

Car labelling Directive 1999/94/EC

Public stakeholder consultation – questionnaire

Fields marked with * are mandatory.

INTRODUCTION

This evaluation for the European Commission aims to identify the experience of EU stakeholders with the Car Labelling Directive 1999/94/EC.

The public consultation will help to assess the extent to which the Directive has achieved its objectives of:

- Ensuring that information on fuel economy/CO2 emissions is displayed prominently and in an understandable way to consumers prior to/at the point of sale.
- Increasing the awareness of CO2 emissions and fuel economy among consumers.
- Influencing consumers to purchase more fuel efficient cars.
- Encouraging car manufacturers to produce more fuel efficient cars.

The evaluation will also examine the costs and the benefits of the Directive and whether the impacts could have been achieved at lower cost.

Your responses will be used to help better understand the outputs, results and impacts of the Directive. The results of this public consultations will be published on the [consultation webpage](#).

The Commission seeks feedback on the following questions:

* 1. In what capacity are you completing the questionnaire?

- ☐ Citizen/Individual
- ☐ On behalf of an organisation or authority

Section A. Introduction (Citizens/individuals)

Section A. Introduction (Citizens/individuals)

* 2. Please provide your country of residence:

- | | | |
|--------------------------------------|--|--------------------------------------|
| <input type="radio"/> Austria | <input type="radio"/> Belgium | <input type="radio"/> Bulgaria |
| <input type="radio"/> Croatia | <input type="radio"/> Republic of Cyprus | <input type="radio"/> Czech Republic |
| <input type="radio"/> Denmark | <input type="radio"/> Estonia | <input type="radio"/> Finland |
| <input type="radio"/> France | <input type="radio"/> Germany | <input type="radio"/> Greece |
| <input type="radio"/> Hungary | <input type="radio"/> Ireland | <input type="radio"/> Italy |
| <input type="radio"/> Latvia | <input type="radio"/> Lithuania | <input type="radio"/> Luxembourg |
| <input type="radio"/> Malta | <input type="radio"/> Netherlands | <input type="radio"/> Poland |
| <input type="radio"/> Portugal | <input type="radio"/> Romania | <input type="radio"/> Slovakia |
| <input type="radio"/> Slovenia | <input type="radio"/> Spain | <input type="radio"/> Sweden |
| <input type="radio"/> United Kingdom | | |

Other, please specify below

3. Please provide your contact Information.

* Contact Name

* Email Address

* Phone number

Please note that received contributions, together with the identity of the contributor, may be published on the Internet, unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution may be published in anonymous form. Otherwise the contribution will not be published nor will, in principle, its content be taken into account.

* 4. DATA PROTECTION

Please read the [Privacy Statement](#) on how we deal with your personal data and contribution.

- ☐ Yes, I agree to the publication
- ☐ No

If you object to the publication of the personal data on the grounds that such publication would harm your legitimate interests, please indicate this below and provide the reasons of such objection.

Section A. Introduction (Company/Organisation/Authority/Association)

Section A. Introduction (Company/Organisation/Authority/Association)

* 5. Please indicate the relevant country of countries of operation

- | | | |
|---|---|---|
| <input type="checkbox"/> EU wide | <input type="checkbox"/> Austria | <input type="checkbox"/> Belgium |
| <input type="checkbox"/> Bulgaria | <input type="checkbox"/> Croatia | <input type="checkbox"/> Republic of Cyprus |
| <input type="checkbox"/> Czech Republic | <input type="checkbox"/> Denmark | <input type="checkbox"/> Estonia |
| <input type="checkbox"/> Finland | <input type="checkbox"/> France | <input type="checkbox"/> Germany |
| <input type="checkbox"/> Greece | <input type="checkbox"/> Hungary | <input type="checkbox"/> Ireland |
| <input type="checkbox"/> Italy | <input type="checkbox"/> Latvia | <input type="checkbox"/> Lithuania |
| <input type="checkbox"/> Luxembourg | <input type="checkbox"/> Malta | <input type="checkbox"/> Netherlands |
| <input type="checkbox"/> Poland | <input type="checkbox"/> Portugal | <input type="checkbox"/> Romania |
| <input type="checkbox"/> Slovakia | <input type="checkbox"/> Slovenia | <input type="checkbox"/> Spain |
| <input type="checkbox"/> Sweden | <input type="checkbox"/> United Kingdom | |

Other, please specify below

6. Please categorise your organisation as appropriate

- | | |
|--|--|
| <input type="checkbox"/> Industry or business association | <input type="checkbox"/> Vehicle manufacturer |
| <input type="checkbox"/> Vehicle trader/dealer | <input type="checkbox"/> Automotive supplier |
| <input type="checkbox"/> Consumer organisation / car users group | <input type="checkbox"/> Advertising/publishing organisation |
| <input type="checkbox"/> Environmental/energy NGO. | <input type="checkbox"/> Transport NGO. |
| <input type="checkbox"/> Consumer NGO. | <input type="checkbox"/> Member State competent authority |
| <input type="checkbox"/> Another national authority or agency | <input type="checkbox"/> Local/regional public authority or agency |
| <input type="checkbox"/> Consultancy. | <input type="checkbox"/> Research/academic institution. |

Other, please specify below

* 7. Is your association/organisation registered in the Transparency Register of the European Commission?

- ☐ Yes
☐ No

Please provide the identification number of your organisation

If you are an entity not registered in the Transparency Register, please register in the [Transparency Register](#) before answering this questionnaire. If your entity responds without being registered, the Commission will consider its input as that of an individual and as such, will publish it separately.

8. Please provide your contact information.

* Name of the organisation/authority

* Email Address

* Phone number

Please note that received contributions, together with the identity of the contributor, may be published on the Internet, unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution may be published in anonymous form. Otherwise the contribution will not be published nor will, in principle, its content be taken into account.

* 9. DATA PROTECTION

Please read the [Privacy Statement](#) on how we deal with your personal data and contribution.

- ☐ Yes, I agree to the publication
☐ No

If you object to the publication of the personal data on the grounds that such publication would harm your legitimate interests, please indicate this below and provide the reasons of such objection.

Section B - General questions - Consumer's experience

Note: This section is addressed to citizens/individuals. If you are representing an organisation or authority your answers will be considered in your capacity as an individual. If you do not wish to answer these questions, please move directly to section C (question 17).

10. Are you aware that information about the CO₂ performance and fuel consumption of new cars is available:

	Yes	No	Do not know
On a label displayed on or near the car where it is purchased	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In a guide available for free at the point of sale.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On a poster or electronic screen displayed near the car where it is purchased.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In any printed advertisements / promotional literature. (E.g. adverts in newspapers/magazines).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

11. Have you been involved in purchasing a new passenger car since 2001?

- ☐ Yes
☐ No
☐ Do not know / cannot remember

12. For the most recent passenger car purchase, please specify if it was a private car or a company car.

- ☐ Private Car
☐ Company Car

13. Please indicate the Member State it was purchased in.

- | | | |
|--------------------------------------|--|--------------------------------------|
| <input type="radio"/> Austria | <input type="radio"/> Belgium | <input type="radio"/> Bulgaria |
| <input type="radio"/> Croatia | <input type="radio"/> Republic of Cyprus | <input type="radio"/> Czech Republic |
| <input type="radio"/> Denmark | <input type="radio"/> Estonia | <input type="radio"/> Finland |
| <input type="radio"/> France | <input type="radio"/> Germany | <input type="radio"/> Greece |
| <input type="radio"/> Hungary | <input type="radio"/> Ireland | <input type="radio"/> Italy |
| <input type="radio"/> Latvia | <input type="radio"/> Lithuania | <input type="radio"/> Luxembourg |
| <input type="radio"/> Malta | <input type="radio"/> Netherlands | <input type="radio"/> Poland |
| <input type="radio"/> Portugal | <input type="radio"/> Romania | <input type="radio"/> Slovakia |
| <input type="radio"/> Slovenia | <input type="radio"/> Spain | <input type="radio"/> Sweden |
| <input type="radio"/> United Kingdom | | |

Other, please specify below

14. Referring to your most recent purchase of a new car and information on CO2 performance and fuel consumption, please indicate if the following statements apply in relation to the options below by ticking the relevant box.

	The information was visible/available	I read the information	The information provided was clear/understandable	The information was useful	The information influenced my purchase decision	Do not know
Label displayed on or near the car	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Guide	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poster or electronic screen displayed near the car	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In any printed advertisements / promotional literature	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

15. Please indicate if you have faced any of the following problems in understanding the information provided in any of the following sources about the CO₂ performance and the fuel consumption?
(Please indicate all those that apply for each of the sources of information by ticking the relevant box)

	The metrics (e.g. CO ₂ /km) were not understandable	The presentation was poor / confusing	Information was missing	Other information (e.g. on costs) should have been provided
Label displayed on or near the car	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Guide	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poster or electronic screen displayed near the car	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In any printed advertisements / promotional literature	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please indicate any other problems in understanding the information provided in any of the above sources about the CO₂ performance and the fuel consumption or other information that should have been provided.

16. Do you have any additional comments with respect to your experience of using either the label, fuel economy guide, poster/electronic screen or promotional literature in informing you about the CO₂ emissions and fuel economy of new cars?

Section C – Specific questions

Note: This section is addressed to companies/ organisations/ authorities / associations. However, if you are responding as a citizen/individual, you may also answer any of the questions in this section. If you are a citizen/individual and do not wish to answer these questions, please move directly to section D (question 34).

17. How effective have the following been in terms of increasing consumer awareness of CO2 emissions of new cars?

Please rate from 1: Not effective at all to 5: Very effective

[illegible]

18. How effective have the following been in terms of increasing consumer awareness of fuel consumption of new cars?

Please rate from 1: Not effective at all to 5: Very effective

[illegible]

In any printed advertisements / promotional literature (E.g. adverts in newspapers/magazines)							2	
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19. How effective have the following been in terms of influencing consumers' decisions to purchase more fuel efficient cars?

Please rate from 1: Very ineffective to 5: Very effective

	1 (Not effective at all)	2	3	4	5 (Very effective)	Do not know	BEUC/ANEC Answer
Label displayed on or near each new car model at the point of sale.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	3
Guide available for free at the point of sale.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	2
A poster or electronic screen displayed near new car models offered for sale or lease at the point of sale.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	3
In any printed advertisements / promotional literature (E.g. adverts in newspapers/magazines)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	2

20. How effective was the Directive in encouraging car manufacturers to introduce more efficient vehicles in the market?

Please rate from 1: Not effective at all to 5: Very effective

- ☐ 1 (not effective at all)
 ☐ 2
☐ 3
☐ 4
☐ 5 (very effective)
 ☐ Do not know

21. How has the Directive impacted the supply of more fuel efficient vehicles, i.e. increased consumer choice for more fuel efficient cars?

- ☐ It has had no impact.
☐ It has led to an increase in the supply of more fuel efficient cars.
 ☐ Don't know

22. How has the Directive impacted the price of more fuel efficient vehicles?

- ☐ It has had no impact. X
- ☐ It has led to an increase in prices for more fuel efficient cars. ☐ It has led to a decrease in prices for more fuel efficient cars ☐ Don't know

23. Has the implementation of the Directive resulted in any costs in relation to any of the following aspects for the organisation(s) that you represent?

- ☐ Costs of information collection and record-keeping
- ☐ Cost of producing, printing, distributing, maintaining and updating labels, posters, guides etc.
- ☐ Costs of monitoring compliance for authorities (local/regional/national)
- ☐ None X

Other types of costs (please indicate below)

If possible, please provide specific information on the actual costs directly associated with the implementation of the Directive (e.g. total expenditure associated with the specific actions on an annual basis, total time required for specific actions in full time equivalent).

24. If relevant for the organisation(s) that you represent, please indicate if you believe that any of the costs incurred by your organisation(s) could have been reduced (e.g. on the basis of synergies with other national, EU or international initiatives)?

- ☐ Costs of information collection and record-keeping
- ☐ Cost of producing, printing, distributing, maintaining and updating labels, posters, guides etc.
- ☐ Costs of monitoring compliance for authorities (local/regional/national)
- ☐ None X

Please explain how these costs could be reduced

25. Has the implementation of the Directive resulted in any cost savings/ benefits in relation to any of the following aspects for the organisation(s) that you represent?

- ☐ Fuel cost savings
- ☐ Time savings, as a result of having easy access to information on fuel efficiency and CO2 emissions
- None X

Other types of cost savings/benefits (please indicate below)

If possible, please provide estimates of the actual savings arising.

26. Are you aware of any issues (conflicts, overlaps, trade-offs or inconsistencies) between the requirements or the practical implementation of the Car labelling Directive and those set by other relevant policy tools developed at national, EU or international level (e.g. other legislation, standards, tax incentives, financial support programmes)?

- ☐ Yes **X**
- ☐ No
- ☐ Don't know

If yes, please indicate the specific policy tool and the specific nature of the conflict, overlap or inconsistency.

Harmonisation of different labels

The labelling Directive does not require Member States to label information in such a way that it is aligned with other EU related labelling schemes such as the EU's energy label. This is inconsistent and has weakened the potential for consumers to familiarize themselves with the label and understand to a better extent what the label entails. We suggest that in all Member States the label should make use of a comparative colour-coded rating scale ranging from class A to class G. Such a system is easy to understand and based on the model of the original energy label for household appliances (before it was revised in 2010 and allowed the introduction of additional plus classes), which is very well-known among consumers. Research by Consumer Futures (2009) showed that consumers have difficulties understanding the numerical measure of CO₂ used in advertisements. A rating system therefore provides context for the numbers and helps people understand whether a certain number indicates good or bad performance. The simultaneous use of a similar label design for cars, household appliances, buildings and car tyres will reinforce the impact and recognition of the labelling scheme in the several areas of application. A recent study ordered by the European Commission's Directorate for Energy has also recommended an alignment of car labelling with the EU Energy Label format in order to avoid consumer confusion across all products.

It is also clear from research that the A to G label (and not including +s) for household appliances has been successful in terms of encouraging consumers to buy more energy efficient appliances and also in encouraging manufacturers to provide more energy efficient appliances. The clarity and straightforwardness of this scheme has made it very popular among consumers. This has resulted in a rapid market transformation as manufacturers were very keen to provide top-rated products to consumers. Simplicity, clarity and comparability of information that is meaningful to consumers are elements that have rendered this labelling scheme one of the few truly effective consumer information tools, enjoying widespread acceptance and trust amongst consumers.

Finally, it is also the case that although the EU Tyre label requires the fuel efficiency classes to be set according to a colour coded 'A' to 'G' scale – which provides familiarity with the labelling of household products - again the car CO₂ label does not have such a requirement. This difference between the labels of two directly related products will again hamper the effectiveness of both labels by causing potential confusion between

consumers.

For more information, see the BEUC/ANEC paper on 'Simplifying the EU Energy Label' in Section D, qu 34.

Financial information

Taxes: There are no requirements for Member States to include information relating to the national tax band of the vehicle as regards the registration and circulation taxes that must be paid by the owner. This information would be important to include in order to reinforce the benefits of purchasing a low CO2 emitting/fuel efficient car and allow for consumers to better understand the total cost of ownership associated with buying a vehicle.

It is also the case that in certain Member States (Netherlands for example) the tax advantages for fuel efficient cars has had a strong effect on the supply and uptake of vehicles, which has in turn affected the manner in which car dealerships have marketed vehicles. This has led for instance to car dealers marketing models that meet requirements for lower taxes, as categorised under national CO2 class bands.

For full references see BEUC/ANEC position paper on car Co2 labelling referenced in Section D, qu 34.

27. Some EU Member States have included additional elements in their national CO2/fuel consumption labelling systems. Are you aware of any of the following additional elements in CO2/fuel consumption labelling systems in EU Member States?

	Included	Not included	Don't know	BEUC/ANEC Answer
Running costs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Included
Taxes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Included
Air pollution	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Don't know
Noise	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Don't know
Safety	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Don't know
Eco-scores	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Don't know
Lifecycle CO2 emissions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Don't know
Labelling of second hand cars	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Included
Labelling of light commercial vehicles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Included
Provision of information through electronic media (Internet, Television, Cinema,	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	Included

If yes, please specify the Member State(s) in which the additional element has been implemented.

The UK and Germany label details running costs and taxes, and also requires the information to be presented voluntarily for second hand cars.

Tax information is often provided in advertisements in the Netherlands but not on the label.

According to AEA (2011) labels for light commercial vehicles are required in Denmark

According to AEA (2011) the label is also provided online by Belgium, Denmark, Spain and UK. However, it is more important about the location of the label online, in that it seems no, or very few, labels are provided at the point of sale online.

28. How effective do you consider any of these additional elements in terms of influencing consumers' car purchase decision?

	1 (not effective at all)	2	3	4	5 (Very effective)	Don't know	BEUC/ANEC Answer
Running costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	5
Taxes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	5
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	3
Noise	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	2
Safety	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	5
Eco-scores	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	3
Lifecycle CO ₂ emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	2
Labelling of second hand cars	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	5
Labelling of light commercial	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Do not know
Provision of information through electronic media (Internet, Television,	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	5

Others (please specify below)

Classification of cars along the A-G rating scale according to their absolute emission levels ("absolute labelling scheme");

Please explain your answer

Classification of cars along the A-G rating scale according to their absolute emission levels ("absolute labelling scheme");

We consider that all information provided to consumers on the label should be expressed in absolute terms. Therefore, we recommend that cars should be classified along the suggested A-G rating scale according to the cars' absolute CO₂ emissions (i.e. absolute labelling scheme) and *not* along a scale that is related to the cars' CO₂ emissions compared to cars of the same size, weight or type (i.e. relative rating scheme).

If the emission levels were expressed in relative terms on weight for instance, a large car which uses a lot of fuel and thereby emits a lot of CO₂, could still receive a top rating when amongst the most efficient cars of its class. Under the German labelling system for instance, the Audi Q7 3.0 TDI (CO₂: 189 g/km, weight: 2345 kg) falls under the energy class "B", whereas the small car Toyota Aygo 1.0 (CO₂: 105 g/km, weight 930 kg) falls under the energy class "C". Thus, a relative approach does not readily allow consumers to compare e.g. a sports utility vehicle (SUV) with a small city car.

A survey by the consumer centre of North Rhine-Westphalia with 1,006 German consumers conducted in July/August 2012 also showed that a large number of consumers expect a car that receives a top rating (i.e. A+) should have an overall very low level of fuel consumption, despite the fact that Germany follows a relative labelling approach. More precisely, consumers were asked what they personally expect from a car that receives the highest energy efficiency class A+ (which is currently the top rating in Germany). More than two thirds of the respondents responded that the A+ class stands for an overall very low level of fuel

consumption of the car. Nine percent of consumers expected the top rating shows a car that has a low level of fuel consumption in comparison to other cars of similar size. Only 17% of the respondents expected that the A+ rating stands for a low level of fuel consumption compared on the basis of similar car's weight, the system that is actually applied in Germany.

We see a high risk that this kind of misinterpretation of the label will lead to distrust towards the labelling system which undermines the effectiveness of the system. A report commissioned by DG CLIMA also concludes that "in a policy that in the short term should aim at increasing familiarity, trust, and comprehension [of the label] it seems more appropriate to use the absolute system...". In addition, an absolute labelling scheme could be more easily linked to fiscal measures which are commonly related to absolute CO₂ emissions in many Member States.

Running costs

Codagnone et al. (2013) have revealed that running costs (in both per mile/km format and in a 5 year format) were the most effective nudge among all tested during laboratory and online experiments. In addition, a Dutch study by ANWB also revealed that the Dutch label would benefit from the inclusion of financial information, including the fuel costs and tax related costs. Thus, available research points into the direction that respondents' attention can be better reached by providing information on operating costs (in addition to fuel consumption) than by environmental information on CO₂ emissions.

Taxes

When the taxation rates are linked to a car's CO₂ emissions, then this information would be very valuable to help consumers to take more informed choices.

However, it may be difficult to provide this information in a standardised way as current car tax schemes differ widely amongst EU Member States. In addition, tax schemes might change within one tax year and there is a risk that the label seen by the consumers gives wrong information in case the information is not regularly updated. We suggest that if a tax scheme exists in the specific Member States, it should be made obligatory to communicate about it on the label for new cars. If there would be changes required to the labelling, in advance of a due review date of the labelling, retailers would be required to inform consumers and to issue printed material with concrete information as to what impacts the changes will have on their tax load.

Air pollution

Information concerning the performance of a passenger car in relation to its production of air pollutants is potentially of benefit to consumers. Having said this, it is important not to over complicate the purchase decision process and therefore more research is needed to ensure that such information, if included in the label, is done in such a way that does not confuse the prospective car buyer. As a result of the existing divergence between laboratory and real world emissions performance, and if research indicates that consumers will not suffer from information overload, it might also be worth considering the inclusion of such information based on Real Driving Emissions. Such an approach might better inform the consumer more about the environmental credentials of the vehicles they are buying and allow them to consider both the carbon footprint and the air pollutant performance.

Safety

Safety is of course extremely important for consumers. Safety of motor vehicles is subject to Regulation (EC) No 661/2009 - type-approval for motor vehicles and trailers, i.e. manufacturers must guarantee that new vehicles sold, registered or put into service in the EU are type-approved in accordance with this regulation. On the other hand, tyres, which are an important safety component of the vehicle, are subject to a standard label which is mandatory throughout Europe since November 2012: based on three criteria, the EU tyre label provides information on the environmental and safety characteristics of a tyre with the aim of increasing road safety and reducing pollution. However, one safety aspect of the tyre label is lacking as there is no obligation to provide information about the grip of the tyres when in icy conditions. A recent study in Finland and Sweden for example showed that the current label is putting at risk the safety of consumers from Nordic countries, as they would be misled by the current label, potentially choosing a tyre based on wet grip (information which is required). In this, it would be important to consider a

harmonised label responding to the needs of all consumers without putting at risk the consumers from a certain geographical area by omitting information relevant to their conditions.

Lifecycle CO₂ emissions

As a long-term approach we recommend taking into account all well-to-wheel greenhouse gas emissions for all types of cars (petrol, diesel and alternatively powered vehicles), which include not only tailpipe emissions (emissions produced by the vehicle as it runs), but also all emissions related to fuel production, processing, distribution and use. We recognise that there are challenges to doing this in the short-term, particularly as long as CO₂ emissions targets regulations continue to use tailpipe emissions, as is likely to be the case until at least 2020. We are also aware that introducing well-to-wheel emissions across all vehicle technologies would greatly increase the complexity of the CO₂ calculations and thus potentially make such a calculation unreliable.

Labelling of second hand cars

New passenger cars are only part of the picture when it comes to individual motorised transportation. A big share of consumers do not buy a new passenger car but a second-hand car. In many countries of the European Union, the used car sales volumes exceed the sales of new cars. We suggest that the label should be extended to the second-hand car sold by professional sellers. The label should be applied for used cars sold by individual consumers only on a voluntary basis.

Provision of information through electronic media (Internet, Television, Cinema, Radio)

When the original car labelling Directive was adopted in 1999, online advertisement was only in its initial stage. The internet has now become a major – if not the primary – source of consumer information. A web-based survey with more than 1,000 car owners in the UK showed that websites and the internet were the most important source of information for consumers during the decision-making process of buying a car. Almost 2/3 of all car buyers that recently bought a car made use of that source of information

The study by Codagnone et al. (2013) showed that 13.1% of the respondents surveyed in 10 European countries looked for information about a new car on a search engine every day or almost every day. An additional 23% and 18.2% used a search engine at least once per week or at least once per month, respectively. Only 22.5% of all consumers surveyed in 10 European countries have either not used an online search engine for looking up information or were not aware of the existence of this source of information.

Yet, although information on CO₂ emission levels of cars must currently be provided in showrooms and in all printed advertisements (including in newspapers, magazines and posters), non-printed media such as the internet, television, radio and cinema, under the current Directive, are not required to provide this information to consumers. Not requiring the display of information on fuel consumption and CO₂ emissions in internet advertisements and other non-printed media is an old-fashioned approach towards consumer information. We therefore call on the Commission to set strict rules on print advertisements (e.g. technical manuals, brochures, advertisements in newspapers, magazines, posters), but also on internet, TV, cinema and radio.

In addition, we would also support that under EU competences, a smart phone and internet tool should be developed (e.g. accessible through a QR Code or any other state-of-the-art technology with easy accessibility for consumers) where consumers could easily compare the fuel consumption values of all vehicles available on the market, and could obtain more personalised information, adapted to different factors, including for instance the local fuel price, electricity mix and individual driving habits, in order to obtain the best possible cost-benefit analysis. It would be important to ensure that key information (i.e. fuel consumption performance, colour coded rating, CO₂ emissions, running costs, taxes etc.) provided electronically, should also remain at the point of sale at physical car dealerships. Consumers should not have to take inconvenient and additional steps in order to access critical information that could positively affect their purchasing decisions.

To read our full position, please see the position paper on car CO₂ labelling included in Section D, question 34.

29. Would the car labelling Directive have been more effective if information on air pollutants (e.g. NOx) had been included in addition to CO2 emissions and fuel consumption?

- ☐ Yes
- ☐ No
- ☒ Don't know X

Please explain your answer:

Although in principle such additional information might be useful for consumers, further analysis of the interest of consumers in being provided such information is needed and the way it would be detailed. For instance, simply using the label to additionally inform consumers that the car's emissions meet EU limits would not be useful as all vehicles would be obliged to meet the limits anyhow. However, informing consumers of the exact emissions (ideally based on Realworld Driving Emissions) and using a rating scale to do so might be of interest to consumers but again further analysis is needed to avoid over informing consumers and informing in such a way that consumers can understand the relevance of the information.

30. Are you aware of any other positive impacts of the Directive that have not been mentioned above? ☐ Yes ☒ No ☐ Don't know

Please explain

31. Are you aware of any negative impacts of the Directive that have not been mentioned above? ☐ Yes ☒ No ☐ Don't know

Please explain

Another argument against a relative labelling system based on weight as pursued by Germany, is that less incentive would be provided to manufacturers to invest in light-weighting which is seen as a very efficient way of achieving CO₂ reductions. Using mass as the parameter to assign cars to efficiency classes might have the unintended negative consequence that manufacturers increase the mass of the cars in order to achieve a better rating without actually improving the CO₂ performance of the car.

To read our full position, please see the position paper on car CO₂ labelling included in Section D, question 34.

32. Member States are currently free to develop their own label designs and there is currently a range of different labels across Member States. To what extent do you agree that the level of flexibility that the Directive provides is appropriate to meet the objectives of the Directive?
- ☒ Too flexible ☐ Sufficiently flexible ☐ Not flexible enough ☐ Don't know

33. Please indicate the extent to which you agree or disagree with the following statement: There is still a need for EU legislation to inform consumers of the CO2 performance and fuel consumption of new cars.

- ☒ Strongly agree X
- ☐ Slightly agree
- ☐ Neutral
- ☐ Slightly disagree
- ☐ Strongly disagree
- ☐ Don't know

Section D. Final Remarks

34. Please indicate any reports or other sources of information that provide evidence to support your responses. Please provide the title, author and, if available, a hyperlink to the study/report.

BEUC/ANEC (2014) Empower EU consumers through visible and clear information on CO₂ emissions from new passenger cars http://www.beuc.eu/publications/beuc-x-2014-053_cca_cars_co2_labelling-2014_anec-beuc_position_paper_long_version.pdf

BEUC/ANEC (2015) Simplifying the EU Energy Label

http://www.anec.eu/attachments/ANEC_BEUC%20key%20priorities%20in%20the%20revision%20of%20the%20EU%20Energy%20Label.pdf

35. Do you have any further comments to make regarding the Car Labelling Directive?

Concerning the car labelling Directive

We support a revision of the car labelling Directive by standardising and optimising the format of the label across the European Union in order to make sure that all EU consumers are provided with information that is given in an intuitive and user-friendly way allowing simple and accurate comparisons between cars.

More precisely, we support harmonisation of the key elements of the Directive. However, some flexibility should be included in order to enable countries to adapt the Directive to national circumstances.

We support the introduction of a harmonised format of the CO₂ label where the **key elements** of the format of the label should be standardised:

- Use of a colour-coded comparative rating scale ranging from class A to class G as the main focus of the label;
- Classification of cars along the A-G rating scale according to their absolute emission levels (“absolute labelling scheme”);
- The long-term objective should be that the classification of the rating scale should be based on well-to-wheel CO₂ emissions as the measure of comparison in order to make all vehicle types comparable;
- Set CO₂ thresholds of the labelling classes at EU level;
- Periodically tighten the criteria for achieving the rating classes to keep up with technological changes.

In addition, we recommend that Member States should provide the following information on the label **in a standardised way**, but adapt the label to **national circumstances**:

- Information on fuel consumption to be expressed in the metric used in the Member State;
- Mandatory information on fuel costs based on national fuel prices;
- Mandatory information on tax related information adapted to national circumstances;
- Additional information provided in the country-specific language (s).

Moreover, the Directive should be extended to cars rented or leased by professional companies and to second-hand cars sold by professional sellers, and to two- and three-wheelers.

Concerning this consultation

Several of the questions in Section C (for instance 17/18/19) can only merit a subjective answer as existing research does not provide conclusive quantifiable evidence supporting one answer or another. It is arguable whether robust evidence for such answers could ever be discovered as the behavior of people and the decisions that are taken by consumers is a complex process, particularly concerning passenger cars when there are so many variables affecting the decision making process.

Car labelling measures can deliver major benefits for consumers and the environment. These benefits can be counted in terms of alleviating the environmental impacts of passenger cars, decreasing running costs for European consumers and improving the overall quality of passenger cars. However, this all depends on

the construction of the label (design/relevance of information etc.) and the reliability and comparability of the information provided. Here, the impact of the EU car label has been reduced because of the way it has been implemented in different Member States, and as a result of the failings of vehicle testing procedures to provide comparable and reliable information. There are also however some good examples of best practice and these need to be built on in order to strengthen the Directive itself and in turn ensure that across Europe the impact of the Directive is leveraged.

Furthermore, regarding the reliability of the information, it is also apparent that to make the information truly useful to consumers, the values for fuel consumption and CO₂ should be as representative as possible. Beyond implementation of a new testing protocol, the WLTP (expected for implementation as of 2017), the Commission should also explore adding a conversion factor to laboratory based results to allow for more representative figures (as is the case in the US). In addition, the development of a robust on-the-road testing protocol (i.e. extending RDE testing to fuel consumption testing) should also be further explored for the purpose of providing more realistic values. On top of this, adequate penalties should be administered by Member States to car makers for providing misleading information about the fuel consumption of vehicles. Furthermore, at present, very few European consumers of passenger cars can match the fuel consumption figures (on the road) that car makers are officially declaring and using as part of their advertisements. These consumers also have poor consumer rights as regards holding manufacturers to account for those misleading claims (in terms of demanding adequate compensation when the difference is significant). Consumers across Europe should be presented with a better opportunity to demand compensation if the official figures declared by car makers are significantly different from what is found on the road. Hence other systems that present opportunities for the owners of vehicles to be compensated in this regard (i.e. the US system), should be further explored in the European context in order to ensure that European consumers have stronger and more adequate rights to compensation.

As an organisation, it is also important to recognize that our answers to the questions are based on feedback from our members and are intended to represent our opinions for across the EU. Several of the answers we have given in Section C. are therefore considered representative of the impact of the labelling Directive across the EU. As the Directive has been implemented in different ways across the EU, of course our views cannot always account for the specificities of different labelling schemes applied in the different Member States. We have also not answered all the questions as some of them are not appropriate for a consumer organization to answer but will be more relevant to other stakeholders such as industry stakeholders.

As detailed in our position paper on car labelling, it is also the case that numerous studies have been produced that have evaluated the performance of including different elements on the car label and have shown what information and how it is presented would work best. We would encourage the Commission to take note of these studies and propose revising the Directive in order to ensure its objectives can be better achieved.

To read our full position with full references, please see the position paper on car CO₂ labelling included in Section D, question 34.

Thank you for participating in the survey