



Vehicle
Certification
Agency

The Passenger Car (Fuel Consumption and CO₂ Emissions Information) Regulations

Guidance notes –

Effective from 15th November 2018

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Introduction

The Passenger Car (Fuel Consumption and CO₂ Emissions Information) Regulations first came into force on 21 November 2001 and implemented into UK law EU Directive (1999/94/EC). Since then, UK legislation has been subsequently updated by Statutory Instruments (SI) 2004 No 1661; 2013 No 65; and 2018 no.673 (published June 2018).

The primary aim of the Regulations is to ensure that clear and accurate information on the fuel consumption and CO₂ emissions of new passenger cars is readily available to potential purchasers in particular at the points of sale. Enforcement authorities should bear in mind whether manufacturers, dealers and third-party advertisers have failed in this overall objective when *deciding how to deal with compliance issues*.

The aim of this document is to provide guidance for enforcement officers, car dealers, car manufacturers and advertisers. It deals mainly with the changes that are being implemented from the 1st January 2019, but also attempts to answer some questions that may arise in the interim period, i.e. from 1st September 2018 until 31st December 2018. It is not however, an exhaustive guide to the meaning and effect of the Regulations.

Please note that while this document sets out DfT's view of some of the requirements of the Regulations, it is not offered as an authoritative legal interpretation of the meaning of the Regulations which can only be provided by a Court of Law.

Additional best practise for advertising in other mediums can be found on the LowCVP website here: www.lowcvp.org.uk/wltp

Scope of Regulations

The requirements of the Regulations apply to passenger cars which have been EC Whole Vehicle Type Approved. They do not apply to vehicles which have been approved via the Individual Vehicle Approval (IVA) scheme, to small series vehicles or to pre-production vehicles which might from time to time be displayed to the public.

The Regulations place requirements on the information available at points of sale and the content of promotional literature and also informs the annual fuel economy guide published by government. The requirements do not apply to sales made via the internet, promotional websites or other electronic channels such as television, radio, email etc., although government would expect similar approaches to be followed.

Guidance Update

The primary purpose of this update to the guidance is to reflect a change in the fuel consumption and CO₂ testing regime and the impact this has on the provision of fuel consumption and CO₂ information at the point of sale.

The Worldwide Harmonised Light Vehicle Test Procedure (WLTP) will replace the New European Driving Cycle (NEDC) test procedure for establishing the official Fuel and Energy Consumption, CO₂ emissions and electric range of new cars.

The new WLTP test is aimed at better reflecting real driving behaviour and also takes into account a number of factors that have an effect on fuel consumption and CO₂, including optional extras. This then allows vehicle specific Fuel Consumption and CO₂ figures to be produced.

One of the obvious differences is the type of data that results from the new test. For petrol / diesel cars for example, the terms used to describe the test cycle driving phases: "urban", "extra-urban" and "combined", will no longer be used. In their place, the data will be expressed as "Low", "Medium", "High", "Extra-high" and "Combined".

You can read more about the changes brought in by WLTP here:

- <http://www.dft.gov.uk/vca/fcb/wltp.asp>
- <http://wltpfacts.eu/>
- <https://www.lowcvp.org.uk/initiatives/fuel-economy/wltp.htm>

Effective dates for implementation of WLTP are as follows:

- Required for newly approved types of car from 1st September 2017
- Mandatory for all new cars registered in the EU from 1st September 2018
- A provision exists for 'end-of-series' cars (tested under NEDC) to continue to be registered until 1st September 2019, subject to approval

Fuel Consumption information

From 1 January 2019, the fuel and energy consumption information provided to consumers will be based on the WLTP test. Advertising, promotional literature and labels should show WLTP fuel consumption data from that point. Where end of series vehicles are still being offered for sale however, NEDC figures should continue to be shown with the advice that consumers should only compare fuel consumption and CO₂ figures with other cars tested to the same technical procedures.

While the current legislation does not specify the requirements for displaying information for cars powered by electricity, or a combination of electricity and conventional fossil fuels, it does apply to all types of M1 (car) category vehicles. Accordingly, this guidance has been expanded to include information that should be provided at the point of sale and in advertising for Battery Electric Vehicles (BEV), Range Extender Electric Vehicles (REEV) and Plug-in Hybrid Electric Vehicles (PHEV).

CO₂ and Vehicle Excise Duty (VED (Car tax)

Between the 1st September 2018 and prior to the 6th April 2020, the first year car tax will be calculated on the CO₂ results obtained under NEDC testing, or CO₂ results from WLTP tests which are equated back to what they would have been had the car been tested to NEDC procedures. That being the case, only NEDC CO₂ figures will be used on labels and within advertising prior to the 6th April 2020. To avoid confusing consumers, WLTP and NEDC CO₂ data should not usually be shown side by side; where such data is presented together then it must be clearly differentiated.

Her Majesty's Treasury is considering how WLTP derived CO₂ emissions will be adopted. It is expected that the amount of tax payable on first registration will continue to be based on the car's CO₂ figure, which from 6th April 2020 will be the WLTP value – rather than its NEDC equivalent. Accordingly, all labelling, promotional literature and advertising will show WLTP data from 6th April 2020.

Presenting the data

The Regulations and guidance from the European Commission (see Commission Recommendation of 31.5.2017) require fuel consumption and CO₂ data to be displayed in a number of ways.

On posters/displays and in guides and other promotional material

Fuel consumption and CO₂ information should be displayed alongside the description of the model. The Regulations allow manufacturers to group vehicles of slightly different specifications ("variants & versions" in European Whole Vehicle Type Approval terminology) with different fuel consumption and CO₂ emissions figures together under one 'model'. In the Department's opinion the intention of this is to avoid having to display impractically large amounts of data, with several entries for vehicles which are identically badged.

What comprises a 'model' is at the discretion of manufacturers, however we would expect the different specifications grouped within a 'model' for the purposes of posters/displays, guides and other promotional material not to differ in at least the following respects;

- Make,
- Model Range,
- Engine Power,
- Fuel type,
- Transmission type

It is the intention that the 'model' should be a description recognisable to consumers by reference to the way vehicles are badged, e.g. Ford Focus, and obvious characteristics of the vehicle e.g. 1.8 litre diesel engine, five speed manual gearbox. Manufacturers may wish to specify further details such as the trim/tune level, engine power, body type etc. For example TDCi 4 door saloon. The descriptions used for each entry in the guide ('New Car Fuel Consumption and Emissions Figures' published by VCA) are a good example of how models should be described. The aim is to make the consumer's choice easier, not more difficult.

Labels

Format

Schedule 2 of the Regulations specifies that the label shall contain the text and data set out in Figure 1 below and requires the same format to be used. The minimum size of the area containing this information is specified as 180mm x 80mm (SI 2013 No. 65 amended 11 February 2013). The information shown in Figure 1 and Figure 2 show the information that should be reproduced on each label without reducing the font size of the text, changing the content of the text, altering the positions of the various items of data or changing the use of bold and standard text. A larger font size may be used and the font itself may be changed, provided that the information remains clearly legible.

Since it is not specifically prohibited by the Regulations, logos, additional information etc. may be printed on the label outside the text box. In addition, background colours and graphics are at the discretion of the manufacturer and dealer provided that the text complying with the relevant example remains clearly legible.

Note that WLTP requires that the label shows the fuel consumption and CO₂ data for the actual car that is being displayed at the point of sale.

Environmental Label

Manufacturers and dealers will also be aware of the voluntary agreement between all stakeholders (vehicle manufacturers, the Department for Transport (DfT), VCA and others) on the use of a colour coded 'Environmental' label. This A4 sized label is now widely used and will include the mandatory element set out in Figure 1 and 2.

Examples of the label for new cars can be found in the downloads section of the Car fuel data, CO₂ and vehicle tax tools website: <https://carfueldata.vehicle-certification-agency.gov.uk/downloads/default.aspx>

Easily Legible

Schedule 2 requires the label to be easily legible. In DfT's opinion this precludes the use of:

- backgrounds which do not contrast with the text
- excessively stylised fonts

Note that the above are examples and not intended to be exhaustive. Labels with transparent backgrounds are acceptable provided that the text contrasts with the background on which the label is placed and the contents of the label remain clearly visible.

Figure 1

Existing mandatory label, to be used

- a) From 1st September 2018, to show NEDC data for end-of-series vehicles only.
- b) To show NEDC fuel consumption and CO₂ (weighted for PHEVs) data from 1st September 2018 until 31st December 2018
- c) Note that the Fuel Type field can also be used to include symbols denoting the compatibility of the car with Bio-fuels in line with the Alternative Fuels Infrastructure Directive (AFID 2014/94/EU).

The symbols to be used are:

For petrol cars E5 E10

For diesel cars B7

<i>ENVIRONMENTAL INFORMATION</i>		
<i>A guide on fuel economy and CO₂ emissions which contains data for all new passenger car models is available at any point of sale free of charge. In addition to the fuel efficiency of a car, driving behaviour as well as other non-technical factors play a role in determining a car's fuel consumption and CO₂ emissions. CO₂ is the main greenhouse gas responsible for global warming.</i>		
<i>Make/Model:</i>	<i>Engine Capacity (cc):</i>	
<i>Fuel Type:</i>	<i>Transmission:</i>	
Fuel Consumption:		
<i>Drive cycle</i>	<i>Litres/100km</i>	<i>Mpg</i>
Urban		
Extra-urban		
Combined		
Carbon dioxide emissions (g/km):		
Important note: some specifications of this make/model may have lower CO ₂ emissions than this. Check with your dealer.		

Minimum width is **180mm**;

Minimum height of the box is **80mm**.

Figure 2

New mandatory label will be effective from 1 January 2019 showing:

- a) WLTP fuel consumption data; and
- b) NEDC CO₂ data until 5th April 2020.

Environmental Information		
A guide on fuel economy and CO ₂ emissions which contains data for all new passenger car models is available at any point of sale free of charge. In addition to the fuel efficiency of a car, driving behaviour as well as other non-technical factors play a role in determining a car's fuel consumption and CO ₂ emissions. CO ₂ is the main greenhouse gas responsible for climate change.		
Make/Model:	Engine Capacity (c.c.)	
Fuel Type:	Transmission	
Fuel Consumption		
Drive Cycle	Litres/100km	Mpg
Low Medium High Extra High Combined		
Carbon Dioxide emissions (g/km):		

Minimum width is **180mm**;

Minimum height of the box is **80mm**.

Posters & Displays

Location

Regulation 8 requires dealers to exhibit a poster/display containing information about fuel consumption and CO₂ emissions in a prominent position at the point of sale. This should be in a location where the customer is likely to spend sufficient time to notice the poster/display.

In the case of a showroom displaying vehicles outdoors it may be located outside or inside. If vehicles are displayed primarily inside the showroom we would expect to find the poster/display inside.

Electronic Screens

SI 2004 No 1661 permits the use of electronic screens for displaying posters. An electronic screen may also allow a consumer to scroll through the list. The minimum dimensions of the screen must be at least 25cm by 32cm, which roughly equates to a 17inch screen or larger. The screen may form part of a larger display which complies with Schedule 3. Where the information is provided solely on an electronic screen it must attract the attention of the consumer at least to the same extent as a poster would have. This may be achieved, for example, by having a prominent poster indicating that the information is available on the electronic screen.

Range Of Data

Posters/displays have previously been required to quote the worst case fuel consumption and CO₂ figures for the range of specifications grouped under each model description. Previous advice also suggested quoting an appropriate (and accurate) range of data for each model, providing it included the worst case figures.

WLTP includes a process for calculating Fuel Consumption and CO₂ data for every specific vehicle including its options. From 1st January 2019 therefore, attempting to produce a poster that contains every possible combination of vehicle and options that might be available is considered impractical. For this reason, we recommend that the poster contains results for the lowest to highest CO₂ and fuel consumption values for a model. The range of values needs to cover all permutations available for sale in the UK (i.e. inclusive of options). If the data range extends to versions not available in the UK this need to be made clear. The list would then be grouped together by fuel type (as described in the introductory text) in order of CO₂ value (based on the lowest CO₂ value for that model) with the model with the lowest at the top of the list.

Additionally, given that under WLTP there are now 5 fuel consumption test cycles, we take the view that it is sufficient to show only the Combined Fuel consumption and CO₂ data on the poster. The headings therefore may be as follows:

- Make / Model
- CO₂ range
- Transmission
- Engine capacity
- Fuel consumption range - Metric l/100km
- Fuel consumption range - Imperial mpg

Displaying Data Obtained Under NEDC

Where vehicles that were tested under NEDC are still available for sale under the 'end-of-series' arrangements (these should no longer be on the market after 1st September 2019), the information should be provided in a separate poster. We would suggest making it clear within the poster that the data shown relates to those vehicles tested under NEDC and that buyers should check with the dealer for details about the specific car they intend to purchase.

The advice to consumers should also make it clear that comparisons should only be made against cars tested to the same technical procedures.

Updating the Poster/Display

SI 2004 No 1661 also changed requirements relating to the updating of posters and displays. In the case of a display featuring an electronic screen it must be updated every 3 months. Other types of poster/display must be updated every six months. There is no requirement to add new models to the poster/display between updates.

Promotional Literature

Meaning of Promotional Literature

The Regulations define 'promotional literature' as 'all printed matter used in the marketing, advertising and promotion of a new passenger car for sale or lease to the general public'. The Department is of the view that this definition does include material which is largely graphical, with limited textual content (perhaps containing only the model name and an advertising slogan). We therefore consider that street advertisements are subject to the requirements of the regulations.

Note that in our view, web sites, workshop manuals and owners' handbooks do not fall within the definition of promotional literature and are therefore, outside the scope of these Regulations.

Whilst all promotional literature must include fuel consumption and CO₂ data, we consider it would be acceptable to include the data in separate pull-out sections included in brochures etc. It is anticipated that manufacturers may wish to take this approach to ease updating of brochures when the data changes. However it would not be acceptable for promotional literature to merely refer to another publication which was not included within its covers.

From 1st January 2019, promotional literature may quote the official fuel consumption figures for the combined drive cycle only, although manufacturers may include the results from other cycles should they wish, along with the official CO₂ emissions figures. In addition, the legislation states: "The fuel consumption figures shall be expressed in miles per gallon (mpg) and in either litres per 100 kilometres (l/100 km), or kilometres per litre (km/l) or an appropriate combination of these. The official specific emissions of CO₂ shall be quoted to the nearest whole number in grams per kilometre (g/km) and all other numerical data shall be quoted to one decimal place". See also the guidance notes for electric plug-in hybrid vehicles.

Publications covering a range of models are required to contain fuel consumption data for the vehicles covered. That being the case, fuel consumption data shown should be the range from the lowest to the highest performing vehicles in terms of mpg. In the case of CO₂ emissions, the highest to lowest figures across the range should be shown.

Literature which merely promotes the marque as a whole and does not refer to specific models need not contain the data.

Prominence and Legibility

Schedule 4 of the Regulations requires that "All information on the official fuel consumption and official specific emissions of CO₂ shall be easy to read and easily understandable and shall be no less prominent than the main part of the information provided in the promotional literature."

VCA considers the 'information on the official fuel consumption and official specific emissions of CO₂' to be limited to the official figures and descriptions of those figures, e.g. The title "Official Fuel Consumption and CO₂ emissions for xxxx"; the description of the test cycle "Combined"; and the metrics, i.e. "mpg (l/100km)"; and "CO₂ emissions".

Advertisers will need to consider the context of their material in assessing whether the information meets the requirements in as much as it is "easy to read" and "easily understandable" and "no less prominent than the main part of the information". Some general guidance is as follows.

In respect of the requirement that fuel consumption and CO₂ in promotional literature should be '...no less prominent than the main part of the information...'. We place emphasis on the word 'information' and consider this to mean that the fuel consumption and CO₂ information should not be in a smaller font size than other text giving information on the vehicle e.g. specification, performance, warranty. We do not consider that the Regulations require the data to be given equal prominence to, for example, the manufacturer's logo, images of the vehicle, advertising slogans etc. However the size of the font containing the fuel consumption information should not be smaller than the size of the font used to print the main message about the vehicle (see example 8). The clear intention of the legislation is to put fuel consumption and CO₂ data on an equal footing with the central message

communicated in the literature in question. This would for instance exclude font sizes used in the literature elsewhere for small-print or footnotes.

However, since the requirement is for the data to be given equal prominence with the **main** part of the information, the Regulations do not prohibit manufacturers from emphasising a particular piece of information e.g. price, provided that fuel consumption and and CO₂ is given equal prominence with the main information section.

Where promotional literature takes the form of a primarily graphical advert with no body copy, but does cite a specific model or models (as is often the case with billboard advertisements) the requirement for equal prominence is difficult to interpret. However, the requirement that the information be easy to read still applies. We consider that, in the case of primarily graphical billboard advertisements, the information on fuel economy and CO₂ emissions should be easily legible by a person standing on the opposite side of the road (but not necessarily one in a passing vehicle). It is not sufficient that the advertisement can be read by someone standing directly in front of the billboard, since it is designed to be seen by a much wider audience and from distance.

General principles

VCA has held discussions with the Committee of Advertising Practice (CAP) and the Advertising Standards Authority (ASA)¹ and agreed some additional 'best practice' principles as follows:

- a) The official figures should be based on a standardised test cycle;
- b) it should be clear that such figures are for comparison purposes only; AND
- c) That they may not reflect real world driving.

It is recommended therefore, that the following text (or similar) accompanies all official fuel and CO₂ figures where the omission is likely to mislead consumers:

"Figures are intended for comparability purposes. The fuel consumption you achieve under real life driving conditions and CO₂ produced will depend upon a number of factors including the accessories fitted after registration, variations in driving styles, weather conditions and vehicle load".

Additionally, it is also recommended that promotional material includes information on the following (excluding billboard / street advertising):

For further information on the CAP/ASA requirements in this area, see their guidance here: <https://www.asa.org.uk/advice-online/motoring-fuel-consumption-and-emissions-figures.html>

Information about the test changing

Prior to 6 April 2020, where data could be derived from NEDC, WLTP or a combination of both, there should be a mention that the test is changing and where consumers can find out more about the changes.

VCA does not recommend reproducing web addresses in printed media, so suggest that the dealer is the first point of contact, although VCA and others will be able to provide more information on line here: <https://www.vehicle-certification-agency.gov.uk/fcb/wltp.asp>.

Billboard / street advertising

While we would still expect billboard advertisements to include information on fuel economy and CO₂ emissions and be as prominent as the main text as previously described, we would not expect them to include the additional text around the test changes.

¹ The ASA enforce the UK Code of Advertising Practice and Direct & Promotional Marketing (the CAP Code) which reflects the requirements of the Consumer Protection from Unfair Trading Regulations 2008 (CPRs). They, along with other consumer protection regulators, have responsibility for ensuring that the presentation of the figures and accompanying information in advertising, including where the inclusion is not required by the Regulations, does not mislead consumers materially.

Only compare vehicles tested in the same way

Finally, to help avoid consumers making comparisons between cars tested under the old and new test regimes, it is suggested that promotional literature makes this clear, i.e. consumers should only compare vehicles tested in the same way.

Some examples are included at the end of this guidance note.

Alternatively Fuelled Vehicles

Battery Electric vehicles

The (Amendment) Regulations 2013 no 65, removed Regulation 4(b) which restricted the scope of the legislation to cars that emitted CO₂, hydrocarbons or carbon monoxide. As a result, battery electric and hydrogen fuel cell electric cars are now included within scope of this legislation. It is necessary therefore, to declare the CO₂ and fuel consumption figures within all promotional material, albeit that the results will be “0” for CO₂ emissions, and “N/A” (not applicable) for fuel consumption data.

While not required as part of these Regulations, we would recommend including the “pure electric range” within the official figures section.

Electric plug-in hybrid vehicles and Range Extender Electric Vehicles

The Regulations do not specifically refer to Electric plug-in hybrid vehicles. The requirements however, are that the 'official fuel consumption' and 'official specific emissions of CO₂' (as determined during the type approval process, and recorded on the Certificate of Conformity) be displayed. In the case of plug-in hybrid electric vehicles (PHEVs) and Range Extender Electric Vehicles (REEVs), the only fuel consumption figures that may be available and which should be shown within all promotional literature will be the weighted combined figure. While not required as part of the Regulations, we would also recommend including the “equivalent all-electric range” within the official figures section.

As voluntary information on the Environmental label, manufacturers are being asked to include the weighted combined electricity consumption figure for PHEVs and REEVs. This alongside the weighted combined fuel consumption figure will allow the consumer to understand the total 'energy' consumption of the vehicle.

For this reason, advertisers may wish to include the weighted combined electricity consumption figure, or range of figures within promotional materials.

Bi-fuelled vehicles

The Regulations do not specifically refer to bi-fuel vehicles. The requirements however, are that the 'official fuel consumption' and 'official specific emissions of CO₂' (as determined during the type approval process, and recorded on the Certificate of Conformity) be displayed. In the case of bi-fuel vehicles switchable between a conventional fuel (petrol or diesel) and an alternative fuel (e.g. LPG or CNG), type approval requires the fuel consumption and CO₂ emissions on both fuels to be determined and recorded on the Certificate of Conformity. Consequently our opinion is that the legal requirement of the Regulations is that figures for both fuels are displayed on labels, posters, promotional literature etc.

The figure of most importance to consumers will be the alternative fuel CO₂ emissions figure since this will determine their road tax on first registration and company car tax liability. It is therefore of most importance that this figure is quoted and manufacturers may wish to make it stand out from the conventional fuel data in some way e.g. by using bold text.

Definitions

WLTP uses a number of terms which are often used in different ways or have the potential to confuse a reader. The following is a set of standard terms that we would expect to see within advertising:

“Highest” and “Lowest” is used to describe fuel consumption and CO₂ across a range of vehicles and has the potential to cause confusion. For example, while ‘highest mpg’ would be a positive aspect, highest fuel consumption would be negative one.

“Range” is often used in two contexts. It may be

- used to describe a series of models that are grouped together to provide a highest and lowest set of data; or
- used to describe the distance an electric or hybrid-electric car can travel on a full battery charge.

It is difficult to omit the use of the word when describing a “group”, “choice” or “selection” of vehicles, but where any single piece of literature talks about an electric range, we would suggest that its use is explicit; i.e. ‘electric range’, ‘model range’, ‘range of values’ etc.

“Equivalent all-electric range” - means the distance the car would travel when using only electricity from a full charge to total depletion of the battery.

Enforcement Responsibilities

The Regulations specify the Secretary of State as an enforcement authority for England, Wales and Scotland; this includes the Vehicle Certification Agency as officials of the Secretary of State for Transport. The VCA will have responsibility for reviewing the content of promotional literature to ensure that the mandatory data is included and accurate.

Local weights and measures authorities (LWMAs)² will enforce all other aspects of the regulations in England, Wales and Scotland e.g. checking posters, labels, and availability of guidebooks. Since LWMAs will be visiting dealers' premises to conduct their enforcement duties it makes sense for them to also have responsibility for checking that promotional literature available here contains fuel consumption and CO₂ data. However should any

² Weights and measures legislation is enforced by Local Weights and Measures Authorities (LWMAs). Local authorities' trading standards departments deliver the local enforcement of most of the UK's weights and measures legislation. To promote consistency and best practice, the Office for Product Safety and Standards (Safety & Standards) works closely with the national coordinating body, local government and the professional institute for inspectors of weights and measures - CTSI - as well as with regional groups of local authorities and individual inspectors. Ref: <https://www.gov.uk/guidance/national-regulation-weights-and-measures#enforcement-of-the-weights-and-measures-act>

question arise regarding the accuracy of the data in the literature they should refer the matter to VCA. As part of their enforcement responsibility, LWMAs may have to take action not only against dealers, but also against suppliers should they be found to have failed to provide data to the dealers (see Regulation 5). In Northern Ireland the Department of Enterprise, Trade and Investment (DETI) will hold enforcement responsibility for all aspects of the Regulations.

The Passenger Car (Fuel Consumption and CO₂ Emissions Information) Regulations 2001 (Statutory Instrument 2001 No. 3523) is available here: http://www.legislation.gov.uk/ukxi/2001/3523/pdfs/ukxi_20013523_en.pdf

Statutory Instrument 2004 No. 1661 which amended the requirements for posters/displays is available here: http://www.legislation.gov.uk/ukxi/2004/1661/pdfs/ukxi_20041661_en.pdf

Statutory Instrument 2013 No. 65 which amended the requirements to include all fuel types; and changes to the minimum label size requirements, is available here:

http://www.legislation.gov.uk/ukxi/2013/65/pdfs/ukxi_20130065_en.pdf

Statutory Instrument 2018 No. 673 which amended the format of the mandatory label and implementation dates for the publication of WLTP data is available here:

http://www.legislation.gov.uk/ukxi/2018/673/pdfs/ukxi_20180673_en.pdf

Alternatively copies of the relevant regulations can be purchased from TSO, PO Box 29, Norwich, NR3 1GN.

Tel. +44 (0)333 200 2425

Email: esupport@tso.co.uk

About VCA

In addition to VCA's role within the DfT of being the United Kingdom approval authority for Type Approval, VCA is the principle organisation within the DfT for ensuring compliance with the aspect of this legislation that deals with promotional literature. As well as having the enforcement role, VCA is always happy to provide guidance on planned advertisements before they are passed for publication.

Advertising examples

The purpose of these examples is to illustrate ways in which CAP/ASA and VCA principles can be applied within an advertisement. Please be aware however, that there may be other requirements for presenting text within an advertisement which are outside the scope of this guidance note.

The examples reflect the requirement to show a range of figures for a particular model to cover all of the options that are available for that model. In certain cases however, the model being advertised may not have options available or the advertisement is for a variation of a model with specific options clearly set out in the text. In those cases it is acceptable to show a single set of figures rather than a range. Cars with Internal Combustion Engines

Example 1

Advertisement placed for a petrol / diesel model between 1st September 2018 and 1st January 2019:

Image	Manufacturer's strapline
Manufacturer's text explaining the features of the car	

Fuel economy figures for the [Brand / model description] Mpg (l/100km).* Urban 18.5 (15.1) to 24.2 (9.7), extra-urban 27.0 (10.5) to 31.3 (7.5), combined 36.4 (7.8) to 41.1(5.7)* CO₂ emissions: 249 to 221 g/km

*Figures shown are for comparability purposes; only compare fuel consumption and CO₂ figures with other cars tested to the same technical procedures.

These figures may not reflect real life driving results, which will depend upon a number of factors including the accessories fitted (post-registration), variations in weather, driving styles and vehicle load.

There is a new test for fuel consumption and CO₂ figures. The figure(s) shown however, are based on the outgoing test cycle for a transition period ending 31/12/2018.

Example 2

For advertisements or trade literature describing an end-of-series petrol or diesel model tested under NEDC:

Image	Manufacturer's strapline
Manufacturer's text explaining the features of the car	

Fuel economy figures for the [Brand / model description] Mpg (l/100km).* Urban 18.5 (15.1) to 24.2 (9.7), extra-urban 27.0 (10.5) to 31.3 (7.5), combined 36.4 (7.8) to 41.1(5.7)* CO₂ emissions: 249 to 221 g/km

Figures shown are for comparability purposes. Only compare fuel consumption and CO₂ figures with other cars tested to the same technical procedures.

These figures may not reflect real life driving results, which will depend upon a number of factors including the accessories fitted (post-registration), variations in weather, driving styles and vehicle load.

* There is a new test for fuel consumption and CO₂ figures. The figures shown however were achieved using the outgoing test procedure.

Example 3

Advertisement placed for a petrol or diesel model from 1st January 2019 where WLTP Fuel consumption is shown (no end-of-series cars included):

Image	Manufacturer's strapline
Manufacturer's text explaining the features of the car	

Fuel economy and CO₂* results for the [Brand / model description]

Mpg (l/100km) (combined): 30.4 (9.3) to 34.6 (8.2)

*** CO₂ emissions:** 268 - 249 g/km

Figures shown are for comparability purposes; only compare fuel consumption and CO₂ figures with other cars tested to the same technical procedures.

These figures may not reflect real life driving results, which will depend upon a number of factors including the accessories fitted (post-registration), variations in weather, driving styles and vehicle load.

* There is a new test used for fuel consumption and CO₂ figures. The CO₂ figures shown however, are based on the outgoing test cycle and will be used to calculate vehicle tax on first registration.

Example 4

Advertisement placed for a petrol or diesel model from 6th April 2020:

Image	Manufacturer's strapline
Manufacturer's text explaining the features of the car	

Fuel economy and CO₂ results for the [Brand / model description]

Mpg (l/100km) (combined): 30.4 (9.3) to 34.6 (8.2)

CO₂ emissions: 268 - 249 g/km

Figures shown are for comparability purposes; only compare fuel consumption and CO₂ figures with other cars tested to the same technical procedures.

These figures may not reflect real life driving results, which will depend upon a number of factors including the accessories fitted (post-registration), variations in weather, driving styles and vehicle load.

Battery Electric Vehicles (BEV)

Example 5

Advertisement placed for a Battery Electric Vehicle (BEV) car model where tested to NEDC:

Image	Manufacturer's strapline
Manufacturer's text explaining the features of the car	

Fuel economy and CO₂ results for the [Brand / model description]

Mpg (l/100km): Not applicable
CO₂ emissions: 0 g/km
Electric range*: 125 – 178 miles

These figures were obtained after the battery had been fully charged. The <model name > is a battery electric vehicle requiring mains electricity for charging.

Figures shown are for comparability purposes. Only compare fuel consumption, CO₂ and electric range figures with other cars tested to the same technical procedures.

These figures may not reflect real life driving results, which will depend upon a number of factors including the starting charge of the battery, accessories fitted (post-registration), variations in weather, driving styles and vehicle load.

* There is a new test for fuel consumption, CO₂ and electric range figures. The electric range shown however, was achieved using the outgoing test procedure.

Example 6

Advertisement placed for a Battery Electric Vehicle (BEV) where tested to WLTP:

Image	Manufacturer's strapline
Manufacturer's text explaining the features of the car	

Fuel economy and CO₂ results for the [Brand / model description]

Mpg (l/100km): Not applicable
CO₂ emissions: 0 g/km
Electric range*: 125 to 210 miles

These figures were obtained after the battery had been fully charged. The [model name] is a battery electric vehicle requiring mains electricity for charging.

There is a new test for fuel consumption, CO₂ and electric range figures. The electric range shown was achieved using the new test procedure.

Figures shown are for comparability purposes. Only compare fuel consumption, CO₂ and electric range figures with other cars tested to the same technical procedures.

* These figures may not reflect real life driving results, which will depend upon a number of factors including the starting charge of the battery, accessories fitted (post-registration), variations in weather, driving styles and vehicle load.

Plug-in Hybrid Electric Vehicles(PHEV)

Example 7

Advertisement placed for a Plug-in Hybrid Electric Vehicle tested under NEDC between 1st September 2018 and 1st January 2019:

Image	Manufacturer's strapline
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Manufacturer's text explaining the features of the car

Fuel economy and CO₂ results for the [Brand / model description]

Mpg (l/100km) (weighted combined):	122.2 (1.9) to 156.4 (1.5) *
Electric energy consumption (weighted combined):	5.2 to 6.4 miles/kWh
CO₂ emissions (weighted):	51 to 42 g/km
Equivalent all-electric range:	86.2 to 101.1 miles

*These figures were obtained using a combination of battery power and fuel. The [model name] is a plug-in hybrid vehicle requiring mains electricity for charging.

Figures shown are for comparability purposes. Only compare fuel consumption, CO₂ and electric range figures with other cars tested to the same technical procedures.

These figures may not reflect real life driving results, which will depend upon a number of factors including, accessories fitted (post-registration), variations in weather, driving styles and vehicle load.

There is a new test for fuel consumption and CO₂ figures. The figure(s) shown however, are based on the outgoing test cycle for a transition period ending 31/12/2018.

Example 8

For advertisements or trade literature describing an end-of-series Plug-in Hybrid Electric Vehicle tested under NEDC:

Image	Manufacturer's strapline
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Manufacturer's text explaining the features of the car

Fuel economy and CO₂ results for the [Brand / model description]

Mpg (l/100km) (weighted combined):	122.2 (1.9) to 156.4 (1.5) *
Electric energy consumption (weighted combined):	5.2 to 6.4 miles/kWh
CO₂ emissions (weighted):	51 to 42 g/km
Equivalent all-electric range:	86.2 to 101.1 miles

Figures shown are for comparability purposes. Only compare fuel consumption and CO₂ figures with other cars tested to the same technical procedures.

These figures may not reflect real life driving results, which will depend upon a number of factors including the accessories fitted (post-registration), variations in weather, driving styles and vehicle load.

* There is a new test for fuel consumption and CO₂ figures. The figures shown however were achieved using the outgoing test procedure.

Example 9

Advertisement placed for a Plug-in Hybrid Electric Vehicle where tested to WLTP (all new registrations from 1st January 2019):

Image	Manufacturer's strapline
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Manufacturer's text explaining the features of the car

Fuel economy and CO₂ results for the [Brand / model description]

Mpg (l/100km) (weighted combined):	122.2 (1.9) to 156.4 (1.5) *
Electric energy consumption (weighted combined):	5.2 to 6.4 miles/kWh
CO₂ emissions (weighted):	51 to 42 g/km
Equivalent all-electric range:	86.2 to 101.1 miles

These figures were obtained using a combination of battery power and fuel. The [model name] is a plug-in hybrid vehicle requiring mains electricity for charging.

Figures shown are for comparability purposes. Only compare fuel consumption, CO₂ and electric range figures with other cars tested to the same technical procedures.

These figures may not reflect real life driving results, which will depend upon a number of factors including, accessories fitted (post-registration), variations in weather, driving styles and vehicle load.

* There is a new test used for fuel consumption and CO₂ figures. The CO₂ figures shown however, are based on the outgoing test cycle and will be used to calculate vehicle tax on first registration.

Example 10

Advertisement placed for a Plug-in Hybrid Electric Vehicle where tested to WLTP (all new registrations from 6th April 2020):

Image	Manufacturer's strapline
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Manufacturer's text explaining the features of the car

Fuel economy and CO₂ results for the [Brand / model description]

Mpg (l/100km) (weighted combined):	122.2 (1.9) to 156.4 (1.5)
Electric energy consumption (weighted combined):	5.2 to 6.4 miles/kWh
CO₂ emissions (weighted):	51 to 42 g/km
Equivalent all-electric range:	86.2 to 101.1 miles

These figures were obtained using a combination of battery power and fuel. The [model name] is a plug-in hybrid vehicle requiring mains electricity for charging.

Figures shown are for comparability purposes. Only compare fuel consumption, CO₂ and electric range figures with other cars tested to the same technical procedures.

These figures may not reflect real life driving results, which will depend upon a number of factors including, accessories fitted (post-registration), variations in weather, driving styles and vehicle load.

Example 11

Strapline



Slogan

Hoc car mos perspective tui quandoque operum instabant. Gloriantes magna fuel oeconomia, adhuc satis magna ad utilitatem totius familiae satisy - granny inter canem et, quod plus petere non potuit?

Main text area (Manufacturer's text explaining the features of the car)



Fuel consumption and CO₂ data should be the same size / font as the main text area



Fuel Consumption figures for the [Brand / model description]

Mpg (l/100km): Combined 30.4 (9.3) to 34.6 (8.2)

CO₂ emissions: 268 - 249 g/km

Figures shown are for comparability purposes; only compare fuel consumption and CO₂ figures with other cars tested to the same technical procedures.

These figures may not reflect real life driving results, which will depend upon a number of factors including the accessories fitted (post-registration), variations in wea

Additional information does not need to be the same size as the main text

