

FAEP INPUT TO THE CONSULTATION ON REDUCING CO2 EMISSIONS FROM CARS

The European Federation of Magazine Publishers (FAEP) welcomes the opportunity to make an input to the Commission's consultation on reducing CO2 emissions from cars.

Our comments are limited to one area under consideration: advertising.

Advertising is the life-blood of the printed press. Revenues gleaned from advertising – not copy sales - allow for an independent and vibrant press in Europe.

Car advertising represents up to 20% of total advertising revenues for print publishers. At a time when advertising spend is fragmenting across the old and new media, the printed press seems to face a never-ending stream of new advertising restrictions and/or requirements which only serve to squeeze the ability of the press to provide quality, trusted content catering for a broad spectrum of interests.

Further advertising restrictions or requirements could impact on the willingness of car manufacturers to choose press publications (online or offline) for their brand promotions. The printed press in Europe is embracing the challenges presented by the digital revolution. Business models are developing, but advertising will remain the key ingredient for safeguarding an independent, thriving print media.

Indeed, policy makers should rather be encouraging measures which allow for the maintenance of a strong press sector in Europe.

According to the Labelling Directive, car manufacturers are already obliged to provide information on the fuel consumption and CO2 emissions in advertising for new cars, which we consider to be already an adequate means of informing potential buyers of the environmental impact of the car they are considering to buy. In this respect, perhaps any future statutory measures in this field should be limited to uniform requirement for labelling, rather than additional requirements for the content of advertisements.

It is one of the fundamental values of the European Union to protect freedom of expression. This freedom applies for editorial speech as much as for commercial speech. Statutory advertising requirements inevitably affect the fundamental right of freedom of expression. Producers of legally offered, commonplace and even essential products in the EU market should be able to publicly express themselves without any restrictions other than those contained in existing national and/or European norms and self-regulatory codes.

Furthermore, publishers would strongly oppose any political measure that has the potential to create an imbalance in the advertising revenues of the press as this would have a severe impact on the independence and diversity of the press.

Statutory advertising requirements with an anti-promotional effect in print media (such as being obliged to devote space to non-promotional text) might lead to less advertising for print in total, by effectively encouraging advertisers (car manufacturers) to choose other forms of media in which to promote their products.

Finally, we would argue that in making any multi-thousand Euro purchase, most consumers give good consideration to their purchase and do not base their decision on the sight of a single advert. Consumers are well-placed and very well served to further inform themselves – if they so wish – about the environmental features of the car. Research shows this to be the case, with consumers weighing their options from a plethora of sources, media, promotional literature, internet, word-of-mouth, salesrooms etc.

With respect to all the above, FAEP calls on the Commission to give serious reflection to this concern of the print media when drafting future legislation in this field.

FAEP is a federation representing over 15.000 publishers producing over 50.000 magazine titles in Europe. Twenty billion magazines are read each year on a regular, consistent basis by over 80% of the EU adult population. The sector is worth forty billion Euro, half of which is gleaned from advertising. Periodical publishers directly employ over 200.000 citizens, with a multiple of that figure employed in the related advertising, graphic, print and paper manufacturing industries.