



## Car labelling revision: using real-world information to empower consumers - T&E policy note

This short note presents T&E's position on the revision of the EU car labelling rules, which were proposed as part of the [revision](#) of the car CO2 standards regulation when the Commission presented its automotive [package](#) on 16 December last year.

### 1. Why current EU car labelling rules are not enough

The current Car Labelling Directive (Directive 1999/94/EC) aims to increase transparency for consumers on the fuel consumption of vehicles. The Directive requires that new vehicles for lease and sale be accompanied by a label showing the fuel consumption and CO2 emissions for the car model.

Having access to accurate information about a car's CO2 emissions and its fuel and energy consumption can help consumers make more sustainable and affordable choices. Unfortunately, the existing law is failing to do so, and is largely outdated.

The legislation as it is today does not require carmakers to provide information on the energy efficiency and the range of electric vehicles. And, despite the fact that over three quarters of Europeans buy their cars on the secondhand market, the Car Labelling Directive - adopted back in 1999 - only applies to new cars.

### 2. Commission proposal: what's good...and what's missing

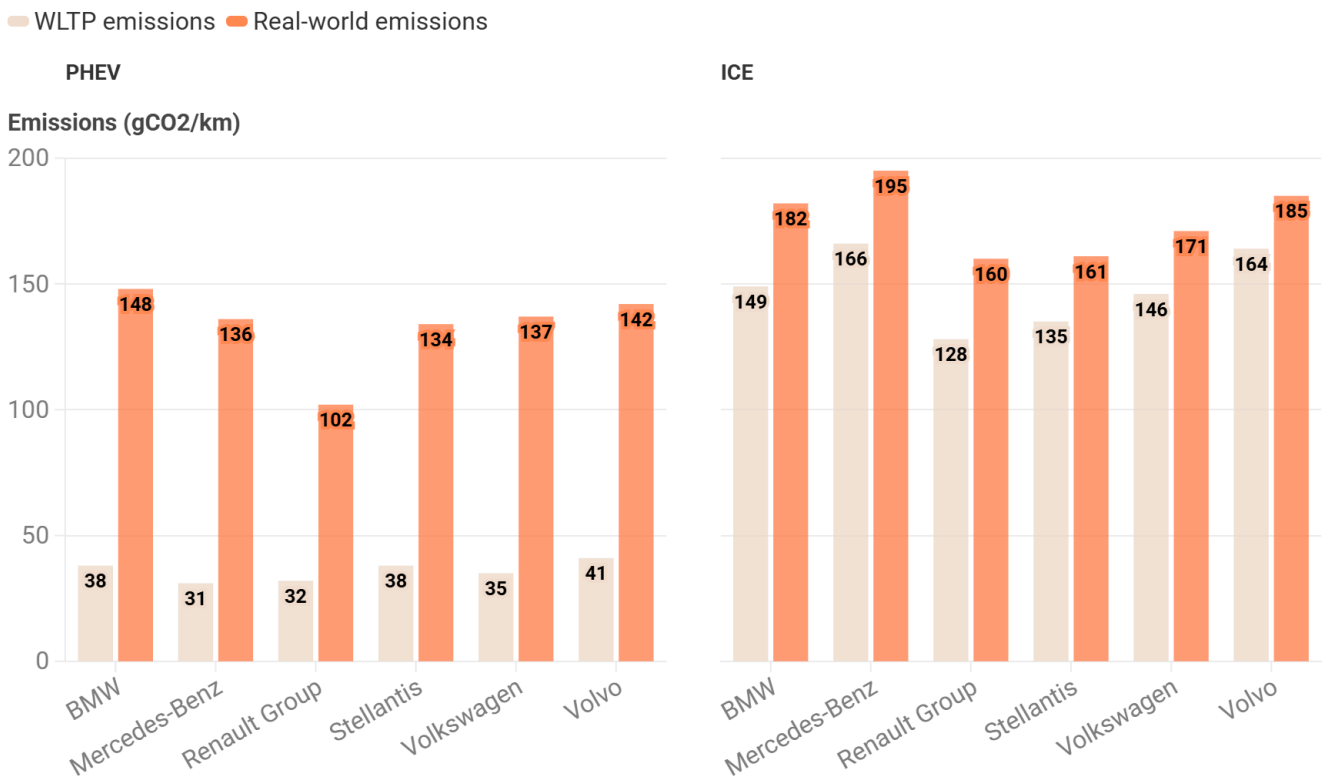
#### **Moving to a harmonised regulation covering EVs and second hand car sales**

The Commission has proposed integrating the new car labelling rules under the car CO2 standards regulation. This is a welcome step to ensure harmonised implementation and information for all consumers across the EU, as existing rules have been implemented in a patchwork manner with different parameters and metrics applying to labels in different member states. Also welcome is the move to ensure second hand vehicles are covered. For used EVs, distributors will now be required to provide consumers with information on a vehicle's battery state of health (SoH), an important missing piece that is needed if Europe wants a dynamic and functional used car market for EVs.

Some other important information gaps will also now be filled for consumers looking to buy an EV, as numbers on the electric energy consumption and electric range for both BEVs and PHEVs will also be included on the label. As well as real world driving emission (RDE) and life cycle emissions (LCA) data, all available for consumers to access and compare with other similar models on a product database via a QR code.

**But...real world emissions information is still missing**

With the gap between official laboratory test (WLTP) results and real world fuel consumption remaining stubbornly high at 19% on average for traditional ICE cars and growing to an astonishing 390% for PHEVs, the Commission has missed an open goal by not including real-world data on emissions in its proposal. Such data are already being reported and collected through official OBFCMs, yet remain largely unused. Evidence also shows variations between models and brands, and making this information transparent would both better inform consumers and increase pressure on OEMs to improve real-world vehicle performance.



Source: T&E analysis of 2021-22-23 OBFCM data collected by the EEA

**3. T&E recommendations - making better use of available data to empower consumers**

**Provide real-world information (for both electric and combustion cars) in addition to laboratory test values (WLTP)**

For all cars (including used cars), real-world data should be available on the label and in the product database (accessible to consumers via the QR code). Whenever possible, this information should be based on vehicle model fleet-wide averages from the official

on-board-fuel-consumption meters (OBFCM) data and updated on an annual basis<sup>1</sup>. This includes:

- For ICEs: fuel consumption and CO<sub>2</sub> emissions. For new car models, where real-world data is not yet available, labels should reflect real-world CO<sub>2</sub> emissions by using an OEM-specific ‘uplift factor’ (a regulatory multiplier calculated using OBFCM data averaged for each carmaker).
- For BEVs: range and electric consumption (city, highway and combined; for both mild weather and cold weather), as well as charging power (max rated charging capacity, and time to charge from 20% to 80% at the max power based on real-world charging curves).
- Where vehicle-specific data on the real world environmental performance of used cars is available (from the in vehicle display), this should also be provided to consumers by distributors (as is already proposed for battery SoH, see new Article 15a.1).

**Real world information in car label and product database for new cars placed on market**

	<b>Label - new models placed on the market</b>	<b>Label - existing models*</b>	<b>Product database</b>
<b>ICE and PHEV -</b> Real world CO <sub>2</sub> emissions and fuel consumption	Based on OEM-specific ‘uplift factor’	Based on OBFCM averages per model	Information updated annually based on the most recent OBFCM average data
<b>BEV -</b> Range and electric consumption	Based on OEM-specific ‘uplift factor’	Based on OBFCM averages per model	

\*Existing models: for models that have been on the market long enough for sufficient OBFCM data to be collected

**Ensure a future proof car label and allow for differentiation between vehicle classes based on the carbon footprint**

The proposed rating system for vehicle emission classes fails to help consumers distinguish between different zero emission models, rating all of them ‘A’. Instead, vehicle classes should allow for differentiation based on the vehicle carbon footprint from the materials and production phase, including between ZEVs. T&E proposes to reserve at least the top two categories (e.g. A-B) for ZEVs. The car label should include the carbon footprint value (in tons of CO<sub>2</sub>) for all vehicles, as soon as an EU methodology exists for calculating the carbon impact of steel, aluminium and the battery.

<sup>1</sup> The EEA already [analyses](#) OBFCM data per OEM. The uplift factor can be calculated on a per-OEM, per-year, and per-powertrain basis. If sufficient data points exist, the granularity can extend to per-model.



Such a system would incentivise BEVs with the lowest carbon footprint, incentivising clean materials like green steel, green aluminium and clean batteries, and would improve affordability by encouraging smaller EVs which would get a better rating than SUVs.

**Vehicle classes<sup>2</sup> based on CO2 emissions**

**Commission proposal**

CO2 emissions class	CO2 emissions in g/km
A	0
B	1 to 25
C	26 to 50
D	50 to 75
E	76 to 100
F	101 to 125
G	126 and higher

**T&E proposal**

CO2 emissions class	CO2 emissions in g/km
A	0
B	0
C	1 to 25
D	26 to 50
E	51 to 75
F	76 to 100
G	101 and higher

<sup>2</sup> For vehicle category M1

## ANNEX

### Overview of T&E proposals for information requirements in new car label and product database:

<b>Car label (information coming from vehicle Certificate of Conformity)</b> <i>Provided by distributor</i>	<b>Product database</b> All info in column 1 + the following: <i>Provided by OEM</i>	<b>Information provided by distributor to consumer - related to the individual vehicle</b> <i>(all info below is already available as in-vehicle display of envi data)</i>
OEM, M1 or N1, commercial name, QR code, CO2 emissions + rank (A-G), Fuel consumption*, Electric consumption*, Electric range*	Vehicle model, Test mass (in kg), date of end of production of vehicle model*, Hybrid class*, fuel*, RDE emission data (NOx and PN), LCA emissions**, Made in EU (Y/N)**, Small BEV (Y/N)**	Distributor shall inform consumer of vehicle's current 'traction battery state of health'
<i>Real world CO2 emissions: based on OEM-specific 'uplift factor' (calculated using OBFCM data from previous year)</i>	<i>Real world CO2 emission and consumption per vehicle model based on average of all OBFCM data points (dynamic data updated annually)</i>	<i>NOx emissions, fuel/electrical energy consumption*, virtual distance V2X*</i>
<i>Made in EU (Y/N)</i>	<i>Battery info: battery capacity, chemistry and origin</i>	
<i>Carbon footprint (in tCO2) (once available)</i>		

COM proposal

T&E recommendation

\* if applicable

\*\* optional