



ACCC NEW CAR RETAILING INDUSTRY MARKET STUDY DRAFT REPORT



Australian
Automobile
Association

Submission - September 2017





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Introduction

The Australian Automobile Association (AAA) welcomes the opportunity to comment on the Australian Competition and Consumer Commission's (ACCC) Draft Report for the New Car Retailing Industry market study (the Draft Report).

The AAA is the peak organisation for Australia's motoring clubs and their eight million members. The AAA advances the interests of its constituent motoring clubs as well as all road users across Australia to ensure motoring is safe and affordable, and that Australia's transport infrastructure delivers for the community and the economy.

The AAA strongly supports the draft recommendations and actions in the Draft Report.

For most Australians, purchasing a new vehicle is often the second largest financial decision they will make. Along with the daunting financial commitment, consumers in the new car market must navigate an overwhelming amount of information in order to make an informed choice: vehicle performance specifications, fuel consumption, emission levels, consumer guarantees, warranties, and warranty obligations are just some. The AAA believes this information must be presented to consumers in a way that is easily digestible and accurate.

As the purchase of a new vehicle is an ongoing financial commitment, the AAA strongly believes there must be strong competition in the aftermarket sector to ensure costs of owning and maintaining a vehicle are as low as possible. Consumers should be able to choose who can service and repair their vehicle, and not be restricted by limited access to manufacturers' technical information.

The ACCC Draft Report findings show that consumers are not presented with clear and concise information about their statutory consumer rights and are not provided with accurate information about a vehicle's fuel consumption and environmental performance.

Furthermore, the findings confirm that independent service and repair operators do not have reasonable access to service and repair information from manufacturers.

The AAA strongly believes the actions and draft recommendations in the Draft Report will improve how information is presented to consumers, and maintain competition in the aftermarket sector.

Section Two

Consumer guarantees

The AAA strongly supports the ACCC's draft recommendations and actions to enhance consumer protections. The AAA notes that they are wholly consistent with its submissions to the ACL review and the ACCC's market study.

Buying a new vehicle is a major financial decision for most Australians. For many people, it is the second largest purchase they will ever make, second only to a house.

Such a daunting financial decision should be supported with adequate consumer protections. While federal and state governments have consumer protection laws, and manufacturers and dealerships provide warranties and offer extended warranties, the interplay between these, and the confusion about which protection applies in which instance, is not readily apparent to consumers in the new car market.

Issues contributing to this include:

- Ambiguous language within the current ACL legislation. The ACL lacks a definitive performance standard by which to judge whether a vehicle is of acceptable quality or reliability. For example, it is unclear as to what constitutes a 'major failure'. Words in the ACL, such as 'reasonable', are also open to wide interpretation.
- Poor consumer education. Australians are generally unsure and even unaware of the legal rights that they might have under the ACL. It appears that consumers are not fully informed about their statutory legal rights under the ACL at the point of sale, or are not provided with easily digestible information from which to gain a reasonable understanding.

Ambiguous definitions in the ACL and poor consumer education mean that consumers can find themselves at an immediate disadvantage when problems arise. A consumer will not be able to assert their rights if they do not know or understand what recourse is available to them. The ACCC's Draft Report findings show that dealerships and manufacturers are potentially contributing to this disadvantage by focusing the consumer on warranties rather than their statutory legal rights under the ACL.

The AAA believes the actions and recommendations in the Draft Report for manufacturers and dealers to better present ACL information to consumers and improve the manufacturers' complaint handling systems is an important first step in enhancing the operation of ACL in Australia.

In addition, the AAA supports the ACCC vigorously targeting instances of misleading or deceptive conduct. Test cases may deliver precedents and set best practice that other manufacturers and dealerships can be encouraged to follow.

Ultimately, amendments to the ACL are necessary to remove current ambiguity. Language such as 'reasonable', 'short specified period of time' and 'major failure' must be defined or referenced in the legislation.

Amending the ACL will require leadership and commitment from the Australian Government. The process to achieve change will be long and complex, as it requires support from states and territories and could have flow-on impacts to other legislation, such as the ASIC Act. However, the complex nature of the intergovernmental arrangement that supports the ACL should not distract from the leadership role the Australian Government will need to play in supporting and progressing the proposed changes.

2.1 AAA response to draft recommendations and actions to enhance consumer law

Draft recommendation 3.1 The ACCC supports the amendments proposed by CAANZ in the recent ACL Review to enhance the ACL and address any uncertainties about the application of consumer guarantees. Of particular relevance to issues arising in this study, the ACCC supports proposals 1, 2 and 3 in the final report on the ACL Review:

- Proposal 1: Where a good fails to meet the consumer guarantees within a short specified period of time, a consumer is entitled to a refund or replacement without needing to prove a 'major failure'.
- Proposal 2: Clarify that multiple non-major failures can amount to a major failure.
- Proposal 3: Enhance disclosure in relation to extended warranties by requiring:
 - agreements for extended warranties to be clear and in writing
 - additional information in writing about what the ACL offers in comparison to the extended warranties
 - a cooling-off period of ten working days (or an unlimited time if the supplier has not met their disclosure obligations) that must be disclosed and in writing.

AAA response

The AAA supports draft recommendation 3.1.

In order to eliminate ongoing uncertainty, the AAA believes that a 'short specified period of time' must be clearly defined in legislation, or referenced as a legislative example and provided in industry specific guidance material.

The AAA believes the recent court enforceable undertaking from GM Holden sets the precedent for an appropriate 'short specified period of time'. For new vehicles, Holden has committed to offering consumers a refund or replacement without the need for them to demonstrate a major failure if a defect prevents a vehicle from being driveable within 60 days of the date of purchase. The AAA supports the ACCC's assessment of the undertaking as being consistent with best practice ACL compliance.

A 60-day time period provides increased certainty for consumers in asserting their rights. It would also enable disputes to be resolved earlier, quickly and economically, avoiding the potential for consumers to become trapped in a cycle of failed repairs.

ACCC action 3.1 The ACCC will work with manufacturers and dealers to develop a concise and simple explanation of consumer guarantees and their interaction with warranties, which should, as industry best practice, be provided to consumers at the point of sale of a new car.

AAA response

The AAA supports action 3.1.

It appears that consumers are not being fully informed or do not fully understand their legal rights under the ACL and how they relate to the manufacturer's warranties.

As outlined in the AAA submission to the Issues Paper, consumers regularly contact the AAA's member clubs about what legal rights they have after having problems with their new vehicles.

Ensuring that consumers are aware of and understand their legal rights under the ACL must start at the point of sale.

ACCC action 3.2 To assist consumers better understand their rights when it comes to new car defects and failures, the ACCC will work with other ACL regulators to publish an updated version of Motor vehicle sales & repairs - an industry guide to the Australian Consumer Law (August 2013) to ensure that this publication addresses the issues identified in this study, including specific guidance on criteria for determining a 'major failure'. Guidance may also be designed for use by businesses, including dealers, regarding their rights and obligations under the ACL.

AAA response

The AAA supports action 3.2.

Updating the industry guide will be an important first step in improving the operation of the ACL in the new car market.

The AAA believes that an updated industry guide must include specific examples of best practice compliance with the ACL and references to what constitutes a reasonable timeframe. For example, the industry guide could make reference to the recent GM Holden undertaking as being consistent with best practice ACL compliance.

ACCC action 3.3 Instances of misleading or deceptive conduct, or misrepresentations, in relation to the use of independent repairers or non-OE spare parts will be targeted through action by the ACCC, including enforcement action where appropriate.

AAA response

The AAA supports action 3.3.

Addressing non-compliance by manufacturers or dealers, including through enforcement action where appropriate, would help set a precedent and establish best practice to guide the industry and protect consumers.

ACCC action 3.4 Manufacturers' complaints handling systems, policies and practices that do not comply with the consumer guarantee requirements of the ACL will continue to be targeted through action by the ACCC and fair trading agencies, including enforcement action where appropriate.

Such action may also address any instances of non-compliance by dealers. The ACCC is particularly concerned about manufacturers and dealers engaging in conduct that may be misleading or unconscionable.

AAA response

The AAA supports action 3.4.

The AAA believes there is an opportunity to improve visibility on the extent of consumer complaints about new vehicles. Currently, there is no detailed information on how many complaints manufacturers, dealerships, and the ACCC receive about problems with new vehicles.

The AAA would support the development of a national database collecting consumer complaints received by the ACCC, including complaints about new vehicles. The information collected should be released on an annual basis, with feedback from manufacturers required on trending consumer issues.



Section Three

Service and repair

The AAA supports the draft recommendations regarding access to service and repair information for new vehicles.

The ACCC's Draft Report presents a body of evidence that shows how obtaining service and repair information from manufacturers is a daily struggle for independent operators. Independent operators should not have to rely on the good-will of a friendly contact working at an authorised dealership or scroll through internet forums to diagnose and repair vehicles.

The AAA is concerned that the current lack of access to service and repair information will restrict competition and ultimately lead to higher service and repair costs for consumers. The AAA's Transport Affordability Index shows that the average household is already spending over \$1,400 a year on maintaining both a new and an old vehicle. Without improved access to service and repair information, there is a real risk that costs will continue to rise and put more pressure on household budgets.

The AAA believes that consumers should be able to choose who services their vehicle and not be restricted by who has access to service and repair information from the manufacturer.

Accessing service and repair information appears to be an issue specific to Australia. Independent repairers in other countries, such as Canada, the US and in the EU, do not have major issues with accessing information from manufacturers, and the relationship between independent operators and manufacturers appears to be constructive.

The principle reason for this constructive relationship is the existence of industry-specific legislation, or detailed industry agreements backed by legislation, in those jurisdictions. These agreements specify that manufacturers must provide service and repair information to independent operators in the same manner and in the same timeframe as they are provided to their own authorised networks.

Manufacturer concerns about protecting security-related information and intellectual property seem to be manageable in other countries. The AAA believes that if this issue can be managed effectively in other countries, it should be possible for it to be managed in Australia.

In Australia, the current voluntary industry agreement, Agreement on Service and Repair Information for Motor Vehicles 2014 (the Agreement), has not resolved industry disagreements in relation to service and repair information for independent repairers. As the AAA stated in its submission to the market study Issues Paper, the industry agreement has not produced measurable outcomes for independent service and repair operators or consumers. Issues surrounding independent access to service and repair information remain characterised by claims and counterclaims.

The most efficient solution to ensuring independent operators can access service and repair information from the manufacturer is by way of regulation.

3.1 AAA response to draft recommendations on access to service and repair information

Draft recommendation 4.1 A mandatory scheme should be introduced for car manufacturers to share with independent repairers technical information, on commercially fair and reasonable terms. The mandatory scheme should provide independent repairers with access to the same technical information which car manufacturers make available to their authorised dealers and preferred repairer networks.

The mandatory scheme should place an obligation on car manufacturers and other industry participants to achieve the aims and principles set out in the Heads of Agreement (including those in relation to training and reinforcing existing statutory obligations on independent repairers to ensure repairs and servicing are carried out correctly to car manufacturers' specifications to assure the safety of consumers).

The mandatory scheme should, subject to the type of regulation used, address the following operational matters:

Real time access – Car manufacturers should make available to independent repairers, in real time, the same digital files and codes, such as software updates and reinitialisation codes, made available to dealers to repair or service new cars.

Coverage – Obligations on sharing technical information should apply to all car manufacturers in Australia.

Consideration should be given to including options for relevant intermediaries to access technical information from car manufacturers on commercially fair and reasonable terms.

Definitions – All relevant terms, conditions and exclusions should be defined in the regulation, for instance, defining diagnostic tools and their relevance to facilitating access to technical information, as well as defining security-related information.

Dispute resolution – Any dispute resolution processes should be timely and accessible by all relevant stakeholders.

Any dispute resolution processes should be subject to compulsory mediation and binding arbitration by an independent external party.

Governance/consultation – Key stakeholders should meet regularly to discuss the rapidly changing nature of repair and service information.

Security-related information and data – Similar to the EU or US models, a process for the secure release of security-related technical information should be established or authorised under the mandatory scheme.

Enforcement – Appropriate options to enforce the terms of any regulation, if appropriate, should be included (e.g. penalties).

AAA response

The AAA supports recommendation 4.1.

A new industry agreement will be most effective if it is supported by way of regulation which is accompanied by Government oversight.

The AAA believes there are four principles that should be reflected in regulation. These are:

- Manufacturers be required to make available to qualified independent operators on commercially fair and reasonable terms:
 - All diagnostic, service and repair information and technical updates to authorised networks
 - All diagnostic, service and repair tools to authorised networks
 - All on-board diagnostic, service and repair information and telemetry to authorised networks.
- Information pertaining to immobiliser systems and security-related electronic modules only be released to independent operators via a secure data release framework, which allows manufacturers and enforcement agencies to trace information
- An effective dispute resolution process be introduced, with an independent third party mediator to consider and resolve disputes
- Penalties be introduced for non-compliance.

It is important that any new agreement covers vehicle telematics information. Telematics technology enables manufacturers to communicate directly with the car owner. Manufacturers can provide the car owner with remote diagnostic reports in real time and schedule services and repairs with one of their authorised networks. This will be mostly convenient for consumers in the short term; however, it could reduce competition over the long term. The effect of regulation without telematics technology is likely to erode as more connected vehicles enter the market.

Section Four

Spare parts

The AAA supports the draft recommendations and actions on spare parts.

The AAA is principally concerned about the increasing price of parts. Expensive parts mean more expensive maintenance costs and higher insurance premiums.

As the AAA outlined in its submission to the market study Issues Paper, more expensive parts can have road safety implications. Consumers will not be able to regularly service their vehicle if parts are too expensive. A RACQ survey found that the main reason why consumers did not service their car regularly was because of costs.¹

The AAA supports the use of aftermarket parts that are fit for purpose and notes that competition in the spare parts market can place downward pressure on prices of parts.

4.1 AAA response to draft recommendations and actions on parts

Draft recommendation 5.1 OE manufacturer-branded parts and accessories should be generally available to independent repairers on commercially fair and reasonable terms.

Car manufacturers should develop policies which clearly outline any parts subject to restricted access on security-related grounds. These policies should be publicly available.

The FCAI is well-placed to work with manufacturers to examine whether there is benefit in agreeing a standard definition and detailed classification system for 'security-related' parts to provide certainty to parts customers.

AAA response

The AAA supports draft recommendation 5.1.

ACCC action 5.1 Refusals by car manufacturers to supply security-related parts for repair and service will be monitored and addressed through action by the ACCC, including enforcement action where appropriate.

AAA response

The AAA supports draft action 5.1.

Request for further information *The ACCC seeks further information on the issue of transparency in parts prices, and whether the withdrawal of retail price lists by some or all manufacturers would harm competition or increase costs in parts markets.*

AAA response

The AAA does not have any specific information to provide the ACCC.

Section Five

Vehicle telematics data

The AAA welcomes ACCC support for recent recommendations in the final report of the Productivity Commission (PC) inquiry into Data Availability and Use, which provide an opportunity to establish a framework for the management of vehicle telematics data.

Vehicles with telematics technology can store and use large quantities of data to monitor a vehicle's functionality.

Telematics technology offers great benefits to consumers. For instance, it can:

- Locate a vehicle when it is broken down, involved in a crash, or stolen.
- Send traffic updates directly to the driver, helping avoid traffic jams.
- Provide diagnostic information in real time, alerting the driver to mechanical issues before or as they arise.

However, it is unclear as to what information telematics technology collects about drivers, who sees this information and what it is being used for. Research in Europe suggests that telematics technology can collect personal information about the driver (like mobile phone use) and their driving habits (e.g. erratic acceleration and excessive braking).² This can be used to create a detailed profile of the driver and opens up the opportunity for manufacturers to pass on or sell personal information to third parties, such as insurers or marketers.

The AAA believes consumers should be able to access and control any data generated by telematics technology, including data about the vehicle's performance, operation or security. Consumers should also be able to choose who receives that data.

Furthermore, it is important the vehicle telematics is included in any regulation regarding access to service and repair information. With telematics technology, manufacturers can directly schedule a service booking for the car owner with one of the manufacturer's authorised dealers. As vehicle manufacturers increasingly provide remote repairs and automatically book scheduled services, independent operators, motoring clubs and other ancillary service providers will be further sidelined from the market. This will ultimately reduce competition within the market and could result increased costs to consumers.

5.1 AAA response to draft recommendation on vehicle telematics

Draft recommendation 7.1 The ACCC supports the Productivity Commission's recommendations in its final report on Data Availability and Use for a comprehensive right for consumers to access digitally held data about themselves, including to direct data custodians to copy that data to a nominated third party which may address some of the concerns that were raised about the impacts of telematics technology on new car purchasers.

AAA response

The AAA supports recommendation 7.1.

The PC recommendations provide an opportunity to establish a framework for the management of vehicle telematics information.

The PC recommended that consumers should have a comprehensive right to access personal data collected by public and private entities and direct data holders to copy that data to a nominated third party. The PC envisages that individual industries would negotiate agreements specifying what data can be transferred. These would be lodged with the ACCC, who would oversee their operation.

While preliminary commentary regarding this issue has focused upon consumer benefit within the context of the financial and telecommunications sectors, the AAA believes the PC recommendations provide foundations to establish an agreement for the sharing of vehicle telematics data.

In addition to supporting the PC recommendations, the AAA believes the ACCC should include an additional action item in its final report requiring manufacturers and dealerships to ensure:

- consumers who purchase a new car with telematics technology are provided with a written disclosure about what type of data is collected, stored or transmitted by their car.
- written approval is obtained from the consumer before any data collected from a car is shared with any third party.

The AAA believes that consumers should have the right to choose which third parties have access to their data, including third party repairers and roadside assistance providers.

Information on fuel consumption and real-world testing

The AAA supports the ACCC draft recommendations on fuel consumption and real-world testing.

Currently, Australian consumers have no accurate way of knowing a vehicle's true fuel efficiency and environmental performance. Therefore, Australians are not able to make an informed decision about which vehicle will put the least pressure on the household budget.

Information currently provided to consumers about a vehicle's fuel efficiency and environmental performance is based on results from the standard laboratory test procedure. As demonstrated by both the Volkswagen scandal, and a growing body of international literature, this test procedure is a poor representation of real-world driving performance.

As governments around the world have introduced more stringent emissions regulations based on laboratory tests, car makers have optimised their vehicles to perform well in the laboratory, but not necessarily in the real world.³ The gap between fuel consumption results from the laboratory test procedure and real-world experiences has increased from around 9 per cent in 2001 to 42 per cent in 2015, according to international studies.⁴

By continuing to demand emissions reductions that are measured only in a laboratory, without ensuring that these reductions also exist in the real world, governments are placing a cost burden on consumers who are paying for the vehicle technology, without achieving benefits for either household budgets or the environment.

To achieve meaningful emissions reductions and help reduce fuel costs for consumers, consumers need access to information on the real-world fuel efficiency and emissions performance of cars being sold on the Australian market.

6.1 AAA response to draft recommendations on fuel consumption and emissions claims

Request for further information The ACCC welcomes views on whether general consumer education or awareness initiatives about how fuel consumption and CO₂ emissions are measured (and what factors influence them) should be considered.

AAA response

The AAA believes that consumers should be fully aware of how manufacturers derive the current fuel consumption ratings.

Consumer education should start with manufacturers' advertising material. Brands that promote current fuel consumption and emissions performance of their vehicles must properly disclose that this information is derived in a laboratory test and may not be replicable in the real world.

Educating consumers on how manufacturers derive fuel consumption and emissions levels will have limited impact beyond helping them understand the current deficiencies in the information.

The AAA conducted a Real Driving Emissions (RDE) test program, testing 30 vehicle models from the Australian vehicle fleet. This program produced a wide variety of results, with some models almost replicating fuel consumption from the laboratory test and some using up to 60 per cent more fuel in the real world. This means that consumers are not able to simply adjust the laboratory result, by a standard factor when deciding which vehicle to purchase (eg adding an extra 10 or 20 per cent to the fuel consumption value shown on the windscreen label of new cars).

To achieve meaningful emissions reductions and reduce fuel costs, consumers must have access to information about real-world fuel consumption and emissions performance of vehicles being sold on the Australian market.

Draft recommendation 6.1 Changes to the fuel consumption label affixed to new cars should be considered to improve the comparative use of the information supplied. Introducing a star-rating system or annual operating costs may minimise the extent to which consumers interpret an 'absolute' fuel consumption/emissions value as equivalent to what they would achieve in real-world driving conditions.

AAA response

The AAA strongly supports draft recommendation 6.1.

The AAA has been calling for improvements to the way fuel consumption information is presented to consumers. The limitations of laboratory-derived information need to be acknowledged, and consumers directed to a source of additional information, including information derived from on-road tests.

As stated in the AAA submission to the Issues Paper, the AAA believes the Australian Government's Green Vehicle Guide (GVG) should provide clearer guidance to consumers by presenting the information in a way that is easily digestible, like a star rating system similar to energy labelling of electrical appliances and ANCAP vehicle safety ratings. The AAA notes the GVG has previously displayed star ratings and continues to call for this to be restored.

The AAA also believes the GVG should consider including operating cost savings to consumers as included in the US and New Zealand models and leverage the successful labelling system for the energy efficiency of appliances. In addition, the AAA believes the Government consider extending the labelling system to incorporate used cars.

Draft recommendation 6.2 The ACCC supports measures to enhance the quality of information supplied to consumers currently being considered by the Ministerial Forum into Vehicle Emissions, including the replacement of the current fuel consumption and emissions testing regime with the new Worldwide Harmonised Light Vehicles Test Procedure, a more realistic laboratory test, and the introduction of an on-road 'real driving emissions' test.

AAA response

The AAA supports draft recommendation 6.2.

The Ministerial Forum on Vehicle Emissions is considering the introduction of tighter noxious emissions standards (Euro 6), a CO₂ standard, and changes to fuel quality. Unfortunately, to date, it has not seriously considered the introduction of a real-world driving emissions test.

The AAA has been calling on the Government to introduce an Australian RDE test before the introduction of Euro 6 and a CO₂ standard. As stated above, international evidence shows that the gap between real-world and laboratory testing has increased as emissions controls have tightened. Continuing to rely solely on a laboratory test to enforce regulation and provide consumers with fuel consumption and environmental information will only exacerbate the problem.

The AAA acknowledges the important international developments that have occurred in regard to how vehicles are tested. However, the AAA believes that these developments do not remove the need for an Australian-based RDE test program.

The new Worldwide harmonised Light vehicles Test Procedure (WLTP), which is expected to better reflect real-world driving conditions, will still have limitations. International studies predict a 31 per cent divergence between WLTP fuel consumption results and real-world experiences in 2025.⁵ Relying only on the WLTP will ensure manufacturers can continue optimising their vehicles to perform in a laboratory, not in the real world.

The European Union is introducing a real-world driving test as part of Euro 6 standards. However, this will only test noxious gasses, not fuel consumption. And it will only test vehicles sold into the European markets.

Benefits of real-world driving emissions testing in Australia

An RDE testing program conducted in Australia, testing Australian vehicles, using Australian fuels, driven on Australian roads would provide Australian consumers with accurate information about which vehicles use the least fuel and emit the least CO₂ in the real world.

An Australian RDE test program would allow consumers to make informed purchasing decisions, and allow policy makers to ensure that regulatory settings reflect real-world conditions.

An Australian RDE testing program must:

- Provide Australian consumers with the accurate information they need on real-world CO₂ emissions and fuel consumption
- Empower Australian consumers to put pressure on vehicle manufacturers to bring their most efficient vehicle models to the Australian market
- Inform policy makers and ensure that the regulatory settings consider real world driving conditions, not just laboratory results
- Act as an audit mechanism that could identify vehicles that are designed to comply in the laboratory using defeat devices, which are prohibited under Australian emissions regulations.



Endnotes

¹ RACQ, Dealer vs non-dealer servicing information. Access here: <http://www.racq.com.au/cars-and-driving/cars/owning-and-maintaining-a-car/car-maintenance/dealer-vs-non-dealer-servicing>

² FIA Region I, Technical Study. Access via www.mycarmydata.eu/

³ European Environment Agency, 2016, Explaining road transport emissions: A non-technical guide. Available here: <file:///C:/Users/david.colmer/Downloads/Explaining%20road%20transport%20emissions.pdf>

⁴ International Council on Clean Transportation, 2016, From laboratory to road: A 2016 update of official and 'real-world' consumption and CO2 values for passenger cars in Europe. Available here: http://www.theicct.org/sites/default/files/publications/ICCT_LaboratoryToRoad_2016.pdf

⁵ International Council on Clean Transportation, 2015, From laboratory to road: A 2015 update of official and 'real-world' consumption and CO2 values for passenger cars in Europe. Available here: http://www.theicct.org/sites/default/files/publications/ICCT_LaboratoryToRoad_2015_Report_English.pdf

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