

# Car labeling Directive 1999/94/EC

## Public stakeholder consultation – questionnaire

Fields marked with \* are mandatory.

### INTRODUCTION

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This evaluation for the European Commission aims to identify the experience of EU stakeholders with the Car Labeling 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 (Company/Organisation/Authority/Association)

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#### **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 checked="" 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 organization | <input type="checkbox"/> Advertising/publishing                      |
| <input type="checkbox"/> Environmental/energy NGO.                            | <input type="checkbox"/> Transport NGO.                              |
| <input type="checkbox"/> Consumer NGO.  | <input checked="" 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

Netherlands Ministry of Infrastructure and the Environment

\* Email Address

\* Phone number

+ 31 70-4566062

*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.

X 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

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**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).**

## Section C – Specific questions

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**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

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

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

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

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
Label displayed on or near each new car model at the point of sale.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Guide available for free at the point of sale.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A poster or electronic screen displayed near new car models offered for sale or lease at the point of sale.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In any printed advertisements / promotional literature (E.g. adverts in newspapers/magazines)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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.
- 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

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).

Collecting and record-keeping of fuel consumption and CO<sub>2</sub>-emission data is done by the Netherlands type approval authority, the RDW. In the Netherlands this data is transmitted to most of the car importers in order to produce car labels. Some car importers do their own data collecting and record-keeping for car label production. Collecting and record-keeping of data by the Netherlands' type approval authority RDW is part of the primary task of the RDW.

Costs of collecting and record-keeping of fuel consumption and CO<sub>2</sub>-emission data: 80.000 euro per year  
Costs of producing the content of the fuel economy guide: 10.000 euro per year  
Cost of printing 50.000 fuel economy guides: 60.000 euro per year.  
Cost of producing, printing, distributing, maintaining and updating labels and posters: estimately 250.000 euro per year or higher. The exact costs are not known.  
Costs of monitoring compliance for authorities: 200.000 euro per year

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

Please explain how these costs could be reduced

Costs of information collection and record-keeping could be reduced if one integral, EU-wide database for official fuel-consumption and CO<sub>2</sub>-emission figures would be made available that could be used for different purposes.

Cost of producing, printing, distributing, maintaining and updating labels, posters, guides etc. could be reduced if no paper version of the guides would be required and if the requirement for the poster in the showroom would be cancelled.

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 CO<sub>2</sub> emissions
- None

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
- No
- Don't know

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

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

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

In the Netherlands the fuel economy class from A to G is also printed on the car label. The fuel economy class gives an indication for fuel efficiency of a car with respect to other cars of the same size.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Taxes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Eco-scores	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lifecycle CO2 emissions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labelling of second hand cars	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Others (please specify below)

Including the fuel economy class from A to G on the label could be effective.

The effectiveness of the guide can be improved by requiring that national car importers have to use the commercial names of car models for the guide.

Please explain your answer

With the fuel economy class from A to G on the label the appearance of the car label would be similar to the energy labels for other products, like for household appliances.

Some car importers use cryptic names for their car models in the guide.

29. Would the car labeling 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

Please explain your answer:

Type approval values for the NO<sub>x</sub> emission of modern diesel cars do not give a good indication for real world NO<sub>x</sub> emission levels. Real world emission levels are much higher (for modern diesel cars typically a factor 3 to 5) than NO<sub>x</sub> limit values. So in the past, the car labeling Directive would not have been more effective, if information on air pollutants (e.g. NO<sub>x</sub>) had been included.

For the future, adding information on pollutants could be interesting if diesel passenger cars come onto the market that fulfill the requirements of the new Real Driving Emissions test of Euro-6. Diesel cars that fulfill the RDE requirements, should be approximately as clean as petrol cars. If this is done, then on the label should be mentioned that diesel passenger cars comply with RDE stage 1 (1-9-2017 / 2019) respectively RDE stage 2 (1-1-2020 / 2021). Actual type approval values for NO<sub>x</sub> should not be mentioned on the a label.

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

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

Slightly agree

Neutral

Slightly disagree

Strongly

disagree  Don't

know

## Section D. Final Remarks

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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.

In the Netherlands the fuel economy guide is available on the following site:

<https://www.rdw.nl/SiteCollectionDocuments/VT/Naslag/Brandstofverbruiksboekje%202016.pdf>

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

The Fuel Consumption Directive 1999/94/EG requires that member states define fuel efficiency labels for passenger cars. In the Netherlands the fuel labels are designed as A to G labels and are attached to car models per calendar year. The labeling categories from A to G are updated per 1st of January of each calendar year in the Netherlands.

In the Netherlands the labels must be established well in advance of the next year in order to give the manufacturers sufficient lead time to prepare their administrations and systems for that year. Furthermore a guide/booklet is made available containing all car models with their labels, CO2 emission values and fuel economy figures that are available on the market in that year

Per September 1st 2018 the fuel economy of passenger cars will be measured according to the new WLTP-test procedure. This means that there will be a change from the NEDC values to the WLTP values for the label. If the Commission would propose to realize this change per September 1st 2018, this would imply that for the year 2018 all the obligations mentioned above must be carried out twice. This means that the Netherlands will be faced with extra administrative burden for this year.

Considering the above mentioned issues, the Netherlands strongly prefer that the Commission comes with a proposal that leaves member states the choice to implement the change per September 1st 2018 or per January 1st 2019.

Thank you for participating in the survey