

AIG Response to the European Commission Consultation on the Revision of the EU rules on car labelling

OUR POSITION

1. We support the Commission's efforts to modernise and harmonise the point-of-sale label mandated by the Car Labelling Directive 1999/94/EC, but we maintain our long-standing position that label requirements should apply at the point of sale, not in advertising.
2. We acknowledge the Commission's objective to harmonise labelling requirements, which currently vary across Member States. Whilst harmonisation addresses these inconsistencies, we believe that vehicle manufacturers should also retain the flexibility to voluntarily display additional information. This enables them to highlight unique selling propositions and engage in brand differentiation. However, any additional information should remain clearly delineated from mandatory elements of the label to preserve the comparability and ensure clarity for consumers.
3. As consumers increasingly purchase cars online, digital labels and guides are essential to reflect this shift in consumer behaviour. These digital tools must remain user-friendly and accessible, avoiding information overload. The obligation to provide the label should continue to apply only at the point of sale – whether physical or digital – and not extend to advertising.
4. The scope of this Directive should not be extended to require advertisers to include label information in advertising because the role of advertising is first and foremost to raise awareness of a product's existence, not to provide technical details to consumers. Advertisements, online and offline inherently face space and time constraints. Including technical data such as electricity consumption and range – in the form of a label or other prominent formats – would clutter the advert, compromise creative execution and increase costs. Advertisers would need to purchase additional space or airtime segments to accommodate this information.
5. Mandatory or standardised information requirements in advertising could restrict creative freedom and reduce advertising effectiveness, ultimately harming sales as well as the press and media sector that depends on advertising revenue. This would be counterproductive to the Directive's objectives since advertising funds media outlets that inform the public about topics such as e-mobility, energy efficiency and environmental issues.
6. Current provisions already ensure essential information appears in advertising, whilst detailed data is provided at the point of sale where consumers with genuine purchase intent can access it. Extending these obligations or indeed, specifying how this information must be shown would risk information overload, crowd the advertising space, and thereby undermine the Directive's overall aim of enabling informed choice.

ABOUT AIG

7. The Advertising Information Group (AIG) is a pan-European advertising and media industry network that brings together different parts of the advertising industry: from advertising agencies, broadcasting and publishing bodies, direct marketing, to radio and online.
8. It exists to promote a genuine single market in commercial communications, supports responsible advertising self-regulation in the EU, and is an industry member of the advertising self-regulatory organisation, the European Advertising Standards Alliance (EASA).
9. The secretariat of the AIG is formed from three national advertising associations, namely: the Advertising Association in the UK, Zentralverband der deutschen Werbewirtschaft (ZAW) in Germany and Wirtschaftskammer Österreich (WKÖ) in Austria, respectively.

Advertising Information Group

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