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Vehicle Fuel Efficiency Secretariat  
Department of the Environment, Water, Heritage & the Arts  
Renewables & Energy Efficiency Division  
Energy Futures Branch, Technology and Transport Section  
GPO Box 787 CANBERRA ACT 2601

Dear Sir / Madam,

As the peak body of a domestic advertising & marketing communications sector currently contributing some \$30 billion a year to the Australian economy, the AANA is pleased for the opportunity to comment on the Discussion Paper: *Vehicle Fuel Efficiency: Potential measures to encourage the uptake of more fuel efficient, low carbon emission vehicles.*

The AANA acknowledges the expertise of the Australian Transport Council and the Environment Protection & Heritage Council Vehicle Fuel Efficiency Working Group, and limits its comments to the specific references to areas of its own expertise within the Discussion Paper.

Specifically, the AANA's advertising, marketing and media membership is concerned at the proposal for standard fuel consumption and CO<sub>2</sub> data to be provided in advertising material for vehicles *"to reinforce the current fuel consumption and greenhouse information provided to consumers via the current fuel consumption label and the Green Vehicle Guide."*

While this 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, it is noted that most car makers already indicate such information in advertising material on a voluntary basis.

It is further noted that the Discussion Paper accepts 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."*

On this reasoning, the AANA believes that inclusion of fuel consumption and CO<sub>2</sub> data in advertising material should more reasonably be requested on a voluntary basis than mandated

by government regulation. To this end, the AANA offers its influence, as the architect of the advertising industry self-regulation system, to gain industry consideration of this measure.

In the view of the AANA, reliance on self-regulation in this instance would afford a more effective and cost-efficient alternative to an unnecessary extension of government regulation requiring additional policing resources.

The self-regulatory alternative would most readily be pursued by way of an amendment to the Federal Chamber of Automotive Industries (FCAI) Advertising Code of Practice, administered together with AANA Codes, through the Canberra-based Advertising Standards Bureau and Board.

The Secretariat and/or Board of the AANA will be pleased to speak to any aspect of this comment on your Draft Paper.

Sincerely,

Scott McClellan  
Chief Executive Officer