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MEMBER OF



Mr. Rod Sims  
Chairman  
Australian Competition and Consumer Commission  
GPO Box 3131  
CANBERRA ACT 2601

23 October 2017

Dear Mr. Sims



The Australian Automobile Association (AAA) has released the final results of its real-world emissions test program and the conclusion is clear: Rather than driving down emissions or fuel bills, more stringent pollution laws appear to be driving motorists into more expensive cars that don't deliver their promised benefits.

Following the Volkswagen emissions scandal, the AAA engaged engineering firm ABMARC to test 30 popular cars in Australia to measure the difference between emissions and fuel consumption in official laboratory tests and in the real world.

The final results show:

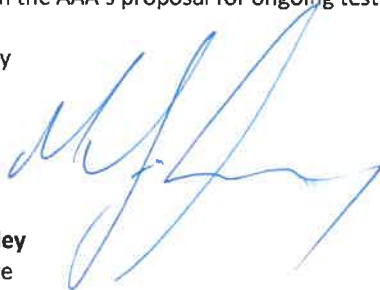
- Vehicles (not including plug-in hybrids) use up to 59% more fuel than advertised, and 23% more on average;
- One plug-in hybrid vehicle uses more than four times the petrol claimed;
- Vehicles produce up to seven times the legal limit of some noxious emissions; and
- 11 out of 12 diesel cars tested exceed legal limits for noxious emissions.

The results are of critical importance to the Australian Competition and Consumer Commission New Car Retailing Market Study. As global vehicle emissions regulations tighten, the gap between laboratory and real-world results is widening, meaning both consumers and the environment are increasingly being short-changed.

The AAA is now calling on the Australian Government to introduce a real-world emissions test program in Australia to ensure pollution laws actually drive down costs for motorists and deliver meaningful environmental benefit. The AAA proposes that the real-world emissions test program be modelled on the European standard but modified slightly to take account of Australian conditions, allowing for variations such as higher urban average speeds, lower highway maximum speed, and a warmer climate.

Please find enclosed a summary of the final results of the AAA test program and further information on the AAA's proposal for ongoing testing in Australia.

Yours sincerely



**Michael Bradley**  
Chief Executive

Encl: ABMARC Final Report & AAA proposed real-world vehicle emissions testing program for Australia  
Cc: ACCC New Car Retailing Industry Market Study Team