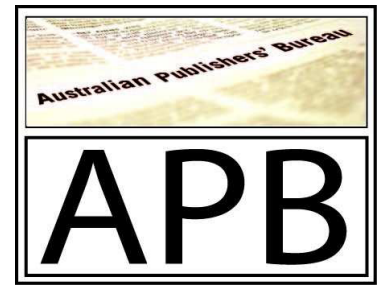


7 November 2008

Vehicle Fuel Efficiency Secretariat
Department of the Environment, Water, Heritage & the Arts
Renewables and Energy Efficiency Division
Energy Futures Branch
Technology and Transport Section
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Dear Sir or Madam,

The purpose of this letter is to provide the industry's comment on the Public Discussion Paper; Potential measures to encourage the uptake of more fuel efficient, low carbon emission vehicles prepared by Australian Transport Council (ATC) and Environment Protection and Heritage Council (EPHC) Vehicle Fuel Efficiency Working Group.

The [Australian Publishers' Bureau](#) (APB) is an association of Australia's major newspaper and magazine publishers which was established 30 years ago to provide a united voice for publishers on issues affecting the industry as a whole. It is the preeminent industry Advisory Body on matters relating to advertising. The Bureau provides advice to its publisher members and their constituent publications, on legal and other issues affecting advertising.

We maintain a cordial and professional relationship with the various Departments of Fair Trading across the country and also with the ACCC. It is recognised by the Commission as the representative industry association for newspaper and magazine publishers on all advertising and related matters. The ACCC has referred to the Bureau as "a model of industry co-operation".

At the [APB](#) we pride ourselves on our extensive knowledge of the estimated 160 pieces of Commonwealth, State and Territory legislation, which include requirements on advertising, as well as various industry sector and professional Codes of Practice/Ethics, along with publishers' legal obligations under the Trade Practices Act 1974 and the various Fair Trading Acts.

The [Australian Publishers' Bureau](#) wishes to comment in particular upon the following proposal.

Proposal

Require standard fuel consumption and CO₂ data to be provided in vehicle advertisements to reinforce the current fuel consumption and greenhouse information provided to consumers via the current fuel consumption label and the Green Vehicle Guide. The measure is aimed at improving fuel efficiency by providing consumers with a capacity to choose better performing models from among those models that meet their needs.

Means of Implementation

There are two broad options which could be used to deliver the proposal:

1. A non-regulatory mechanism via an agreement between the Australian government and industry;
or
2. A set of mandatory requirements delivered via regulation.

As stated in the Discussion Paper there are certain car manufacturers who already indicate this information in their current advertisements.

The Discussion Paper also states that it is not possible or feasible to “confidently quantify estimates of the likely impact of this measure on fuel efficiency in isolation from normal market developments or from other measures designed to encourage consumers to purchase more fuel efficient vehicles.”

Although the financial impact of including this information into an advertisement would be relatively minor, it is likely that this particular initiative will have such a low impact on the purchase decision of potential consumers that the [APB](#) questions the purpose of making this a mandatory requirement when there appears to be no evidence, either local or international to indicate significant benefit to consumers.

With regards to implementation in general, advertising in Australia is already well regulated by a combination of regulation, co-regulation and self-regulation.

The [APB](#) endorses the current regime of self-regulation running parallel to regulation and should it be necessary to formulate specific requirements with regards to execution of the requirements the [APB](#) believes that the option of self regulation would be more effective for both implementation and cost objectives.

The capability of amending the existing Federal Chamber of Automotive Industries (FCAI), Advertising Code of Practice would naturally be a matter for the FCAI to comment upon, although it appears to be the most logical and timely way forward, as opposed to the introduction of new legislation or amending existing legislation

Given its history of participation on various Advertising Committees and Code Councils, the Bureau is always very keen to contribute in any forum which promotes a balanced approach to social and corporate responsibility in the role of advertising.

As the peak industry association the [Australian Publishers' Bureau](#) would welcome the opportunity to work on any initiative developed from the outcomes of the discussion paper.

Yours faithfully,



Lianne E Richards
Executive Director