



**Friends of
the Earth
Europe**

for the people | for the planet | for the future

Thursday, 10 janvier 2008

DEMAND

Dear Sirs,

Our non-profit association Friends of the Earth Europe, the registered headquarters of which are at rue Blanche 15, 1050 Brussels, and I, Jeroen Verhoeven, of rue d'Albanie 32, 1050 Brussels, in my role as collaborator, bring to your attention the following facts.

For information, we attach to this document as an appendix the statutes of our non-profit organisation, Friends of the Earth Europe.

You will notice that its objective is clearly to carry out campaigns for the protection of the environment.

It has come to our attention that the following advertisements are being displayed on your website concerning vehicles:

1. "Saab BioPower"
2. "Scandinavia is known for its environmental protection and luxuriant landscapes. It is therefore not surprising that Saab takes its environmental responsibilities very seriously."
3. Concerning bioethanol, you state that it is made from plant material, and that when used it is a natural vehicle fuel which enables power to be enjoyed with a clear conscience.

It is also stated on your website that the use of ethanol in a moving vehicle cuts carbon-dioxide emissions into the atmosphere by 80%.

We have reviewed this website carefully (reference <http://www.saab.be/main/BE/fr/model/95/biopower.shtml>).

However, in our view, this information is misleading.

The Belgian Law of 14 July 1991 on trade and consumer information and protection prohibits any advertisements which include statements, indications or representa-

tions which may prove misleading as to the identity, nature, composition, origin, quantity, availability, mode or date of manufacture, characteristics of a product, or its effects on the environment (article 23).

However, by using this type of advertising, you are not informing consumers of the actual consequences of carbon-dioxide emissions for the environment.

You assert that when a BioPower car is driven, only 30-50 grams of carbon dioxide from fossil fuels are emitted per kilometre.

More specifically, a set of obviously questionable information is supplied concerning the vehicles listed hereafter:

*"1.8 t BioPower (175 BHP) ***

Fuel consumption in litres/100 km: Man./Auto.-NA*

Carbon-dioxide emissions in g/km: Man./Auto.-NA*

*Emission standard: Euro 4 *Urban/extra-urban/combined **These values apply when bioethanol (E85) is used.*

BioPower engines consume approximately 30% more than equivalent petrol engines. For the time being, there are no European directives for the measurement of fossil carbon-dioxide emissions by bioethanol E85-fuelled cars. A Saab BioPower car emits only 30-50 g of fossil carbon dioxide when using bioethanol (E85).

Source:

http://www.saab.be/main/BE/fr/model/93_CONV/107227/fc_extended.shtml

*2.0t BioPower (200 BHP) ***

Fuel consumption in litres/100 km: Man./Auto.-NA*

Carbon-dioxide emissions in g/km: Man./Auto.-NA*

*Emission standard: Euro 4 *Urban/extra-urban/combined **These values apply when bioethanol (E85) is used.*

BioPower engines consume approximately 30% more than equivalent petrol engines. For the time being, there are no European directives for the measurement of fossil carbon-dioxide emissions by bioethanol E85-fuelled cars. A Saab BioPower car emits only 30-50 g of fossil carbon dioxide when using bioethanol (E85).

Source:

http://www.saab.be/main/BE/fr/model/93_CONV/107229/fc_extended.shtml

*2.3t BioPower (210 BHP) ***

Fuel consumption in litres/100 km: NA*

Carbon-dioxide emissions in g/km: NA*

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*Emission standard: Euro 4 *Urban/extra-urban/combined **These values apply when bioethanol (E85) is used.*

BioPower engines consume approximately 30% more than equivalent petrol engines. For the time being, there are no European directives for the measurement of fossil carbon-dioxide emissions by bioethanol E85-fuelled cars. A Saab BioPower car emits only 30-50 g of fossil carbon dioxide when using bioethanol (E85).

Source:

http://www.saab.be/main/BE/fr/model/95_WAGON/107235/fc_extended.shtml".

Moreover, the actual concept of "green car" appears several times in your 2008 brochure, on Pages 20 and 24.

In our view, this information is untrue.

1. The statement that a vehicle is "green" is a postulate which cannot be scientifically demonstrated in any manner whatsoever.

The manufacture and use of vehicles indisputably has many impacts on the environment and on health.

Such assertions are therefore always misleading.

For information purposes, please refer to the recent decision by the Advertising Ethics Jury, which did indeed consider that your advertisement was unacceptable.

2. Saab BioPower does not cut carbon-dioxide emissions.

When E85 fuel is used, a great deal of carbon dioxide is emitted, a fact of which you do not inform consumers.

Only ethanol producers may assert that carbon-dioxide emissions may be reduced by producing low-carbon fuels.

3. BioPower cars consume a great deal of energy.

The BioPower cars are included in the Belgian official carbon dioxide guide on a "D to G scale", which is the worst category.

It is therefore untrue that BioPower cars are energy-saving.

4. Saab cannot assert that when driving with E85 fuel carbon-dioxide emissions are cut by up to 80%, as it does not inspect the ethanol market and therefore has no knowledge of the origin of ethanol production.

5. It should be remembered that at the present time E85 is not yet available on the Belgian market.
6. It should also be noted that there is obvious uncertainty concerning the conditions in which ethanol is produced with respect to the criteria for sustainable development.

Therefore, the public can in no way be given a guarantee that the use of ethanol contributes to sustainable development.

7. Finally, the advertisement does not state that the fuel consumption and carbon-dioxide emission information is contrary to Belgian law, specifically the rules set out by the Royal Decree of 3 September 2004.

Under this Decree, car manufacturers must, in their advertisements, state fuel consumption and carbon-dioxide emission on the basis of a European-level reference.

Although there is no European directive on the subject, this is no excuse for non-compliance with Belgian legislation.

Therefore, we request that all the following be deleted from your advertisement:

- "clear conscience"
- all references to the following terms: green, nature, environmentally friendly behaviour
- all advertising stating that driving a Saab cuts carbon-dioxide emissions
- all advertising stating that carbon-dioxide emissions from bioethanol are non-existent and that pure bioethanol is carbon-dioxide-neutral and does not lead to the emission of carbon dioxide in the atmosphere
- all advertising which states that driving with E85 cuts carbon-dioxide emissions by 80%. Information must also be supplied concerning the fact that the use of agro-ethanol fuel depends mainly on the manner in which it has been produced, and consumers informed of the distribution of the ethanol market according to origin and availability
- supply information concerning fuel consumption and carbon-dioxide emissions, and delete references to "biopower" and "bio", in accordance with the Royal Decree of 3 December 2004.

Unless the above are implemented within eight days of this letter, an action for discontinuance will be brought in the law courts.

This letter has been sent by ordinary post and by registered post.

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In the meantime, we remain,
Yours sincerely,

Joanna van Aalst,
Head of finance
and administration

Jeroen Verhoeven,
Car efficiency campaigner