

AEGPL Response to the Public consultation to support the evaluation of the car labelling Directive

AEGPL, the European LPG Association, welcomes the opportunity to contribute to the evaluation of the car labelling Directive (Directive 1999/94/EC).

This consultation comes in a specific context. Indeed, COP21 talks in Paris successfully led to the renewal of a global commitment to address climate change, while alarming levels of air pollution in all the European major cities, underline the need to address air pollution in parallel. But for an effective mitigation of climate change and improvement of the quality of the air, citizens must be empowered.

AEGPL strongly agrees that information to consumers is key to develop more sustainable purchasing decisions. Better informed consumers can play a role in promoting a switch to cleaner fuels and to decarbonise the transport sector.

AEGPL believes that Autogas can play a strategic role in transport decarbonisation since it is a low-carbon, near-zero back carbon and low-polluting alternative to conventional fuels. In fact, Autogas offers well-to-wheel GHG emissions that are 23% lower than diesel and 21% lower than gasoline. However, Autogas will only deliver its full potential if European consumers are being made aware of its benefits. AEGPL therefore calls for a consumer-friendly label displaying objective and comparable information on GHG and pollutants emissions from all cars, as well as other elements such as running costs.

Below you can read AEGPL's response to the Public Consultation to support the evaluation of the car labelling Directive. We look forward to continue working with the European Commission and other stakeholders in view of designing an effective and valuable information scheme for consumers.

Samuel Maubanc

AEGPL General Manager

Section C – Specific questions

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
Running costs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Taxes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Noise	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Safety	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Eco-scores	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lifecycle CO ₂ emissions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labelling of second hand cars	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labelling of light commercial vehicles	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Provision of information through electronic media (Internet, Television, Cinema, Radio)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Running costs are featured on labels in the UK and Germany. Annual road taxes are featured on labels in the UK, Denmark and Germany. EuroNCAP rating is featured on labels in Denmark.

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
Running costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Taxes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Noise	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Eco-scores	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lifecycle CO2 emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labelling of second hand cars	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labelling of light commercial vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provision of information through electronic media (Internet, Television, Cinema, Radio)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

AEGPL believes that more can be done to effectively inform consumers about cars' environmental performance and running costs. The car label can be a very powerful tool to feature this information. In fact, if well designed, it can provide the relevant information in a fashion that can easily be understood by consumers and, consequently, promote more sustainable purchasing habits. This has the potential to encourage car manufacturers to invest in efficiency improvements as well as in the development of sustainable alternative technologies.

AEGPL calls for the expansion of the scope of the car label to include NOx and PM emissions as well as running costs (e.g. € per kilometer). Recently, alarming levels of air pollution in Europe have made consumers extremely sensitive to this issue, which according to the EEA is responsible for more than 400,000 premature deaths in Europe each year. Similarly, it is essential for consumers to be aware of the running costs of cars, a key driver to more sustainable purchasing decisions. An indication of the noise levels from motor vehicles could also be of interest to the consumers, given its important health impact.

Regarding CO₂ emissions, AEGPL considers that the increasing share of alternatively fuelled cars calls for modifying the traditional calculation system, which currently only accounts for tailpipe emissions. In fact, the production and the distribution of the energy sources powering today's car fleet are currently not considered although they have an influence on the car overall performance. For this reason, we suggest that the CO₂ value indicated on the label reflects lifecycle emissions, i.e. emissions at all stages therefore including the emissions related to the production and distribution of energy sources in addition to the cars' tailpipe emissions (well-to-wheel approach) for all technologies.

We also consider that car labels should be made obligatory for second hand cars, since used cars' sales make up a considerable share of overall car sales. For example, in 2014, 7.2 million used cars changed hands in the UK, while new cars sales, in the same year, accounted for 2.5 million. We also believe that the label should apply to light commercial vehicles, for consistency reasons.

In order to make the label more effective, it is crucial that marketing campaigns aimed at increasing its awareness are delivered on both traditional and electronic media. The reason of the high level of awareness of the energy efficiency label is that it is now a key part of most household appliances' promotional campaigns. AEGPL believes that the car label has the potential to become the "one stop shop" for consumers looking for the information they need when they consider purchasing a new vehicle, provided that it is amended to include above mentioned key information and that it is adequately promoted.

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

Yes

Air pollutants emissions are a key piece of information that is currently missing on car labels. Recently, extremely high levels of air pollution in European capitals have made EU citizens more sensitive to this issue, which became an element of their purchasing decisions. Hence, information on NO_x and PM emissions should be included in the label.

Such expansion of the scope will make the label more effective. Indeed, we believe that the best strategy to increase the consumers' awareness of the label is to make it a "one stop shop" where they can find all the information they need when purchasing a vehicle.

30. 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?

Sufficiently flexible

31. 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

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