and advertising operators face as they need to navigate between different local regulations on nationally bought and planned advertisements. *“We deal with a national advertiser running national campaigns. The ban can create a patchwork of different regulations that make it very complicated to determine what is allowed and what is not”* (S. Bakker, interview 6). The fragmentation is presented as an implementation risk, especially when municipalities have differing definitions and exemptions. Consequently, this would mean an increase in administrative costs and time spent on checking if the advertisements are not in violation of a local advertisement regulation. In the interviews, clarity of definitions was linked to the enforceability of the ban. The clearer the definition and exemptions are, the easier it will be to enforce. *“The vaguer it is, the less well you will be able to enforce”* (L. Vullings, interview 3). Moreover, E. van Hecke questioned whether it was realistic and manageable to enforce the ban given the monitoring requirements. *“If you regulate something in an APV, there is quite a lot involved. Do you then, as a municipality, have someone on the street every day checking whether the rules are applied correctly?”* (E. van Hecke, interview 4). This suggests that compliance of the ban is assumed to depend on monitoring and enforcement instead of on voluntary compliance once the ban is implemented.

In contrast, D. Beumer argued that the definitions of fossil advertisements are clear enough to have no problem with the implementation. Furthermore, she suggested that the compliance would be high even without heavy enforcement. *“I think fossil is at least easy to implement. I think you can distinguish those products well. You also see that most people simply comply with it without you having to enforce.”* (D. Beumer, interview 9).

#### *4.2.3 Political support and opposition*

Interviewees described the political landscape around fossil fuel advertising restrictions as polarised and fragmented. Multiple stakeholders noticed that the issue follows a typical left-right divide in politics. Left-wing parties are more likely to support the advertising ban, while right-wing parties are more likely to oppose the ban. *“The left-wing parties are often in favour, and right and far-right parties are against it”* (F. Slegers, interview 2). This is demonstrated in the voting results on the 17<sup>th</sup> of December 2025, when a motion to amend the APV to include a ban on fossil advertisements was passed. The supporters of the ban (party name and number of seats): CDA (2), GroenLinks (8), Partij voor de Dieren (3), PvdA (4), SP (3), Lijst De Vries-Kraaijeveld (1). In contrast, the opposition of the ban: D66 (6), Stadspartij Nijmegen (8), VVD (3), ODV (1) (Gemeente Nijmegen, 2025). The political left almost all voted in support of the ban. The political right mostly voted against the ban. However, the CDA is traditionally not seen as a left-wing party, and D66 is not seen as a right-wing party. Noting that

left-wing parties are usually in support of the ban and right-wing parties are usually in opposition to the ban remains just a general tendency rather than a strict rule.

While the advertising debate is currently playing on a local level, the Dutch parliament almost reached a majority for banning fossil fuel advertisements on a national level. *“Right before the last elections (2023) we were almost at a majority in parliament for an advertisement ban”* (F. Slegers, interview 2).

Interviewees also pointed out that it is difficult for branch organisations and other interest parties to navigate the fragmented political landscape. S. Bakker argued that it is hard to keep track of decision moments, especially in local contexts. *“We are so fragmented that we have to deal with many different people, and you also don’t always know exactly when something will be on the agenda”* (S. Bakker, interview 6). This makes it hard for branch organisations to follow and keep an overview of recent developments and subsequently makes it difficult to keep the issue moving forward consistently.

The role of branch organisations is discussed as they represent a wide range of organisations and thus a wide range of interests. This makes it inappropriate to voice a strong opinion if not every organisation they represent is in agreement. *“What we notice is that those branch associations are generally quite conservative in their opinion. Because they represent all interests of all their members and thus the frontrunners and the laggards.”* (H. van Swinderen, interview 8). Van Swinderen argued that this would potentially limit support for an advertising ban. Frontrunners of the ban would need to be contacted individually in order to gain support for a fossil fuel advertisement ban.

## 4.3 Politics

### 4.3.1 National mood

The debate on fossil fuel advertising is becoming more visible in the public opinion of citizens with for example, regular protests aimed at forcing the municipality to do more for the climate. *“Every first Monday of the month they call out the climate emergency here on the street. Fossil fuel advertisements is probably on one of their banners”* (T. van Elferen, interview 5). Signalling that the public supports the municipality in taking more action on climate change and decreasing our dependency on fossil fuels.

There was also some critique on the voiced opinion of the public, as H. van Swinderen argued that the public might not understand the trade-offs and effects that policy change might bring. *“The fact that the public says, yes, OK, fine, you just stop advertising. I understand that. But I also think that they, like in so many matters, do not immediately realise the consequences”* (H. van Swinderen, interview 5).

The national political mood seems to be shifting away from fossil advertising compared to the last elections in 2023. *“Well, there are also political parties that say something about it in their election programmes. What struck us is that this time they say less about it than in 2023”* (H. van Swinderen,

interview 5). This suggests that even when the issue enters political debate, it still needs to compete with other issues for priority on the political agenda. Alongside this shift in political attention, there are still indicators that the national public mood is still favoured towards an advertisement ban but with a big neutral middle. *“There have been several opinion polls this year (2025) and they show that 50% are in favour, 30% are neutral and 20% are really opposed”* (F. Slegers, interview 2).

#### *4.3.2 Pressure group campaigns*

Interviewees described the debate on fossil fuel advertising as contested and attention is triggered on both sides of the debate. The controversy itself can generate more contact between different stakeholders. *“What of course is the case is that because of all the commotion about this we are approached by branch associations and of course our local advertising operator JCDecaux”* (T. van Elferen, interview 5). The controversy also resulted in a position statement from Outreach. In the statement they respond to the growing number of municipalities considering the advertisement ban. Outreach calls upon the municipalities to reflect on the effectiveness, legal robustness, and the local level of policymaking (Outreach, 2025). This suggests that controversy can generate an increase in engagement in social debates by stakeholders who want to influence the policy-making process.

Within the commotion, supporters of the ban are emphasising their coalition-building efforts. F. Slegers from Reclame Fossielvrij states that they work together with multiple other NGOs and professionals in the health and climate sector. *“We also have contact with groups, for example, aviation groups that fight against aviation. With Greenpeace, we also have contact. And we also work a lot together with doctors and healthcare providers”* (F. Slegers, interview 2). Pressure group campaigns by NGOs and civil society are seen as an important part of influencing policy-making by the interviewees. In one of the interviews, D. Beumer argues that the social movements of NGOs show the political mandate because it demonstrates that the advertisement ban resonates with the wider public. *“Yes, I strongly believe that societal initiatives like Extinction Rebellion and Reclame Fossielvrij and all those climate protests show that the message we have carried in politics is supported by residents. They sometimes stand in front of city hall and I just go and talk to them”* (D. Beumer, interview 9).

Furthermore, T. van Elferen underscores that arguments made by all stakeholders should be placed in the correct context and understood within the broader lobby dynamics. When asked about claims by advertising operators that the ban could result in serious financial consequences for the municipality he argued the following: *“I honestly think it is hypothetical and, in this stage, also a bit of a lobby threat. They are not going to walk away quickly, I don’t think so and we are not going to make their life impossible either”* (T. van Elferen, interview 5). To summarise, these quotes demonstrate that the debate is shaped by both the industry and activist groups. With both groups wanting to influence policy making.

#### 4.3.3 Legislative/ administrative turnover

Interviews with two political parties in Nijmegen gave a contradictory answer on a question about the influence of upcoming council elections on decision-making. P. Eigenhuijsen from Stadspartij Nijmegen rejected the idea that their policy was driven by electoral incentives. *“No, that you would quickly work your way through the party programme... that is not our motivation”* (P. Eigenhuijsen, interview 7). In contrast, D. Beumer indicated that the upcoming elections can create uncertainty of political support and could influence the possibility of a majority for the advertisement ban. The decision to put the advertisement ban on the municipal council agenda is a strategic choice based on whether sufficient support can be secured in the near future before the elections. *“I think it is also a matter of seeing what the coming period brings. Do we get enough support? Should we perhaps carry the decision over the elections? What do we expect the situation will be like after the elections?”* (D. Beumer, interview 9). There has been no shift in administrative turnover that changed the trajectory of the policy making decision on the advertisement ban.

#### 4.3.4 Policy entrepreneurs/policy window

Based on the focusing events discussed previously, like the lawsuit in The Hague, there are indications that there is a policy window open. The advertisement ban in Nijmegen came at a moment when the ban had already gained traction and had been implemented in multiple municipalities across the Netherlands. This created a favourable window for local action. The momentum was being kept alive by political parties like Groenlinks and Partij van de Dieren because they have council members in multiple municipalities across the Netherlands. *“There were a lot of initiatives by GroenLinks people in different cities who started doing this. It’s a kind of wave. It’s now being done a bit everywhere in cities, and then we set a good example and then we can also easily apply it more broadly”* (D. Beumer, interview 2). Municipal action is framed as both a local intervention and a step towards a broader implementation across the country.

Within this window, interviewees also pointed out the policy entrepreneurial work that is being done by, among others, Reclame Fossilvrij. They have direct contacts with different political parties that are open to pursuing an advertisement ban on a local or national level. *“We have contact with people from GroenLinks, PvdA, Partij voor de Dieren, and we also looked along with the election programmes”* (F. Slegers, interview 2). Interviewees also emphasised that other civil society movements contributed to the agenda-setting of the issue of fossil fuel advertising. *“Extinction Rebellion has, of course, been a catalyst on this issue”* (R. Leendertz, interview 1). As observed, movements like Extinction Rebellion are actively trying to couple the different streams and push for a preferred policy.

## 5 Discussion

The purpose of this study was to gain a better understanding of how the recent fossil fuel advertisement ban in the municipality of Nijmegen emerged and what the possibilities are for an expansion of the ban. This study used the Multiple Streams Framework as given by (Kingdon, 2014). The three streams are the problem stream, the policy stream and the politics stream. Additionally, policy windows and the role of policy entrepreneurs are discussed. This chapter discusses the key findings, the Multiple Streams Framework, the literature and will conclude with the limitations and suggestions for future research.

### 5.1 Significance

This study provides a detailed analysis of the emergence of the local fossil fuel advertisement ban in Nijmegen. The significance of this study can be indicated through several dimensions. Firstly, this study contributes to research on local climate governance by showing how Nijmegen, a mid-size municipality, can intervene and attempt to regulate climate-relevant consumption through the regulation of fossil fuel advertisements in the public space, while being constrained by multilevel legal and political dynamics (Bernstein & Hoffmann, 2018; Bulkeley & Betsill, 2005; Van der Heijden, 2019). It also contributes to showing how policy changes in other municipalities can influence horizontal policy diffusion to other municipalities, even when the effectiveness of the policy is contested. In this case, how the implementation of a fossil fuel advertisement ban in The Hague resulted in a similar advertisement ban in Nijmegen.

Secondly, the study contributes by adding to the emerging literature on fossil fuel advertisement restrictions as a local policy instrument. The Nijmegen case indicates that the advertising ban is not primarily justified as a policy to reduce emissions but rather as a normative intervention that challenges what socially acceptable behaviour is, consistent with arguments from Bouman et al. (2023). Furthermore, as Bernstein & Hoffmann (2018) argued that subnational experiments can function as catalysers for normative change. So, the Nijmegen case can be seen as one of such experiments aimed at wider regime change. However, it is too early to tell if such a regime change will actually take place based on the local bans that have been installed in a limited number of municipalities.

Thirdly, this study speaks to Hartmann et al.'s (2023) concern that in current research there is a focus on individual-level decision-making that places the responsibility of sustainable consumption on individual consumers. This is, according to an interview, potentially obscuring the role of big corporate actors in shaping consumer behaviour. Although the advertisement ban is aimed at individual behaviour change, the case of Nijmegen demonstrates how the responsibility of sustainable consumption can be reframed and placed onto unsustainable companies. This is done by limiting the

influence that these companies, through advertising, can exert on the normative standards of consumers.

Lastly, this study addressed the critique given by Zohlnhöfer & Rüb (2016) about the possibly limited implementation options of the MSF in other contexts and levels of government. The study adds empirical research to the implementation of the MSF on the local and municipal scale. Therefore, building on the research of Herweg et al. (2015) in which the applicability of the MSF in parliamentary systems was explored. This research shows that a policy window and stream coupling can be triggered externally through policy diffusion dynamics and external focusing events. In the case of Nijmegen, the lawsuit in The Hague likely opened the policy window and altered the perceived feasibility and created conditions for coupling (Kingdon, 2014). The findings suggest that the streams consist of partly local influences and partly regional and national influences. This adds another dimension to the MSF, broadens its applicability in local policy making and illustrates that municipal policy processes are embedded in wider political networks. The multi-level character is also reflected in the stakeholders which include both municipal and national actors.

## 5.2 Key findings

### 5.2.1 *Contested problem definition*

The emergence of the Nijmegen fossil fuel ban was characterised by the debate being a contest over the problem definition and feasibility criteria. For most stakeholders, climate change was seen as a driving factor of the advertisement ban, and there was a willingness to act on climate change. Other stakeholders included the normalisation of high-carbon behaviours in their problem definition as well. Expanding on this, the inconsistency of a municipality claiming to promote their climate ambitions while allowing and profiting from fossil advertising. The policy debate did not revolve around whether climate change was a real issue but around whether fossil fuel advertising represented an actionable policy problem. Some actors who only see climate change as the problem, see a solution as fitting when it has direct and measurable emission reductions or behavioural impact. This created the norm-setting versus impact-oriented debate. This split in rationale demonstrates that the conflict goes beyond being for or against the ban but debates the justification and legitimation of the advertisement ban.

### 5.2.2 *Debated effectiveness*

A critical analysis of the results suggests that the effectiveness of the ban was not treated as a neutral argument but as a crucial point through which different stakeholders tried to influence the policy outcome. Critiques of the effectiveness of the ban were the substitutability (advertising shift to other online media) and the limited effect size due to the local scale. This aligns with arguments from literature and the interviews that advertisement bans are unlikely to be sufficiently effective on their own but are more effective when implemented in a wider policy package (Bouman et al., 2023;

McDowall & Underthun, 2025). Legal critiques stress the risk of vague descriptions, the burden of proof and the risk of future legal disputes due to the legal uncertainty of this ban. Economic critiques focused on the loss of income for the municipality and the possible extra costs for maintenance and enforcement. The enforcement critiques were mostly a result of the possible vague definitions and economic burden of enforcement. The critiques were used to weaken the legitimization of the advertisement ban. When the effectiveness is not measurable, it becomes merely symbolic. Legal uncertainties are framed as reasons not to act. The economic consequences are framed as economically irresponsible climate governance. The pattern of these results is in line with literature that argues that, from an economic perspective, the ban is not a clever idea (Green, 2018). Although the critiques can be a cause for concern, both supporters and opponents operate in a context where hard evidence is limited because the policy is new. Some stakeholders compare the ban to the tobacco ban where there was a significant and noticeable normative change towards smoking, but it took some time to become evident. According to them, the same long-term effect may occur with the advertisement ban.

This shows that evidence and effectiveness are not neutral benchmarks but can be used strategically. Opponents are asking for proof of effect, like measurable CO<sub>2</sub> reductions and behavioural change. Additionally, arguing that advertisements will just move to other media, making it impossible to measure any effects. Demanding evidence of effectiveness while arguing that the policy design makes measuring the effect impossible. This suggests that impact-oriented evaluation standards tend to disadvantage policies that operate through norms and public communication, such as an advertisement ban. That there is no measurable effect on emissions does not mean that there is no effect at all. Multiple stakeholders argue that the value of the ban lies in its symbolic and normative effect (Schneider & van der Linden, 2023). It communicates a normative change about what the municipality finds to be socially acceptable behaviour. Ultimately, this discussion comes down to a disagreement about what municipal policies are for: for direct emission reductions or for shaping public norms.

### *5.2.3 Policy window and policy entrepreneurs*

In terms of the MSF, the policy window in Nijmegen likely opened when The Hague lawsuit altered the legal possibilities for the ban. This focusing event changed the debate from 'can a municipality do this?' to 'do we want this and how do we implement this?'. The problem of fossil advertisement was already in the back of people's minds (Kingdon, 2014) but needed a focusing event and a frontrunner (The Hague municipality) to take the risk. When the court ruled in favour of The Hague, entrepreneurs used it to couple the streams. Moreover, the ruling reduced the legal and first-mover risk for other municipalities. The court ruling became a politically convenient argument for supporters within this

contested policy debate. This resulted in a sort of ‘wave’ in which a still-growing number of municipalities began exploring and implementing similar advertisement bans (Bernstein & Hoffmann, 2018).

Within this window, activity from policy entrepreneurs was visible from both inside and outside of politics and policymaking. Interviewees mentioned that activists, most notably Extinction Rebellion and Reclame Fossielvrij, were described as contributing to coupling the three streams of the MSF and to help sustain attention. They had contact with receptive political parties, particularly Groenlinks and Partij van de Dieren, to create political alignment. Groenlinks and Partij van de Dieren subsequently worked to get the issue on the municipal agenda and translated it into local proposals. It helped that both Groenlinks and Partij van de Dieren have local parties in multiple municipalities across the Netherlands such as Amsterdam, Utrecht, and Den Haag. However, the entrepreneurs also shaped the narrative surrounding the ban and therefore, they could prioritise the symbolic and normative rationale despite the disputed effectiveness of the ban. This also invited counter frames from industry actors, such as Outreach and Bond van Adverteerders, that framed the ban as a legal and economic risk. This suggests that the policy window that has been opened has been a combination of dynamics across various levels of policy-making and in different municipalities. The entrepreneurship that bundles the streams went beyond formal council politics and included coalition building, cross-party networks and using momentum from other municipalities to keep the issue visible and to enable implementation.

#### *5.2.4 Expansion likelihood*

Based on the results of the interviews and document analysis, it can be concluded that it remains uncertain whether an expansion of the ban is likely. There are two ways in which an expansion can be understood. One way is to add other high-carbon lifestyle categories, such as meat, dairy, fast fashion, or unhealthy food to the ban. Second, the ban could be extended to other media types such as radio, TV, newspapers or social media. At the municipal level, it is not known if the latter is legally possible. However, national legislation shows that cross-media advertising bans are possible, as is demonstrated by the total tobacco advertisement ban (Saffer & Chaloupka, 2000).

According to the interviews, an expansion of the ban on a local scale to additional categories would face more contestation because of less clear definitional boundaries. Subsequently, enforcement will be more complex, and the burden on the municipality to justify the necessity and proportionality would increase. In terms of the MSF, this would mean that the ban is less likely to survive in the policy stream (Kingdon, 2014; Zahariadis, 2007). All the increased uncertainty would likely result in a stronger counter-frame concerning the legal/economic risks. However, supporters often attribute value to the ban precisely because of the symbolic and normative effects. To widen the scope would mean to classify more high-carbon practices as socially undesirable. This increases pressure for broader policy

change on a local or national scale (Bouman. T et al., 2023; Schneider & van der Linden, 2023). Simultaneously, this would in turn likely heat up the underlying debate about the role of the municipality in norm-setting.

Scaling up to the national level legislature and expanding to a national cross-media ban for fossil fuel advertisement would address the structural critiques that undermine the ban. National scaling was seen by most stakeholders as the better option compared to a local ban. National regulations would remove a local patchwork of regulations, provide clearer definitions and better legal standards. In addition, a cross-media expansion to other media types is presumably only feasible at the national level since municipalities have limited influence beyond outdoor public spaces. That a national fossil fuel advertisement ban would be better does not mean it is easier to implement. A better policy design does not equal adoption (Kingdon, 2014). The ban would require a supportive political stream and a new policy window since policy windows are typically short-lived and can close at any moment. Such a window could be triggered by another focusing event, such as coordinated municipal pressure, further court rulings or shifts in the national mood. Policy entrepreneurs would need to align the streams again. As T. van Elferen suggested, a letter from the G40 (40 biggest municipalities) urging the government to consider a national ban could trigger another policy window.

#### *5.2.5 Limitations and reflections*

Although this research was carefully designed, it is also subject to limitations. The limitations are important to consider when interpreting the results and for future research. The limitations relate to both the MSF and the overall research design.

Firstly, the MSF is strongest at explaining agenda setting and timing (Kingdon, 2014; Zahariadis, 2007) rather than explaining contestation and conflicts in a systemic way. In a contested case like Nijmegen, most of the arguments are not neutral arguments but strategic resources used by actors to help reach their preferred policy outcome. The MSF can be applied empirically but it does not theorise how structural power, institutional constraints and dependencies, and corporate influence shape the dominant frames. Secondly, the streams of the MSF are conceptually broad, so there is a lot of data that can be attributed to any of the streams. In retrospect, there is always something to fill into a stream. Because the narrative of stakeholders is constructed in retrospect, the MSF helps structure the case but does not prove causal effects. When you put an event in a stream, it does not automatically mean that it caused a certain decision or change in opinion. For example, it is hard to say whether the lawsuit in The Hague actually changed votes or just provided a justification for those who already supported the ban. On a local scale, the broad conceptualisation causes a boundary problem since the streams are not contained within the municipality. In this case, national branch organisations or legal developments influence local dynamics. Thirdly, the MSF provides limited guidance on how to assess

the outcome after the adoption of a policy. One of the research questions is about the expansion of the advertisement ban. The MSF can help structure or determine conditions that would help an additional coupling, but it cannot determine if those conditions are likely to be met.

Another limitation is the generalisability of the results. Since this was a case study of the municipality of Nijmegen, and Nijmegen does not represent other Dutch municipalities due to a difference in political parties, political composition, activity of activists and differing media attention. Although a case study allows for detailed research, it limits the external validity. However, the insights into the mechanisms, conditions and dynamics behind the advertisement ban may be applicable in other similar municipal contexts. Furthermore, this study relies mainly on interviews, which are suitable for capturing perceptions, framing strategies and interpretations, but simultaneously it risks misinterpretation as stakeholders can emphasise certain conditions or arguments to influence the dominant narrative or to improve their position within the debate.

Even though the MSF was applied to a recent policy and developments were ongoing during the research period, there is still the possibility of recall bias. The retrospective interviews may result in less accurate descriptions of events or timelines. Although the document analysis supplied a decent depiction of the timeline, there are several informal processes that happen behind closed doors that are not discussed in interviews or have left no paper trail. So, some informal parts of decision-making remain unreported and cannot be considered in this research. Additionally, the study applied triangulation to strengthen the internal validity (Carter et al., 2014) but the documents that were selected remain limited to formal documents. This limits how well the documents can represent a full range of arguments, negotiations and institutional positions. Finally, the policy development of the advertisement ban is recent and remains dynamic. Further legal action can be taken; other municipalities may introduce a similar ban that further pressure the national government or political coalitions may shift through elections. Consequently, the conclusions about the likelihood of expansion should be treated as conditional rather than predictive.

### 5.3 Future research

Based on the limitations and reflection, there are some recommendations for future research. First, the most logical next step is to study normative and behavioural effects over time to be able to make inferences about the effectiveness of the ban in the long-term. However, since the ban in Nijmegen is recent, these effects cannot be measured yet, but a study with a longitudinal design could assess whether a fossil fuel advertisement ban can shift social acceptability of fossil fuel products and services. Second, comparative research across municipalities could help with the transferability of the findings and enable more systemic conclusions about policy diffusion on a local scale. Comparing early adopters

and late adopters could clarify which political configurations, activist mobilisation and administrative capacity make the implementation of the ban more likely. Third, studies could focus on exploring how media budgets shift across media types following local regulations and what this means in terms of policy design. This was a frequently mentioned question in the interviews, given the uncertainty about the future effects of the ban. This would help justify the ban and help clarify how corporate entities respond to the ban. In addition, this would shed light on the economic consequences of the ban, so the trade-off between the costs and the normative change can be made more accurately. Fourth, the boundary problem in the MSF could be explored in future studies. The Nijmegen case suggests that the streams are shaped by influences beyond the local scale, such as court rulings, media attention, national branch organisations and national party networks. The multi-level processes can influence or reinforce each other, and research is needed to help understand this institutional dynamic and what it means in the application of the MSF on a local scale. Finally, future research could expand the documentary basis for a better analysis. A larger and more diverse set of documents would allow the document analysis to become more leading than primarily for triangulation. This would include more council documents, legal opinions, sector communications and internal materials if accessible. A larger body of documents can also help analyse how frames surrounding the ban change across time and actors.

## 6 Conclusion

The objective of this thesis was to find out how the recent fossil advertisement ban in Nijmegen emerged and whether an expansion of the ban was likely. This was done by using the Multiple Streams Framework by Kingdon (2014). The main research question was formulated as follows: *How did the recent fossil fuel advertisement ban in Nijmegen emerge and under what conditions could expansion of this policy occur, based on the Multiple Streams Framework?*

### 6.1 Main research question

The fossil fuel advertisement ban in Nijmegen emerged through a combination of three aspects. First, the competing but ultimately dominant problem framing of fossil fuel advertisements. Second, the availability of a viable policy option through an APV change. Third, a supporting political configuration and action from external parties during the policy window. The policy window opened when The Hague court ruling provided the legal feasibility necessary for the implementation of the ban through the APV. This focusing event contributed to policy diffusion across different municipalities. Expansion of the ban is possible but uncertain. It would require a new policy window, and the streams would need to be coupled again. The expansion is likely to face intensified contestation concerning the definitional clarity, enforceability and proportionality.

### 6.2 Problem

The main research question was answered by using three secondary research questions. The first secondary research question was about how fossil fuel advertising was identified and framed as a pressing problem among municipal policymakers and other stakeholders in Nijmegen. Stakeholders all agreed that climate change is an urgent problem, but they differed in the way they treated fossil fuel advertisements as an actionable policy issue. Opponents of the ban framed fossil advertisements as a marginal contributor to climate change. By contrast, supporters of the ban framed it as a normative issue because fossil fuel was seen as normalising high-carbon behaviours. They also emphasised that fossil advertisements undermined the credibility and coherence in the communication to citizens about climate policy. In this framing, promoting climate ambitions while allowing and financially benefiting from fossil advertising was described as inconsistent and potentially hypocritical.

### 6.3 Policy

The policy stream contained multiple alternatives for the advertisement ban. These alternatives included existing municipal policies (such as the energy strategy), educational and informational approaches, and the strategic use of advertising space for behaviour change campaigns. The existing policies, for example, the energy strategy, were seen as a more direct and proven measure to reduce emissions. It was therefore debated what an advertisement ban adds in terms of climate impact and

emission reductions. Alongside this, interviewees point to ‘positive’ advertisement campaigns that focused on behavioural change through information and education as a viable option instead of a ban. Some stakeholders argue that education and information should be complementary to the advertisement ban to strengthen the behavioural effects and the effectiveness of the ban. Another conclusion based on the results is that the scale and policy instrument choice dominated the assessment of feasibility and effectiveness. Interviewees argued the limited effectiveness of the ban on account of the substitution of the advertisements to other media types. To counter this, many stakeholders proposed national legislation where the ban would be cross-media and expanded to other categories of high-carbon behaviour. This is similar to the advertising ban on tobacco products. This was seen as the most effective option due to the definitional clarity and the large scale of the ban. Furthermore, the legal route remained contested. Contract-based approaches were viewed as too slow, whereas an APV-based ban would be faster and stronger. However, the APV-based ban was associated with stricter legal requirements, definitional clarity disputes and enforcement concerns. Overall, the policy stream concludes that the advertisement ban gained viability despite stakeholders agreeing that it was not the most climate-effective instrument. Instead, supporters framed it as a necessary intervention with symbolic and normative value. Opponents and industry stakeholders primarily challenged the ban on the expected effectiveness, legal feasibility and implementation feasibility.

## 6.4 Politics

Politically, the issue was seen as polarised. Support tended to cluster among left-wing parties and opposition among right-wing parties, but there were some exceptions. Besides the party ideology, the politics stream shaped the activity of pressure group campaigns. Industry actors and advertising operators pushed back against the ban, while civil society groups mobilised in support of the ban. This public mobilisation made the issue more visible and thus harder to ignore while also triggering a stronger response from opposing pressure groups. Because the political support relied on coalition building to gain a majority in the council, the timing of the upcoming elections was therefore influential in the agenda setting of the ban. Interviewees stated that once a majority coalition was formed, the issue was placed on the agenda before the upcoming elections. This was partly due to the risk that a shift in seat distribution would result in the loss of a majority coalition.

## 6.5 Expansion

The fourth secondary research question can be answered using the results of the first three questions. Expansion of the advertisement ban is possible through two pathways. First, the broadening of the advertisement ban to include additional high-carbon lifestyle categories like meat, dairy, unhealthy food or fast fashion, to name a few. Second is the expansion of the ban to include other media types such as TV, social media, newspapers or radio. However, for one or both pathways to be possible, the

three streams of the MSF would need to be coupled again in a new policy window. There are some conditions that need to be met per stream for this to work. In the problem stream, supporters would need a universally accepted problem definition and justification that goes beyond the general climate urgency. In the policy stream, there would need to be a policy design with clear, legally defensible definitions and a workable plan for the implementation and enforcement. In the politics stream, there would need to be a stable majority in the municipality council that can withstand stronger counter-mobilisation from industry operators. Local category expansion is conditional on tight definitions and enforceability, while cross-media expansion is more likely to require national legislation or a stronger legal precedent. Since the fossil fuel advertisement ban has recently been implemented, there is still a limited practical and legal record to draw on. This could make an expansion more sensitive and contested, as each category would open new debates. However, a small and clearly defined addition might be framed as an incremental adjustment and might retain the support of the current coalition.

## 6.6 Policy recommendations

If policymakers accept that fossil advertisements shape what is considered normal and socially desirable, then treating fossil fuel advertising as the status quo is no longer defensible. The next step is to turn fragmented local initiatives into coordinated, legally robust standards that can operate across media and jurisdictions. This would, for example, require standardised definitions, a working enforcement plan and a long-term evaluation plan based on normative indicators. Other municipalities should use the Nijmegen and The Hague experiences to set clear definitions, close loopholes, and move from local momentum into nationally scalable advertisement regulation. Municipalities should coordinate their collaboration to lobby national politics. This would ultimately be the best solution.

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## 8 Appendix I

### AI-statement

Generative AI tools were used only as supporting aids in line with course guidelines. Specifically, they were used for brainstorming and refining the research approach and methodology. Improving structure and clarity for example. Additionally, AI tools assisted with assembling and organising relevant academic literature. And lastly for language editing and improving grammar and readability. Generative AI was not used to generate empirical data, to analyse interview or document data, to produce findings or write any part of the thesis that requires independent academic judgement.

## 9 Appendix II

Informed consent sheet in Dutch

### INFORMED CONSENT FORMULIER

Naam van het onderzoeksproject	Wetgeving verbod op fossiele advertenties gemeente Nijmegen.
Doel van het onderzoek	Dit onderzoek wordt geleid door Jelle. U bent van harte uitgenodigd om deel te nemen aan dit onderzoek. Het doel van dit onderzoek is om er achter te komen hoe de huidige wetgeving tot stand is gekomen en of er een uitbreiding van de huidige wetgeving mogelijk is.
Gang van zaken tijdens het onderzoek	<p>U neemt deel aan een interview waarin aan u vragen zullen worden gesteld over de beleidsprocessen achter de huidige wetgeving van het verbod op fossiele advertenties.</p> <p>U dient tenminste 18 jaar te zijn om deel te nemen aan dit onderzoek. Verder acht u door de onderzoeker relevant te zijn voor dit onderzoek.</p> <p>Van het interview zal een audio-opname worden gemaakt, zodat het gesprek later ad-verbatim (woord voor woord) kan worden uitgewerkt.</p> <p>Dit transcript wordt vervolgens gebruikt in het verdere onderzoek.</p>
Potentiële risico's en ongemakken	Er zijn geen fysieke, juridische of economische risico's verbonden aan uw deelname aan deze studie. U hoeft geen vragen te beantwoorden die u niet wilt beantwoorden. Uw deelname is vrijwillig en u kunt uw deelname op elk gewenst moment stoppen.
Vergoeding	U ontvangt voor deelname aan dit onderzoek geen vergoeding.
Vertrouwelijkheid van gegevens	<p>Uw privacy is en blijft maximaal beschermd. Er wordt op geen enkele wijze vertrouwelijke informatie of persoonsgegevens van of over u naar buiten gebracht, waardoor iemand u zal kunnen herkennen.</p> <p>Voordat onze onderzoeksgegevens naar buiten gebracht worden, worden uw gegevens <b>anoniem</b> gemaakt: geanonimiseerd. Tenzij er toestemming gegeven wordt om uw naam of functie titel te gebruiken. Enkele eenvoudige voorbeelden van het anonimiseren:</p> <ul style="list-style-type: none"><li>- Uw naam wordt vervangen door anonieme, op zichzelf betekenisloze combinatie van getallen of letters.</li></ul>

	<ul style="list-style-type: none"> <li>- Andere persoons informatie zoals leeftijd en woonplaats worden niet gebruikt.</li> <li>- Contact informatie zoals email adressen of telefoonnummers worden niet gebruikt.</li> </ul> <p>Bij de start van ons onderzoek krijgt uw naam direct een <b>pseudoniem</b>; uw naam wordt gepseudonimiseerd ofwel 'versleuteld'. Op deze manier kan wel worden onderzocht wat u in het gesprek aangeeft, maar weten de getrainde onderzoekers niet dat u het bent. De onderzoeksleider is zelf verantwoordelijk voor dit pseudoniem en de sleutel en zal uw gegevens niet delen met anderen.</p> <p>In een publicatie zullen of anonieme gegevens of pseudoniemen worden gebruikt. De audio-opnamen, formulieren en andere documenten die in het kader van deze studie worden gemaakt of verzameld, worden opgeslagen op een beveiligde locatie bij de Radboud Universiteit Nijmegen en op de beveiligde (versleutelde) computers van de onderzoekers.</p> <p>De onderzoeksgegevens worden indien nodig (bijvoorbeeld voor een controle op wetenschappelijke integriteit) en alleen in anonieme vorm ter beschikking gesteld aan personen buiten de onderzoeksgroep; in dit geval aan een onderzoekscommissie van de Radboud Universiteit die hiertoe bevoegdheden heeft.</p>
<p><b>Vrijwilligheid</b></p>	<p>Deelname aan dit onderzoek is geheel vrijwillig. Je kunt als deelnemer jouw medewerking aan het onderzoek te allen tijde stoppen, of weigeren dat jouw gegevens voor het onderzoek mogen worden gebruikt, zonder opgave van redenen.</p> <p>Dit betekent dat als je voorafgaand aan het onderzoek besluit om af te zien van deelname aan dit onderzoek, dit op geen enkele wijze gevolgen voor jou zal hebben. Tevens kun je tot 5 werkdagen (bedenktijd) na het interview alsnog de toestemming intrekken die je hebt gegeven om gebruik te maken van jouw gegevens.</p> <p>In deze gevallen zullen jouw gegevens uit onze bestanden worden verwijderd en vernietigd. Het stopzetten van deelname heeft geen nadelige gevolgen voor jou of de eventueel reeds ontvangen vergoeding.</p> <p>Als je tijdens het onderzoek, na de bedenktijd van 5 werkdagen, besluit om jouw medewerking te staken, zal dat eveneens op geen enkele wijze gevolgen voor je hebben. Echter: de gegevens die u hebt verstrekt tot aan het moment waarop uw deelname stopt, zal in het onderzoek gebruikt worden, inclusief de bescherming van uw privacy zoals hierboven beschreven. Er worden uiteraard geen nieuwe gegevens verzameld of gebruikt.</p> <p>Als u besluit om te stoppen met deelname aan het onderzoek, of als u vragen of klachten heeft, of uw bezorgdheid kenbaar wilt maken, of een vorm van schade of</p>

	<p>ongemak vanwege het onderzoek, neemt u dan aub contact op met de onderzoeksleider: Jelle Vianen</p> <p>+31-637226906</p> <p><a href="mailto:j.vianen@nijmegen.nl">j.vianen@nijmegen.nl</a></p>
<p>Toestemmings- verklaring</p>	<p>Met uw ondertekening van dit document geeft aan dat u minstens 18 jaar oud bent; dat u goed bent geïnformeerd over het onderzoek, de manier waarop de onderzoeksgegevens worden verzameld, gebruikt en behandeld en welke eventuele risico's u zou kunnen lopen door te participeren in dit onderzoek</p> <p>Indien u vragen had, geeft u bij ondertekening aan dat u deze vragen heeft kunnen stellen en dat deze vragen helder en duidelijk zijn beantwoord. U geeft aan dat u vrijwillig akkoord gaat met uw deelname aan dit onderzoek. U ontvangt een kopie van dit ondertekende toestemmingsformulier.</p> <p>Ik ga akkoord met deelname aan een onderzoeksproject geleid door Jelle Vianen. Het doel van dit document is om de voorwaarden van mijn deelname aan het project vast te leggen.</p> <ol style="list-style-type: none"> <li>1. Ik kreeg voldoende informatie over dit onderzoeksproject. Het doel van mijn deelname als een geïnterviewde in dit project is voor mij helder uitgelegd en ik weet wat dit voor mij betekent.</li> <li>2. Mijn deelname als geïnterviewde in dit project is vrijwillig. Er is geen expliciete of impliciete dwang voor mij om aan dit onderzoek deel te nemen.</li> <li>3. Mijn deelname houdt in dat ik word geïnterviewd door (a) onderzoeker (s) van de Radboud Universiteit Nijmegen. Het interview zal ongeveer 30-60 minuten duren. Ik geef de onderzoeker (s) toestemming om tijdens het interview opnames (geluid/ beeld) te maken en schriftelijke notities te nemen. Het is mij duidelijk dat, als ik toch bezwaar heb met een of meer punten zoals hierboven benoemd, ik op elk moment mijn deelname, zonder opgaf van redenen, kan stoppen.</li> </ol>

	<p>4. Ik heb het recht om vragen niet te beantwoorden. Als ik me tijdens het interview ongemakkelijk voel, heb ik het recht om mijn deelname aan het interview te stoppen.</p> <p>5. Ik heb van de onderzoeksleider de uitdrukkelijke garantie gekregen dat de onderzoeksleider er zorg voor draagt dat ik niet ben te identificeren in door het onderzoek naar buiten gebrachte gegevens, rapporten of artikelen. Mijn privacy is gewaarborgd als deelnemer aan dit onderzoek.</p> <p>7. Ik heb dit formulier gelezen en begrepen. Al mijn vragen zijn naar mijn tevredenheid beantwoord en ik ga vrijwillig akkoord met deelname aan dit onderzoek.</p> <p>8. Ik heb een kopie ontvangen van dit toestemmingsformulier dat ook ondertekend is door de interviewer.</p>	
<p><b>Toestemming naamgebruik</b></p>	<p>Mijn naam mag, waar relevant, gebruikt worden in het onderzoek. JA / NEE</p> <p>Mijn titel mag, waar relevant, gebruikt worden in het onderzoek. JA / NEE</p>	
<p><b>Handtekening en datum</b></p>	<p><b>Naam Deelnemer</b></p>	<p><b>Naam Onderzoeksleider</b> Jelle Vianen</p>
	<p><b>Handtekening</b></p>	<p><b>Handtekening</b> </p>
	<p><b>Datum</b></p>	<p><b>Datum</b></p>