Executive Agency for Health and Consumers

CONSUMER MARKET STUDY ON THE FUNCTIONING OF THE MARKET FOR VEHICLE FUELS FROM A CONSUMER PERSPECTIVE

Final Report

Part 4: Mystery Shopping

Funded by the European Union

CIVIC CONSULTING

Title	Consumer market study on the functioning of the market for vehicle fuels from a consumer perspective
Conducted for	Executive Agency for Health and Consumers
Prepared by	Civic Consulting
Sub-contractor	TNS Opinion *(consumer survey implementation)*
Reported by	Dr Frank Alleweldt, Dr Senda Kara *(directors)* Robert Graham, Donald Blondin *(project managers)* Anthony Allen, Tanja Kimova, Oscar Rivière, Steve Schwarzer *(consumer survey, TNS opinion)* Prof Ralf Dewenter (*economic analysis*) Dr Panagiotis Fotis (*expert group member*) Dr Axel Friedrich *(expert group member)* Associate Prof Michael Noel (*expert group member*) Dr Hendrik Perfors (*expert group member*) Prof Douglas West (*expert group member*) Dr Andrew Eckert (*expert group member*) Nicholas McSpedden-Brown *(research),* Rémi Béteille
Reviewed by	Dr Senda Kara, Dr Frank Alleweldt, Robert Graham
Support team	Lenka Filipova, Jeff Deutch, Arabel Luscombe, Neva Nahtigal, Aysun Yahlier, Francis Murphy
Report finalised on	24.02.2014

Civic Consulting
Potsdamer Strasse 150, D-10783 Berlin

www.civic-consulting.de

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Contents

1 INTRODUCTION

The Executive Agency for Health and Consumers, acting on behalf of the European Commission (DG SANCO, Directorate Consumer Affairs), has commissioned a consumer market study on the functioning of the market for vehicle fuels from a consumer perspective to Civic Consulting, lead Contractor of the Consumer Market Studies Consortium (CMSC).

Part 4 of the study presents the results of the mystery shopping exercises.

2 MYSTERY SHOPPING EXERCISES

This section presents the findings of the mystery shopping exercises, which examined labelling at the pump via station visits and an associated assessment exercise, the usefulness of comparison websites, and information provision on other relevant websites.

The following sections present the results of the five main components of the mystery shopping exercise:

- Petrol station visits in the capital cities of six Member States;
- Assessment of fuel labelling at petrol stations;
- Evaluation of comparison websites;
- Information provision on a selection of relevant websites, including those of fuel retailers, automobile clubs and public authorities; and
- Focus group summary.

The participants in these exercises will hereafter be labelled 'mystery shoppers'.

2.1 PETROL STATION VISITS

This section presents the findings of 150 petrol station visits conducted in the capital cities of six Member States.

2.1.1 Methodology

The petrol stations visits were undertaken in order to collect information on fuel pricing, the service level provided at the stations, their labelling of different fuel types at the pump and selected aspects related to potentially vulnerable consumer groups. In addition, a test purchase of fuel was made at each petrol station visited.

The exercise covered 25 petrol stations in each of six capital cities: Prague, the Czech Republic; Berlin, Germany; Paris, France; Rome, Italy; Bucharest, Romania; and Helsinki, Finland. Accordingly, a total of 150 stations were visited. The country selection was designed to yield a representative sample of EU Member States, including northern, central and southern European countries, relatively more and less populous countries, and a mix of EU15 and EU12 Member States. Additionally, the sampling ensured inclusion of the three countries where E10 fuel was widely available at the time of research (Finland, France and Germany) and three countries where E10 fuel was not available (the Czech Republic, Italy and Romania).

At each of the visited petrol stations, the mystery shoppers bought a small quantity of a fuel type compatible with the test vehicle (E10 fuel where available; otherwise, regular petrol 95 or another petrol type). They also documented the prices of the fuel types listed on the billboard (price display) at the road, compared the advertised price (on the billboard and at the pump) with the price actually charged, and collected information regarding the other aspects mentioned above.

Regarding the experiences of potentially vulnerable consumer groups at these stations, mystery shoppers assessed:

- The level of service provided (e.g. self- or full-service), as well as the availability of individual services such as handicap-accessible toilets;
- The presence of labelling or signs in a language(s) other than the country's primary language;
- The use of colour coding at the pump to facilitate fuel type identification; and
- The presence of indications of potential harm from mis-fuelling with an incompatible fuel type.

To contribute to the documentation of the exercise, mystery shoppers took a photograph of the billboard, when available, and requested permission of a station employee to capture the labelling at the pump in a series of three pictures. Selections of these pictures were subsequently utilised for the assessment of fuel labelling (the results of this exercise are presented in Section 2.2).

Each of the figures included in this section displays the results of the station visit exercise by country but also provides a full-sample total. The results are separated into the following sub-sections:

- Service level and individual services provided at petrol stations;
- Price displays and labelling at the pump;
- Fuel purchases and price consistency.

2.1.2 Service level and individual services provided

The next figure shows the percentage of visited stations characterised by full, partial or self-service; also shown is the percentage of 'unmanned' stations, which inherently provide self-service.

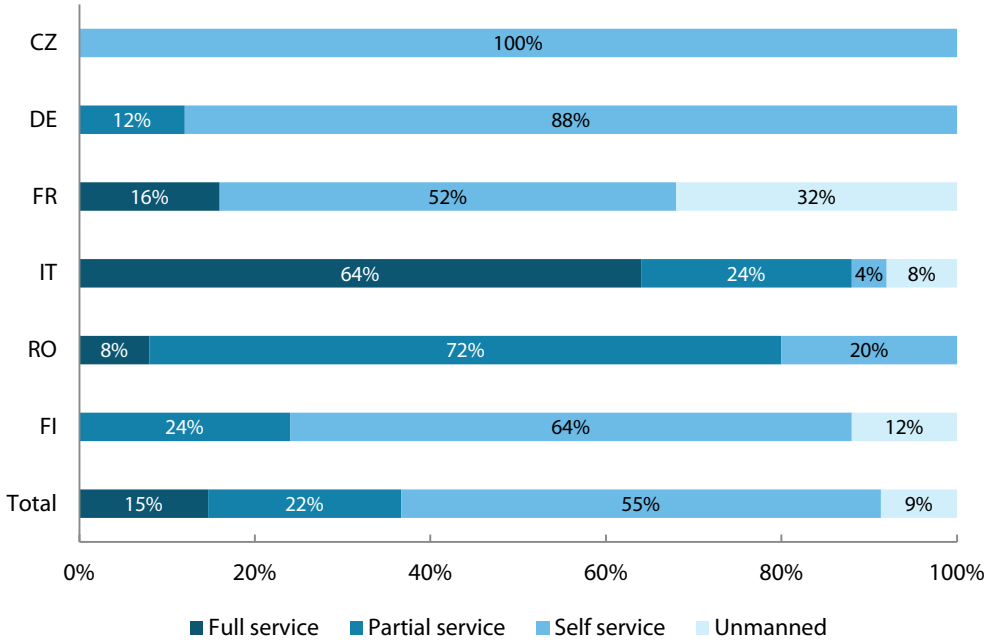
The service levels were defined in the following manner:

- Full service: A station attendant fuels the consumer's vehicle without the consumer needing to exit the vehicle;
- Self-service: Standard service level under which the consumer must exit the vehicle and pump the fuel him-/herself;

- Partial service: Both full service and self-service options are present at the station, with the full service option generally linked to a higher price.

Figure 1. *Service level available at the petrol stations*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 5. (N=150)



In terms of the service level provided at the visited petrol stations, the profiles of the six city samples vary substantially, with hardly any observable similarities. However, in five out of the six visited cities at least two different levels of service were provided. An exception was Prague, where all of the visited petrol stations operated on a self-service basis.[1] In this respect, Prague was closely followed by Berlin, where self-service was available at the vast majority (88%) of the visited petrol stations and partial service offered at only three (12%). With 55% of all visited petrol stations providing self-service, it was by far the most frequent service level encountered by mystery shoppers.

The second most commonly encountered service level was partial service, which was available at 22% of the petrol stations in the overall sample. In Bucharest, 72% of visited petrol stations provided this type of service, the highest figure among all of the city samples. In comparison, 24% of the petrol stations visited in Rome and Helsinki operated with this service level.

Though full-service was only available at 15% of the 150 stations visited across all six capital cities, the sample of stations in Rome stands out with the highest frequency of stations offering this service level (64%). In the other cities, mystery shoppers either

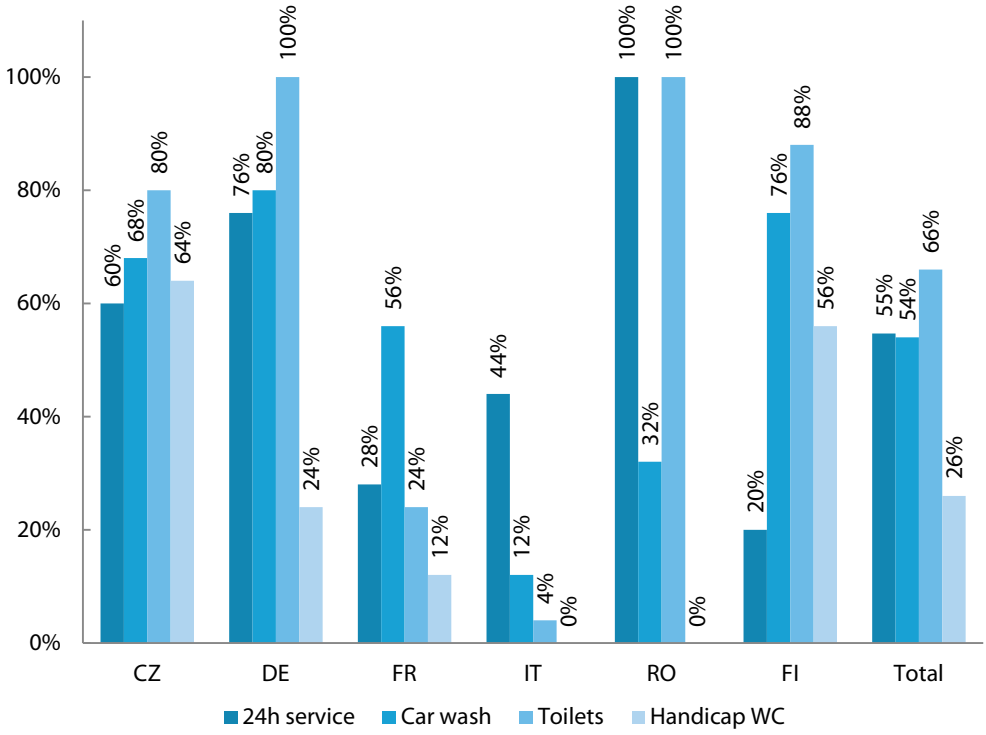
[1] Although none of the 25 petrol stations visited in Prague provided full or partial service by default, mystery shoppers reported that they noticed small signs near the pumps at most of the visited stations inviting disabled customers to honk their vehicle's horn three times to request help.

did not encounter any full-service stations (Berlin, Helsinki, and Prague) or rarely did so (8% and 16%, respectively, in Bucharest and Paris).

Unmanned stations composed 9% of the overall petrol station sample. The majority of these were located in Paris, where 32% of the visited stations were unmanned. Elsewhere, 12% of the stations visited in Helsinki were unmanned and this held for 8% of the stations visited in Rome. Mystery shoppers did not find or visit any unmanned stations in Prague, Berlin or Bucharest.

Figure 2. *Availability of services at petrol stations: 24h service, car wash, WC and handicap-accessible WC*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 6. (N=150)



In addition to the service level, mystery shoppers were asked to assess the availability of several individual services, including 24-hour opening times, a car wash, a WC and the accessibility of the WC for handicapped people. Again, the profiles of the six petrol station samples differ significantly, and no general similarities can be observed.

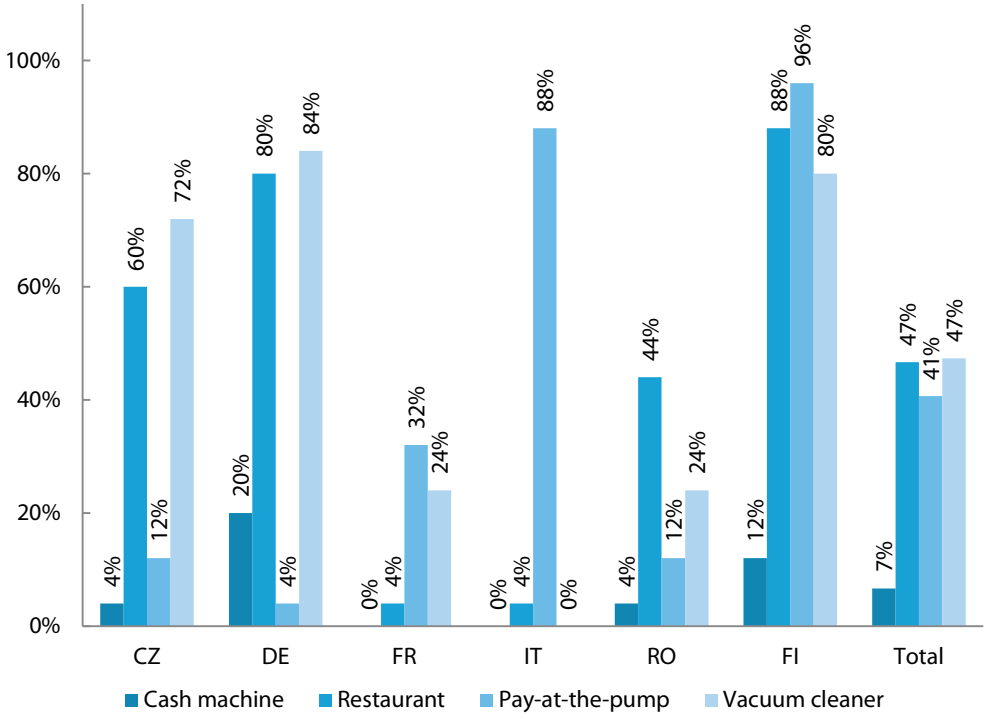
Slightly more than half of all visited petrol stations (55%) offered 24-hour service. This service was by far most common in Bucharest, where all visited petrol stations were open 24 hours per day, and least common in Paris and Helsinki where, respectively, only 7 and 5 of the 25 visited petrol stations were open at all hours.

While a car wash was commonly available among the visited stations in Berlin (80%), Helsinki (76%) and Prague (68%), it was less commonly present at the Paris (56%) and Bucharest (32%) stations and rarely available in the selection of stations in Rome (12%). Overall, 54% of the visited petrol stations offered a car wash.

Even though toilets were available at 66% of all visited petrol stations, only 26% of the stations had bathrooms designed to be handicap-accessible, according to station personnel. Major differences are again visible among the six samples. In Bucharest and Berlin, toilets were available at all of the visited petrol stations; this was true for 88% of the visited stations in Helsinki and 80% of those visited in Prague. Conversely, toilets were only available at 6 (24%) of the visited stations in Paris and a single (4%) station in Rome. In terms of the availability of handicap-accessible toilets, they were most common in Prague (64% of visited stations) and Helsinki (56%) and not at all available among the stations visited in Rome and Bucharest.

Figure 3. *Availability of services at petrol stations: cash machine, restaurant/bistro, pay-at-pump and vacuum cleaner*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 6. (N=150)



Other individual services that mystery shoppers determined the availability of at the visited stations were cash machines, restaurants/bistros, pay-at-the-pump functionality and vacuum cleaners. While cash machines were rarely present (7% of all stations), restaurants and pay-at-pump functionality (i.e. the ability to pay with a credit/debit card or key fob at the pump) were available at almost half of all visited stations (47% and 41%, respectively). Similarly, vacuum cleaners were available at nearly half of the stations (47%).

The Helsinki petrol station sample clearly stands out in terms of the percentage of visited stations which offered these services, although similarly high percentages of the visited stations in Prague (60% and 72%, respectively) and Berlin (80% and 84%,

respectively) also had restaurants and vacuum cleaners, and almost all of the stations visited in Rome (88%) had pay-at-the-pump functionality.

Cash machines were not available at any of the stations visited in Paris and Rome and at just 4% of the stations in Prague and Bucharest. Vacuum cleaners were also not available at any of the stations visited in Rome, and only about a quarter (24%) of the stations in Paris and Bucharest provided them.

Restaurants were only present at 4% of the visited stations in Paris and Rome; this was true for at least 44% of the visited stations in the four other capital cities. Finally, pay-at-the-pump functionality was only widely available in Rome and Helsinki; elsewhere, the proportion of stations with this service was below 32%.

2.1.3 Price displays and labelling at the pump

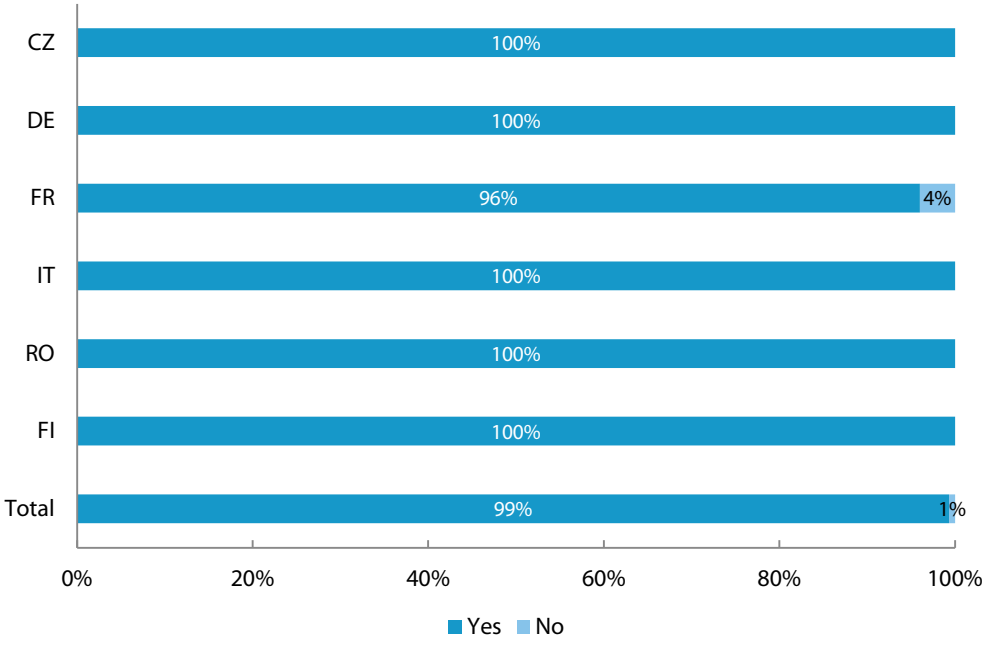
The following sub-sections present the findings on the prevalence of billboards at the road, the availability and labelling of key fuel types, and the use of colour coding to identify the most common fuel types.

Billboards at the road

The figure below indicates the near-comprehensive presence of billboards at the visited petrol stations.

Figure 4. *Presence of billboard displays at petrol stations*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 4. (N=150)



As is evident, billboards displaying fuel prices were present at all of the 150 visited petrol stations, with the lone exception of a station in Paris.

Fuel type availability and labelling

Mystery shoppers checked whether the following four petrol types were available at each station:

- Regular petrol 95;
- E10 fuel;
- Petrol 98; and
- Premium petrol with an octane number greater than 98.

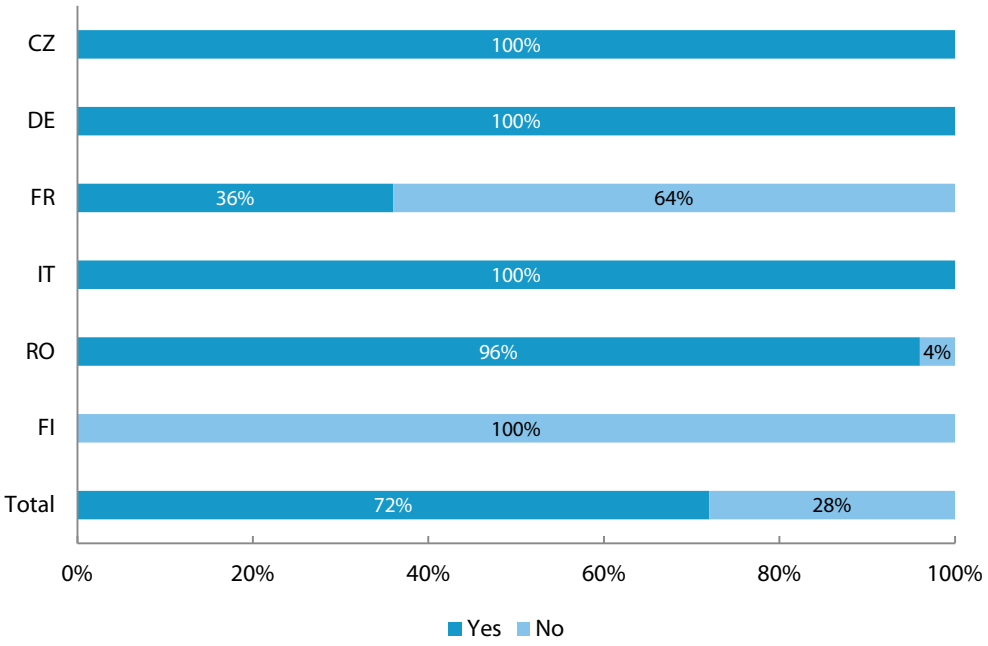
Where these fuel types were available, mystery shoppers then assessed whether they were clearly labelled. The findings are presented below, by fuel type.

Regular petrol 95

The next figure indicates the availability of regular petrol 95 among the six samples of visited petrol stations.

Figure 5. *Availability of regular petrol 95 at petrol stations*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 7. (N=150)



In terms of the availability of regular petrol 95, all of the 25 visited petrol stations in Prague, Berlin and Rome, as well as 24 out of 25 (96%) in Bucharest, offered this fuel type. In contrast, it was only available at around a third (9) of the 25 visited stations in Paris (36%) and was not available at all in Helsinki.

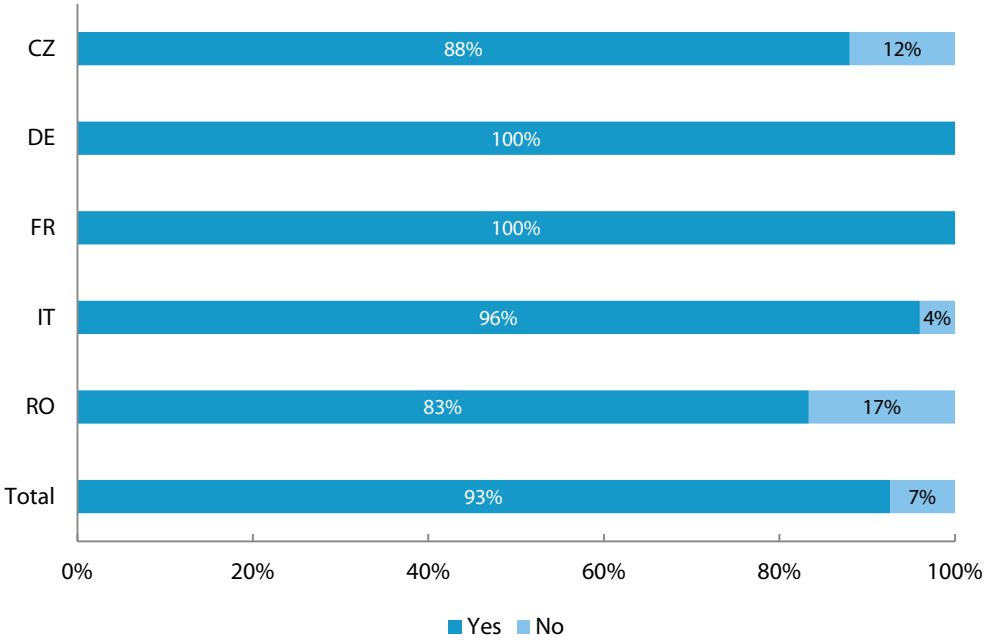
The non and limited availability of regular petrol 95 in Helsinki and Paris, respectively, is due to the fact that this formerly common fuel type has been completely or widely replaced by E10 (which also has an octane number of 95). At the time of research, E10

was also widely available at stations in Berlin, and Germany more broadly, but stations in that country still offered a non-E10 variant of petrol 95.

The next figure shows that when it was available, mystery shoppers generally found the labelling of regular petrol 95 clear.

Figure 6. *Is regular petrol 95 clearly labelled as such?*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 7a. (N=108)



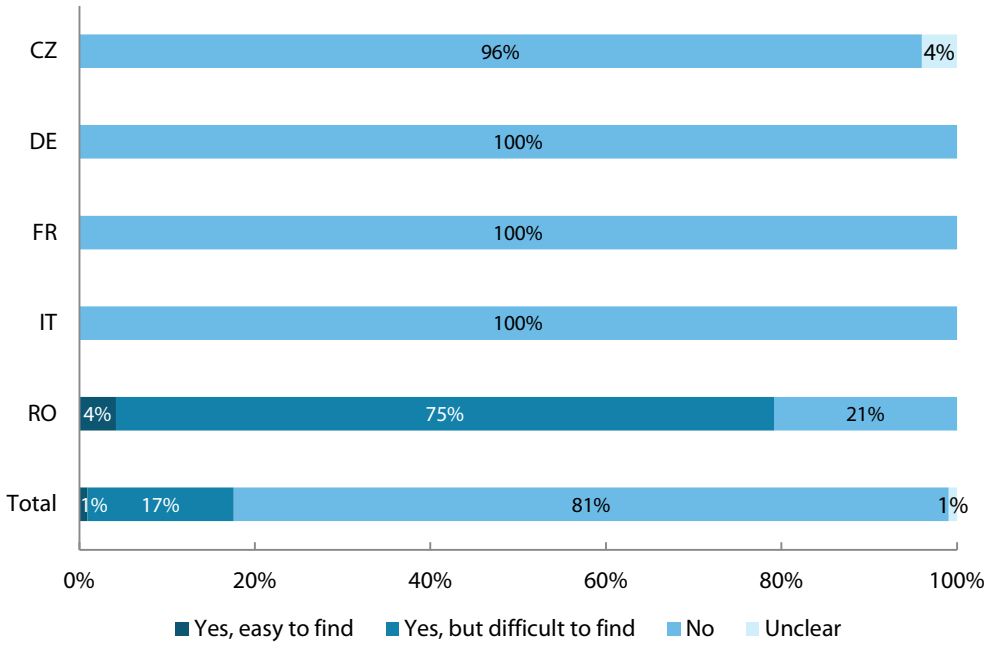
As it is evident from the figure directly above, mystery shoppers in Berlin, Paris and Rome agreed that regular petrol 95 was clearly labelled as such at all of the visited petrol stations which sold it, with the exception of one station in Rome.[2]

The situation was more varied among the Prague and Bucharest station samples, with 88% of visited petrol stations in Prague (22 of 25) and 83% in Bucharest (20 of 24) clearly labelling regular petrol 95, according to the mystery shoppers. Overall, 93% (100 of 108) of the stations where regular petrol 95 was sold displayed clear labelling of this fuel type.

[2] Regular petrol 95 was not sold in Helsinki. In Finland, E10 fuel has replaced petrol 95 in petrol stations.

Figure 7. *Is there an indication of the maximum content of ethanol?*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 7b. (N=108)



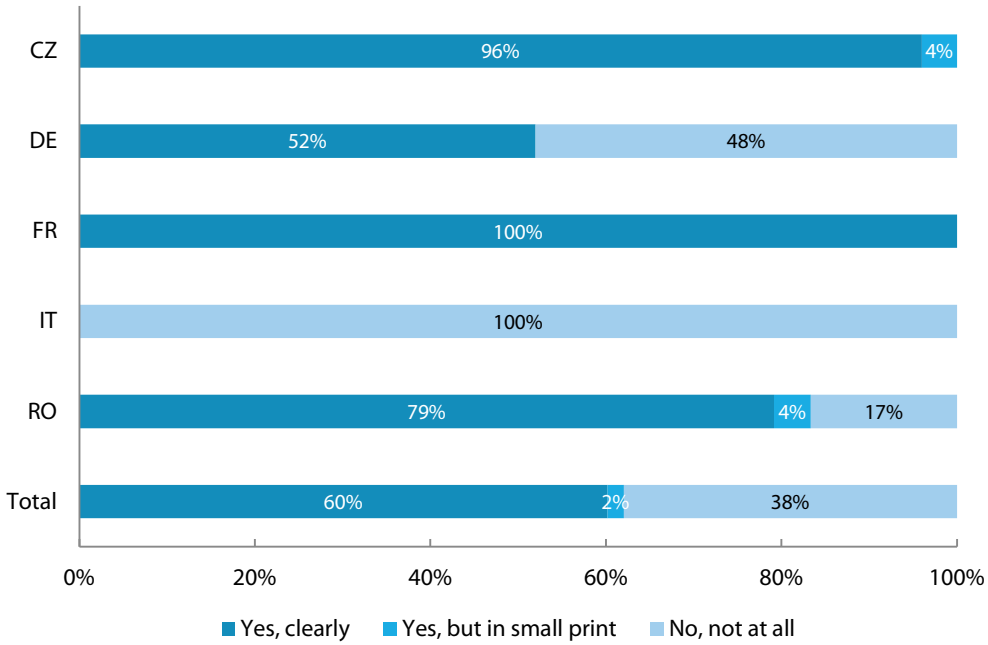
Mystery shoppers in Berlin, Paris and Rome did not find an indication of the maximum ethanol content of regular petrol 95 at any of the stations they visited. Mystery shoppers in Prague encountered only one unclear indication, with the other 24 stations not providing an indication. The situation was different in Bucharest, where 79% of stations (19 of 24) provided some indication of the maximum ethanol content, though it was only easy to find this indication at 4% (1) of these stations. The remaining 21% (5) of the visited stations in Bucharest did not provide any such indication.

Overall, indications of the maximum content of ethanol in regular petrol 95 do not seem to be commonly provided at petrol stations, as the vast majority of all visited petrol stations which sold regular petrol 95 (81%, or 88 of 108) did not provide this information. Where it was provided (18%, or 19 of 108 stations), it was almost always difficult to find (17%, or 18 of the 108 stations where it was provided).

The last question pertaining to regular petrol 95 asked mystery shoppers if the octane number was clearly indicated (see next figure).

Figure 8. *Is the octane number (95) clearly indicated?*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 7c. (N=108)



As opposed to the maximum content of ethanol in the fuel, this information was provided more frequently, though the situation varied significantly among the five capital city petrol station samples where this fuel type was available.

One extreme is represented by the stations visited in Prague and Paris, all of which displayed the octane number, though one of the Prague stations did so in small print. The other extreme is represented by the sample of stations in Rome, none of which indicated the octane number.

More than four fifths of all visited petrol stations in Bucharest indicated the octane number (83%, or 20 of 24), though one station provided this indication in small print. The stations in Berlin were evenly split on this aspect, with 52% (or 13) indicating the octane number and 48% (or 12) not doing so.[3]

Overall, only 60% of the visited stations where regular petrol 95 was available provided a clear indication of its octane number.

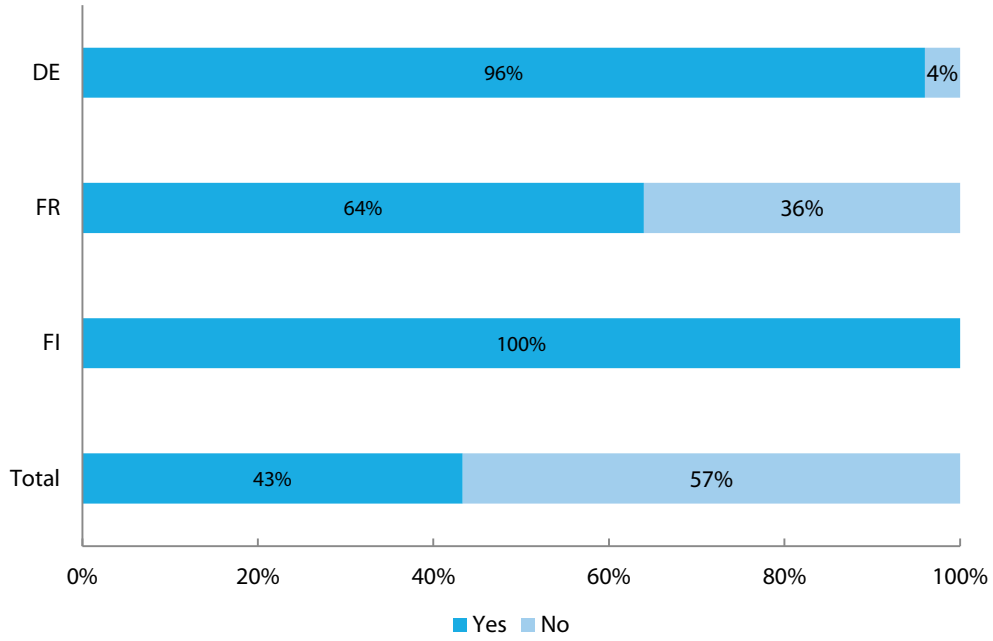
[3] In Germany, regular petrol 95 is commonly labelled as "Super" and regular 98 as "Super Plus". This system of labelling is consistently applied overall and explains why the octane numbers of these fuel types are not commonly indicated.

E10 fuel

The next figure indicates the availability of E10 fuel across the sample of 150 visited petrol stations.

Figure 9. *Availability of E10 fuel at petrol stations*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 8. (N=150)
Note: Member States where no E10 fuel was available excluded.



Whereas E10 fuel was not available at any of the visited petrol stations in Prague, Rome and Bucharest, it was available at all of the visited stations in Helsinki and most of the stations in Paris (64%, or 16 of 25). This fuel type was also available at all of the visited stations in Berlin, with the exception of one station where it was temporarily not in stock.[4] In total, E10 was available at 65 of the 150 visited stations (43%).

Concerning the clarity of E10 labelling, there was broad agreement among mystery shoppers in all three capital cities where this fuel type was available: its labelling was regarded as clear at all of the relevant stations (24 in Berlin, 16 in Paris and 25 in Helsinki).

In terms of the compatibility of E10 with different vehicle types, no list of compatible or incompatible vehicle types was displayed at or near the pump at any of the visited petrol stations in Berlin or Helsinki. In notable contrast, only in Paris did mystery shoppers find such a list at 13 of the 16 (81%) visited petrol stations. In a subsequent question, mystery shoppers were asked to determine whether there was any indication of potential harm to incompatible vehicle types at or near the pump.

The results of this question reveal that none of the 65 visited stations where E10 fuel was available displayed this type of information.

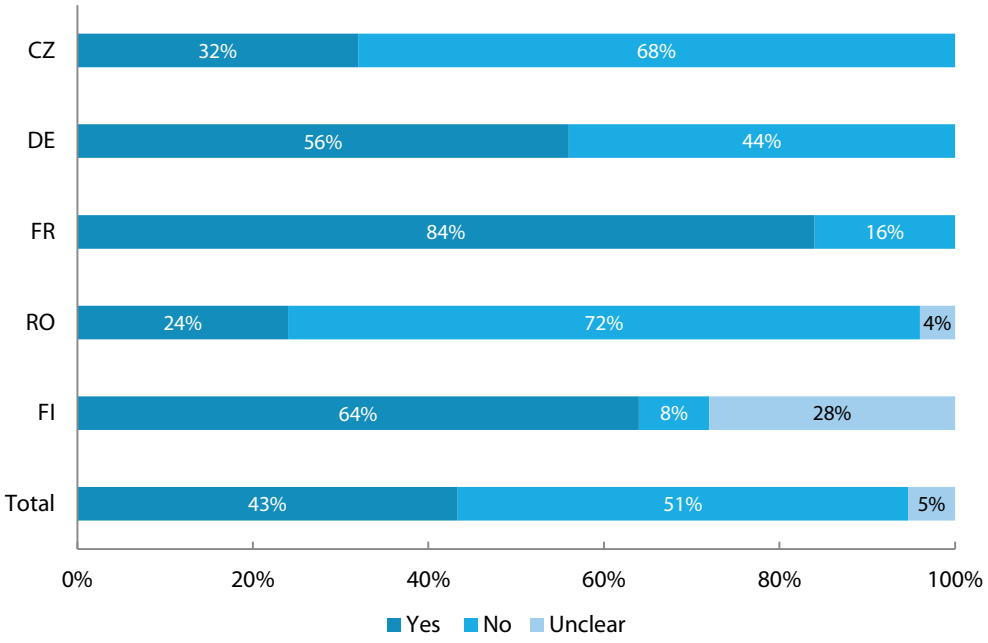
[4] This petrol station did not offer E10 at the time of the mystery shoppers' visit because of construction work.

Petrol 98

The following figure depicts the availability of petrol 98 across the samples of visited petrol stations.

Figure 10. *Availability of petrol 98 at petrol stations*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 9. (N=150)
Note: No Petrol 09 found in Italy.



With the exception of Rome, where none of the visited petrol stations actually offered it, petrol 98 was available in at least some of the visited stations in the five other capital cities. Petrol 98 was most commonly available in Paris, where 84% of the visited petrol stations (21 of 25) offered this fuel type, though this proportion may have been superseded by Helsinki – only 64% (16) of the visited stations in Helsinki clearly sold petrol 98, but it was unclear whether this fuel type was available at another 28% (7) of the stations.[5] In Berlin, 56% (or 14) of the visited petrol stations offered petrol 98.

In Prague (32%, or 8 of 25) and Bucharest (24%, or 6 of 25) the proportion of stations selling petrol 98 was even lower, as less than a third of the visited petrol stations in these cities offered this type of petrol.

Overall, petrol 98 was available at 65 of the 150 visited petrol stations (43%). Slightly more than half (51%, or 77) did not sell this type of fuel, and at another 5% of the stations (8 of 150) it was not clear whether petrol 98 was available.

[5] Some of the petrol stations in Helsinki offered a fuel type which appeared to be labelled as premium petrol, but the labelling did not indicate an octane number – only the maximum content of ethanol (E5) was provided. As 5% by volume is now a common value for the maximum content of ethanol for petrol with an octane number of 98, this fuel type was unlikely to be a premium according to the definition used for the station visits (which required premium petrol to have an octane number higher than 98, see definition provided in the next sub-section).

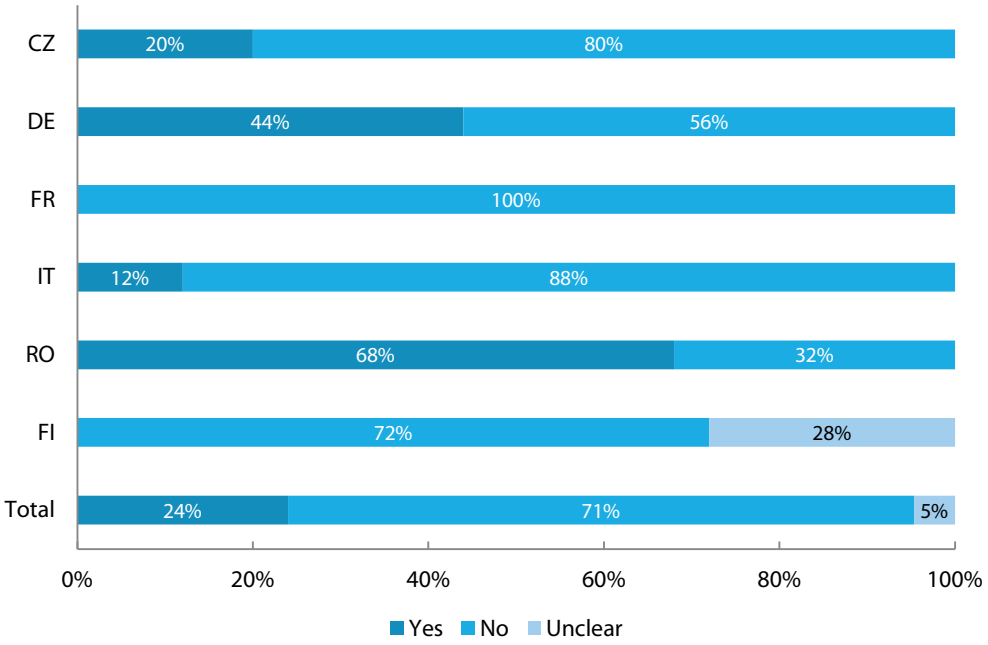
At all 65 of the stations which definitely sold petrol 98 at the time of research (8 in Prague, 14 in Berlin, 21 in Paris, 6 in Bucharest and 16 in Helsinki), this fuel type was clearly labelled, according to the mystery shoppers.

Premium petrol

The following figure shows the availability of the last fuel type assessed by mystery shoppers, namely premium petrol. Mystery shoppers were provided with the following definition of premium petrol: refers to petrol that is typically more expensive than regular petrol and has a high octane rating (RON > 98); often it also contains additives. 'Premium' petrol is often marketed with specific terms such as 'Ultimate', 'V-Power', etc.

***Figure 11.** Availability of premium petrol (RON >98) at petrol stations*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 10. (N=150)



As is visible in the figure, the sample of stations visited in Bucharest stands out markedly as having the highest proportion of stations that sold premium petrol at the time of the visits (68%, or 17 of 25). Premium petrol was also available at almost half of the visited petrol stations in Berlin (44%, or 11 of 25) and at a fifth of the ones visited in Prague (20%). In the latter city, several stations were clearly marketing a premium variant of petrol 95, indicating that it offered engine / vehicle performance benefits relative to the regular petrol 95. The price for these 'premium' petrol 95 variants was higher than that of their regular 95 counterparts; however, they are not included in this figure because they did not comply with the definition for premium petrol used for this exercise.

Premium petrol was not available among the stations in the Paris sample, and it was only rarely available in Rome, where three of the visited stations (12%) offered it. At 7

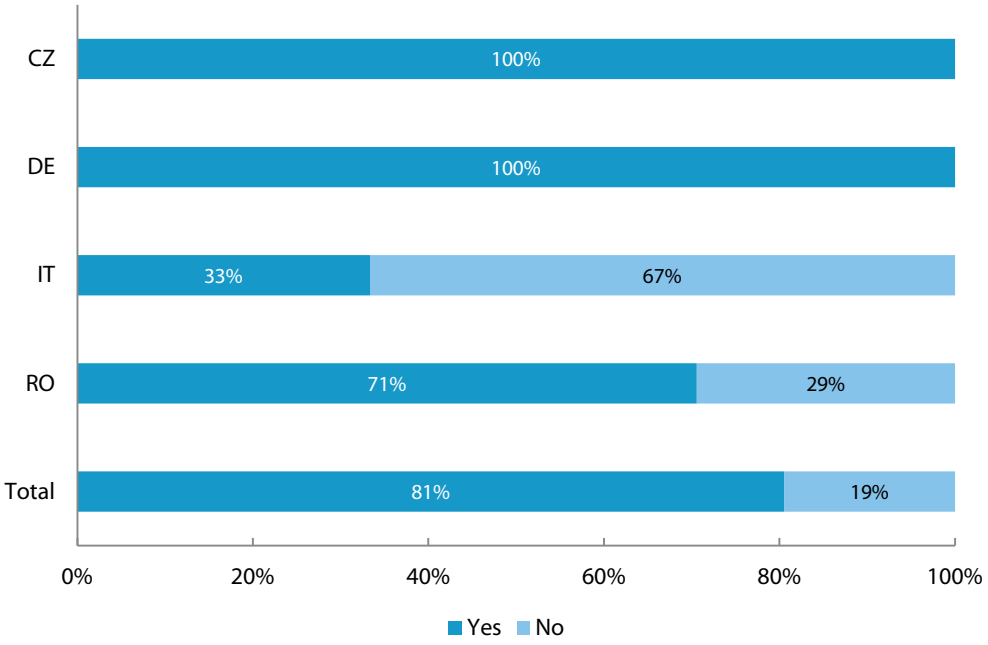
of the 25 stations visited in Helsinki (28%) mystery shoppers reported that it was not clear whether premium petrol was being offered. As previously discussed in relation to petrol 98, a petrol variant at these seven stations was labelled as a premium fuel without any indication of its octane number. It was thus impossible for the mystery shoppers to reliably determine whether the offered fuel was petrol 98 or premium petrol with a higher octane number. The remaining 72% of visited petrol stations in Helsinki (18 of 25) did not sell premium petrol.

Overall, the majority of the visited petrol stations did not sell premium petrol. Only at 36 of the 150 stations (24%) was premium petrol definitely offered.

The following two figures pertain to the labelling of premium petrol at the relevant stations.

Figure 12. *Is the premium petrol clearly labelled as such?*

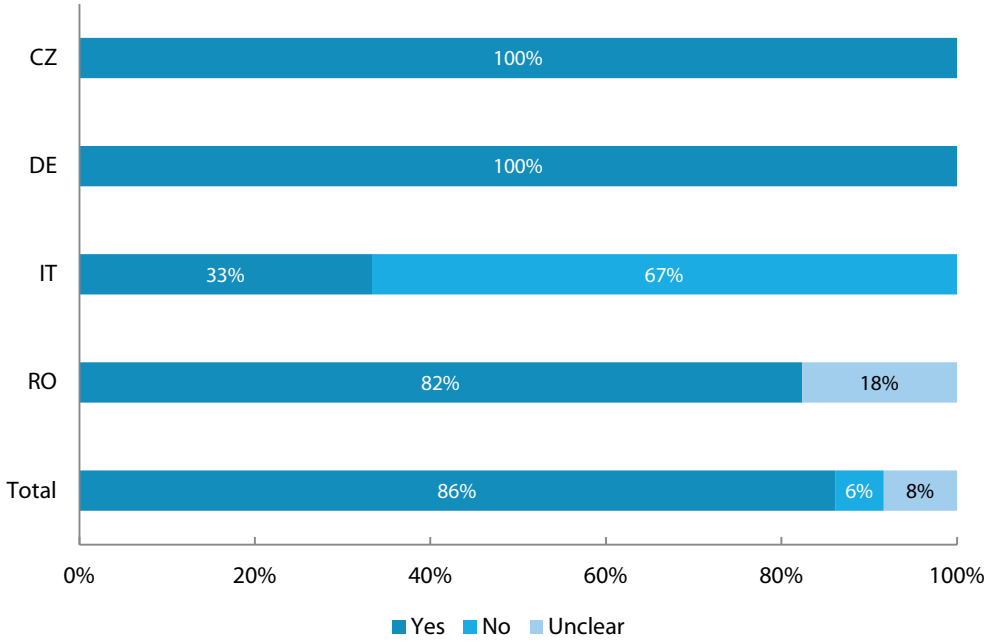
Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 10a. (N=36)



Overall, in 81% of stations where it was available, mystery shoppers found premium petrol to be clearly labelled. In terms of the clarity with which premium petrol was labelled, mystery shoppers in both Prague and Berlin found the labelling of this fuel type clear at all of the applicable petrol stations. In Bucharest, this was the case for 71% of the stations offering premium petrol (12 of 17), while in Rome the labelling of premium petrol was clear at just one of the three petrol stations offering this fuel type (33%).

Figure 13. *Is there an indication of the material difference between premium petrol and regular petrol 95 at or near the pump?*

Source: Civic Consulting mystery shopping visits to petrol stations, Question 10b. (N=36) Note: This refers to the indication of any material difference, including the octane number and a specification of additives.



Among the 36 stations that definitely offered a premium petrol type at the time of the station visits, 86% (or 31) provided a clear indication of a material difference between premium petrol and regular petrol 95 at or near the pump. In this case, the material difference could constitute an octane number, among other possibilities. At 6% (or 2) of these stations no indication of the material difference between the fuel types was provided, and at 8% (or 3) the indication was unclear.

Among the 5 Prague and 11 Berlin petrol stations that sold premium petrol, an indication of the material difference between that fuel type and regular petrol 95 was always provided. Such an indication was provided at 14 of the 17 stations (82%) selling premium petrol in Bucharest but at only 1 of the 3 stations (33%) selling premium petrol in the Rome sample. These findings mirror the results, shown in the previous figure, for the overall clarity of premium petrol labelling.

While the preceding text analysed overall labelling clarity for the four petrol types, the next sub-section investigates one potential cause of clear or unclear labelling at the pump: label or nozzle colour-coding to distinguish fuel types.

Use of colours to distinguish key fuel types

Mystery shoppers participating in the station visit exercise also investigated the presence of colours on fuel labels or nozzles at the pump. The intention was to see whether stations made use of colour-coding to help distinguish key fuel types and if this colour-coding was consistent within and across countries.

Below, six figures examine, in turn, the colours used by the visited stations to indicate:

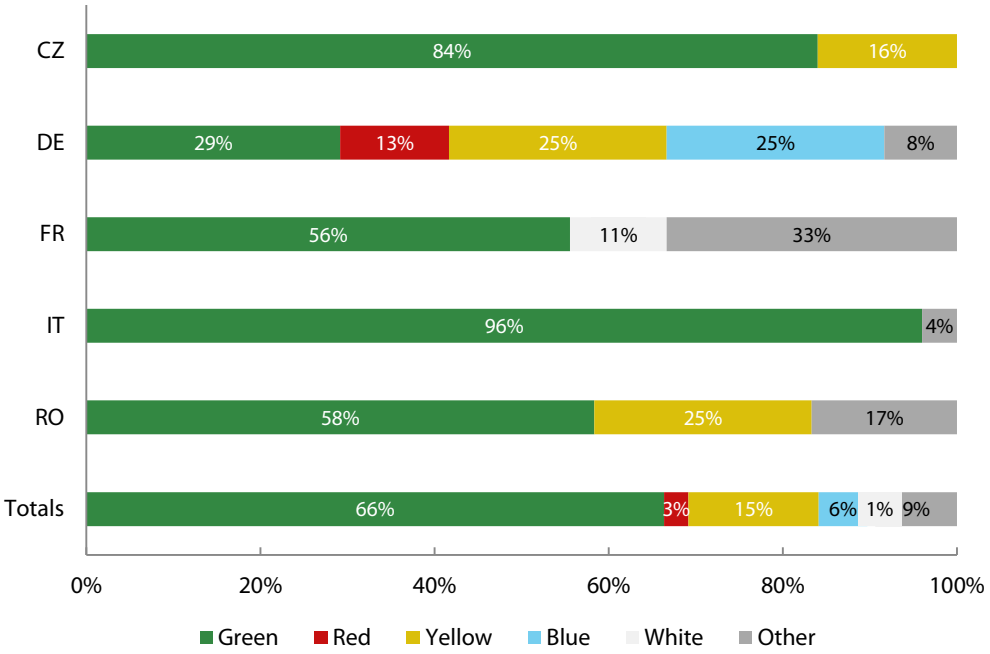
- Regular petrol 95;
- E10 fuel;
- Petrol 98;
- Premium petrol;
- Regular diesel; and
- Premium diesel.

To identify the colour coding mystery shoppers first looked for the colour of the fuel label on the pump itself; however, in some cases mystery shoppers indicated that the colour differentiation was made on the nozzle rather than on the pump, and in these cases colour indications refer to the nozzles.

Regular petrol 95

Figure 14. *Colours used on the pump to distinguish fuel types – Regular petrol 95*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 11. (N=107)



The most common colour used to label regular petrol 95 at the visited petrol stations was green. Among the 107 petrol stations that offered this fuel type, 66% used green on the label or nozzle to identify this fuel type.[6]

The use of green for this purpose was most consistently applied among the stations visited in Rome, where only one station used another colour, and Prague, where 84% of the applicable stations associated green with regular petrol 95. The picture was noticeably different in the three other city samples. In Paris and Bucharest and, especially, Berlin, many of the visited stations used colours other than green to indicate regular petrol 95. This was the case for 42% of the stations in Bucharest, 44% in Paris and 71% in Berlin. At the visited Bucharest stations, other colours used to indicate regular petrol 95 were yellow and 'other', with the latter category comprising any colour not listed in Figure 14 above or a combination of multiple colours. White was used by one of the visited Paris stations (11%), while three (33%) from this sample used 'other' colours.[7] A true range of colours was used in Berlin, with 29% of stations employing green, 13% red, 25% yellow, 25% blue and 8% 'other'.

Overall, yellow was the second most commonly used colour to distinguish regular petrol 95 (15% of all applicable stations). Six percent of the stations used blue to indicate regular petrol 95, and 9% used other or multiple colours.

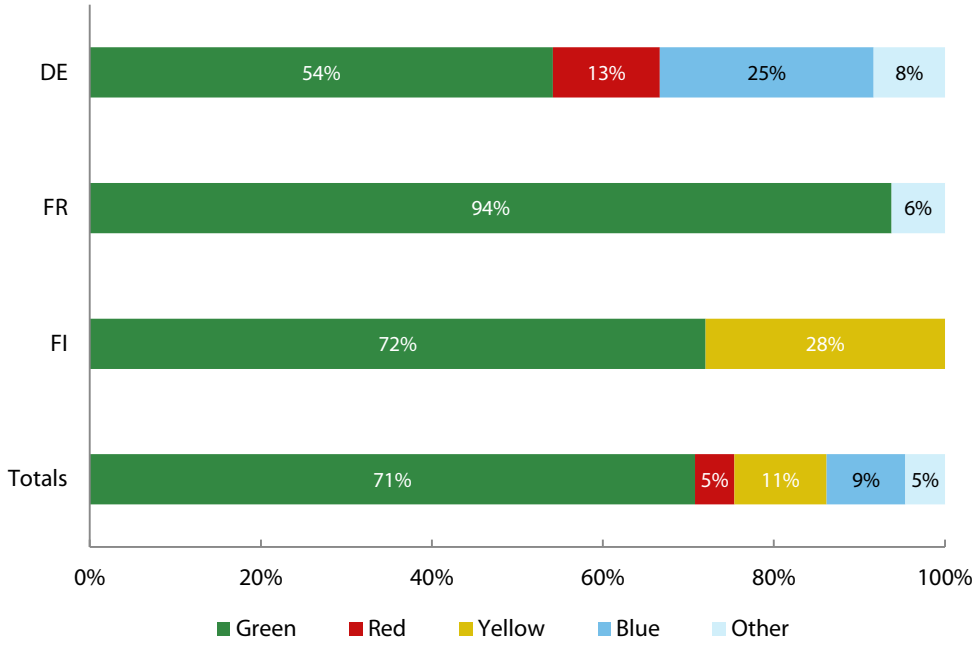
6 In Finland, Petrol 95 was replaced with E10 fuel.

7 The category of 'other' colours includes any colour other than green, black, red, yellow, blue or white, as well as instances in which multiple colours were presented on a label or nozzle.

E10 fuel

Figure 15. *Colours used on the pump to distinguish fuel types – E10 fuel*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question11. (N=65)



Green was also the colour most commonly used to distinguish E10 fuel in the three cities where it was available. Of the 65 petrol stations that offered this type of fuel,[8] 71% used green on the relevant label or nozzle, while 11% used yellow and 9% blue.

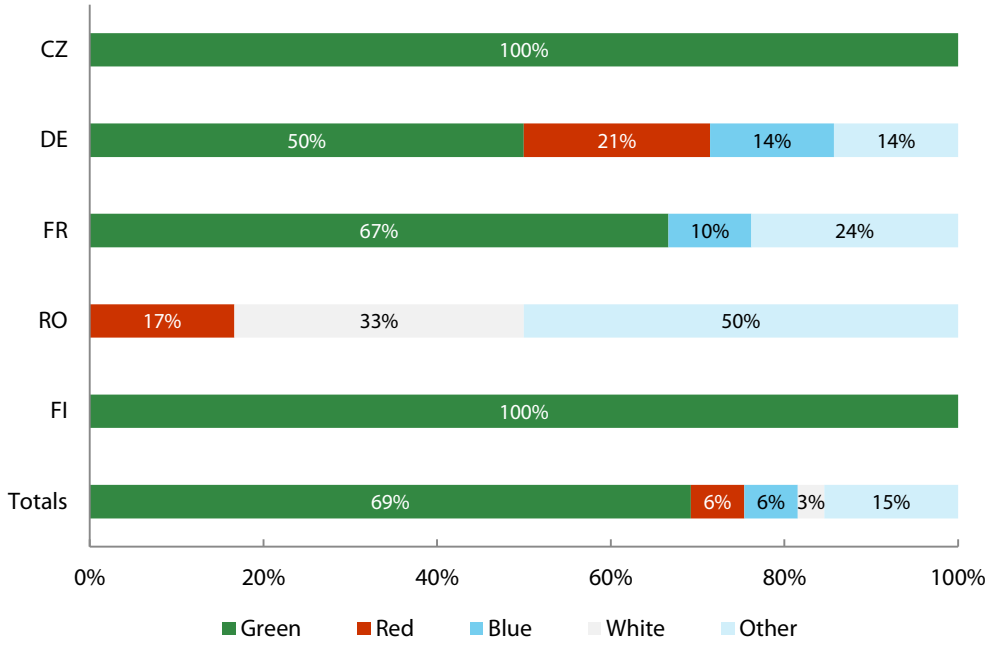
All but one of the relevant petrol stations visited in Paris used green (94%), while 72% (or 18 of 25) of the visited stations in Helsinki did the same; the remaining 28% of Helsinki stations used yellow. The visited Berlin stations again made use of the widest variety of colours to distinguish E10 fuel. Thirteen of the 24 applicable stations in Berlin used green (54%), but 25% used blue, 13% red, and 8% 'other'.

[8] E10 fuel was found only in Helsinki, Paris, and Berlin.

Petrol 98

Figure 16. *Colours used on the pump to distinguish fuel types – Petrol 98*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question11. (N=65)



Continuing the trend of associating green with petrol types, this was also the most commonly used colour to identify petrol 98, where available.[9] Sixty-nine percent of the visited stations that offered petrol 98 used green on the relevant labels or nozzles; 15% used 'other' or multiple colours, while 6% used red and another 6% blue.

Relevant stations in Prague and Helsinki were entirely consistent in using green to indicate petrol 98 (100% of these stations). The majority of the relevant stations in Paris used green (67%), but 24% used 'other' or multiple colours, and 10% utilised blue.

Again, the petrol stations visited in Berlin stand out for having used the greatest variety of colours to indicate petrol 98. Mystery shoppers reported the use of at least four different colours (green, 50%; red, 21%; blue, 14%; and 'other', 14%) at the visited Berlin stations.

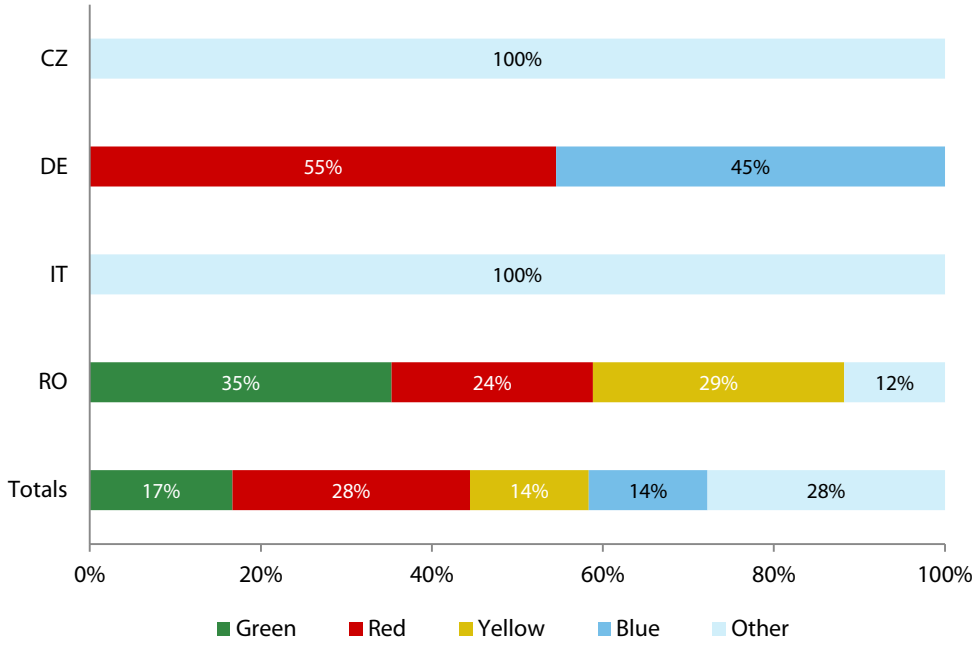
Notably, none of the visited stations in Bucharest used green to distinguish petrol 98. Instead, red (17%), white (33%) and 'other' or multiple colours (50%) were used.

[9] As no RON98 fuel was found in Rome, results from Italy are not included here.

Premium petrol

Figure 17. *Colours used on the pump to distinguish fuel types – Premium petrol*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 11. (N=36)



In contrast to the previous findings for petrol 95, E10 and petrol 98, no single colour was overwhelmingly used to identify premium petrol fuel types.[10] Overall, 28% of stations used red to identify premium petrol, but 28% also used 'other' or multiple colours. Green (17%), yellow (14%) and blue (14%) were used by almost equal proportions of stations.

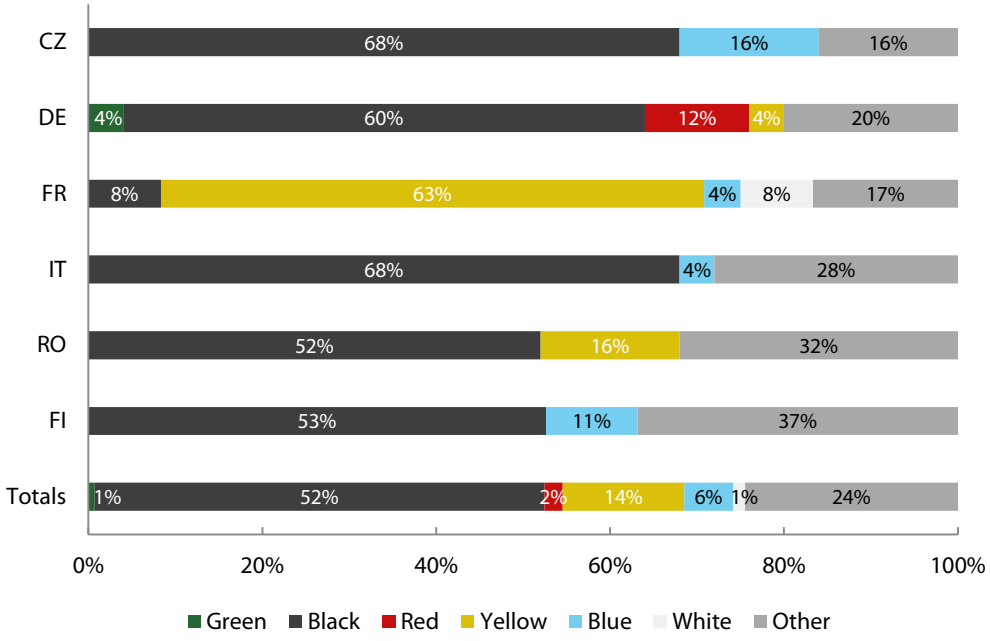
The findings from Prague and Rome are notable in that all of the applicable stations in these cities used 'other' or, in many cases, multiple colours to label premium petrol. Visited stations selling premium petrol in Berlin used either red (55%) or blue (45%) to identify this fuel type. Finally, in Bucharest, four different colour types were used to label premium petrol: green (35%), yellow (29%), red (24%) and 'other' or multiple colours (12%).

[10] There was no premium petrol found in the visits to Paris and Helsinki.

Regular diesel

Figure 18. *Colours used on the pump to distinguish fuel types – Regular diesel*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 11. (N=143)



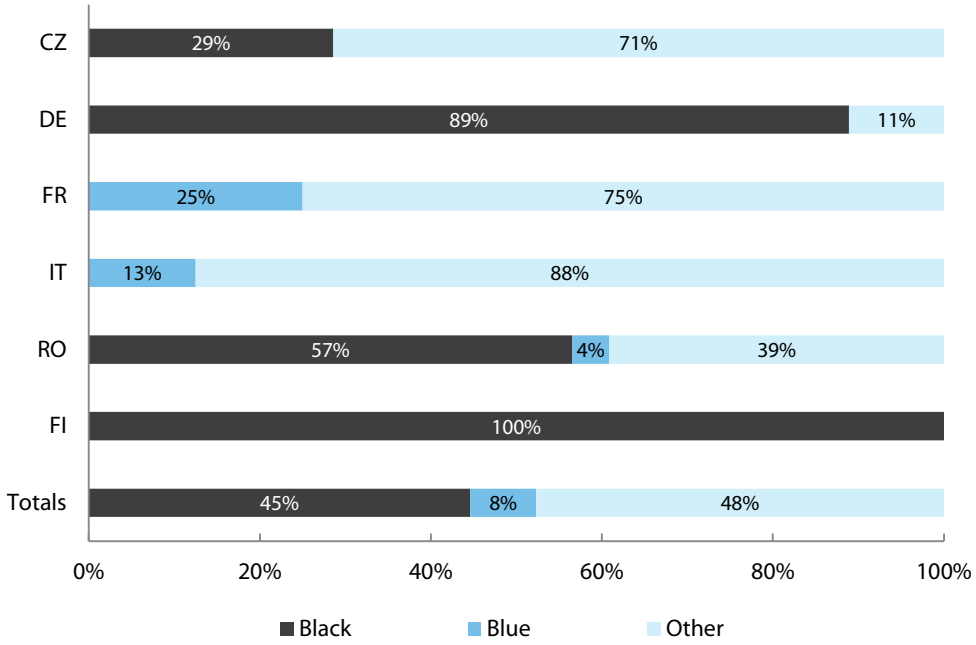
Among the 143 visited stations where it was offered, regular diesel fuel was predominantly distinguished by the colour black (52%), with 'other' or multiple colours (often including black) being the next most commonly used colour type (24%). Fourteen percent of the visited stations that sold regular diesel fuel used yellow on the labels or nozzles to indicate it. No more than 6% of visited stations used any other colour to distinguish regular diesel fuel.

The majority of the visited stations in five of the six city samples associated black with regular diesel fuel, including 68% in Prague and Rome, 60% in Berlin, 53% in Helsinki and 52% in Bucharest. In contrast, the majority of the visited stations in Paris used yellow to identify regular diesel fuel (63%), with only 8% using black for this purpose.

Premium diesel

Figure 19. *Colours used on the pump to distinguish fuel types – Premium diesel*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question11. (N=65)



In contrast to the findings for regular diesel, black was not the most commonly used colour to indicate premium diesel at the visited stations which sold this fuel type. Specifically, 45% of the relevant stations used black, but 48% used 'other' or multiple colours and 8% utilised blue. Notably, though, some of the labels that made use of multiple colours to identify premium diesel included black.

The findings differ substantially when considered by the six individual city samples. All of the relevant Helsinki stations (100%) and the vast majority of the Berlin stations (89%) used black to distinguish premium diesel. However, only 57% of Bucharest stations and 29% of Prague stations used black for this purpose, with the remainder using 'other' / multiple colours (39% in Bucharest and 71% in Prague) or, in Bucharest, blue (4%). Again, when multiple colours were used, black was often one of them.

The association of black with premium diesel fuel was not reported by the mystery shoppers for any of the visited stations in Paris or Rome. Instead, stations in these cities utilised blue (25% in Paris and 13% in Rome) or 'other' / multiple colours (75% in Paris and 88% in Rome).

2.1.4 Fuel purchases and price consistency

Toward the end of their visit to each petrol station, mystery shoppers purchased a small amount of fuel. Based on this activity and their previous review of labelling practices, they assessed the risk of confusing the preferred petrol type (generally E10 or regular petrol 95) with another petrol variant, as well as with diesel fuel. These findings are detailed in the first sub-section below. The second sub-section then

reports on whether any written material in a language other than the visited country's primary language was available at the station and, if so, whether it aided in the fuel selection process. The final sub-section provides the results of the price consistency check in which mystery shoppers compared the price listed on the billboard, the price displayed at the pump and the price recorded on their receipt.

Risk of confusing fuel types before purchase

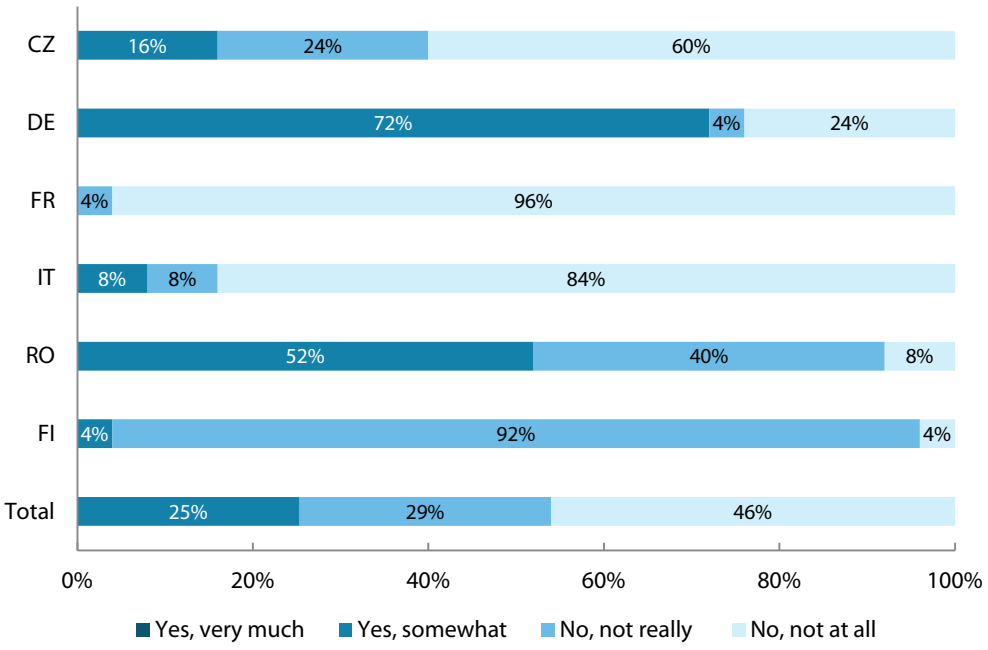
The mystery shoppers' assessments of the risk of confusing their preferred fuel type with another are displayed in the next two figures. Overall, while there was little risk of confusing the preferred type of petrol with diesel fuel, there was a significantly greater risk of confusion between different petrol types.

Different types of petrol

The first figure pertains to the assessed risk of confusing the preferred petrol type with another petrol variant.

Figure 20. *When you searched for the right type of petrol was there a risk of confusing it with other petrol types?*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 13. (N=150)



For at least one station in five of the capital cities mystery shoppers did report somewhat of a risk of confusing the preferred petrol with other petrol types. This was the case for 18 out of 25 visited petrol stations in Berlin (72%), and in Bucharest this risk level was reported at 52% of the visited stations. In the comment fields associated with this question, mystery shoppers mainly cited use of the same colour or same label design for more than one type of fuel as a potential cause of confusion. In Prague, Rome and Helsinki, somewhat of a risk of confusing different petrol types was reported at 16%, 8% and 4% of stations, respectively.

In terms of the proportion of visited stations at which there was deemed no risk at all of confusing petrol types, Paris, Rome and, to a lesser extent, Prague, stand out. In these cities 96%, 84% and 60% of stations, respectively, were seen as presenting no risk at all of confusing different petrol types.

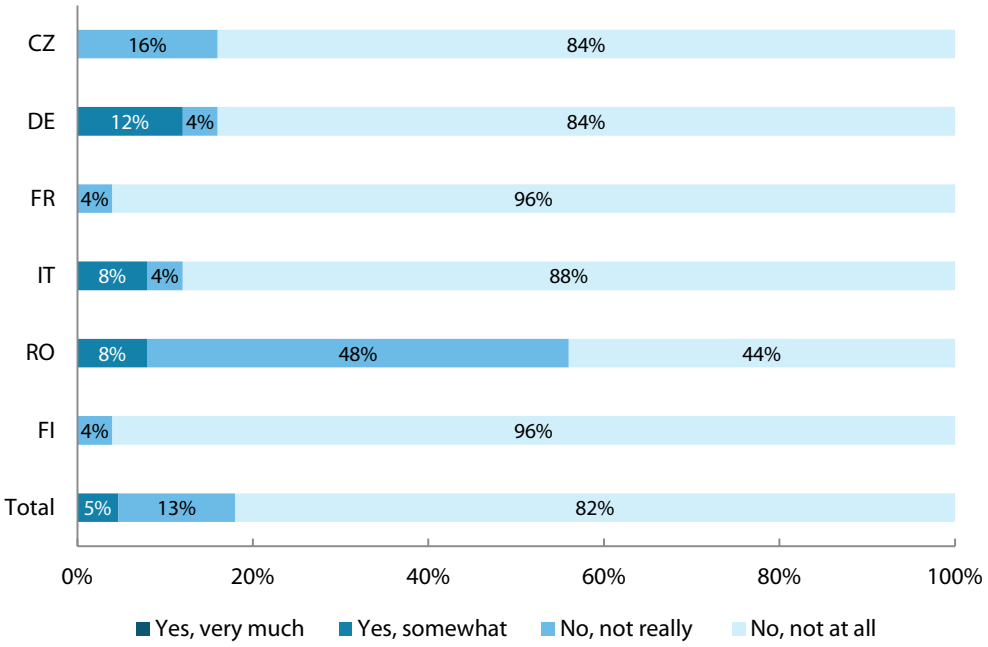
Overall, there was somewhat of a risk at 25% of visited stations, not really a risk at 29% and no risk at all at 46%, according to mystery shoppers.

Petrol and diesel fuel

This figure pertains to the assessed risk of confusing the preferred petrol type with diesel fuel.

Figure 21. *When you searched for the right type of petrol was there a risk of confusing it with diesel fuel?*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 14. (N=150)



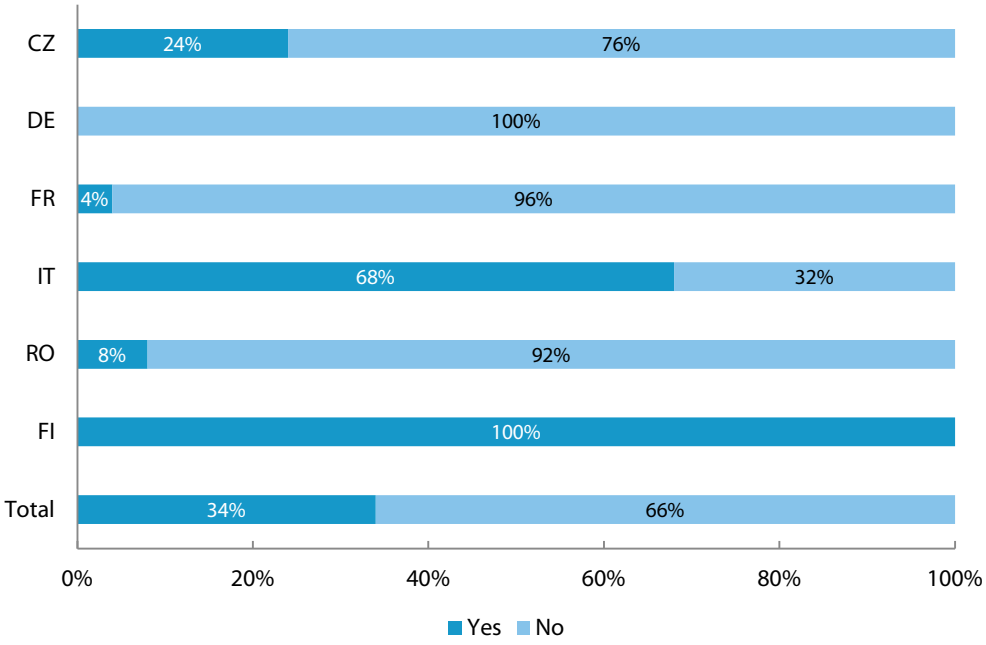
None of the mystery shoppers found a very high risk of confusing petrol with diesel fuel. At the majority of all visited petrol stations (95%), mystery shoppers reported there was no risk at all (82%) or not really a risk of such confusion (13%). Only in the remaining 5% of cases did mystery shoppers indicate that there was somewhat of a risk. These ratings originated at visited stations in Berlin (3 stations), Rome (2 stations) and Bucharest (2 stations). In Berlin, the mystery shoppers reported that the risk emerged from use of the same colours and design in different fuel types' labels.

Availability of written material in another language(s)

While purchasing fuel, mystery shoppers searched for any labelling or signs at the petrol station which appeared in a language other than the country's primary one. The next figure shows the proportion of stations at which they encountered signs in another language.

Figure 22. *During the search process, did you note any labels or signs in another language* at the petrol station?*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 15. (N=150)
Note: * A language other than the country's national or primary language; the label for a fuel's brand was not considered for this question.

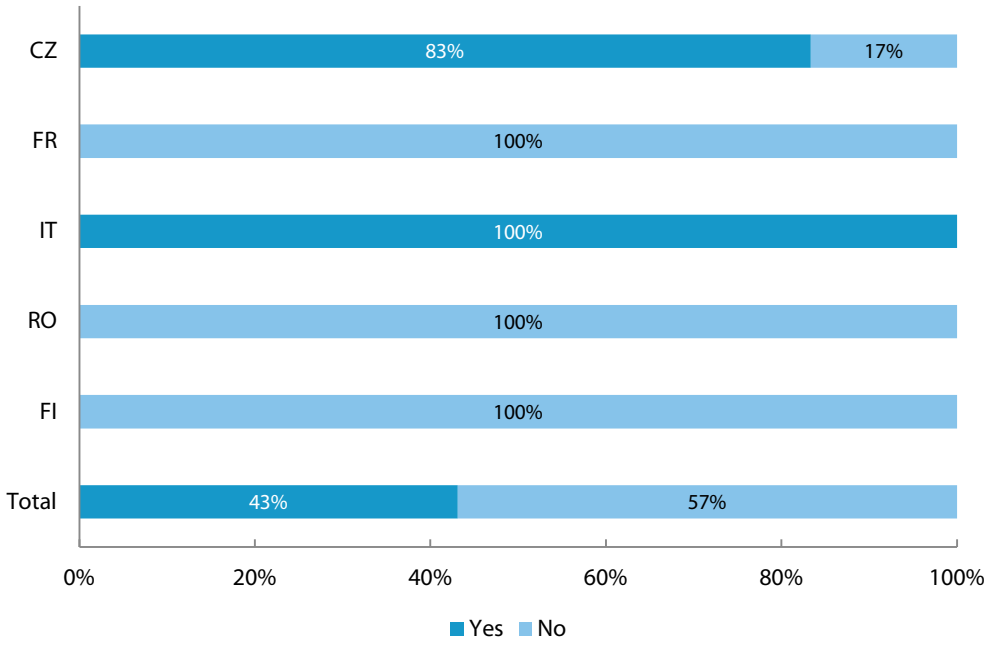


Overall, as the figure above indicates, only about one third (34%) of the visited petrol stations displayed labels or signs in another language. However, the proportion differed substantially depending on the city sample. For example, 100% of the visited stations in Helsinki had labels or signs in a language other than Finnish. In Rome, 68% of the visited stations offered labels or signs in a language other than Italian, and 24% of the stations visited in Prague had labels or signs in a language other than Czech. In the Prague cases, the secondary language was English and/or German, while in Rome, the mystery shoppers noted the use of English words in fuel labelling.

However, among the 75 stations visited in the other three cities, namely Berlin, Paris and Bucharest, just three stations, and none in Berlin, displayed labels or signs in a language other than the country's primary one.

Figure 23. *Did this label or sign in another language* help you in choosing the right fuel?*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 15b. (N=51)
Note: * A language other than the country's national or primary language



For those visited petrol stations at which labels or signs did appear in another language, mystery shoppers were asked whether this information proved helpful in choosing the right fuel type. Overall, the information available in another language was regarded as helpful at only 43% of the applicable stations, including all of the Rome stations at which it was provided and 83% of the Prague stations at which it was available.

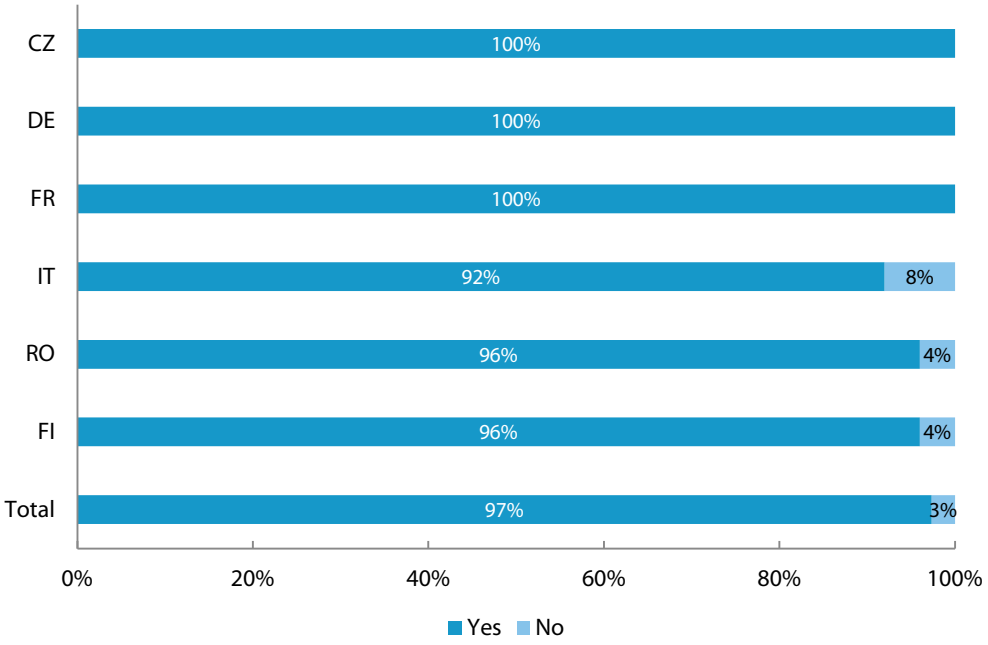
The proportions shown for Paris and Bucharest are based on only one and two stations, respectively, but the non-helpfulness of the foreign language information at visited stations in Helsinki is notable, because such information was available at all 25 visited stations in that city. The reason that the mystery shoppers did not find this information helpful in Helsinki is that it was only available in Swedish, a language which neither of them spoke. In contrast, where information was provided in another language at visited stations in the Czech Republic that language, as mentioned above, was generally English or German, which are more widely understood. In Berlin, no petrol stations with signs in a language other than German were visited.

Price consistency

As the final step in their visit to each station, the mystery shoppers checked the consistency of price data presented on the billboard, at the pump and on their receipt. As the figure below indicates, these prices were almost always consistent in each of the six countries.

Figure 24. *Are the prices at the pump on the receipt and on the billboard (if available) all consistent?*

Source: Civic Consulting mystery shopping visits to petrol stations in six Member States, Question 18. (N=150)



Overall, prices on the billboard, at the pump and on the receipt were identical at 97% of the 150 visited stations. Inconsistencies emerged only at two stations in Rome, one station in Bucharest and one station in Helsinki. In the Helsinki case, the price on the receipt was actually lower than the one advertised on the billboard. This was also the case at the Bucharest station, where the billboard price was 5.92 but the price on the pump and on the receipt was 5.90. In one of the cases in Rome, the receipt showed a 0.10 Euro lower price than what had been displayed at the pump; in the other case, the billboard indicated a price for regular petrol 95 that did not include the charge for service; the price per litre with service was not included on the billboard.

2.2 ASSESSMENT OF FUEL LABELLING AT PETROL STATIONS

This section presents the findings of an assessment of billboard displays and labelling at the pump which was carried out by mystery shoppers. The assessment is based on photographs of a selection of petrol stations located in the capital cities of six Member States.

2.2.1 Methodology

The assessment was undertaken to gain an understanding of whether existing price information and fuel labelling at petrol stations is appropriate for consumer decision-making. Specifically, the exercise was designed to address the following aspects: Do billboards at the road facilitate price comparison of different fuel types? And, does labelling at the pump facilitate consumer choice regarding fuel types?

For this component of the mystery shopping exercise, 30 mystery shoppers were divided into 10 groups of 3. Each group then separately reviewed identical sets of 25 photographs of billboards and approximately 75 photographs depicting fuel labelling at 25 pumps from different perspectives.

The photographs had been taken during visits to a sample of 150 petrol stations in the capital cities of six EU Member States (25 stations per city).[11] Participants in that exercise took photographs of the billboard, if available, at each of the stations they visited. They also requested the permission of a station employee to take three photographs at the pump: one of the entire pump, a more detailed one of the labelling above and on the nozzles, and a final photograph of the pump's side. Only 1 of the 150 stations visited did not have a billboard, but at many stations employees denied the participants' requests to take photographs of the pump.

This was most notably the case in Romania where only 2 of the 25 stations allowed such photographs to be taken. Employees at approximately half of the 25 stations visited in each of the other capital cities allowed photographs of labelling at a pump to be taken, with the exception of Helsinki, where 21 of the 25 stations permitted such photographs. The main reason given was that taking photographs contradicted company policy, as well as privacy and confidentiality issues, though no legal impediment was cited.

In preparation for the labelling assessment, a representative selection was made from the full collection of photographs in order to give an overview of the situation documented in the different countries. This selection process resulted in the previously-described sets of photographs displaying 25 billboards and 25 pumps.

[11] The photographs were taken during the petrol station visits carried out in early November 2012 and February 2013. The following capital cities were visited: Prague, the Czech Republic; Berlin, Germany; Paris, France; Rome, Italy; Bucharest, Romania; and Helsinki, Finland. Please see Section 2.1 for more details about the station visit methodology as well as the findings of that exercise.

The 10 groups of mystery shoppers were asked to consider the billboard photographs in light of the amount of information provided on the billboard and the clarity of that information. Mystery shoppers were to consider labelling at the pump in terms of the ease of identifying the right fuel type for a person coming from another EU country.[12] Specifically, they tried to identify regular diesel fuel and regular petrol 95.

The matrix for the billboard assessment is displayed in the next table. The groups were instructed to first rate the amount of information provided on each billboard (moving down the first column of the matrix) and to subsequently rate the clarity of that information (moving across the first row). They discussed the assessment until consensus emerged. They then found the corresponding matrix cell and noted down the applicable number, a 0 for 'insufficient'; a 1 for 'acceptable'; or a 2 for 'very good'.

Table 1. *Evaluation matrix for price information on billboards*

Source: Civic Consulting.

Amount of information provided	**Clarity of information provided on the billboard**		
	Not very clear	Fairly clear	Very clear
Not enough information	*Insufficient (0)*	*Insufficient (0)*	*Insufficient (0)*
Too much information	*Insufficient (0)*	*Insufficient (0)*	*Acceptable (1)*
The right amount of information	*Insufficient (0)*	*Acceptable (1)*	*Very good (2)*

As the next table shows, the matrix utilised for the assessment of labelling at the pump was broadly similar. In this case, the groups of mystery shoppers were asked to first assess the ease of identifying regular diesel fuel (moving down the first column of the matrix) and then to assess the ease of identifying regular petrol 95 (moving across the first row). The applicable matrix cell and score – a 0, 1 or 2 – were then identified.

[12] This part of the exercise was carried out with a specific focus on cross-border experiences: mystery shoppers, who came from a wide variety of Member States and Iceland were instructed to assess labelling at the pump in terms of the ease with which they, as cross-border shoppers, were able to identify the fuel types. Mystery shoppers who were natives of one of the six countries from which photographs had been taken were asked to hold their opinion until the end of the group discussion, and, in the case of disagreement, the assessment of the other group members was to prevail.

Table 2. *Evaluation matrix for fuel labelling at the pump*

Source: Civic Consulting.

Ease of identification - regular diesel	**Ease of identification - regular petrol 95**		
	Not very easy	Fairly easy	Very easy
Not very easy	*Insufficient (0)*	*Insufficient (0)*	*Insufficient (0)*
Fairly easy	*Insufficient (0)*	*Acceptable (1)*	*Acceptable (1)*
Very easy	*Insufficient (0)*	*Acceptable (1)*	*Very good (2)*

In total, 500 scores were assigned by the 10 groups of mystery shoppers – 250 for price information provided on the billboards and 250 for labelling at the pumps. The analysis of the findings is presented in the following sub-sections:

- Assessment of information provided on billboards at the road;
- Assessment of fuel labelling at the pump;
- Cumulative findings by station.

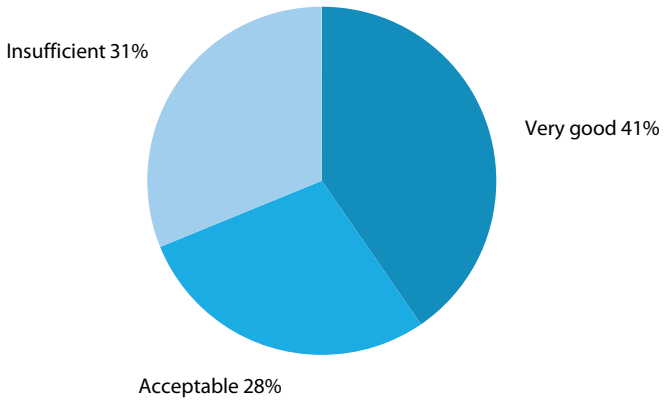
A limited selection of the photographs utilised for this exercise is included in this section to illustrate good, acceptable and insufficient billboard and labelling practice, as assessed by the groups of mystery shoppers.

2.2.2 Assessment of information provided on billboards at the road

Consideration of the entire sample of 250 scores assigned to information provided on billboards (25 billboards assessed by 10 separate groups of mystery shoppers) reveals that the three possible scores – 'very good' (2); 'acceptable' (1); and 'insufficient' (0) – were assigned with similar frequency.

Figure 25. *Distribution of scores for information provided on billboards*

Source: Civic Consulting assessment of fuel labelling at petrol stations. (N=250)

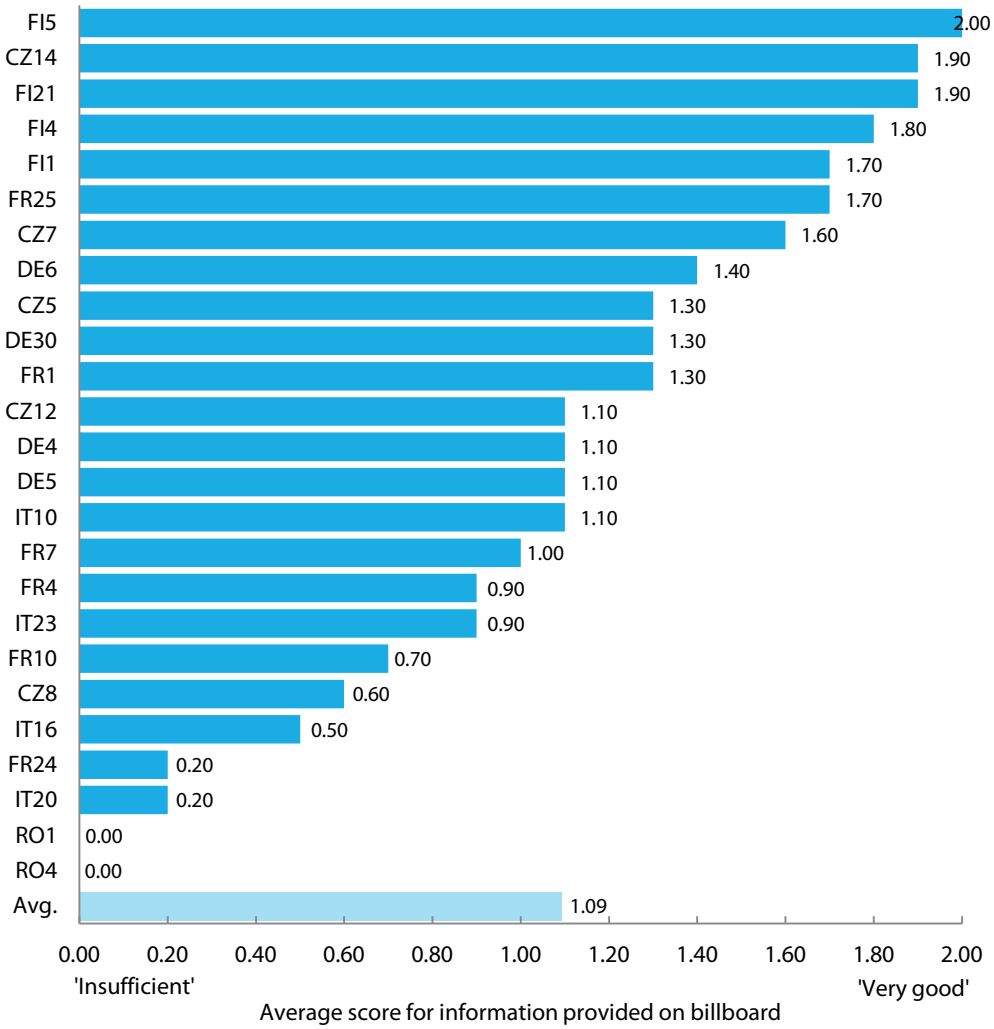


Specifically, the figure above shows that of the 250 ratings, 41% were 'very good', meaning that mystery shoppers thought a billboard provided the right amount of information in a very clear manner. A smaller proportion of the assigned ratings, 28%, were 'acceptable'. As shown in the evaluation matrix above (see Table 1), a billboard rated 'acceptable' either presented the right amount of information in a fairly (but not very) clear manner or presented information very clearly but showed too much of it. The remaining 31% of ratings were 'insufficient'.

To arrive at an overall score for information provided on each billboard included in the sample, the ratings assigned to it by the 10 groups of mystery shoppers were averaged. The following figure displays these average scores by station.

Figure 26. *Average score for information provided on billboard, analysis by station*

Source: Civic Consulting assessment of fuel labelling at petrol stations. (N=250)



As the figure shows, the information provided on several billboards, including those at stations FI5, CZ14, FI21, FI4, FI1, FR25 and CZ7, was highly regarded by mystery shoppers in terms of its amount and clarity. Notably, information provided on the billboard at station FI5 was rated 'very good' by all 10 groups of mystery shoppers (average score of 2.00); this was nearly the case for the billboards at stations CZ14 and FI21 (average scores of 1.90). The average scores for information provided on the billboards at stations FI4, FI1, FR25 and CZ7 were also high, ranging from 1.80 to 1.60. The focus group discussions (see Section 2.5 for a full summary), provided insight into why mystery shoppers regarded some stations' billboards as informative and clear and others' as less so. Favourable factors indicated by the mystery shoppers include the use of clear colour codes to differentiate fuel types; the highly visible display of the octane number (RON), e.g. 95 or 98 for petrol fuel types; and the use of large and clear numbers on billboards, with no or limited advertisements. Conversely, mystery shoppers noted in the focus group discussions that more negative assessments of billboards were sometimes tied to the usage of language- or country-specific terms,

such as 'super' to refer to petrol 95 in Germany and terms other than 'diesel' to refer to that fuel type because this terminology decreased the billboards' clarity for cross-border fuel purchasers.

A second subset of billboards with average information provision scores ranging from 1.40 to 1.30 is identifiable and includes stations DE6, CZ5, DE30 and FR1.

Information provided on billboards at four stations, CZ12, DE4, DE5 and IT10, was rated almost directly at the overall, 25-station average of 1.09. The provision of information on three additional billboards – FR7 (1.00), FR4 (0.90) and IT23 (0.90) – was assessed slightly below the overall average.

Finally, the provision of information on billboards at seven stations was, on average, regarded as less than 'acceptable' or outright 'insufficient' by the groups of mystery shoppers. The former rating pertains to the billboards at stations FR10 (0.70), CZ8 (0.60) and IT16 (0.50), while the latter more appropriately characterises the billboards at stations FR24 (0.20), IT20 (0.20), RO1 (0.00) and RO4 (0.00). The information provided on the latter two billboards received unanimous 'insufficient' ratings.

The following pages display photographs of three billboards taken in different countries (FI5, CZ14, FR25) which received among the highest average scores for their provision of price information. Also included is a photograph of a billboard (located at station DE4) whose information provision was assessed near the overall, 25-station average, and three photographs of billboards (FR24, IT20, RO4) for which the information provided was poorly regarded by the groups of mystery shoppers.

Examples of very good information provision on billboards

The following photograph depicts the billboard at petrol station FI5, located in Helsinki, Finland. This billboard received a 'very good' rating (2.00) from all 10 groups of mystery shoppers that assessed it.

Figure 27. *Photograph of billboard at station FI5*

Source: Civic Consulting petrol station visits.

This billboard is from station CZ14. It received the second-highest average score of 1.90 for its provision of information.

Figure 28. *Photograph of billboard at station CZ14*

Source: Civic Consulting petrol station visits.

The information provided on this billboard, located at station FR25 in Paris, France, received a high average score of 1.70, placing it in a tie for the fifth-highest score.

Figure 29. *Photograph of billboard at station FR25*

Source: Civic Consulting petrol station visits.

Example of acceptable information provision on a billboard

Located at petrol station DE4 in Berlin, Germany, the information provided on this billboard was rated 'acceptable' (average score of 1.10) by the 10 groups of mystery shoppers.

Figure 30. *Photograph of billboard at station DE4*

Source: Civic Consulting petrol station visits.

Examples of insufficient information provision on billboards

This billboard, located at station FR10 in Paris, France, received an average score of 0.70, below the 'acceptable' rating.

Figure 31. *Photograph of billboard at station FR10*

Source: Civic Consulting petrol station visits.

This billboard, from station IT20 in Rome, Italy, was not well regarded for its provision of information – it was assigned an average score of 0.20.

Figure 32. *Photograph of billboard at station IT20*

Source: Civic Consulting petrol station visits.

As a final example of billboards that were poorly assessed for their provision of information, this one, from station RO4 in Bucharest, Romania, received an average score of 0, meaning that all 10 groups of mystery shoppers regarded it as 'insufficient'.

Figure 33. *Photograph of billboard at station RO4*

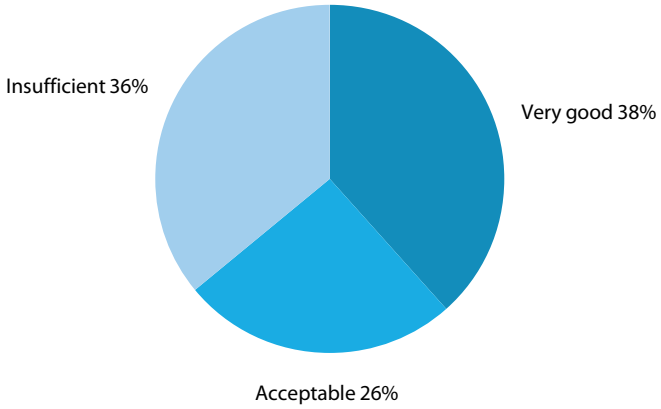
Source: Civic Consulting petrol station visits.

2.2.3 Assessment of fuel labelling at the pump

The following figure reveals a distribution of scores for the instances of labelling at the pump included in the exercise that is approximately equal to the one seen for information provision on the billboards (see Section 2.2.2 above).

Figure 34. *Distribution of scores for labelling at the pump*

Source: Civic Consulting assessment of fuel labelling at petrol stations. (N=250)

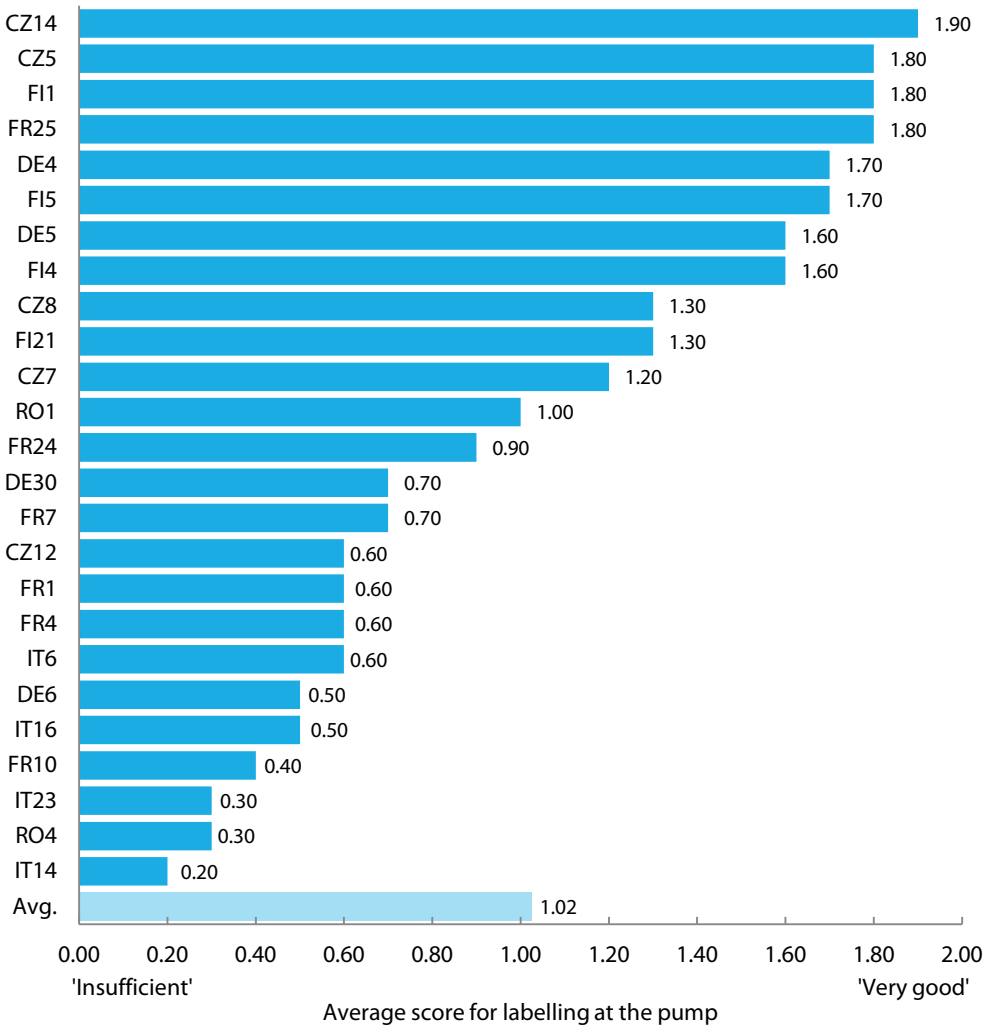


Nearly two in five (38%) of the scores assigned to the examples of labelling at the pump reflected 'very good' labelling. Per the evaluation matrix presented above, this score means that both regular diesel fuel and regular petrol 95 were regarded as very easy to identify. A further 26% of the assigned scores identified 'acceptable' fuel labelling, which reflects one of the two fuel types being very easy to identify and the other fairly easy. The remaining 36% of the 250 scores assigned to pumps were ones of 'insufficient'.

The following figure displays the average labelling-at-the-pump score for each station included in the assessment sample.

Figure 35. *Average score for labelling at the pump, analysis by station*

Source: Civic Consulting assessment of fuel labelling at petrol stations. (N=250)



Visible in the above figure is a group of stations whose labelling at the pump practices were regarded as 'very good'. This list includes CZ14 (average score of 1.90); CZ5, FI1, FR25 (all 1.80); DE4 and FI5 (both 1.70); and DE5 and FI4 (both 1.60).

Several additional stations received scores slightly above or at the overall, 25-station average of 1.02 for their labelling at the pump. Included in this group are CZ8 (1.30), FI21 (1.30), CZ7 (1.20) and RO1 (1.00). The station FR24 received an average score (0.90) just below the overall average.

The remaining 12 stations can be evenly divided into two categories: those six stations that received less than 'acceptable' average scores of either 0.70 (DE30, FR7) or 0.60 (CZ12, FR1, FR4 and IT6), and those six that received average scores closer to

the 'insufficient' end of the scale. This latter group includes DE6 and IT16 (both 0.50), FR10 (0.40), IT23 and RO4 (both 0.30) and IT14 (0.20).

The following pages display photographs that depict three examples of highly regarded labelling at the pump (CZ14, FI1 and DE4), one example of a station (CZ7) whose labelling at the pump was assessed as slightly better than the overall, 25-station average, and three examples of poorly regarded labelling at the pump (FR10, RO4 and IT14).

Examples of very good labelling at the pump

The following photograph displays the front side of a pump at station CZ14 in Prague, the Czech Republic.[13] Based on the mystery shoppers' assessments, the fuel labelling at this pump received an average score of 1.90, which means that nearly all of the groups rated it 'very good'.

Figure 36. *Photograph of pump at station CZ14*

Source: Civic Consulting petrol station visits.

[13] As stated in the 'Methodology' section above, mystery shoppers actually formed their assessments of labelling at the pump based on three photographs (one of the entire front side of the pump, a close-up of the labelling above and on the nozzles, and a third photograph of the side of the pump). Here, for purposes of brevity, only one photograph of the front of each pump is displayed.

The next picture is of a fuel pump at station FI1 in Helsinki, Finland. The labelling at this pump was also highly regarded (average score of 1.80).

Figure 37. *Photograph of pump at station FI1*

Source: Civic Consulting petrol station visits.

The pump displayed in the following photograph, and located at station DE4 in Berlin, Germany, received an average score of 1.70, indicating that most of the assessing groups founds its labelling practices to be 'very good'.

Figure 38. *Photograph of pump at station DE4*

Source: Civic Consulting petrol station visits.

Example of acceptable labelling at the pump

This example of 'acceptable' labelling at the pump originates from station CZ7, in Prague, the Czech Republic. This labelling received an average score of 1.20, slightly above the acceptable rating of 1.00, as well as the overall, 25-station average of 1.02.

Figure 39. *Photograph of pump at station CZ7*

Source: Civic Consulting petrol station visits.

Examples of insufficient labelling at the pump

The following pump, located at station FR10 in Paris, France, was largely deemed to exhibit 'insufficient' fuel labelling; it received an average score of 0.40.

Figure 40. *Photograph of pump at station FR10*

Source: Civic Consulting petrol station visits.

The next example of labelling at the pump was also regarded as 'insufficient' to allow for easy identification of regular diesel fuel and petrol 95 (average score of 0.30).

Figure 41. *Photograph of pump at station RO4*

Source: Civic Consulting petrol station visits.

Finally, the labelling at this pump at station IT14 in Rome, Italy, was assessed most negatively, with an average score of 0.20.

Figure 42. *Photograph of pump at station IT14*

Source: Civic Consulting petrol station visits.

2.2.4 Cumulative findings by station

Considering the average scores for information provided on billboards and labelling at the pump indicates that the station whose display of price information and labelling at the pump were, on average, most highly scored by the 10 groups of mystery shoppers is CZ14 (photographs of this station's billboard and labelling at the pump were displayed above). CZ14 was closely followed by FI5 in terms of mystery shoppers' assessments, and stations FI1, FR25 and FI4 also received high overall scores.

On the other end of the scale, several stations received overall average scores well below the 'acceptable' level. These include IT23, FR10, FR24, RO1 and IT16, as well as RO4 (photographs depicting the billboard and at-the-pump labelling of station RO4 were displayed above).

In most instances, positively-assessed billboards are associated with well-regarded labelling at the pump and vice versa. Stated differently, it was rare for a petrol station to be assessed substantially better or worse on one of these components than the other. However, there were some exceptions, including the station DE4, whose labelling at the pump (depicted in a photograph above) received a substantially higher average score than its billboard (also shown above).

2.3 EVALUATION OF COMPARISON WEBSITES

This section presents the results of mystery shoppers' assessments of 60 comparison websites targeted at the vehicle fuels market.

2.3.1 Methodology

Comparison websites to be evaluated during the mystery shopping exercise were identified through multiple approaches. First, Civic Consulting undertook the following steps:

- A variety of Web indices and directories, including DMOZ, were referenced;
- The resulting list was then supplemented with Google searches for 'price comparison' and 'comparison website', combined with the terms 'fuel', 'Euro 95', 'Diesel', etc. (Google's translation function was used to translate the search terms from English into the appropriate language);
- Again using Google's translation feature, Civic Consulting verified that the identified websites were indeed functional comparison websites;
- Mystery shoppers were asked to conduct a Web search in their native language to check the completeness of the comparison website lists in each country.

In addition, mystery shoppers who were researching countries in which fewer than three comparison websites had been identified prior to the start of the mystery shopping exercise, conducted further searches for such websites during the exercise. In this manner, we were able to identify comparison websites for the vehicle fuels market in 28 of the 29 countries relevant to the study. For some countries, more than three relevant comparison websites were identified. In these cases, we selected the three most frequently used websites based on Alexa traffic rankings[14] (while excluding non-functional or non-applicable websites).

The intention of the comparison website evaluation was to assess websites for their provision of contact information and transparency on their business practices. Additionally, the mystery shoppers were to assess the functioning of the websites using the following criteria:

- User friendliness;
- Ease of comparing offers from different retailers;
- Coverage of retailers;
- Accuracy;

[14] Alexa Traffic Rank is a global ranking of websites. The traffic rank is based on three months of aggregated historical traffic data from millions of Alexa Toolbar users and data obtained from other, diverse traffic data sources, and is a combined measure of page views and users (reach). For more details, see http://www.alexa.com/help/traffic-learn-more.

- Completeness of information provided; and
- Helpfulness in allowing an informed choice.

The mystery shoppers familiarised themselves with the comparison websites during the course of the mystery shopping exercise.[15] They collected prices, for each fuel type listed, three times during a defined week and on up to three comparison websites per country.[16] The mystery shoppers were then asked to evaluate the same comparison websites they had been using for price collection. They were provided with a questionnaire and given specific instructions on how to complete it. The findings of this evaluation of the comparison websites are presented below.

Results are generally shown for the entire sample of 60 comparison websites; however, toward the end of the section, the comparison websites are separated into two groups according to their ownership model. This affords a comparative view of how websites run by different organisation types performed, according to the mystery shoppers' assessments.

The exercise results are presented in the following sub-sections:

- Availability of websites that compare prices for vehicle fuels;
- Inclusion of basic business information on comparison websites;
- Language availability and market coverage on comparison websites;
- Business and commercial practices of comparison websites;
- Price data acquisition, accuracy and update frequency;
- Provision of general market information by comparison websites;
- Membership in accreditation schemes and codes of conduct;
- Search functions on comparison websites;
- Accessibility of comparison websites;
- Summary assessment of comparison websites;
- Comparative assessment by type of ownership.

[15] The comparison website evaluation exercise was conducted in Berlin, Germany, in November / December 2012 and covered all 29 countries relevant to this study.

[16] In Italy, four comparison websites were ultimately used for price collection and subsequently evaluated (see note to Figure 43). The results of the price collection exercise are detailed in Part 3 of this study.

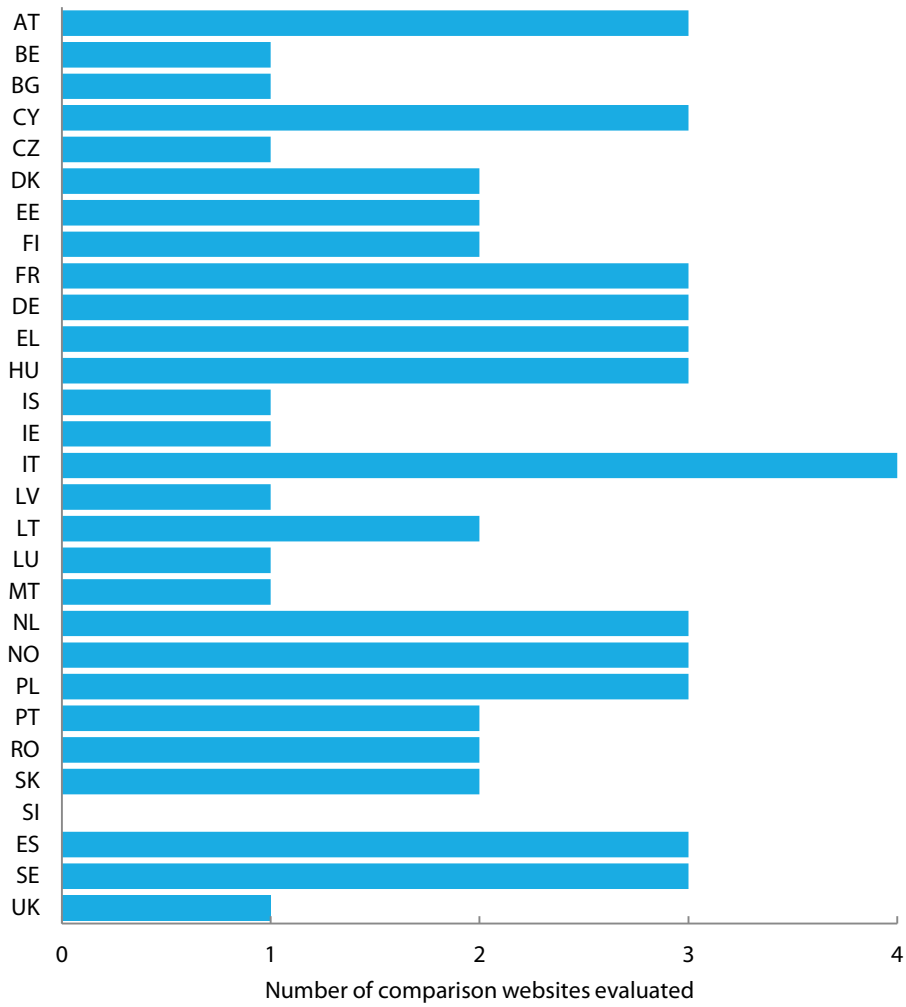
2.3.2 Availability of websites that compare prices for vehicle fuels

As mentioned above, the intention of the comparison website evaluation exercise was to evaluate up to three websites per country that allow for the comparison of vehicle fuel prices. However, it was not possible – either through pre-exercise desk research or in-exercise searches by the mystery shoppers – to identify three such comparison websites in all 29 countries subject to this study.

The following figure displays the number of comparison websites used and evaluated during the exercise by country.

Figure 43. *Number of comparison websites evaluated per country*

Source: Civic Consulting comparison website evaluation, Question 2. (N=60)
Note: No relevant comparison website could be identified in Slovenia. Four were evaluated in Italy because in that country results tended to be shown in a unique manner: the first three websites offered an overall mean or median price for the national and / or regional markets. Thus, the mystery shopper for Italy was asked to evaluate a fourth website which compared prices in a more traditional manner, i.e. by comparing prices at individual stations.



As the figure shows, the larger markets tended to be serviced by more comparison websites. In France, Germany, Italy, and Spain at least three comparison websites for vehicle fuel prices were identified prior to or during the mystery shopping exercise. The notable exception among the large markets is the United Kingdom, where only

one properly functioning and available-to-all comparison website could be identified.[17]

Other countries for which three comparison websites were available include: Austria, Cyprus, Greece, Hungary, the Netherlands, Norway, Poland and Sweden.

In several countries, two comparison websites were identified and evaluated: Denmark, Estonia, Finland, Lithuania, Portugal, Romania and Slovakia.

In the remaining countries – Belgium, Bulgaria, Czech Republic, Iceland, Ireland, Latvia, Luxembourg and Malta – only one relevant comparison website could be identified. The only country for which a functioning comparison website for vehicle fuel prices could not be identified was Slovenia. This is quite possibly due to the specificities of the Slovenian vehicle fuels market in which fuel prices are regulated by the government and thus change relatively infrequently.

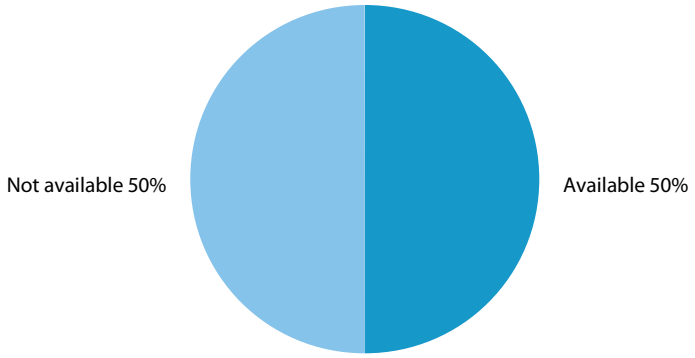
In total, 60 comparison websites were evaluated by the mystery shoppers.

2.3.3 Inclusion of basic business information on comparison websites

One potential concern with online businesses or services is a potential lack of transparency and an associated lack of accountability. Mystery shoppers were thus asked to search for basic business information on the comparison websites, namely contact details such as a business address, email address and telephone number.

Figure 44. *Availability of business address*

Source: Civic Consulting comparison website evaluation, Question 8. (N=60)

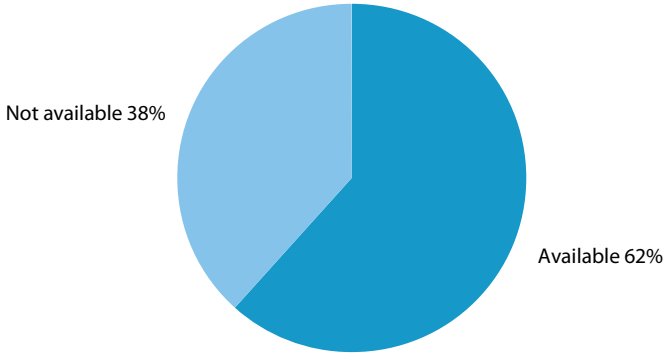


As can be seen in the figure above, a business address was provided on 50% of the evaluated comparison websites; on the other 50% mystery shoppers were unable to locate this type of address.

[17] Other fuel price comparison websites were identified in the UK, but they required paid membership or were not deemed usable.

Figure 45.
Availability of email address

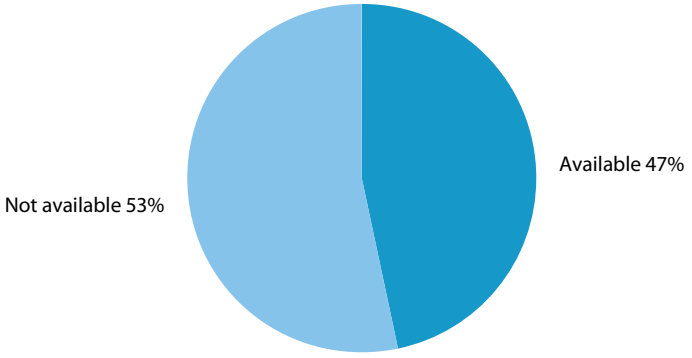
Source: Civic Consulting comparison website evaluation, Question 9. (N=60)



Compared to the provision of business addresses, email addresses were more readily available on this sample of 60 comparison websites: mystery shoppers were able to locate an email address on 62% of the websites; however, on 38% – or 23 individual websites – no email address could be found.

Figure 46.
Availability of telephone number

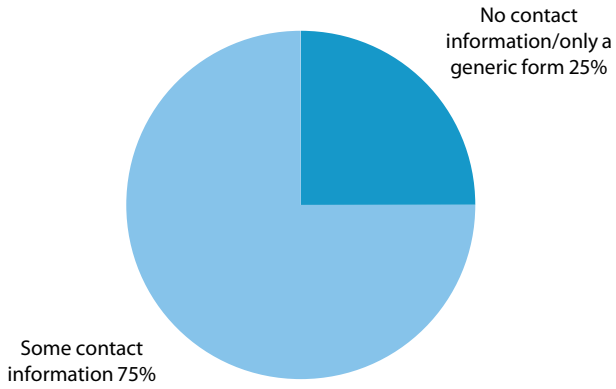
Source: Civic Consulting comparison website evaluation, Question 10. (N=60)



The figure above shows that telephone numbers were less often available on the comparison websites than either business or email addresses. Mystery shoppers found phone numbers on less than half of the websites (47%).

Figure 47.
Availability of any contact information (business address, email or telephone number)

Source: Civic Consulting comparison website evaluation, Question 11. (N=60)



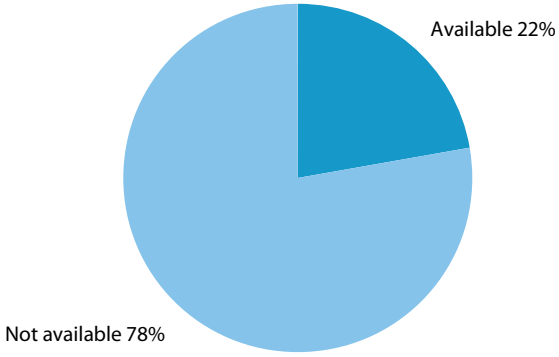
The preceding figure reveals that three-quarters of the websites did provide at least some contact information to their users, either in the form of a business address, email address or telephone number. Notably, however, 25% of the websites did not offer any of these specific contact details, though some of these did provide a generic contact form.

In more detail, mystery shoppers were able to find full, partial or no contact information on the following numbers of comparison websites:

- On 17 of the reviewed comparison websites mystery shoppers were able to find all three pieces of contact information, i.e. a business address, email address and a telephone number; these comparison websites were operating in: Austria, Cyprus, Germany, Denmark, Estonia, Greece, Spain, France, Hungary, Italy, the Netherlands, Portugal and Slovakia;
- On 27 of the reviewed comparison websites mystery shoppers were able to find partial contact information, i.e. at least one of the items but not all of them; these comparison websites were operating in: Belgium, Bulgaria, the Czech Republic, Germany, Denmark, Estonia, Greece, Finland, France, Hungary, Lithuania, Luxembourg, Latvia, Malta, the Netherlands, Poland, Portugal, Sweden, Slovakia, the United Kingdom and Norway;
- Lastly, on 16 of the reviewed comparison websites mystery shoppers were unable to find any of the specified contact details; these comparison websites were operating in: Cyprus, Spain, Hungary, Ireland, Italy, the Netherlands, Poland, Romania, Sweden, Iceland and Norway.

Figure 48.
Availability of VAT identification or company registration number

Source: Civic Consulting comparison website evaluation, Question 12. (N=54)



In addition to the provision of contact details, mystery shoppers were asked to search for the comparison websites' VAT identification or company registration numbers. On 22% of the websites such a number was located. Notably, one would expect some organisation types, e.g. public authorities, not to display such information, but this does not fully explain their overwhelming absence because just 7 of the 60 comparison websites in the sample were run by public authorities (see Section 2.3.5 for more details).

We can also compare the results for the preceding questions on the presentation of basic business information to the findings from a similar comparison website evaluation exercise conducted by Civic Consulting in 2011. Under this approach we see that the proportions of comparison websites listing a business address (50%, down from 67%), email address (62%, down from 70%), telephone number (47%, down from 57%) and VAT identification or company registration number (22%, down from 57%) are all lower among the sample of 60 vehicle fuel price comparison websites than the earlier sample of 81 Internet service provision comparison websites.[18] It is not clear whether this situation reflects differences between the vehicle fuels and Internet service provision markets or a trend of decreasing transparency in the comparison website sector over time.

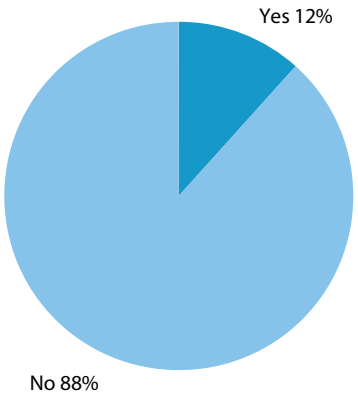
2.3.4 Language availability and market coverage on comparison websites

Findings on the prevalence of multi-lingual functionality, as well as market coverage, make it clear that most of the comparison websites in this sample were designed for one national market or a portion of that market.

[18] Civic Consulting. (2013). *Consumer Market Study on the Functioning of the Market for Internet Access and Provision from a Consumer Perspective – Final Report, Part 3: Website Evaluation and Switching Exercise*. [Online] Brussels: European Commission. Although published in 2013, the research for the mystery shopping component of this report was carried out in the fall of 2011.

Figure 49. *Is the comparison website available in multiple languages?*

Source: Civic Consulting comparison website evaluation, Question 13. (N=60)

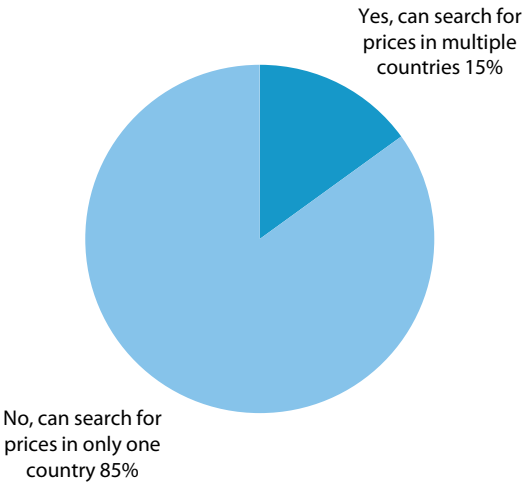


More specifically, we see in the figure directly above that only 12% of the comparison websites were available in multiple languages, which means that nearly 9 in 10 (88%) could only be used in one language.

Those comparison websites with multi-lingual interfaces tended to offer one language in addition to the primary / national language of the country they served. So, for example, an Estonian website and a Latvian website were also available in Russian; the Icelandic comparison website was also presented in English, as was an Italian website; and the website evaluated for Malta offered its services in German and Portuguese. The Belgian comparison website was available in both Dutch and French, and it was a Spanish website which provided by far the widest array of languages: Spanish, Catalan, Basque, Galician, English, German, French and Italian.

Figure 50. *Does the comparison website allow you to search for prices in more than one country?*

Source: Civic Consulting comparison website evaluation, Question 14. (N=60)



Less than one in six of the websites (15%) allowed mystery shoppers to search for prices in multiple countries – 85% of the websites were singularly focused on a particular national market or regions within a country.

Among those websites which did cover multiple markets, three allowed for price searches across Belgium, France and Luxembourg.[19] The comparison website evaluated in Malta could also be used in many other countries, but it was clear to the mystery shopper that the comparison tool focused on the fuel markets in Germany, Ireland, Portugal and the United Kingdom.

It was also reported that one of the Slovakian comparison websites allowed price searches in several countries, including Austria, Italy, Hungary, Poland and Slovenia, as well as a few non-EU countries. Another four comparison websites (one each in Bulgaria, Finland, Lithuania and Slovakia) were reported to provide separate, non-searchable tables or lists containing specific or average prices in other countries; in three of these four cases the price lists covered the EU27, while the Finnish comparison website in this group presented price data for a wider array of European countries and Taiwan.

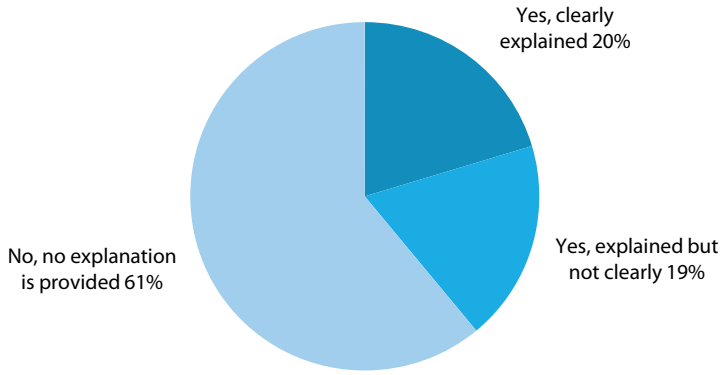
[19] These three comparison websites appear to be operated by the same company. Notably, though, the three websites have unique Web addresses, and while the design of the websites is highly similar, they are identifiably 'different' websites.

2.3.5 Business and commercial practices of comparison websites

This sub-section focuses on the business practices of the comparison websites, including their market coverage, ownership and revenue models.

Figure 51. *Is it explained why prices from certain petrol stations are listed and not others?*

Source: Civic Consulting comparison website evaluation, Question 16. (N=59)



One potential concern with comparison websites is that the price data they provide may not reflect the entire market they serve. In this context, mystery shoppers were asked to search for an explanation of why prices from some petrol stations were listed but not others. Importantly, the absence of such an explanation, as noted for 61% of the websites, cannot be interpreted as an admission of incomplete market coverage. This is because, generally speaking, comparison websites that do provide all-inclusive coverage of the various retailers in a given market may not explain this full coverage. Nonetheless, explanations of the extent to which comparison websites 'cover' the market can be informative for their users, as they may signal whether additional research / comparison is needed. One-fifth of the comparison websites in the sample did offer a clear explanation along these lines, while almost another fifth (19%) provided an explanation that lacked clarity.

Several comparison websites which, according to mystery shoppers, provided clear explanations of their market coverage noted that because their price data was based on reporting by website users (i.e. crowd sourcing), market coverage depended on the extensiveness of that reporting. This was the case for comparison websites in Belgium,[20] the Czech Republic, Finland, the Netherlands, Portugal and Sweden.

A few other comparison websites also provided clear explanations of market coverage. One of the websites in Lithuania explained that its data was based on prices collected from public information provided by fuel stations. However, the mystery shopper reported that while this database did list prices from small or

[20] From the text provided, it appears that this comparison website also permitted network operators, as well as some stations, to update their fuel prices on the comparison website based on agreement with the website operator.

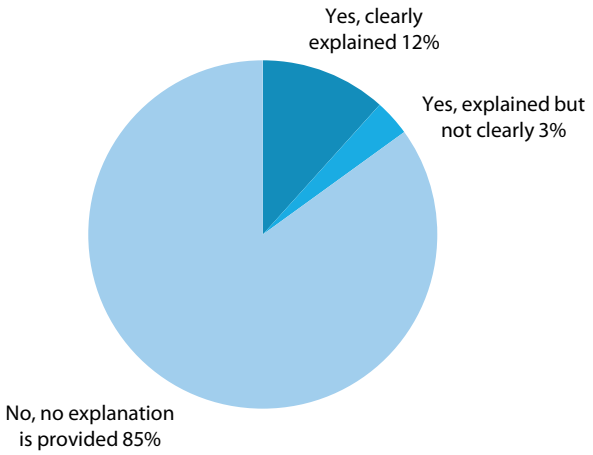
independent station networks, it did not appear to include some leading brands in the Lithuanian market, e.g. Statoil, Lukoil and Orlen. Comparison websites in Greece, France and Portugal implied that due to regulations requiring all stations to disclose their prices, their price data was comprehensive, though the French and Portuguese websites noted that small stations (specifically, those selling less than 500 cubic meters per year) were not required to submit price data and thus possibly not included in the search results.

Petrol stations in Austria are also required to notify price changes (in nearly real-time), and all three of the comparison websites in that country now have access to comprehensive price data through E-Control Austria, which collects the data. However, one of the websites in Austria clearly explained that rather than show comprehensive listings, the search results page only displays the five cheapest prices per area.[21]

Lastly, the comparison website evaluated in the United Kingdom noted that it offers near universal coverage of the more than 10,000 stations in the United Kingdom with the exception of stations that have closed or do not accept fuel cards.[22]

Figure 52. *Is the default ranking of search results (the view that appears first) explained?*

Source: Civic Consulting comparison website evaluation, Question 18. (N=60)



On 85% of the comparison websites no explanation of the default ranking of search results (e.g. the order in which the individual petrol stations and their prices for a specified fuel type appear) was provided. On another 3% of the websites an unclear explanation was given, with the result that a clear explanation of the default ranking of price observations was only provided on 12% of the websites. These percentages compare unfavourably with the results of the comparison website evaluation exercise

[21] An interview conducted for this study with a representative of E-Control Austria revealed that one of the reasons for only showing a limited selection of the cheapest prices per area is to avoid a situation in which fuel retailers gain full access to their competitors' pricing structures.

[22] Fuel cards offer discount fuel pricing from various large retail brands.

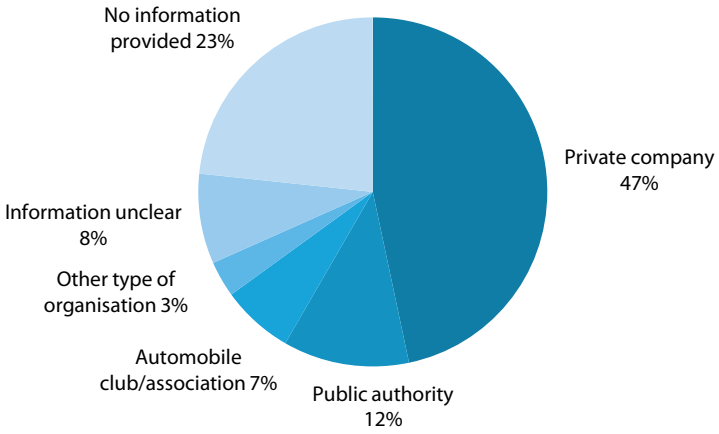
Civic Consulting conducted in 2011 for the Internet service provision market.[23] Among that previous group of comparison websites, 26% clearly explained the default ranking of search results and additional 9% provided some information, though it was regarded as unclear by mystery shoppers.

Among those comparison websites that did provide an explanation of the default ranking of search results, there were some indications that the default view was lowest price first. For example, one website in Cyprus explained that the listings were sorted in descending order, based on the price of unleaded 95 octane gasoline. On one website in Spain the default ranking was lowest price first, and the user could easily add a filter to sort by brand or another to exclude stations not selling to the general public. Two websites, one each in Belgium and Luxembourg, stated that their default rankings were based on the number of services provided. One comparison website in Austria explained that, depending on the geographical search area specified, either the 5 or 10 lowest prices were returned, and another in Italy provided an explanation focused more on the search process itself than the default ranking of results.

Among the comparison websites targeted at the Portuguese market, one provided an extensive explanation of the various ways in which the user could search for and display results, and the other ranked results according to the search method – e.g. by province / city, position on a map, or lowest price first.

Figure 53. *What type of organisation runs the comparison website?*

Source: Civic Consulting comparison website evaluation, Question 20. (N=60)



On 31% of the comparison websites sampled there was no (23%) or unclear (8%) information about the type of organisation operating the website. Forty-seven percent of the 60 websites indicated being run by a private company, while 12% reported being operated by a public authority (six national ministries and one regulatory authority) and 7% by an automobile club or association.

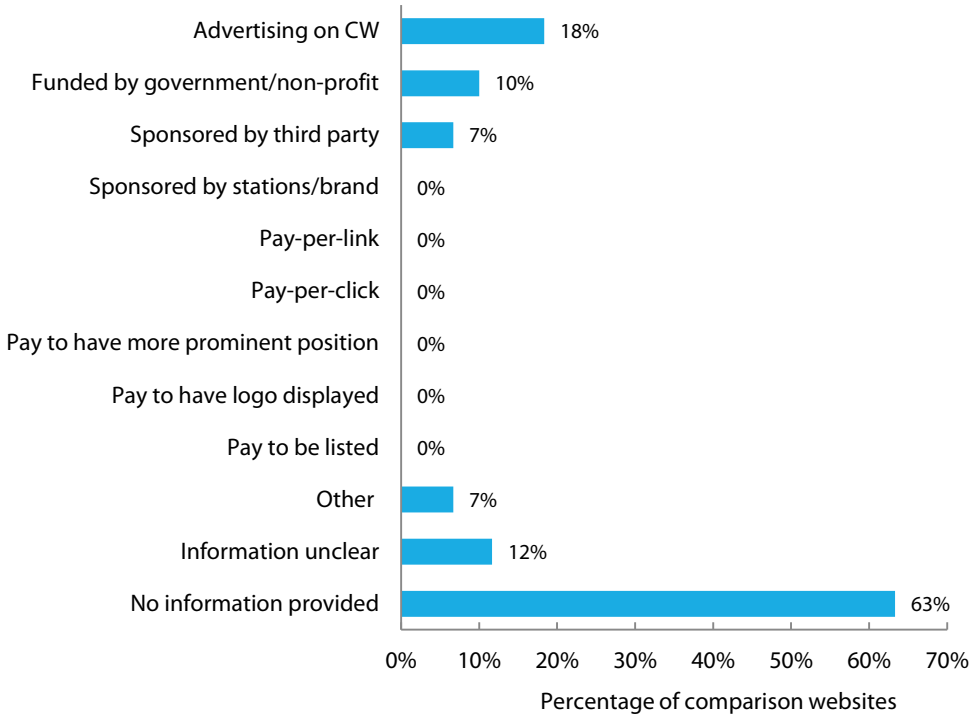
[23] Civic Consulting. (2013).

The remaining 3% of comparison websites indicated being operated by another type of organisation. Mystery shoppers' comments reveal that this category comprises a newspaper's website and another managed by an association of private conveyors.

For three of the five comparison websites on which ownership information was deemed unclear by mystery shoppers, their comments suggest the websites to be the work of individuals (websites in Cyprus and the Czech Republic) or a database project informed by its users, which may have expanded from a blog (a website in Portugal).

Figure 54. *Revenue sources as indicated on the comparison website*

Source: Civic Consulting comparison website evaluation, Question 21. (N=60)
Note: Multiple answers possible.



The provision of information about the comparison websites' revenue models on their websites was sparse. On 63% of websites mystery shoppers were unable to locate any relevant information, while a further 12% of websites provided unclear information about their revenue sources. From those that did provide relevant information, we know that at the time of the mystery shopping exercise 18% used on-site advertising, 10% were supported by government funding[24] and 7% were financed, at least in part, by third parties. Four websites reported another type of revenue source, and mystery shoppers' comments indicate those sources as being:

- Fees paid by the members of an automobile club;
- Fees paid for SMS-based services and a mobile application;
- Commercial usage of the price data gathered by the company.

[24] On one of the seven publicly-administered comparison websites no information was provided regarding the site's funding; however, the utilisation of government funding is likely.

Some of the websites indicated multiple revenue sources, which is why the sum of the percentages observed in the previous figure exceeds 100%.

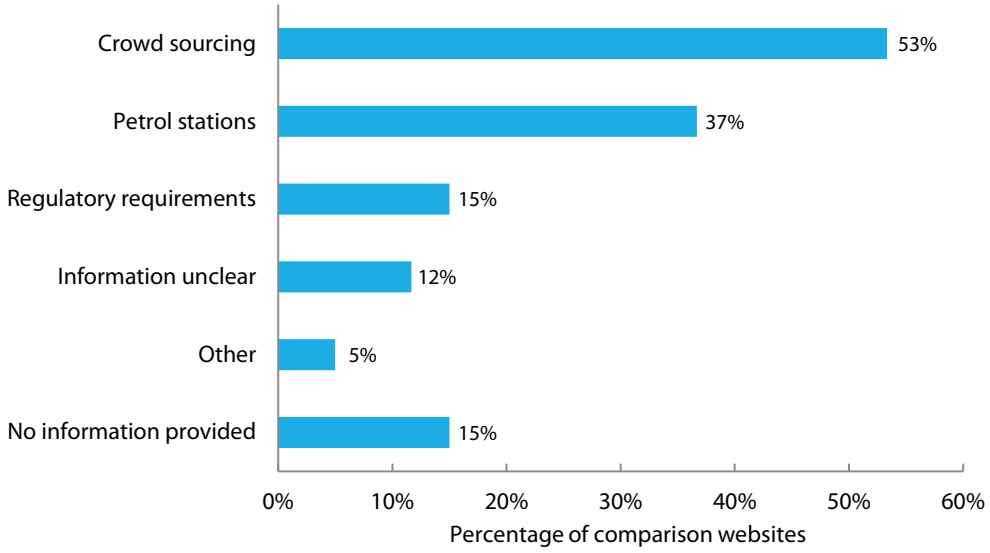
Notably, the variety of revenue sources reported by the comparison websites in this sample is significantly more limited than the variety reported by the 81 Internet service provision comparison websites evaluated during a similar exercise in late 2011. In that sample, 35 websites provided no relevant information, but the others combined to indicate 10 different sources (counting the 'other' category as one).[25] The comparison websites covering the vehicle fuels market may be more constrained in their pursuit of revenue, since models such as pay-per-link and pay-per-click are much less relevant in a market where the ultimate purchase is made at a physical location rather than an online shop.

2.3.6 Price data acquisition, accuracy and update frequency

This sub-section examines the comparison websites' practices for the acquisition, safeguarding and updating of price data.

Figure 55. *From which source(s) does the comparison website acquire its data?*

Source: Civic Consulting comparison website evaluation, Question 22. (N=60)
Note: Multiple answers possible.



As the above figure makes visible, the most commonly reported source of price data among this sample of comparison websites was crowd sourcing.[26] Indeed, at the time of research more than half (53%) of the 60 comparison websites relied on this data channel for some or all of their price data. Twenty-two (37%) of the comparison websites received some or all of their price data directly from petrol stations, while 15% benefitted from regulations enacted in their country of operation that require

[25] Civic Consulting (2013).

[26] Crowd sourcing refers to functionality that allows users of the website to upload price data based on their observations of or visits to petrol stations. The uploading procedure may utilise SMS, a proprietary mobile phone application, or a form on the comparison website, among other potential methods.

vehicle fuel retailers to notify their prices. The countries in which mystery shoppers found notices on the comparison website(s) of regulatory requirements related to price notification were Greece, Spain, France, Cyprus, Austria and Portugal.[27]

Mystery shoppers also reported indications of other data sources on three of the comparison websites. These sources were, for two of the Greek websites, the Ministry of Development, which is the entity that collects the price data petrol stations are required to submit in Greece, and, for one Italian website, the national statistical office and other research institutions.

On seven of the comparison websites data sourcing information was provided but unclear, and nine of the websites did not discuss their data sources. Mystery shoppers recorded some comments regarding the websites with unclear explanations:

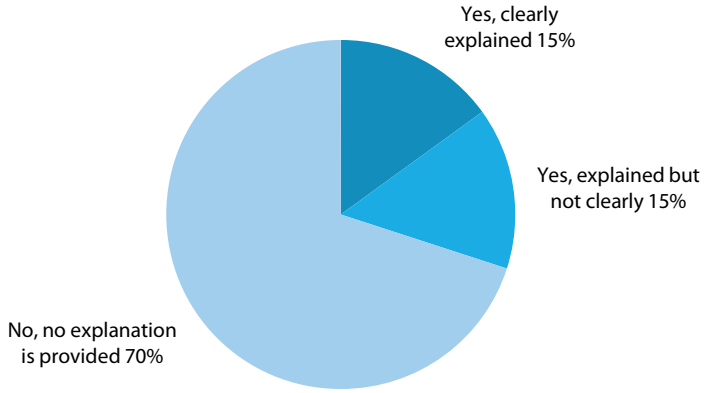
- One website in Cyprus vaguely mentioned "research";
- A website in Finland reported that it utilised crowd sourcing but the mechanisms were regarded as unclear (they involved an iPhone application and perhaps the ability to input prices in a protected part of the website reserved for registered users);
- Data for one of the websites in Malta was based on several third party sources, including user-supplied prices;
- One of the websites in the Netherlands, which was run by a car leasing company, noted that its fuel information was based on data from, on average, 250,000 fill-ups;
- A website in Sweden made use of crowd sourcing but supplemented this source with 'guideline' prices from the retailers' websites.

Other comments recorded by the mystery shoppers show that a number of comparison websites operated by automobile associations or private / unknown owners in Austria, Cyprus, Greece and Spain relied on price data collected by a ministry or other public authority in their country. As mentioned above, in all of these countries, petrol stations are generally required to notify changes in fuel prices.

[27] Near the end of 2012, new legislation was enacted in Germany which establishes a 'Market Transparency Agency' (*Markttransparenzstelle für Kraftstoffe*) and requires fuel retailers to notify their prices. The effect that these changes will have on the market, and fuel prices more specifically, remains to be seen. (For more details, see: http://www.germanenergyblog.de/?p=11333).

Figure 56. *Is it explained how the comparison website safeguards the accuracy of its data on fuel prices?*

Source: Civic Consulting comparison website evaluation, Question 23. (N=60)



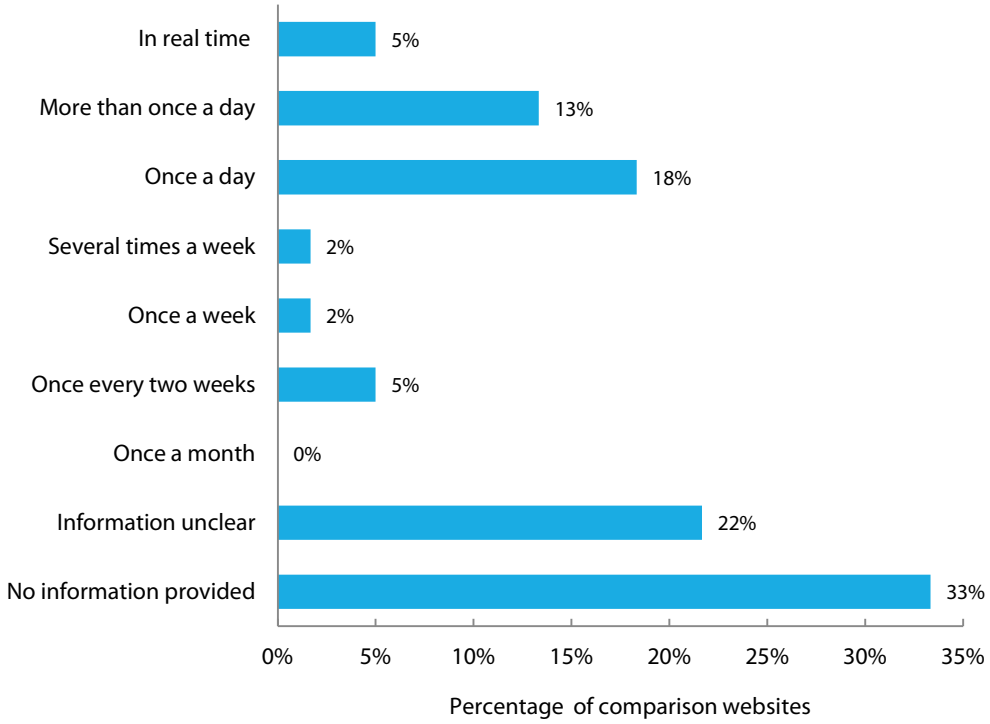
Fifteen percent of the comparison websites, including websites in Belgium, Spain, France, Lithuania, Poland, Portugal, Romania and Sweden, clearly explained how they safeguarded the accuracy of their vehicle fuel price data. An additional 15% of the websites provided an explanation of this aspect of their operating procedures, but mystery shoppers regarded these explanations as unclear. No discussion of data safeguarding policies was presented on the remaining 70% of the comparison websites.

Where mystery shoppers noted clear explanations of data safeguarding practices these included:

- Disclaimers indicating that the website could not take responsibility for or guarantee the accuracy of data because prices were user-generated (i.e. crowd-sourced); in some cases these websites encouraged their users or members to correct mistakes, or attempted to limit potential mistakes by restricting who could update prices;
- Notifications – by a pair of websites utilising crowd sourcing – that though they could not guarantee the accuracy of the price data they did have computer systems in place to monitor suspicious prices;
- Indications on three websites across Spain, France and Portugal that price data was comprehensive and accurate because petrol stations are required by regulation to notify prices.

Figure 57. *Frequency of price updates, according to the information provided on the website*

Source: Civic Consulting comparison website evaluation, Question 25. (N=60)



Twenty-seven of the sixty comparison websites (45%) provided a clear explanation of the frequency of their price updates, and the indications recorded by mystery shoppers show that the most commonly reported update frequency was once per day (18% of the websites in the full sample). This was followed closely by a frequency of more than once per day (13%).

Five percent of the websites reported the capacity for real-time updating of prices, but another 5% fell toward the other end of the scale, reporting only twice-per-month price updates. At the time of the exercise, the remaining 4% of the websites were revising prices several times per week (2%, 1 website) or once per week (2%, 1 website). Notably, none of the websites reported updating prices less frequently than once every two weeks.

Restricting the sample to the 27 websites that did report the frequency of their price updates reveals that more than 4 in 5 (81%) indicated a frequency of at least once per day, while 2 in 5 (41%) reported continuous or multiple price updates per day. Of the remaining websites in this limited sample, 7% were updating prices at least once a week and 11% were doing so once every two weeks.

The websites which indicated that they provided real-time price updates were located in Austria, Denmark and Portugal. The Austrian and Portuguese websites are based on the regulatory requirement that stations notify their prices, and it was thus

feasible for these websites to provide continuous updates.[28] In contrast, the website in Denmark utilised crowd sourcing for its data acquisition. In reporting real-time updates it thus appeared to be referencing the ability to continuously feed user-reported prices into its price database.

At the time of research, findings indicated that consumers in Austria, Germany, Estonia, Greece, Iceland, Italy and Lithuania had access to at least one comparison website that updated its prices more than once per day. Comments provided by mystery shoppers in relation to some of the websites that provided unclear information about their update frequencies suggest that this was also the case in some additional countries, especially if one considers non-comprehensive updates based on crowd sourcing (i.e. several websites appeared to update prices as soon as they were reported by a user).

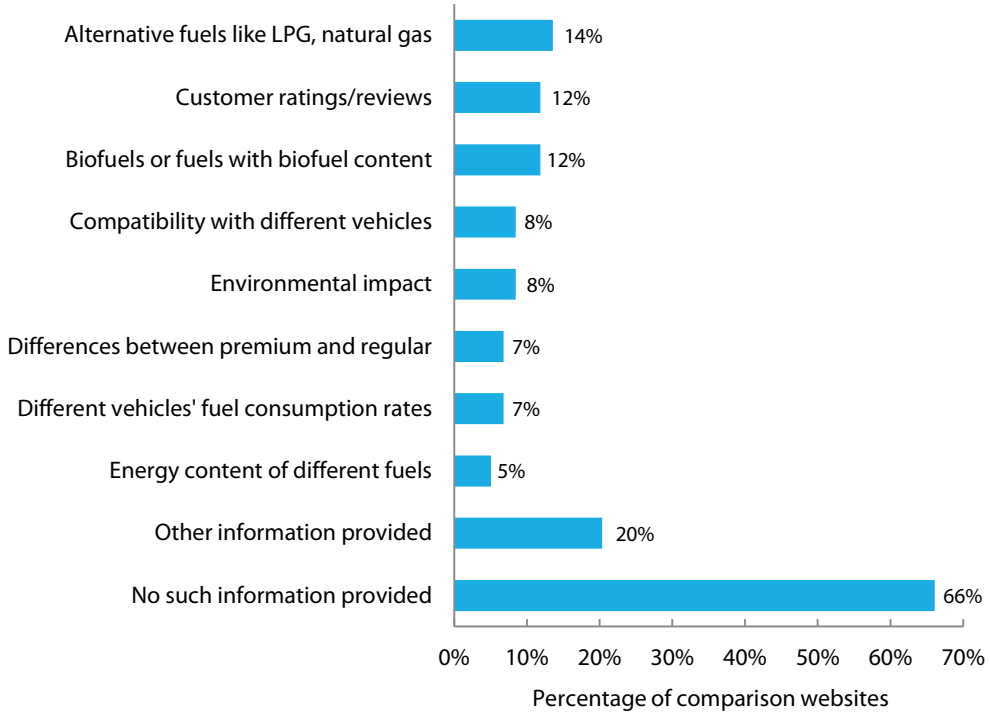
2.3.7 Provision of general market information by comparison websites

Some comparison websites go beyond their primary price comparison function to also provide their users with general product or market information. To see whether this was frequently the case among the sample of 60 vehicle fuels comparison websites, the mystery shoppers were asked whether the website(s) they evaluated displayed any general information on vehicle fuels.

[28] As mentioned above, this price notification requirement was also noted on comparison websites in Greece, Spain, France and Cyprus, and thus one would expect some of the comparison websites in these countries to also be capable of providing frequent price updates. Indeed, one of the comparison websites in Greece reported that it updates prices more than once per day. However, the mystery shoppers for Spain and France reported that the comparison websites provided no or unclear information about the frequency of updates. Finally, the comparison websites in Cyprus reported less frequent price updates.

Figure 58. *Availability of general information on key vehicle fuel topics*

Source: Civic Consulting comparison website evaluation, Question 26. (N=59)
Note: Multiple answers possible.



As seen in the figure above the majority (66%) of the evaluated comparison websites did not provide general information about vehicle fuels; however, the websites that did provide such information addressed a range of topics related to this market. In terms of the topics that were most frequently covered, 14% of the websites offered general information on alternative fuels such as LPG or natural gas;[29] 12% presented customer ratings / reviews of petrol stations or brands;[30] and 12% included information on biofuels or fuels with biofuel content.[31] Less frequently, comparison websites presented information on fuel compatibility with different vehicles (8%), the environmental (climate / air quality) impact of fuels (8%), differences between premium and regular fuels (7%), the fuel consumption rates of different vehicles (7%) and the energy content of various fuel types (5%).

Twelve of the comparison websites addressed one or more other aspect(s) of the vehicle fuels market. The two comparison websites in Austria that are operated by automobile associations reportedly covered a wide range of topics, including cars, fuels, transport and applicable legislation.[32] Meanwhile, a website in Hungary

[29] These websites operate in the following markets: Austria, Germany, Spain, France, Hungary, Luxembourg, Malta and Slovakia.

[30] These websites operated in the following markets: France, Italy, Poland, Romania and Slovakia.

[31] These websites operate in the following markets: Austria, Germany, France, Hungary, Malta and Slovakia.

[32] It is important to note that in the Austrian case, these websites are obliged to follow relevant legislation on providing certain information.

provided information on vehicle documentation and vehicle tests, as well as a link to a website about fuel prices in other countries.

Several more comparison websites, including ones operating in Germany, Ireland, Italy and Lithuania, provided information about price composition and / or price developments over time, e.g. through statistics or figures showing price trends. Another group of four comparison websites spread across Malta, Portugal and Slovakia provided a range of information, including such topics as vehicle financing, general car advice (e.g. maintenance, cleaning), vehicle performance, and travelling, legal and general advice.

2.3.8 Membership in accreditation schemes, trustmarks and codes of conduct

Only one of the comparison websites, based in Greece, clearly indicated that it belonged to an accreditation scheme or displayed an online trustmark. Such an indication was absent on 58 of the 60 websites (97%), while one website in the Netherlands provided information on an accreditation scheme or trustmark that was assessed as potentially relevant but unclear by a mystery shopper. This comparison website identified itself as a service of a major car leasing company which, in turn, was owned by one of the country's largest financial services providers.

The comparison website which clearly reported its participation in an accreditation scheme or online trustmark served the Greek market. In fact, it indicated that it was accredited by multiple organisations – EADP, the Athena Research Center and the University of Athens (*ΕΚΠΑ*); however, no links were provided by the comparison website to these organisations.

Similarly, no indication of participation in an industry code of conduct could be found on 57 of the 60 comparison websites (95%). The 3 remaining websites (5%) provided some potentially relevant information but it was deemed unclear by the mystery shoppers. Notably, all three comparison websites were located in Austria – the mystery shopper reviewing the Austrian websites was unsure whether their public status or registration with the Interior Ministry constituted participation in a code of conduct.[33]

These findings of nearly non-existent participation in accreditation schemes and industry codes of conduct are generally in line with previous research on comparison websites carried out by Civic Consulting,[34] though these participation rates were slightly higher among a sample of 81 Internet service provision comparison websites evaluated in 2011. In that sample, 11% of the comparison websites indicated that they belonged to an accreditation scheme and 5% to an industry code of conduct.

[33] In fact, the regulations providing real-tiem price comparison must follow appropriate regulations and source price data from the Interior Ministry database.

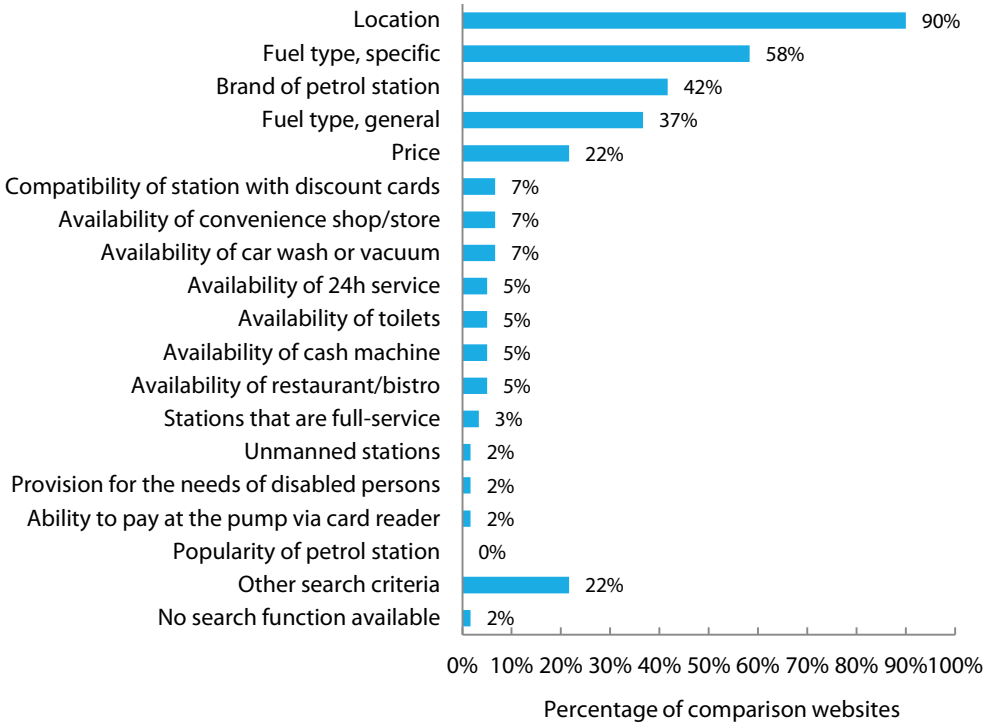
[34] See Civic Consulting (2013).

2.3.9 Search functions on comparison websites

As part of the exercise, mystery shoppers indicated the criteria by which they could search on the comparison websites. The following figure shows how common the various search methods were among this sample of websites.

Figure 59. *Accord-ing to which criteria is it possible to search?*

Source: Civic Consulting comparison website evaluation, Question 34. (N=60)
Note: Multiple answers possible.



In total, mystery shoppers indicated 191 search functions for the sample of 60 comparison websites. This, of course, means that many of the websites allowed multiple search types. Indeed, only one of the websites, which was aimed at a specific region of the Norwegian market, did not provide any criteria by which a user could filter the price observations.

Nearly all of the comparison websites (90%) had functionality which allowed the mystery shoppers to search by location. On the majority of the websites it was also possible to search by specific fuel type.[35] Twenty-five of the 60 websites (42%) allowed one to search by the brand of the fuel retailer, and price was the other search criteria utilisable on at least 10 (22%) of the websites.

Outside of these five relatively common search criteria, it was also possible on some websites to search by discount card compatibility (4 websites) or the availability of a

[35] This refers to the ability to search by fuel and grade, such as regular petrol 95 and petrol 98 or regular and premium diesel fuel. In contrast, the search criteria 'fuel type, general' was defined as allowing one to search only for the overall fuel type, e.g. petrol or diesel fuel.

convenience store (4), hoover / vacuum (4), 24-hour service (3), toilets (3), cash machine (3), restaurant (3), and pay-at-the-pump capability (1).

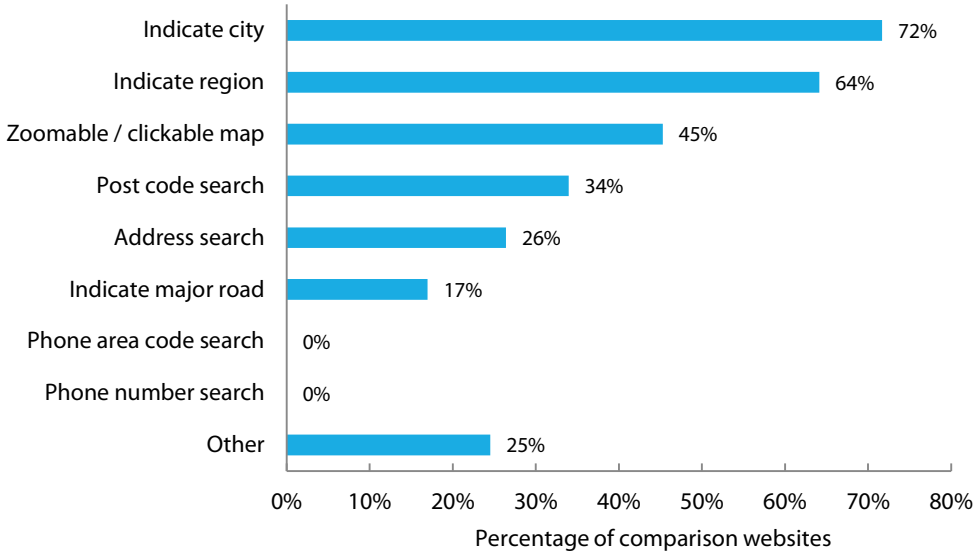
Notably, there were thirteen comparison websites on which it was possible to search by other criteria. These criteria included:

- Whether the station is open at the time of the search;
- Price in country and in other EU Member States;
- Existence of a repair shop;
- Date or time period, including the possibility to search past prices, in some cases going back months or years;
- By itinerary;
- Key word search;
- Station name;
- Name and address;
- Option to select a particular area, e.g. a district within a city, once the initial search is complete;
- Possibility to search for stations within a certain radius of the specified location.

Considering those search options that might be of relevance for disabled people or people with reduced mobility, namely the ability to search for full-service stations (at which a staff member is available to fuel the vehicle), unmanned stations and stations that provide for the needs of disabled people, only on four websites were mystery shoppers able to search by at least one of these criteria. The one comparison website on which it was possible to conduct a specific search for stations that provided for the needs of disabled people was a website serving the Italian market. However, in order to access this information on that comparison website the mystery shopper needed to click on the name of each individual fuel station, so this essentially required a manual search process to be carried out following the initial search.

Figure 60. *What possibilities are there to search by location?*

Source: Civic Consulting comparison website evaluation, Question 35. (N=53)
Note: Multiple answers possible.



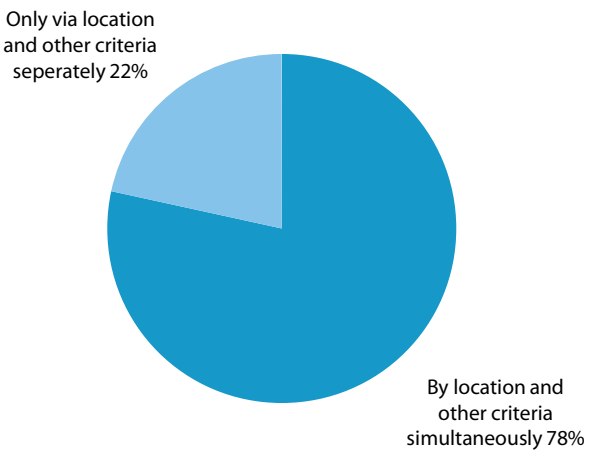
Among those websites which had search-by-location functionality, a wide variety of location-defining search terms were utilised, the most common being the indication of a city (72%). The only other location search term that appeared on the majority of the relevant websites was region indication (64%). Also relatively common were a map with zoom function or clickable regions (45%), post code search (34%) and address search (26%). The possibility to indicate a major road (e.g. motorway, autobahn, etc.) was available on 9 (17%) of the websites, and 25% offered other means through which users could search by location. The other location search mechanisms cited by mystery shoppers included:

- By municipality, including on one website the possibility to search by town, village, or part of a city, e.g. Southeast;
- Along a planned itinerary;
- By province;
- By city district;
- By distance;
- By minor street name, though only in the capital city.

Given that the sample for this question contained 53 websites and the combined frequency of the search functions was 150, it is clear that many of the comparison websites offered multiple methods to search by location.

Figure 61. *Is it possible to search by location and other criteria simultaneously, or only separately?*

Source: Civic Consulting comparison website evaluation, Question 36. (N=51)



On those comparison websites which allowed both search by location and one or multiple other search criteria, the majority (78%) permitted searches to be run simultaneously by location and at least one other criterion. The other 22% compelled the mystery shoppers to search by location and other criteria separately.

2.3.10 Accessibility of comparison websites

A well-functioning website should be usable by as wide an audience as possible. Of course, some potential users have sight impairments, such as farsightedness (hyperopia) or partial / full colour blindness, which can make websites challenging to read and use. Accordingly, mystery shoppers were asked to run a pair of basic accessibility tests on each of the evaluated comparison websites. The framework for these tests originates in the W3C Web Accessibility initiative. Both of the accessibility tests described below are recommended as part of the W3C Conformance Evaluation of Web Sites for Accessibility.[36]

The first test had mystery shoppers increase the font size setting in their browser and then assess whether the enlarged font size rendered the front page or main search page of the website they were evaluating at that time less usable. In the second test, which simulated some of the potential issues that could confront users with partial or full colour-blindness, mystery shoppers utilised a browser extension to temporarily convert the front page and main search page of the website to grey scale. They then assessed whether sufficient contrast between the design elements remained or if the pages had instead become less usable.

[36] For more details, please see: http://www.w3.org/WAI/eval/Overview.html.

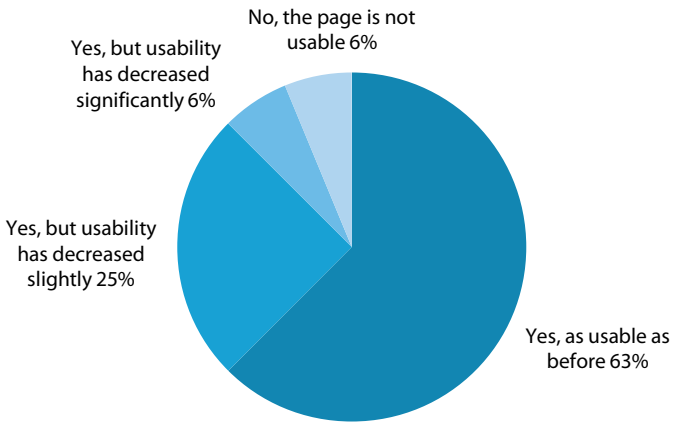
Font size increases

When the mystery shoppers attempted to increase the font size on the comparison websites' front pages, the displayed font did not change in 43% of instances. This outcome could reflect either of two scenarios: first, an incompatibility in the browser extension used to change the font size or, second, website design that did not allow for font scaling. While the possibility of the former scenario cannot be excluded, extensive pre-exercise testing of the browser extension suggested that it functioned properly in the vast majority of cases. Thus, we would tend to attribute many of these instances to website design which precluded the display of larger font sizes.

In an additional 3% of the front page tests, something else unexpectedly happened, i.e. a change other than an increase in font size occurred. Only in the remaining 54% of instances in which the font size did actually increase were mystery shoppers able to report on the post-increase usability of the websites' front pages.

Figure 62. *Is the front page of the website usable with larger font size?*

Source: Civic Consulting comparison website evaluation, Question 38. (N=32)
Note: Only includes those websites for which the front page font size could be increased.



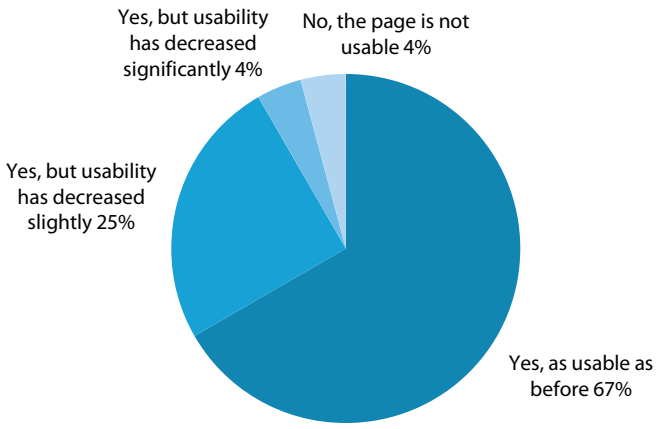
When the font size did increase (see figure immediately above), the websites' front pages remained as usable as before in 63% of the cases; however, their usability decreased slightly in 25% of instances. Moreover, in a non-negligible 12% of instances, usability decreased significantly (6%) or the pages became altogether unusable (6%).

Findings for the attempted font size increases on the websites' main search pages yielded similar results.[37]

[37] Here, the font size did not change as requested in 55% of the cases and something else unexpectedly happened in another 5% of the trials, meaning that the sample for post-increase usability comprises 24 of the 60 trials (40%).

Figure 63. *Is the main search page usable with larger font size?*

Source: Civic Consulting comparison website evaluation, Question 40. (N=24)
Note: Only includes those websites for which the main search page font size could be increased.



When the font size on the websites' main search pages did increase, they were reported to be as usable as before 67% of the time (compared to 63% for the front pages). Again, though, page usability decreased slightly in 25% of the instances, and in 8% of the trials, usability decreased significantly (4%) or the pages became completely unusable (4%).

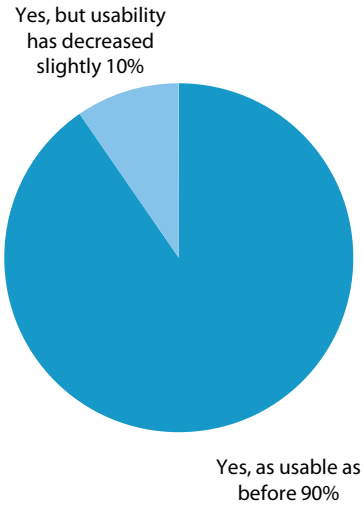
As frequent Internet users will be aware, some websites offer the possibility to increase the size of the font they display by clicking on a link or icon, which is often located near the extreme top or bottom of the page. Mystery shoppers searched for this functionality in addition to conducting the above-described tests, but only two of the comparison websites offered the possibility to increase the font size in this manner, i.e. without altering the browser settings.

Conversions to grey scale

In the second set of accessibility tests, mystery shoppers converted both the front page and main search page of each website to grey scale.

Figure 64. *Is the front page usable in grey scale (i.e. is the contrast between different elements adequate)?*

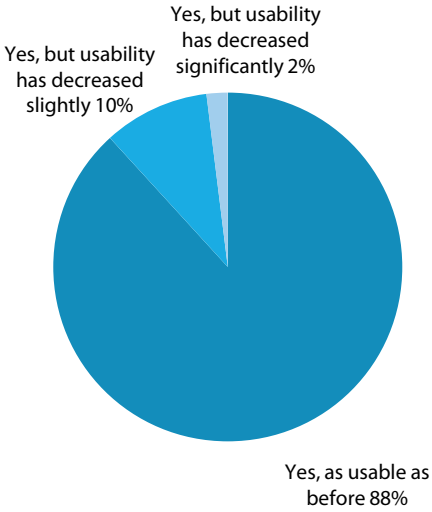
Source: Civic Consulting comparison website evaluation, Question 41. (N=52)
Note: Figure only includes instances in which page could be converted to grey scale.



Nine in ten (90%) of the websites' front pages were reported to be equally usable following the grey scale conversion, but usability decreased slightly in 10% of the instances. None of the websites' front pages became unusable or suffered a significant decrease in usability during this test.[38]

Figure 65. *Is the main search page usable in grey scale (i.e. is the contrast between different elements adequate)?*

Source: Civic Consulting comparison website evaluation, Question 42. (N=51)
Note: Figure only includes instances in which page could be converted to grey scale.



The results of the grey scale test were highly similar when it was carried out on the websites' main search pages. Eighty-eight percent of these pages were deemed equally usable when viewed in grey scale, while 10% were rated as slightly less

[38] Eight of the sixty front pages (13%) could not be properly tested because the browser extension was unable to render them in grey scale. These instances are not included in the figure.

usable. Again, none of the pages was rated as unusable in grey scale, though 2% of trials (1 website) resulted in a significant decrease in usability.[39]

2.3.11 Summary assessment of comparison websites

Based on their experience with each comparison website, including multiple price collection efforts on different days of the week, as well as the information searches, functionality observations and tests detailed above, mystery shoppers were asked to provide a final, summary assessment of each website by answering the six questions presented in this sub-section. In addition to assigning ratings in response to these questions, the importance of substantiating those ratings with written comments was stressed to the mystery shoppers, and a selection of insightful comments are included below in order to provide additional context.

We also present the findings of the summary assessment questions by separating the results by the comparison websites' ownership models.[40] Specifically, we compare the results for those comparison websites run by public organisations and automobile clubs / associations[41] with the findings for the comparison websites run by private companies.[42]

An important caveat is that the sample of comparison websites run publicly or by automobile clubs comprises only 11 websites. In contrast to the 49 privately owned websites, this sample is of course limited; accordingly, when interpreting this data, these limitations should be taken into account.

User-friendliness

The first assessment question asked for a rating of each website's user-friendliness.

[39] Nine of the sixty main search pages could not be rendered in grey scale and their usability was accordingly not assessed. These instances are not included in the figure.

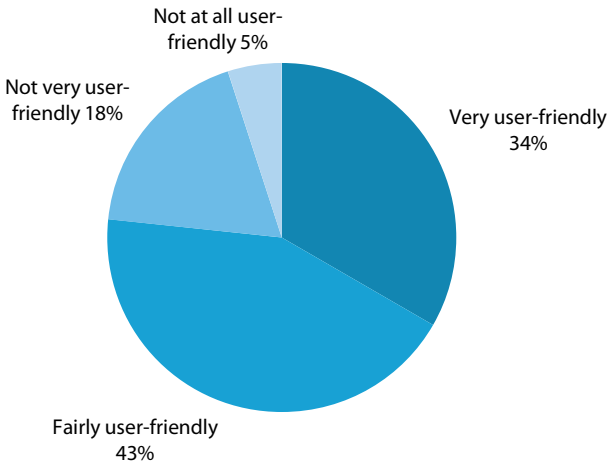
[40] This categorisation is based on the results of Question 20 of the comparison website assessment questionnaire, "What type of organisation runs the CW?" See Figure 53 above, as well as the subsequent discussion, for more details on these findings.

[41] As detailed above in Section 2.3.5, seven of the comparison websites were operated by public authorities. More specifically, six were run under the authority of national ministries and one by a competition authority. Four comparison websites, located in Austria, Germany and Denmark, were administered by automobile clubs / associations.

[42] The private companies category includes the 28 comparison websites which clearly indicated that they were privately owned, as well as the 21 websites which did not provide information on their ownership (14), reported it in an unclear manner (5), or indicated another type of owner (2 – one newspaper and one association of private conveyors).

Figure 66. *User-friendliness of the comparison websites*

Source: Civic Consulting comparison website evaluation, Question 44. (N=60)



More than one third of the websites were assessed as very user-friendly (34%), and another 43% as fairly user-friendly, with the result that, overall, nearly 4 in 5 of the websites (77%) were deemed user-friendly. Only 5% were reported to be not at all user friendly, though 18% were seen by mystery shoppers as not very user-friendly.

In considering mystery shoppers' written comments on user-friendliness, we can arrive at a better understanding of which approaches worked and which did not. Turning first to the positive comments, i.e. those associated with the rating of very user-friendly, it is clear that mystery shoppers appreciated simplicity. For example, one mystery shopper commented that "The page is very simple, but very straight forward and easy to use without much effort". Another praised the lack of "too much irrelevant information". This theme flowed through many other comments:

- "Great and simple interface for sorting out the price of different fuels";
- "Structure of the website is clear and easily understandable, [and] all key information regarding different sections is listed on the front page";
- "With a site as simple as this one you can´t go wrong";
- "Clear and easy to use without any distracting advertisements".

Several mystery shoppers also praised websites with easy to use search functions or efficient navigation structures.

The mystery shoppers for Italy and the United Kingdom concisely summarised what made one of the comparison websites they evaluated particularly user-friendly:

> *"Appropriate number of observations, appropriate number of indications about the fuel stations, clarity in the research and up-to-date sources clearly indicated, sometimes even with pictures".*

"The site is extremely user friendly. It has a very basic and easy layout, not too cluttered, not too much information, nicely designed, easy [to use] functionalities and basic formatting".

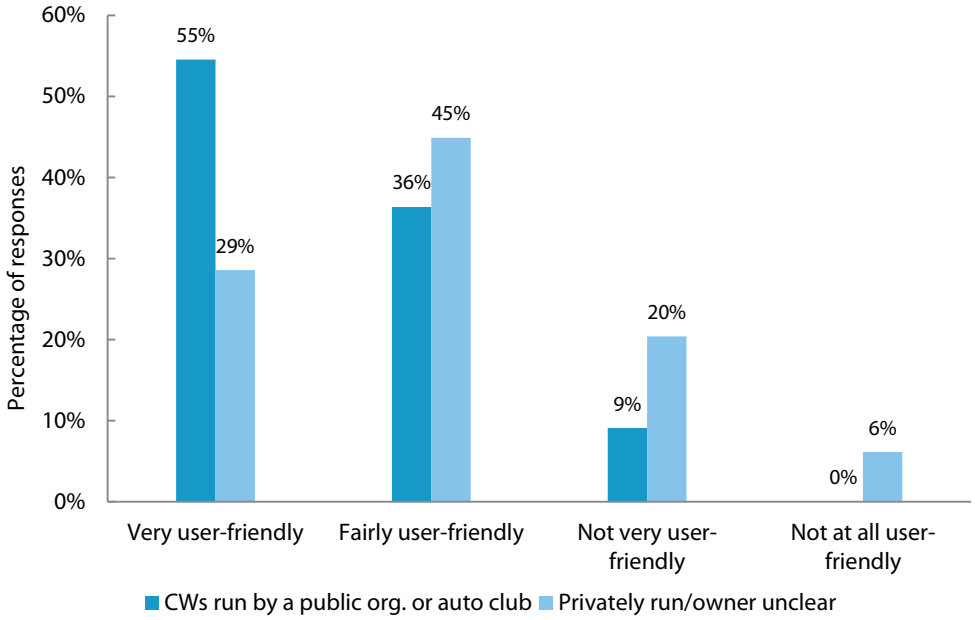
Turning to the comments associated with websites that were assessed by the mystery shoppers as not user-friendly reveals several specific issues. One of these was the inability to sort results by price. For example, the mystery shopper for a southern European country complained that one of the websites operating in that market only listed stations by their location, and then provided prices for three different types of fuel without allowing a ranking by any of those three prices. Accordingly, the website was regarded as helpful for determining the location of a petrol station but not for comparing prices. Similarly, the mystery shopper for another country indicated the absence of a lowest price view and the inability to see all petrol prices at once as contributing to a poor user experience. A different mystery shopper raised an issue regarding results filtering for one of the evaluated comparison websites. Specifically, this mystery shopper noted that the filtering options were not well implemented such that the user needed to scroll down a long list of locations to find the desired one.

Comparative assessment of user-friendliness

Returning to the user-friendliness assessment, the comparison websites run by a public organisation or automobile club were rated more positively than the privately run websites, though not to an overwhelming extent.

Figure 67. *User-friendliness of the websites – comparative analysis*

Source: Civic Consulting comparison website evaluation, Question 44. (N=60)



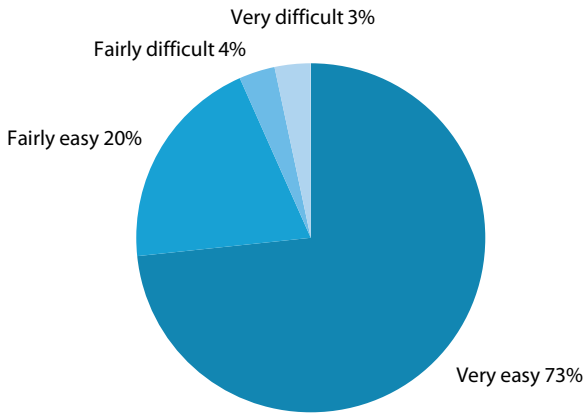
The preceding figure shows that 55% of the public / automobile club websites were regarded as very user-friendly by the mystery shoppers compared to 29% of the privately owned websites. However, 45% of the privately run websites received a rating of fairly user friendly, so, overall, the disparity in positive assessments is only 17% (91% for the public / automobile club websites against 74% for the privately owned ones). Of course, this divergence, though limited, does mean that a larger proportion of the privately owned websites was rated as not very user friendly (20%) or not at all user friendly (6%).

Identification of fuel types

Next, mystery shoppers reported on the ease with which they were able to identify the various fuel types included on the comparison website(s) they evaluated.

Figure 68. *Ease of identifying the various fuel types on the comparison websites*

Source: Civic Consulting comparison website evaluation, Question 45. (N=60)



The identification of different vehicle fuel types was assessed as very easy on 73% of the comparison websites and fairly easy on another 20%. Only for 7% of the websites did mystery shoppers report that it was fairly difficult (4%) or very difficult (3%) to distinguish the fuel types.

Analysis of the comments linked to the 7% of websites which received an assessment of 'difficult' identifies several problematic factors. For example, one comparison website received a negative rating on this criterion because it listed an overwhelming 19 different fuel types, including several brand-specific fuels. In contrast, the same mystery shopper assessed the other two comparison websites in that country positively on this aspect, in part because they offered the possibility to search for the six to eight most common fuel types.

In another country, a comparison website was also assessed negatively in terms of the identification of different fuel types because its petrol and diesel searches did not specify whether premium variants were included in the results. The alternative preferred by the mystery shopper for this country was another comparison website which permitted clear searches for regular petrol and regular diesel, as well as E85 and LPG (Autogas).

Another mystery shopper detailed a similar criticism of one evaluated comparison website, noting that the website only offered the possibility to search for two general fuel types – 'price petrol' and 'price diesel' – without specifying whether the fuels were regular or premium variants . In contrast, the website more positively assessed by this mystery shopper made it possible to select the fuel type in a drop-down menu

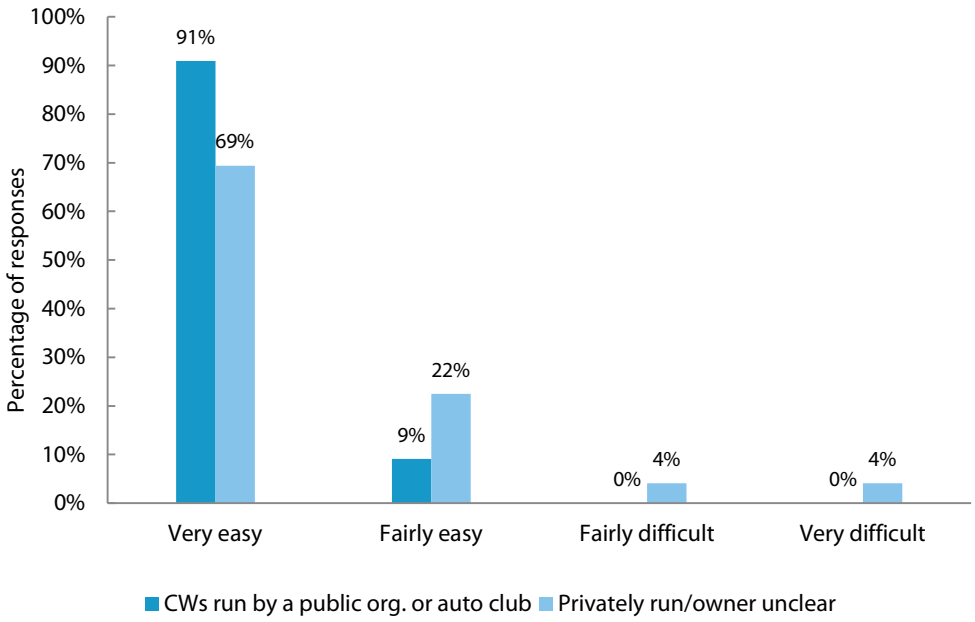
at the beginning of the search process, with the various types being entirely listed in the menu.

Comparative assessment of identification of fuel types

With respect to the ability to distinguish between fuel types on the comparison websites, only a moderate advantage for the group of public and automobile club websites was reported.

Figure 69. *Ease of identifying the various fuel types on the websites – comparative analysis*

Source: Civic Consulting comparison website evaluation, Question 45. (N=60)



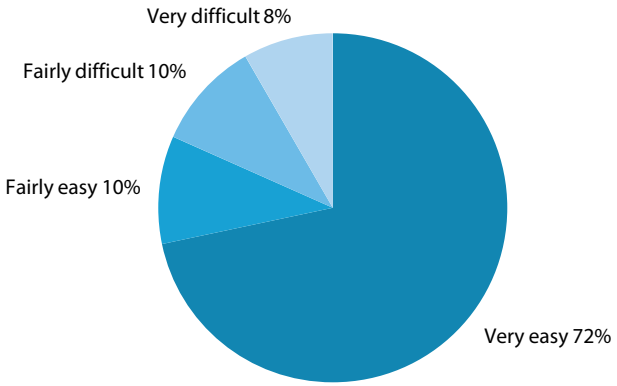
On 91% of these websites, distinguishing fuel types was regarded as very easy, which was the case on only 69% of the privately run websites. Overall, though, 91% of the privately run websites received some type of positive ranking from mystery shoppers on this aspect.

Accuracy and comparability of price observations

Also solicited were mystery shoppers' assessments of the level of difficulty involved in determining whether price observations were up-to-date.

Figure 70. *Ease of determining how up-to-date the price observations were*

Source: Civic Consulting comparison website evaluation, Question 46. (N=60)



Again, the comparison websites generally performed well. On almost three quarters of the websites (72%) it was very easy to determine how up-to-date the price observations were, according to the mystery shoppers. On a further 10% of the websites, this process was regarded as fairly easy. Still, nearly one fifth of the websites (18%) rendered it fairly difficult (10%) or very difficult (8%) to establish the age of the price observations they presented.

By examining the comments associated with those websites which were most positively assessed by mystery shoppers on this criterion, we can identify a range of ways in which it is possible to provide a clear indication of the age of price observations:

- Consistent inclusion of date and / or time stamps next to each price observation;
- A calendar showing all observation dates and times presented on the main page of a comparison website;
- Automated time settings which report the time of the last update to the website;
- Option to see price observation from the last day, last two days, etc. up to the past weeks' worth of observations, with an exact date attached to each result;
- Indication of the date / time of the observation as well as the user name of the person who entered the price data;
- Symbols, in addition to the date stamp, which mark the recently updated price observations.

The comments provided by mystery shoppers also allow us to see the factors which led to negative assessments regarding the information on price data updates. Predictably, the absence of any relevant explanation or information was cause for concern on the part of several mystery shoppers. It was also deemed problematic when information on the price updating schedule could only be found on the frequently asked questions page of a website and when the date / time of the observations was written in extremely small font beneath the prices.

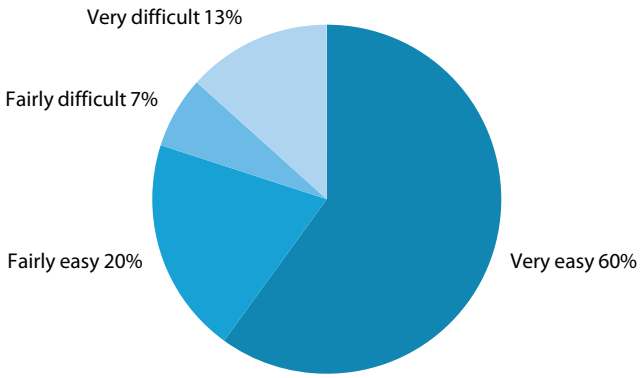
Other approaches negatively assessed by the mystery shoppers included:

- Having to click on a specific price in order to see its observation date, with that date then being difficult to pick out from a conglomeration of other information;
- The display of a vague statement indicating that prices are up-to-date without specification of actual dates;
- The use of unexplained colour coding that appeared to be somehow related to the dates of price observations;
- Appearance of a question mark instead of a concrete time indication like 'today' or 'yesterday'.

The next figure displays the proportions of positive and negative assessments for the question of whether it was easy or difficult to compare fuel prices.

Figure 71. *Overall ease of comparing fuel prices on the websites*

Source: Civic Consulting comparison website evaluation, Question 47. (N=60)



Price comparisons – the centrepiece of the service provided by these websites – were rated very easy on the majority of the websites (60%) and fairly easy on a sizeable minority (20%). However, the price comparison process was assessed as fairly or very difficult on one fifth (20%) of the websites, with comparisons being deemed very difficult on more than 1 in 10 (13%) of the websites.

The mystery shoppers' explanations of the website features and functionality that made it easy to compare fuel prices do not lend themselves to easy categorisation; however, quoting some of these comments at length presents a clear picture of the elements that contributed to efficient price comparisons.

> *"Very easy, because prices, the names of the fuel stations and their addresses are all close to each other. Cheapest price is given first"!*
>
> *"All the information needed [was provided], such as brand name, price, address and directions for how to get to the station".*
>
> *"The basic view allows for very easy comparison of any fuel type within any city".*
>
> *"The search function is on the first page and the default price ranking makes it very easy".*
>
> *"There are some different ways of doing the searches which makes it possible ... to specify what I am looking for in an easy way, depending on if it is a fuel type or region or special brand".*
>
> *"Results are provided in a drop down menu listing the top 5-10 in the area you selected, within the radius you selected. You can then click from the list and be directed down to the map for details about the station, or you can go directly to the map and select a station that way".*

In contrast, several factors were mentioned by mystery shoppers as contributing to the difficulty of fuel price comparisons:

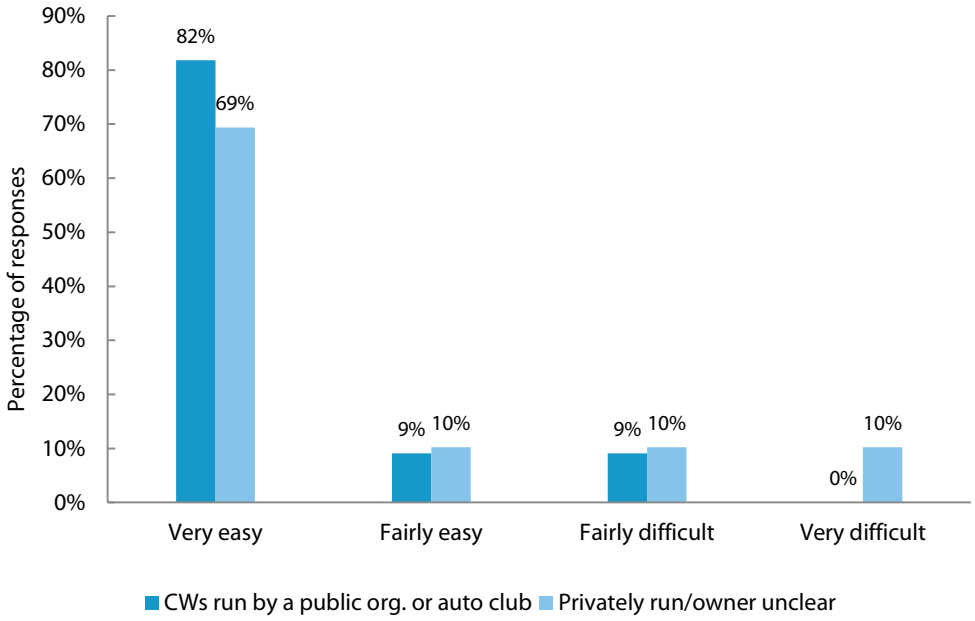
- Prices based on volumes other than a litre of fuel, e.g. the savings per 60 litres;
- Inability to rank the search results by price;
- Inability to search for prices in the capital city;
- Insufficient number of recent price observations, i.e. prices from the last week;
- Failure to specify the default search result ranking, the dates of prices, and whether the observations pertain to regular or premium fuel types;
- The listing of non-existent stations and price observations that were up to five years old in the default search results.

Comparative assessment of accuracy and comparability of price observations

Turning to the question of how easily the age of price observations could be determined, we again see little difference in the assessments received by the two groups of comparison websites, though the websites run by public organisations or automobile clubs were rated slightly better.

***Figure 72.** Ease of determining how up-to-date the price observations were – comparative analysis*

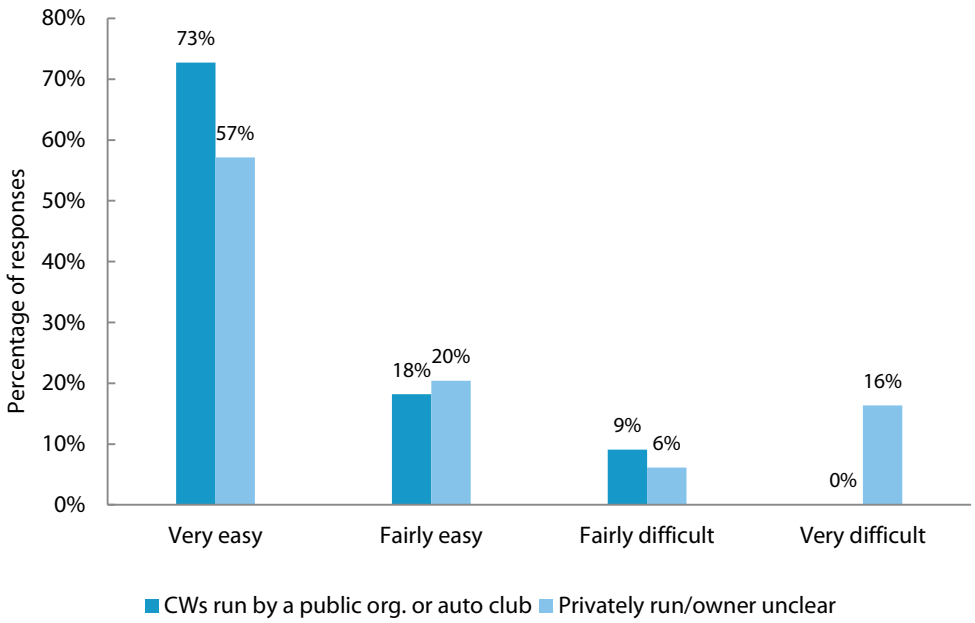
Source: Civic Consulting comparison website evaluation, Question 46. (N=60)



Here, the main difference lies in the percentage of the websites which received a top rating of very easy – this rating was given to 82% of the websites run by public organisations or automobile clubs and 69% of the privately owned websites. The percentage of websites that received assessments of fairly easy and fairly difficult is nearly identical across the two groups, but some of the privately run websites received very difficult ratings (10%). This was not the case for any of the websites run by public organisations or automobile clubs.

Figure 73. *Overall ease of comparing fuel prices on the websites – comparative analysis*

Source: Civic Consulting comparison website evaluation, Question 47. (N=60)



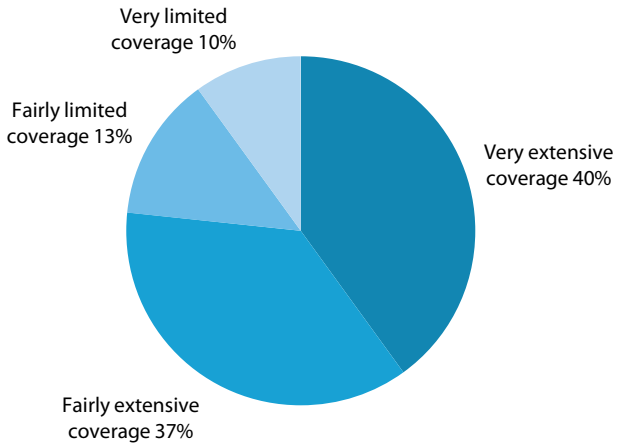
The emerging pattern repeats itself with regard to the ease with which fuel prices could be compared. Again, the public and automobile club comparison websites received very easy ratings at a higher rate than the privately run websites (73% against 57%), and the application rate of fairly easy and fairly difficult ratings was essentially identical across the categories. However, 16% of the privately run websites received the worst possible rating, compared to none of the public and automobile club websites.

Market coverage

As the following figure shows, the websites were rated somewhat less highly in terms of their market coverage.

Figure 74. *Extent of the coverage of different petrol stations / brands on the comparison websites*

Source: Civic Consulting comparison website evaluation, Question 48. (N=60)



Mystery shoppers noted very extensive market coverage on 40% of the comparison websites, with fairly extensive coverage on another 37%. The remaining 23% of the websites provided fairly limited (13%) or very limited (10%) coverage. [43]

This approximates the distribution of ratings for the user-friendliness criterion discussed above, but application of the top rating ('very extensive coverage') falls well short of the rate at which mystery shoppers assigned equivalent ratings in response to the questions on fuel type identification, discernibility of the price updating schedule and price comparability.

Several factors appeared to contribute to assessments of fairly or very limited market coverage. One of these was an obviously low number of stations. For example, at the time of the comparison website evaluation exercise one website had listings for less than 10 stations across the entire country.[44] This effectively rendered meaningful price comparisons impossible. Similarly, a comparison website in another country only covered one leading brand.

On other comparison websites it appeared that some or all of the major brands were absent from the price listings. The comparison websites for one of the Scandinavian markets were thought by the mystery shopper to cover a limited number of stations /

[43] As an indicator of market coverage, mystery shoppers were asked to consider the various retailer brands present in the lists of petrol stations that they had compiled and called by phone to request fuel prices. Due to this exercise, mystery shoppers were highly familiar with the range of retail brands present in the country they were researching and thus in a position to assess the extent to which the comparison websites covered these companies.

[44] This comparison website was apparently brand new – it appeared to go live on the Monday or Tuesday of the week in which the mystery shopping exercise was conducted.

prices, and in another case, a comparison website only allowed specific location searches for the capital city and only covered two fuel types (regular diesel and regular petrol). In a final case, a comparison website covered approximately 45 petrol stations in the capital city, whereas the mystery shopper had previously located 80 stations in that city.[45] Moreover, no price information was provided for many of the 45 listed stations.

In contrast, many of the comparison websites in those countries which require vehicle fuel retailers to notify their prices were seen by mystery shoppers as offering near-universal market coverage. Comments to this effect were recorded for several comparison websites in Austria, Cyprus, Greece, Spain and Portugal. The mystery shopper for the Netherlands also estimated that almost all of the available petrol stations appeared on two of the evaluated websites.

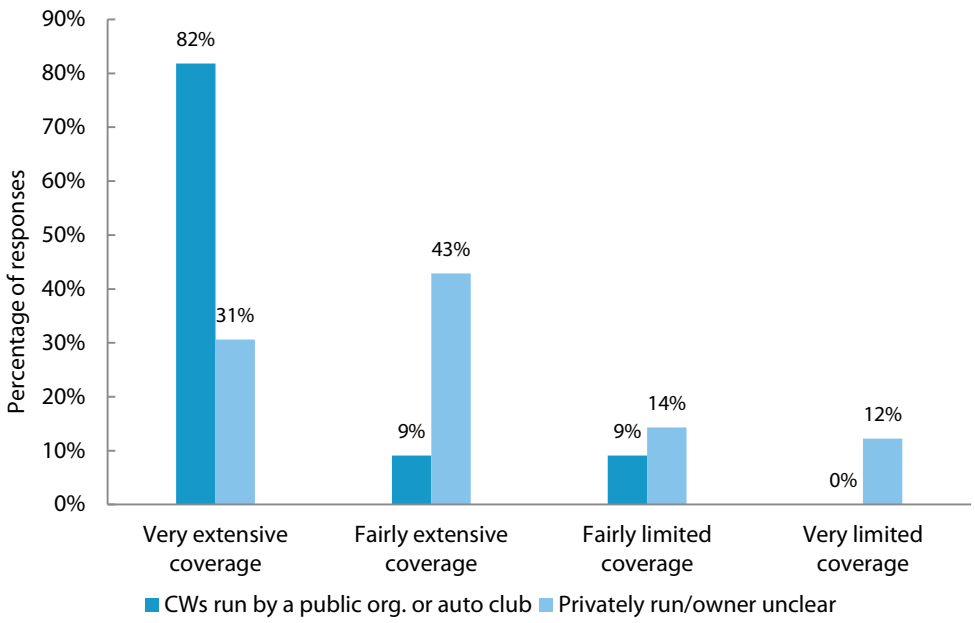
[45] In preparation for the phone-based price collection exercise. See Part 3 of this study for details.

Comparative assessment of market coverage

We see a wider disparity in the assessments of the two groups of comparison websites when it comes to their market coverage.

Figure 75. *Extent of the coverage of different petrol stations / brands on the websites – comparative analysis*

Source: Civic Consulting comparison website evaluation, Question 48. (N=60)



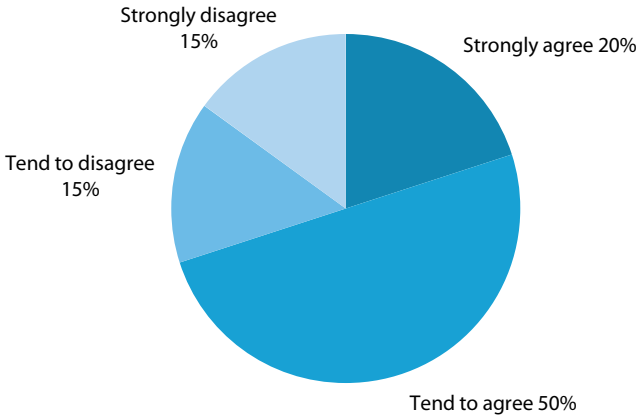
On this criterion, 82% of the websites run by public organisations or automobile clubs were regarded as providing very extensive market coverage. This compares quite favourably to the 31% of privately run websites assessed in the same manner. When the ratings of fairly extensive coverage are factored in, the performance gap does close significantly – 74% of the privately run websites received a positive assessment (compared to 91% of the public / automobile club websites). However, negative assessments were more frequently applied to the privately run websites (26% compared to 9%).

Assessment of overall usefulness

The final assessment question aimed at determining whether mystery shoppers thought the comparison websites constituted useful decision-making tools for consumers.

Figure 76. *Mystery shoppers' level of agreement with the following statement: "I found this CW to be useful in allowing me to make an informed choice".*

Source: Civic Consulting comparison website evaluation, Question 49. (N=60)



Mystery shoppers indicated that they found the vast majority (70%) of the comparison websites helpful in terms of allowing for an informed fuel purchasing decision, though they strongly agreed with this statement for only 20% of the websites. On the other side of the scale, mystery shoppers tended to disagree with application of the statement 'useful in allowing an informed choice' to 15% of the websites, and they strongly disagreed with applying this statement to another 15%.

Several of the comments recorded by mystery shoppers about those comparison websites which were regarded as useful in allowing an informed choice ably summarise the characteristics of well-performing websites:

> *"The website was easy to navigate and seemed reliable and transparent when it came to up-to-date prices and their source".*
>
> *"Very easy to use, can be sorted by fuel type, great interface, detailed addresses for gas stations, maps available, price history for every [station]".*
>
> *"The CW provides information on the prices of all fuel types available in the country. The user can select one fuel type and then his/her location in order to get the cheapest petrol stations in the area. If brand is relevant for the choice, the user can also refer the search to branded petrol stations, so the CW will only show stations of that specific brand in the specific area. The prices on this website are up to date".*
>
> *"[It has a] comprehensive list of stations, updated prices (prices that are more than 6 days old seem to be removed from the list). It shows the location of the station on*

the map, which is very useful, [there is] just the right amount of information shown on the main search results page (name of station, price, address, date), and by clicking on "more information" you can see which other fuels are available at that station and the history of prices in the last year".

An oft-mentioned problem with those websites which were regarded by mystery shoppers as not aiding in an informed choice was that their price data was obsolete. This issue was highlighted in comments associated with websites in three countries. Along similar lines, a website in a fourth country only presented average prices for one brand, a methodology seen as not contributing to an informed choice.

About one comparison website, a mystery shopper stated that although the website was labelled a comparison site it essentially did not offer this service because the "...results are mixed up for the whole country, the results are not dated, and no difference between regular and premium fuel" is specified. This mystery shopper reported that "as a consumer [on this website] I am not informed at all and I can't compare fuel prices". Another mystery shopper also reported that one of the evaluated websites would likely lead inexperienced users toward an incorrect decision about where to buy cheap fuel, because "it does not really work as a tool to find cheap petrol stations, it only helps to compare [general] prices between different fuel types and to see how prices in a specific station develop".

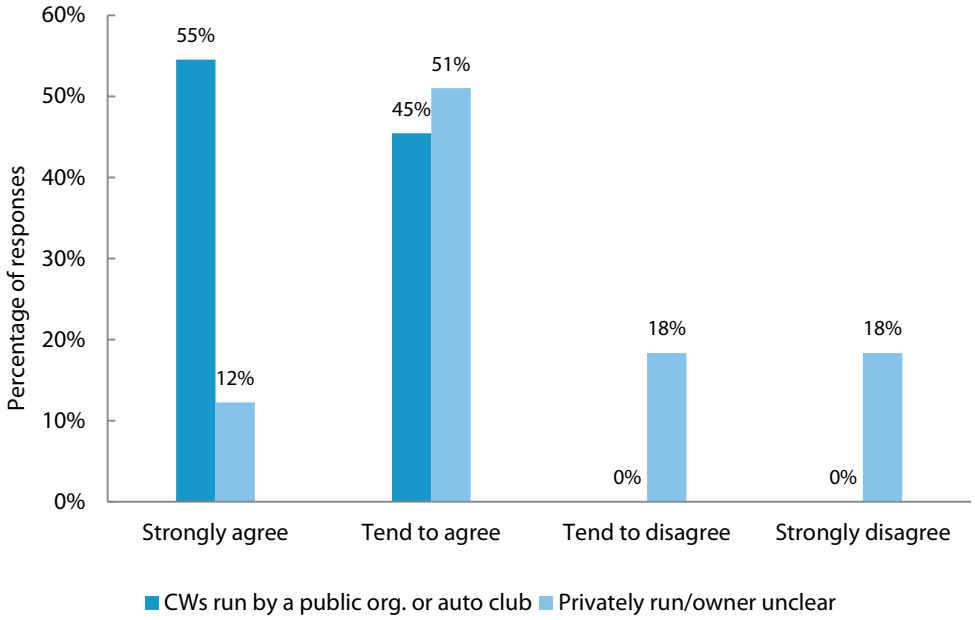
Two of the evaluated websites in another country suffered from lacklustre crowd sourcing, reported a mystery shopper, with users providing price updates too infrequently for the website to allow up-to-date decision-making. This mystery shopper also noted that these websites provided almost no other information about vehicle fuels or individual petrol stations, e.g. whether one could pay with a credit / debit card or if there was a restaurant / store available. The third comparison website in this country was also found insufficient in terms of allowing informed decision-making because the information provided was again not up-to-date. Some prices were listed from seven months prior, and since they were the lowest prices they appeared at the top of the search results. The website used both crowd sourcing and price collection from the websites of fuel retailers, but prices collected through both methods were found to be outdated.

Comparative assessment of overall usefulness

On the question of the overall usefulness of the comparison websites in allowing an informed choice in the vehicle fuels market, mystery shoppers found that the websites run by public authorities or automobile clubs performed substantially better.

Figure 77. *Mystery shoppers' level of agreement with the following statement: "I found this CW to be useful in allowing me to make an informed choice" – comparative analysis*

Source: Civic Consulting comparison website evaluation, Question 49. (N=60)



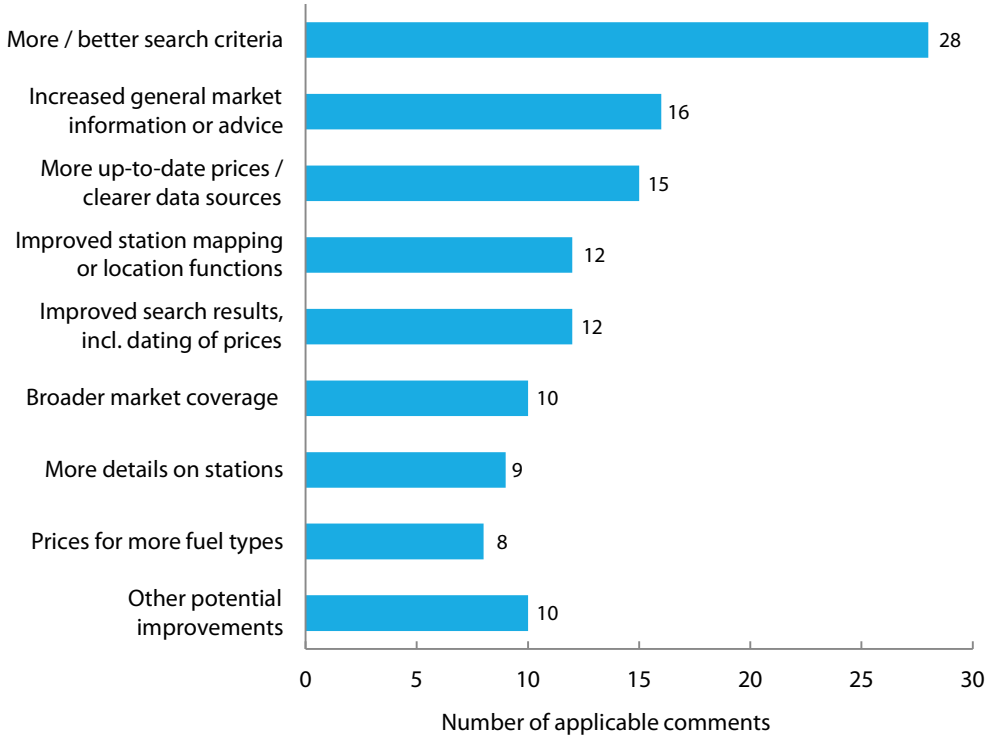
As is visible above, 100% of the public / automobile club websites received positive ratings on this criterion, with 55% of them receiving the highest rating. On the other hand, only 12% of the privately run websites received the strongly agree assessment, and, in total, 63% were assessed positively. More than one third (36%) of the privately run websites received a negative assessment from the mystery shoppers, with half of these receiving the lowest possible rating.

Potential improvements

At the conclusion of the comparison website assessment questionnaire the mystery shoppers were requested to note down the information and / or functionality that they thought was missing from each website. Identifying each individual request for more or better information or functionality within these comments and then grouping those requests into applicable categories produces the figure below. This figure displays the frequencies with which the different categories of missing / desired elements were indicated. It is based on the comments provided by the mystery shoppers for all 60 comparison websites in the sample. Notably, while these findings surely reflect, to some extent, the objective absence of vital information and / or functionality on the websites, they also partially reflect the mystery shoppers' subjective expectations of how these websites should have worked.

Figure 78. *What information or functionality is missing from this website that would make it more informative for you?*

Source: Civic Consulting comparison website evaluation, Question 50. (N=60)
Note: Many mystery shoppers provided multiple comments.



First and foremost, the findings reveal the importance placed by the mystery shoppers on appropriate and well-functioning search criteria. The mystery shoppers noted a need for additional or improved search criteria on 28 of the comparison websites. Participants in the exercise also frequently recommended an increase in the amount of general market information or advice that the websites provided to their users (16 websites). The next most commonly requested improvement was more up-to-date prices or that websites more clearly indicate the sources of their price data (15 websites). Next, two concerns were noted 12 times apiece by the mystery shoppers and they both pertain to the display of search results. One was improved station

mapping or location functions and the other, improved presentation of the main search results page(s), including more transparent dating of price observations. Similarly, the presentation of more detailed information about individual stations was seen as a necessity on nine of the websites.

Requests for expanded fuel type coverage (8 websites) and generally broader market coverage (10 websites) are suggestive of mystery shoppers' desire for these websites to act as comprehensive price comparison services.

Lastly, for 10 websites mystery shoppers reported other types of missing information or functionality. Regarding one of these websites, a mystery shopper recorded the need for better crowd sourcing mechanisms, including the easier introduction of prices by users and the possibility for other users to review and rate the provided price observations. Another mystery shopper noted that one website would benefit from the use of clearer fonts, and yet another suggested that two of the comparison websites evaluated should have displayed more information about the business operating them. This was also a concern with respect to one Italian website, according to a mystery shopper. Meanwhile, the absence of contact information on the comparison websites covering one of the Scandinavian markets was emphasised.

2.4 INFORMATION PROVISION ON RELEVANT WEBSITES

This section presents the results of mystery shoppers' evaluations of 203 websites operated by vehicle fuel retailers, automobile clubs and public authorities. These websites were tested primarily for the amount and quality of information they provided on different aspects of the vehicle fuels market.

2.4.1 Methodology

In this part of the mystery shopping exercise, seven selected websites were evaluated for each country. The breakdown of these seven websites was consistent across the countries and as follows: five retailer websites, including, where available, the website of one independent retailer not branded by a major oil company; the website of a national automobile club / association; and the website of a relevant public authority. In total, then, mystery shoppers evaluated 145 retailer websites, 29 automobile club websites and 29 public authority websites.

Assuming there were more than five major vehicle fuel retailers in a country, the mystery shoppers were instructed to review the websites of the five retailers that appeared most frequently in the sample of petrol stations compiled for their country.[46] In case the mystery shoppers were able to identify the website of an

[46] This refers to the sample of petrol stations that was identified for the phone-based price collection exercise. See Part 3 of this study for details.

independent retailer (which was not the case in all countries), they were then instructed to evaluate that website instead of the website of a fifth major retail brand.

For the automobile club websites, each mystery shopper was provided with a list of the national automobile club(s) in operation in their country. In case more than one such club existed, the websites were sorted according to their Alexa ranking[47] and the highest ranked, relevant website was evaluated.

Mystery shoppers then selected the public authority website which they evaluated. In order to do this they were asked to run a range of Google searches in the primary language(s) of their country. A range of potential search terms was provided.[48]

Once they had achieved an overview of the availability of public authority websites in their country that seemed to provide some information relevant to the vehicle fuels market, the mystery shoppers were instructed to select the one that appeared to offer the most extensive / detailed information on vehicle fuels. In practice, this meant that mystery shoppers aimed to evaluate the public authority website with the most detailed information on vehicle fuels available in their country; however, in some countries locating such a website proved challenging, as can be seen in the results presented in Section 2.4.5 below.

The following sub-sections present the fieldwork results of the evaluation of retailer, automobile club and public authority websites. Results are generally shown for the entire sample of 203 websites with the exception of Sections 2.4.4 and 2.4.7, in which websites are separated into two categories, namely retailer websites and public authority / automobile club websites.

The findings of this component of the mystery shopping exercise are presented in the following sub-sections:

- Inclusion of basic contact information on the retailer, automobile club and public authority websites;
- Website functionality;
- Provision of information about key aspects of the vehicle fuels market;
- Availability of relevant public authority websites;
- Accessibility of the websites;
- Summary assessment of the websites (full sample);
- Comparative assessment by category.

[47] Alexa Traffic Rank is a global ranking of websites. The traffic rank is based on three months of aggregated historical traffic data from millions of Alexa Toolbar users and data obtained from other, diverse traffic data sources, and is a combined measure of page views and users (reach). For more details, see http://www.alexa.com/help/traffic-learn-more.

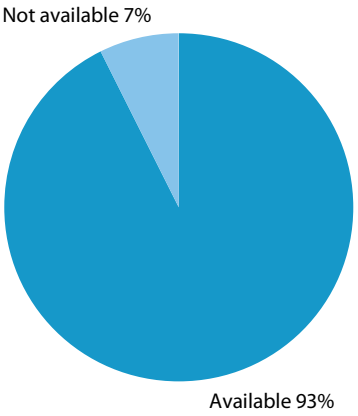
[48] Suggested search terms included: 'Public information on vehicle fuels / petrol / diesel'; 'Information on biofuels / ethanol / E5 / E10 / biodiesel'; 'Sustainability of vehicle fuels / petrol / diesel'; 'Performance of different vehicle fuels / petrol types / diesel types'; 'Premium versus regular vehicle fuels / petrol / diesel (or: advantages of premium petrol / diesel)'.

2.4.2 Inclusion of basic contact information on the websites

As was done for the evaluation of comparison websites (see Section 2.3.3), mystery shoppers were asked to search for a business / organisation address, email address and telephone number on each of the retailer, automobile club and public authority websites they assessed. Notably, this basic contact information was substantially more likely to be presented on these websites than on the comparison websites.

Figure 79.
Availability of business address

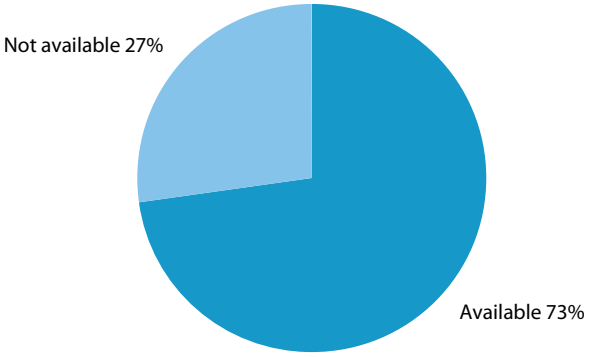
Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 10. (N=203)



Indeed, a business / organisation address was presented on 93% of the websites in this sample, compared to 50% of the comparison websites for vehicle fuels.

Figure 80.
Availability of email address

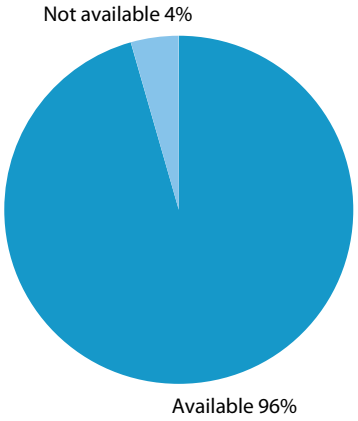
Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 11. (N=202)



Similarly, 73% of the retailer, automobile club and public authority websites provided an email address. Again, this compares favourably to the 62% of comparison websites for vehicle fuels that listed an email address.

Figure 81.
Availability of telephone number

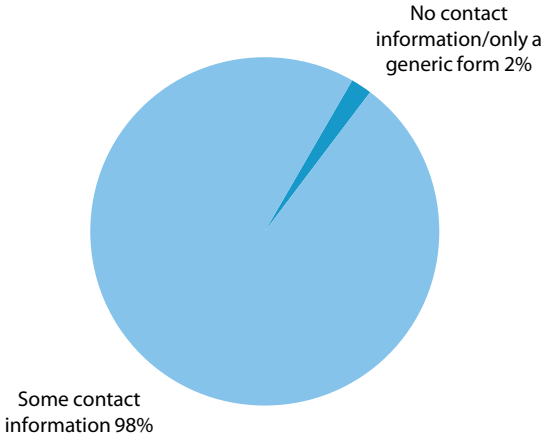
Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 12. (N=203)



Mystery shoppers were able to find a telephone number on almost every website in this sample (96%); this was the case for only 47% of the comparison websites for vehicle fuels.

Figure 82.
Availability of any contact information (business address, email or telephone number)

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 13. (N=203)



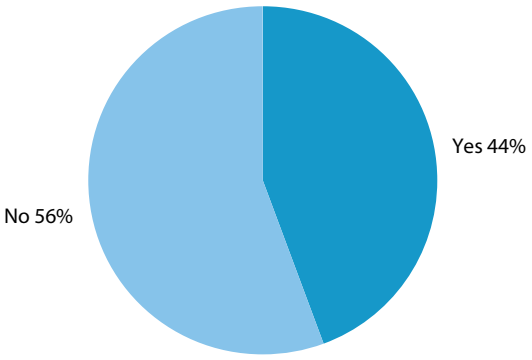
In sum, only on 2% of the 203 websites was no contact information – or only a generic form – provided. The other 98% of the websites provided at least one of the three pieces of contact information, i.e. a business address, email address or telephone number. Unsurprisingly given the findings detailed immediately above, this 98% provision rate is substantially higher than the 75% figure associated with the evaluated comparison websites for vehicle fuels.

2.4.3 Website functionality

As with the comparison websites, mystery shoppers were asked to report on whether the retailer, automobile association and public authority websites were made available in more than one language. Additionally, they were asked to indicate whether the websites provided customer ratings or reviews of either leading retailer brands or individual petrol stations.

Figure 83. *Is the website available in multiple languages?*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 14. (N=203)



The availability of multiple languages was a feature included on 44% of the websites, according to the mystery shoppers. The other 56% of the websites could only be used in one language.

In considering these results it is important to note that the mystery shoppers were instructed not to indicate that a retailer website was available in multiple languages if, for example, a large, multi-national company offered many different country-level websites. In such cases they were told to indicate 'Yes' to this question only if the individual country website, e.g. Shell's website for Germany, was available in multiple languages.

In most cases where a second language was available that language was English. However, there were several instances in which 'neighbouring' languages were available on a website. For example, in addition to German, an Austrian retailer's website was also available in Slovenian and English.

All of the Belgian websites were available in both Dutch and French, with the public authority website also being available in English and German.

The majority of the Bulgarian and Cypriot websites were available in English, as were a couple of the Czech websites.

Four of the Spanish websites were presented in multiple languages. All of them offered English, one Portuguese and two Catalan, Basque and Galician.

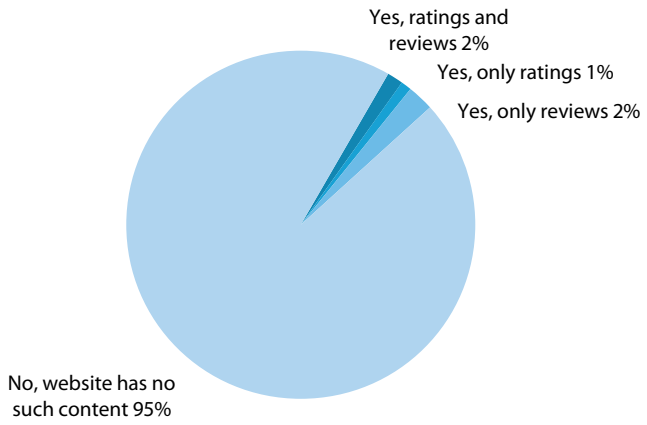
Four of the seven Finnish websites offered English and two additionally offered Swedish; one was available in four languages: Finnish, English, Swedish and German.

Five of the Lithuanian websites were available in English, with two of these also offering a Russian language interface. In Latvia, meanwhile, these findings were reversed: five of the websites were available in Russian and three (one of them with partial functionality) in English.

The public authority website in Sweden was available in an impressive array of languages: English, Arabic, Bosnian / Serbian / Croatian, Finnish, French, Northern Kurdish, Persian, Polish, Somali, Sorani, Spanish, Turkish and German. In contrast, none of the websites serving the United Kingdom appeared to be available in a language other than English.

Figure 84. *Does the website provide customer ratings and / or reviews of major vehicle fuel brands or individual petrol stations?*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 15. (N=203)



Only a small proportion of the websites (5%) provided some type of customer ratings and / or reviews. More specifically, 2% of the websites offered both customer ratings and reviews; 2% provided only reviews; and 1% presented solely ratings. Of the sampled websites, 95% offered no such user-generated content.

The websites offering both customer ratings and reviews were based in Denmark, the Netherlands and Slovakia, though on the last of those websites these functions were not working at the time of research. On the website serving the Netherlands it was also possible to ask questions, for example, regarding the quality difference between different fuel types.

Two additional Danish websites provided or linked to user ratings. One allowed consumers to rate or vote for certain stations and the other provided a link to a website which offers a customer review platform. One Slovakian website contained a discussion forum, but vehicle fuels were not listed among the major topics.

On some of the retailer websites the rating or review section discussed only that company or its fuel types.

2.4.4 Provision of information about key aspects of the vehicle fuels market

The core of the questionnaire for the websites of vehicle fuel retailers, automobile associations and public authorities asked mystery shoppers to search for information on an array of aspects related to the vehicle fuels market. They did this on each of the seven websites evaluated for each country. The individual aspects were grouped into the following eight categories:

- Fuel types;
- Fuel quality;
- Fuel prices;
- Compatibility of different fuel types with the vehicle;
- Effects of particular fuel types on engine / vehicle performance;
- Environmental impacts of fuels and their sustainability;
- Potentially vulnerable consumer groups;
- Potential redress mechanisms for problems experienced by consumers.

Findings are presented in tables according to these categories so that the reader can easily see which categories were addressed by the websites and which less so.

As mentioned previously, the findings are reported by organisation type – retailer websites, in one column, and automobile club and public authority websites, in the other. The figures refer to the percentage of the websites in a given sample, e.g. EU27, EU15 and EU12, which provided clear information on the applicable aspect of the vehicle fuels market, regardless of whether that information was easy or difficult to find.[49] Excluded from the count, then, are only those websites that, according to the mystery shoppers, provided unclear information or none at all.

It is of course important to bear in mind that this exercise assessed only a selection of seven websites from each country: five of retailers, one of a public authority and one of an automobile club. Accordingly, the findings do not claim to cover more than a sample of the available websites in each country. The aim was instead to arrive at an overview of the level of information consumers would likely be able to find by reviewing a few retailer websites, an automobile club website and by conducting Internet searches for a relevant public authority website in their country. Nonetheless, the number of websites assessed at the EU27 level is substantial: 135 retailer websites and 54 public authority / automobile club websites.

[49] For each market aspect the mystery shoppers assessed whether information on a given website was "Clear and easy to find"; "Clear but difficult to find"; "Provided but unclear"; or not provided("No information provided").

Fuel types

Mystery shoppers began their evaluations of information provision on the selection of retailer, automobile club and public authority websites by first attempting to locate relevant information on fuel types. Within this category, the mystery shoppers sought information on several more specific aspects, namely:

- Which fuel types are available in your country;
- Biofuels or fuels with biofuel content, e.g. E10, B7, etc.;
- Alternative fuels like LPG / GPL / Autogas or natural gas / CNG; and
- The labelling of fuels at petrol stations.

Considering the findings at the EU27 level (see the first table below), it is clear that of the four aspects listed above, the evaluated retailer websites were most likely to provide clear information on the types of fuel available in a given country (67% of the websites, compared to 32%, 44% and 17% for the three other aspects). In contrast, the public authority and automobile club websites reviewed during the exercise were about equally likely to provide information on fuel type availability (28%), biofuels (30%) and alternative fuels (26%), though none of these topics were clearly addressed by more than a third of the websites. The aspect least covered on the evaluated websites was that of fuel labelling at petrol stations: relevant and clear information appeared on just 17% of retailer websites and 8% of public authority and automobile club websites. The next sub-sections discuss findings for the four individual aspects in more depth.

Table 3. *Fuel types – percentage of websites providing clear information*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites. (N=201/203). Note: (a) Countries where E10 fuel has been introduced (Germany, France, and Finland – assessment based on 15 retailer websites and 6 public authority/auto club websites).

	Information on which fuel types are available in your country		Information on biofuels or fuels with biofuel content e.g. E10, B7, etc.		Information on alternative fuels like LPG / GPL / Autogas or Natural gas / CNG		Information on the labelling of fuels at petrol stations	
MS	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites
EU27	67%	28%	32%	30%	44%	26%	17%	8%
EU15	73%	47%	44%	50%	41%	45%	16%	13%
EU12	60%	4%	17%	4%	47%	4%	19%	0%
IS/NO	*80%*	*0%*	*40%*	*25%*	*20%*	*25%*	*0%*	*0%*
E10[a]	67%	83%	73%	67%	40%	67%	27%	50%

Fuel types available

The retailer websites provided clear information on fuel type availability at a substantially higher rate than the public authority and automobile club websites: 67% to 28% for the EU27 samples. The proportion of retailer websites displaying this type of information was also relatively consistent geographically: 73% in the EU15 and 60% in the EU12. This was not true for the public authority and automobile club websites. While 47% of these websites in the EU15 displayed clear information on fuel type availability, this was the case for only 4% of the EU12 websites.

Biofuels and fuels with biofuel content

Much less of a divide emerged between retailer websites and public authority / automobile club websites when it came to the provision of information on biofuels. Thirty-two percent of retailer websites across the EU27 provided clear and relevant information, and 30% of public authority and automobile club websites did likewise. Again, however, there was a divergence between information availability within the EU15 and EU12, and in this instance it applied to both groups of websites. Whereas 44% of the EU15 retailer websites and 50% of the EU15 public authority and automobile club websites provided clear information on biofuels, these proportions fell to 17% and 4%, respectively, among the EU12 websites.

Notably, in all three countries where E10 fuel was widely available at the time of research (Germany, France and Finland) at least the public authority or automobile club website that was reviewed provided clear biofuel-related information.

Alternative fuels (such as LPG and natural gas)

Clear information on alternative fuels such as LPG and natural gas was more likely, overall, to be presented on retailer websites (44% to 26%); however, this finding is due to the almost universal non-availability of such information on public authority and automobile club websites in the EU12 (4%). Within the EU15, 45% of this group of websites provided information on alternative fuels that was regarded as clear by mystery shoppers, while 41% of the retailer websites in the EU15 sample were assessed in this way.

Fuel labelling at petrol stations

As already mentioned, information provision regarding the labelling of fuels at petrol stations was low relative to the three other fuel type aspects researched. Scarce information was provided on retailer or public authority / automobile club websites, and this held for both the EU15 and EU12 websites, though it is notable that mystery shoppers did not find clear information on this aspect on any of the public authority and automobile club websites in the EU12.

Fuel quality

The assessment of information provision on a selection of retailer, public authority and automobile club websites proceeded to focus on fuel quality. In this category, mystery shoppers attempted to find clear and relevant information on four additional market aspects:

- Differences between regular and premium fuels;
- Differences between branded and non-branded, i.e. generic fuels;
- Minimum fuel quality standards applicable in their country; and
- Results of tests concerning fuel quality.

The next table indicates that, overall, information about fuel quality was less likely to be provided on these websites than information on fuel types. In general, information on fuel quality was somewhat more likely to be provided on retailer than public authorities and automobile club websites, and retailer websites were more likely to provide information concerning the differences between regular and premium fuels than information on the other three aspects listed above (33% of EU27 websites compared to 2%, 20% and 16% for the other aspects). Each of the four aspects was clearly addressed by less than 1 in 10 of the public authority and automobile club websites (6%, 2%, 9% and 9%). In spite of the low level of information provision on these fuel quality aspects, the proportions for the item 'differences between branded and non-branded fuels' stand out: for the EU27 sample, just 2% of retailer and 2% of public authority and automobile club websites provided clear, pertinent information. The following paragraphs provide additional details on the findings.

Table 4. *Fuel quality – percentage of websites providing clear information*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites. (N=202/203) Note: (a) Countries where E10 fuel has been introduced (Germany, France, and Finland).

	Information on differences between regular and premium fuels		Information on differences between branded and non-branded ('generic') fuels		Information on any minimum fuel quality standards applicable in country		Results of tests concerning fuel quality	
MS	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites
EU27	33%	6%	2%	2%	20%	9%	16%	9%
EU15	33%	10%	4%	3%	22%	13%	16%	13%
EU12	32%	0%	0%	0%	18%	4%	17%	4%
IS/NO	*10%*	*0%*	*0%*	*0%*	*10%*	*25%*	*0%*	*0%*
E10[a]	13%	0%	7%	0%	29%	17%	27%	33%

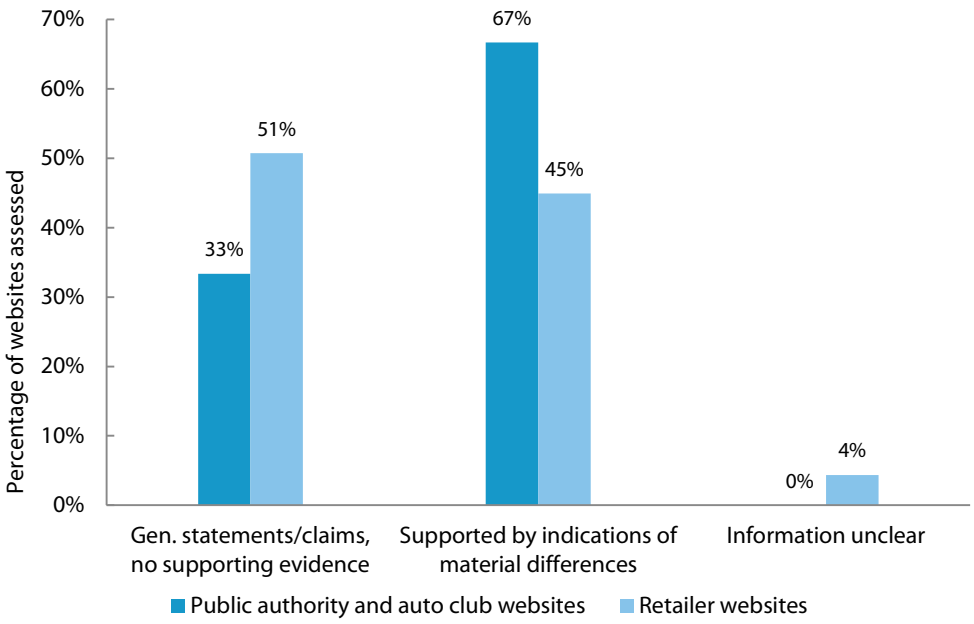
Regular versus premium fuels

Clear information regarding the differences between regular and premium fuels were presented at equal rates on retailer websites in the EU15 and EU12 (33% and 32%, respectively). These proportions were substantially higher than their counterparts among the public authority and automobile club websites, 10% (EU15) and none (EU12) of which provided clear information on this aspect. These latter figures mean that mystery shoppers were unable to locate relevant and clear information on 55 of the 58 public authority and automobile club websites that were selected and reviewed.

Though the sample size of public authority / automobile club websites is too small to draw any robust conclusions, it is notable that when these websites provided clear information on this topic, two out of three supported it with indications of material differences between regular and premium fuels (see next figure).[50]

Figure 85. *Type of information provided on differences between regular and premium fuels*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 21. (N=72)
Note: Includes only those websites on which relevant information was provided.



Among the retailer websites, this was less common: 45% of these websites supported their discussions of regular and premium fuels by indicating material differences, but 51% offered only general statements / claims without supporting evidence.

[50] Regarding information on the differences between regular and premium fuels, mystery shoppers did not aim at judging the quality or scientific soundness of the information provided. Instead, they continued to focus only the clarity of the provided information and, in the case of Question 21("If provided, does this information comprise general statements/claims about the differences between regular and premium fuels or is it supported by indications of material differences such as the octane rating or the additives used in premium fuels?") (Figure 85), whether a reference to material differences (e.g. an octane number) was provided.

Branded versus non-branded ('generic') fuels

Amongst the sample of evaluated retailer websites, only a few in three countries were found to present clear information on the differences between branded and non-branded fuels. Similarly, clear discussion of this issue was almost completely absent from the evaluated sample of 58 public authority and automobile club websites.

Minimum fuel quality standards

Minimum quality standards were more likely to be clearly discussed on retailer than public authority and automobile club sites (20% compared to 9% for the EU27 samples). Among the retailer websites there was little difference in the EU15 and EU12 findings, but a higher proportion of public authority and automobile club websites addressed this issue in the EU15 than the EU12 (13% against 4%).

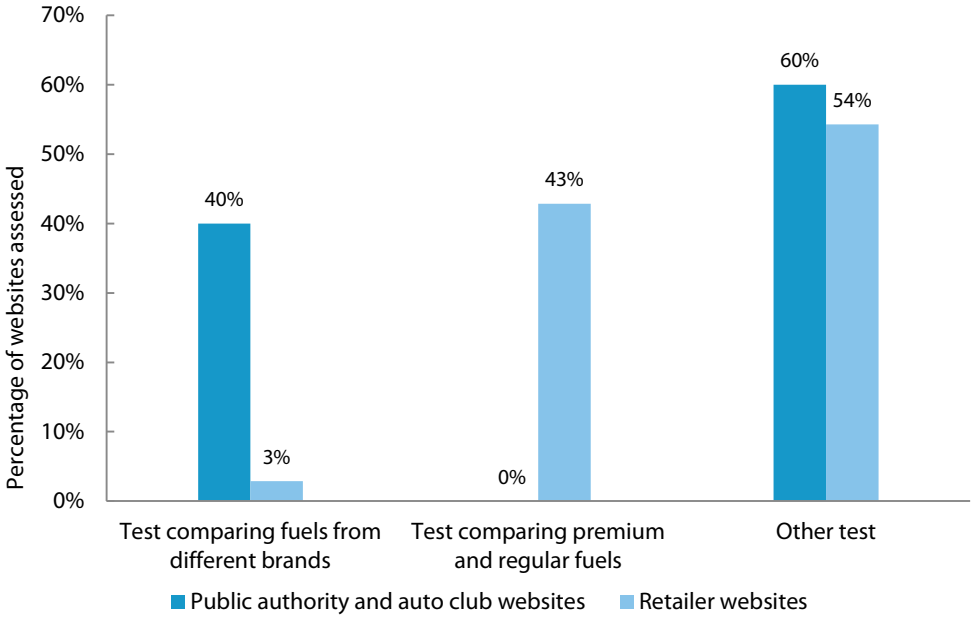
Tests of fuel quality

Again, retailer websites were slightly more likely than public authority and automobile club websites to clearly display the results of fuel quality tests (16% compared to 9% for the EU27 samples). There was no geographic variation in the retailer website proportions, but public authority / automobile club websites in the EU12 were less likely to offer clear information than their counterparts in the EU15 (4% compared to 13%).

As shown in the figure below, those five public authority and automobile club websites that provided test results on fuel quality had either run tests comparing fuels from different brands (40%, 2 of 5 websites) or other types of fuel quality tests (60%, 3 of 5 websites). In contrast, the 35 retailer websites that provided test results rarely showed comparisons of fuels from different brands (3%), preferring to display results comparing premium and regular fuels (43%) or other test results (54%).

Figure 86. *Type of test result(s) presented*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 25. (N=41)
Note: Multiple answers possible; includes only those websites on which relevant information was provided.



Fuel prices

Within the category of fuel prices, mystery shoppers searched the sample of retailer, public authority and automobile club websites for information on six market aspects:

- Up-to-date price information from petrol stations;
- Relative prices of different fuel types (e.g. which tend to be more expensive);
- How often prices change or are permitted to change by regulatory rules;
- A component breakdown of retail fuel prices;
- Short-term price trends; and
- Long-term price trends.

The proportions of websites on which clear information was presented regarding these aspects are displayed in the next table. Within the EU27 sample, retailer websites were more likely to display up-to-date price information for their petrol stations than information on any of the other aspects (27% compared to 9%, 7%, 16%, 8% and 10%). Public authority and automobile club websites, on the other hand, were equally likely to provide clear information on current prices at petrol stations (22%), the components of retail fuel prices (20%) and long-term price trends (24%); the other three aspects were clearly discussed on between 9% and 13% of these websites. The pattern of public authority and automobile club websites in the EU15 more frequently providing clear information than their counterparts in the EU12 holds for each of the aspects grouped in the fuel prices category. More detailed discussions of the results for each aspect are presented below.

Table 5. *Fuel prices – percentage of websites providing clear information*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites. (N=196-203) Note: (a) Countries where E10 fuel has been introduced (Germany, France, and Finland).

	Up-to-date price information from petrol stations		Relative prices of different fuel types		How often prices change, or can change		Component breakdown of the retail price of fuel		Information on short-term price trends		Information on long-term price trends	
MS	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites
EU27	27%	22%	9%	13%	7%	9%	16%	20%	8%	13%	10%	24%
EU15	28%	30%	11%	20%	4%	13%	23%	28%	12%	20%	15%	33%
EU12	27%	13%	7%	4%	12%	4%	8%	10%	3%	4%	5%	13%
IS/NO	*10%*	*0%*	*60%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*
E10[(a)]	27%	17%	7%	67%	0%	0%	27%	33%	7%	33%	7%	33%

Up-to-date price information from petrol stations

Retailer websites were slightly more likely to provide up-to-date price information than public authority and automobile club websites (27% against 22%). In fact, this was the only aspect of the six addressed in the previous table for which this was the case. And, even on this criterion, the pattern of retailer websites providing more information did not hold for the EU15, where 30% of public authority and automobile club websites provided this information compared to 28% of retailer websites.

Relative prices of different fuel types

Information on the relative prices of different fuel types was infrequently provided compared to current price data – just 9% of retailer websites and 13% of public authority / automobile club websites provided topical and clear discussions of relative price differences. As mentioned, there was a noticeable divide between information provision on the public authority and automobile club websites in the EU15 (20%) and EU12 (4%).

Frequency of price changes

Clear information on the frequency of price changes and / or associated regulatory rules was rarely provided on the websites (7% of retailer websites and 9% of public authority and automobile club websites).

Retail price components

The components of retail fuel prices were more likely to be clearly distinguished on EU15 websites, whether they were retailer websites (23% against 8% for the EU12) or

public authority / automobile club websites (28% against 10% for the EU12). Overall, public authority and automobile club websites provided this information in a clear manner more frequently than the retailer websites.

Short-term and long-term price trends

Retailer websites were equally unlikely to provide clear information on short- and long-term price trends (8% and 10%, respectively, for the EU27 sample). In contrast, the public authority and automobile club websites more frequently displayed long-term price trends (24% compared to 13%). For both aspects, information provision was less frequent among the samples of EU12 websites than EU15 websites.

Compatibility of different fuel types with the vehicle

Mystery shoppers next searched for information on the compatibility of different fuel types with vehicle models. Similar to the previous ones, this category was broken down into five distinct information searches:

- General fuel-vehicle compatibility;
- Biofuel-vehicle compatibility;
- Functionality to determine fuel compatibility with a specific vehicle model;
- Potential damage from using an incompatible fuel type; and
- An explanation of what action to take in case of mis-fuelling.

The proportion of the evaluated websites displaying clear and pertinent information was low for all five of these aspects. Only 15% of public authority and automobile club websites in the EU27 sample presented clear discussions of biofuel compatibility, and this was the highest proportion seen for any of the five topics. Across these topics, the public authority and automobile club websites were slightly more likely to offer applicable information in a clear format; however, this was entirely based on the efforts of the EU15 public authority and automobile club websites, because no relevant information on fuel compatibility was clearly displayed on public authority or automobile club websites evaluated for the EU12. As in the previous sub-sections, the individual findings are presented below.

Table 6. *Compatibility of different fuel types with the vehicle – percentage of websites providing clear information*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites. (N=202/203) Note: (a) Countries where E10 fuel has been introduced (Germany, France, and Finland).

	Compatibility between fuel types and vehicle models		Compatibility of bio-fuel content and vehicle models		Functionality to determine fuel-vehicle com-patibility[51]		Information on harm of using incompatible fuels		Explanation of what to do if you use incompatible fuel	
MS	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites	Retailer sites	Public authority & auto club sites
EU27	8%	11%	9%	15%	1%	9%	3%	7%	4%	13%
EU15	9%	21%	15%	27%	1%	17%	4%	13%	4%	23%
EU12	7%	0%	2%	0%	2%	0%	2%	0%	5%	0%
IS/NO	20%	25%	0%	0%	0%	25%	0%	0%	0%	0%
E10[(a)]	13%	40%	47%	67%	7%	17%	7%	17%	7%	33%

Basic compatibility between fuel types and vehicle models

The low overall rate of information provision on this aspect is readily apparent: only 8% of the evaluated retailer websites across the EU27 provided clear information about basic fuel-vehicle compatibility issues.[52] In comparison, 11% of the public authority and automobile club websites that were assessed provided such information.

Biofuel compatibility

More than a quarter (27%) of the public authority and automobile club websites in the EU15 presented clear information on biofuel compatibility; this was the case for 15% of retailer websites in the EU15 sample. Clear discussion of this topic was almost entirely absent from the evaluated websites in the EU12 – just 2% of the retailer websites in this sample presented clear and pertinent information.

At the country level, Finland was a notable case in that four of the five retailer websites clearly addressed biofuel compatibility. Turning to the public authority and automobile club sample, both of the websites reviewed in Germany provided relevant information in a clear manner, as did either the public authority or automobile club websites that were evaluated for France and Finland. These findings

[51] The response options to Question 34 (Does the website have "Functionality that allows you to determine which fuel types are compatible with one specific vehicle model?") differed slightly from those used for the other questions. However, the response options maintained the same pattern of two positive responses and two negative responses. Thus the percentages in the column for Question 34 reflect the proportion of websites whose information provision on the market aspect was assessed positively.

[52] For example, the non-compatibility of diesel fuel with a petrol vehicle or vice versa was considered 'basic' compatibility information.

are logical given the widespread availability of E10 fuel in Finland and France, and its problem-plagued introduction in Germany.[53]

Functionality to determine specific fuel-vehicle compatibility

Functionality allowing users to definitively determine the compatibility of different fuel types with their vehicle model was essentially non-existent on the reviewed retailer websites. In contrast, 17% of public authority and automobile club websites in the EU15 provided users with working variants.

Potential harm of using incompatible fuels

Again, few of the reviewed retailer websites (3% in the EU27 sample) contained clear indications of the potential harm that could arise from the use of fuel types incompatible with the vehicle. This information was present on 7% of public authority and automobile club websites evaluated across the EU27.

Explanation of what to do in case of mis-fuelling

Nearly a quarter (23%) of the public authority and automobile club websites in the EU15 sample provided clear instructions on what to do in case of mis-fuelling the vehicle with an incompatible fuel type. Conversely, only 4% of the retailer websites reviewed offered this type of information.

[53] Consumer difficulties and uncertainty experienced in Germany following the initial launch of E10 fuel were described by several experts during interviews conducted for this study, and many news articles describing the situation can be found by searching the Web for 'E10 Germany'.

Effects of particular fuel types on engine / vehicle performance

To assess whether discussions of the effects of particular fuel types on engine /vehicle performance were presented on the sample of retailer, public authority and automobile club websites, mystery shoppers searched the websites for information on the energy content of different fuel types. Energy content refers to the amount of energy (commonly expressed in mega joules per volume unit) stored in a specified volume of fuel. When used in comparably efficient engines and under similar circumstances a fuel with higher energy content will allow a vehicle to travel farther.

As is visible in the following table, the proportion of retailer websites displaying clear information on various fuels types' energy content is higher than that for the public authority and automobile club websites, both for the EU15 and EU12 samples. Overall, though, the percentage of the evaluated websites on which this type of information was clearly provided is low.

Table 7. *Effects of fuel types on vehicle performance – percentage of websites providing clear information*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites. (N=203)

	Information on the energy content of different fuel types	
MS	Retailer websites	Public authority & auto club websites
EU27	13%	6%
EU15	12%	10%
EU12	15%	0%
IS/NO	*10%*	*0%*

Environmental impacts of fuels and their sustainability

To examine the prevalence with which information was provided on the environmental impacts of different fuel types, mystery shoppers searched for information on the following market aspects:

- Environmental (climate / air quality) impact of different fuel types; and
- Fuel sustainability, e.g. sustainability concerns about biofuels or fossil fuels.

The findings for these information searches, which are displayed in the table below, show that clear information on the environmental impact and sustainability of fuels was not frequently presented on the evaluated retailer or public authority / automobile club websites. Websites in both categories were more likely to provide clear information on the climate / air quality impact of fuels than on the sustainability of their production, but the divergence in these proportions was minor. A more detailed review of the findings is presented below.

Table 8. *Environmental issues – percentage of websites providing clear information*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites. (N=202). Note: (a) Countries where E10 fuel has been introduced (Germany, France, and Finland).

	Information on the environmental impact of different fuel types		Information on the sustainability of different fuel types	
MS	Retailer websites	Public authority & auto club websites	Retailer websites	Public authority & auto club websites
EU27	16%	13%	10%	9%
EU15	15%	23%	15%	17%
EU12	17%	0%	5%	0%
IS/NO	*20%*	*25%*	*20%*	*25%*
E10[(a)]	0%	17%	0%	0%

Environmental (climate / air quality) impact of different fuel types

Sixteen percent of retailer websites in the EU27 sample presented clear information on the impact of different fuel types on the environment. In comparison, 13% of the public authority and automobile club websites provided such information, though this percentage masks the disparity between information provision on EU15 websites (23%) and EU12 websites (0%).

Sustainability of different fuel types

As mentioned before, fewer of the websites provided clear information on the sustainability of different fuel types' production paths. Only 10% of retailer websites and 9% of public authority / automobile club websites offered this type of discussion. Information was particularly scarce within the EU12, where 5% of retailer and none of the public authority / automobile club websites provided such information.

Potentially vulnerable consumer groups

Also of interest in this exercise was whether the retailer, public authority and automobile club websites provided information that could be of aid for consumer groups that are potentially vulnerable in the vehicle fuels market. Accordingly, mystery shoppers searched the sample of websites for text on two additional aspects:

- Information aimed at providing for the needs of vulnerable consumers; and
- Information designed to help consumers with purchasing fuel abroad.

Neither of these aspects was discussed on retailer websites (see the next table) – only 1% of these websites in the EU27 sample provided relevant information in a clear manner. In contrast, 9% of public authority and automobile club websites across the EU27 clearly presented information that could be of assistance to vulnerable consumer groups, and 20% of the websites in this group provided clearly worded help with cross-border fuel purchases. However, both of these proportions disguise the geographic divide whereby it was much more likely for these market aspects to

be addressed on public authority and automobile club websites in the EU15 than EU12 (e.g. 30% of the websites in the EU15 sample offered information on purchasing fuel abroad, while only 8% in the EU12 sample did the same).

Regarding the provision of information aimed at the needs of vulnerable consumer groups, the evaluated public authority website and automobile club website in the Netherlands stood out, because they both offered clear information designed to help consumers with fuel purchases abroad.

Table 9. *Assistance for vulnerable groups of consumers – percentage of websites providing clear information*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites. (N=203)

	Information aimed at providing for the needs of vulnerable groups of consumers		Information designed to help consumers with purchasing vehicle fuels elsewhere in the EU	
MS	Retailer websites	Public authority & auto club websites	Retailer websites	Public authority & auto club websites
EU27	1%	9%	1%	20%
EU15	0%	17%	0%	30%
EU12	2%	0%	3%	8%
IS/NO	*0%*	*0%*	*0%*	*0%*

Potential redress mechanisms for problems experienced by consumers

In their final search for information on the retailer, public authority and automobile club websites selected for this exercise, mystery shoppers attempted to find details on potential redress mechanisms utilisable by consumers who experience problems in the fuels market (see the following table).

This type of information was as likely to be presented clearly on retailer websites as on public authority and automobile club websites (26% and 25%, respectively, for the EU27 samples). Nearly a third of the public authority / automobile club websites in the EU15 (31%) provided clear details on redress mechanisms, while this was the case for 17% of the EU12 websites. Conversely, a higher proportion of retailer websites in the EU12 (28%) addressed this issue than in the EU15 (24%).

Table 10. *Potential redress mechanisms – percentage of websites providing clear information*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites. (N=202)

	Information on potential redress mechanisms should one experience a problem with vehicle fuels or at a petrol station	
MS	Retailer websites	Public authority & auto club websites
EU27	26%	25%
EU15	24%	31%
EU12	28%	17%
IS/NO	*30%*	*25%*

Summary of findings by country

The following table aggregates the findings for all 25 market aspects researched by mystery shoppers on the samples of retailer, public authority and automobile club websites reviewed in the 29 countries. Specifically, the table indicates the range of market aspects for which the mystery shoppers were able to find clear information.

It is important to note that these findings are not based on the totality of information available on relevant websites in a given country; rather, they are based on the review of a selected sample of five retailer websites, one public authority website and one automobile club website per country. This information is intended to given a sense of the range of market topics about which a consumer might be likely to find clear information by reviewing a group of such websites in his or her country. Importantly, though, the number of market aspects covered would likely vary depending on the precise selection of websites.

In terms of information provision on retailer websites, Denmark, Germany, Latvia, Slovenia and Slovakia stand out because mystery shoppers were able to find clear information on more than half of the 25 researched market aspects on retailer websites in these countries.

Turning to the public authority and automobile club websites, Germany, France, the Netherlands, Austria, and Finland were the countries for which mystery shoppers found clear information on a majority of the researched market aspects.

Table 11. *Summary of findings on information provision, analysis by country*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites. (N=203) Key: +++ indicates that clear information on most market aspects (22-25) was found; ++ indicates that clear information on a majority of market aspects (13-21) was found; + indicates that clear information on a limited number of market aspects (4-12) was found; and, - indicates that clear information on few or none of the market aspects (0-3) was found.

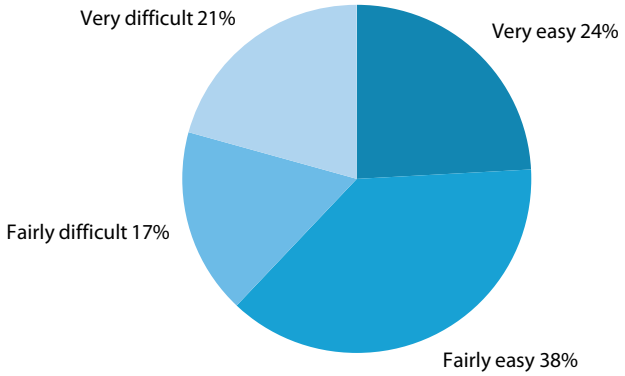
	Number of market aspects for which clear information was found	
MS	Retailer websites	Public authority & auto club websites
BE	+	+
BG	+	-
CZ	+	-
DK	++	+
DE	++	++
EE	+	-
IE	+	+
EL	+	+
ES	+	+
FR	+	++
IT	+	+
CY	+	-
LV	++	-
LT	+	-
LU	+	+
HU	+	-
MT	-	-
NL	+	++
AT	+	++
PL	+	-
PT	+	-
RO	+	-
SI	++	+
SK	++	-
FI	+	++
SE	+	+
UK	+	+
IS	+	-
NO	+	+

2.4.5 Availability of relevant public authority websites

The following figure pertains only to the sample of public authority websites, but it may partially explain the frequent non-availability of information on public authority websites that was noted by mystery shoppers (and displayed in the preceding tables).

Figure 87. *How easy / difficult was it to find this website?*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 9.
Note: This question only pertains to mystery shoppers' searches for relevant public authority websites. (N=29)



Though mystery shoppers reported that it was easy to find a public authority website containing information relevant to the vehicle fuels market in 62% of the 29 countries surveyed (24%, very easy; 38%, fairly easy), the search process was deemed fairly (17%) or very difficult (21%) in the remaining countries.

The difficulties reported surely reflect to some extent the challenges and uncertainties inherent in Internet searches. However, judging from some of the associated comments provided by the mystery shoppers, the negative assessments of the search process also reflect, at least in the case of some countries, the lack of a comprehensive public authority website dedicated to the provision of clear consumer information on the vehicle fuels market.

2.4.6 Accessibility of the websites

For the reasons detailed in Section 2.3.10, mystery shoppers were asked to run two basic accessibility tests – based on components of the W3C Web Accessibility initiative – on each of the evaluated websites.

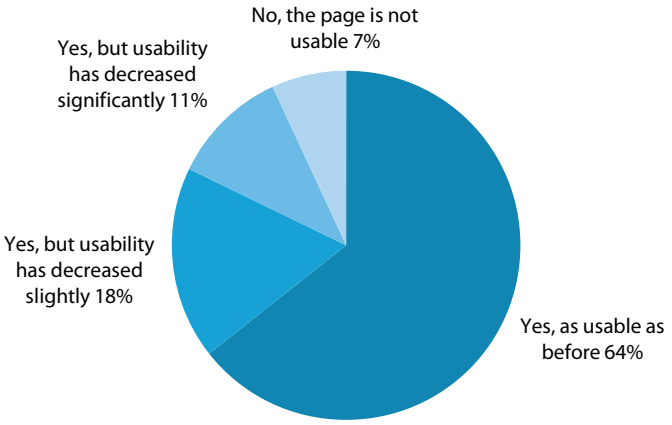
In the first test, mystery shoppers increased the font size setting in their browser and then assessed whether the enlarged font size rendered the front page or other key information page of the website they were evaluating at that time less usable. In the second test, mystery shoppers utilised another browser extension to temporarily convert the front page and other key information page to grey scale. They then determined if there was still sufficient contrast between the various design elements or if the pages had instead become less usable.

Font size increases

For previously discussed reasons (see Section 2.3.10), only in about half of the instances was it possible for mystery shoppers to increase the font size on the tested Web pages. In these cases mystery shoppers were able to report on the pages' usability (see figure below).

Figure 88. *Is the front page of the website usable with larger font size?*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 44. (N=101)
Note: Only includes those websites for which the front page font size could be increased.



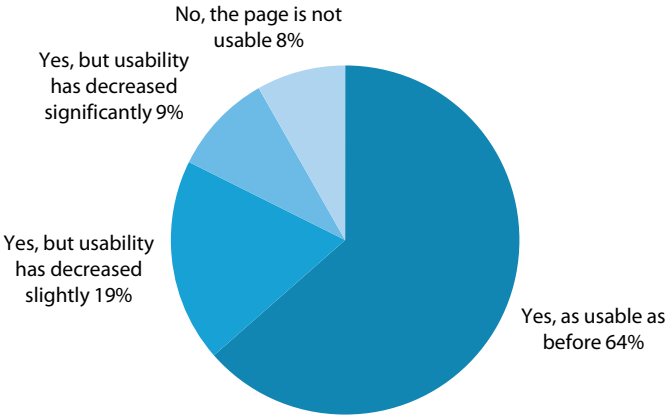
When the font size did increase, the websites' front pages were equally usable in 64% of instances. In 18% of cases usability decreased slightly, and in an additional 11% it decreased significantly. Seven percent of the front pages became unusable following the font size increase.[54]

[54] Again, these proportions almost mirror the findings for the sample of comparison websites. The front pages of the comparison websites were as usable as before in 63% of cases, slightly less usable in 25% of cases, significantly less usable in 6% of cases and unusable in another 6%.

The attempted font size increases on a key information page of each website resulted in highly similar findings (next figure).

Figure 89. *Is the other key information page of the website usable with larger font size?*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 46. (N=85)
Note: Only includes those websites for which the other key information page font size could be increased.



Following increases in the displayed font size, the key information pages remained equally usable in 64% of cases. However, they became slightly less usable in 19% of cases and significantly less usable in 9% of cases. In 8% of trials they became entirely unusable.

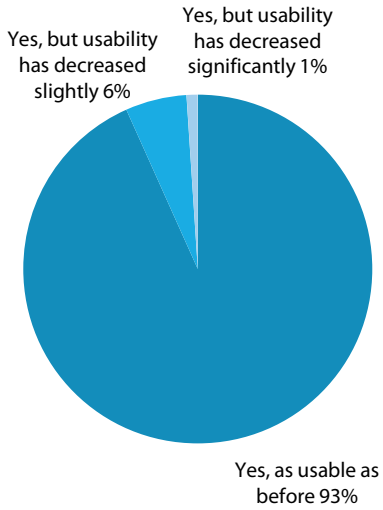
Some websites offer the possibility to increase the size of the font they display by clicking on a link or icon (making it unnecessary to change browser settings). Mystery shoppers searched for this functionality on the retailer, automobile club and public authority websites, and found it on 20 of the 203 websites (10%).

Conversions to grey scale

In the second set of accessibility tests, mystery shoppers converted both the front page and a key information page of each website to grey scale.

Figure 90. *Is the front page usable in grey scale (i.e. is the contrast between different elements adequate)?*

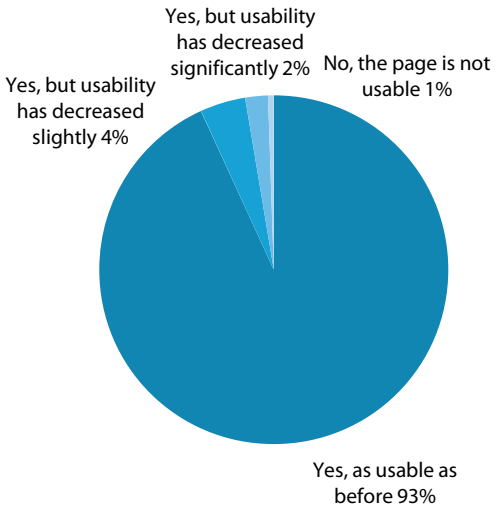
Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 47. (N=203)
Note: Figure only includes instances in which page could be converted to grey scale.



Following the grey scale conversion, 93% of the front pages were equally usable, according to mystery shoppers, and none of the pages became unusable. Only in 6% of the trials did usability decrease slightly; in 1% (2 cases) it decreased significantly.

Figure 91. *Is the other key information page usable in grey scale (i.e. is the contrast between different elements adequate)?*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 48. (N=203)
Note: Figure only includes instances in which page could be converted to grey scale.



When performed on a key information page, the results of the grey scale test were almost identical: 93% of the pages were as usable as before, 4% became slightly less usable; the usability of 2% decreased significantly and 1% (1 page) became unusable.

2.4.7 Summary assessment of the websites

After exploring and testing the retailer, automobile club and public authority websites in their country for contact information, functionality / services, provision of information on different aspects of vehicle fuels and accessibility, mystery shoppers provided summary assessments which are discussed in this sub-section. As mystery shoppers were asked to provide thorough commentary substantiating their assessments, the discussions below utilise some of their comments to highlight examples of good practice, as well as aspects of the websites that mystery shoppers found problematic.

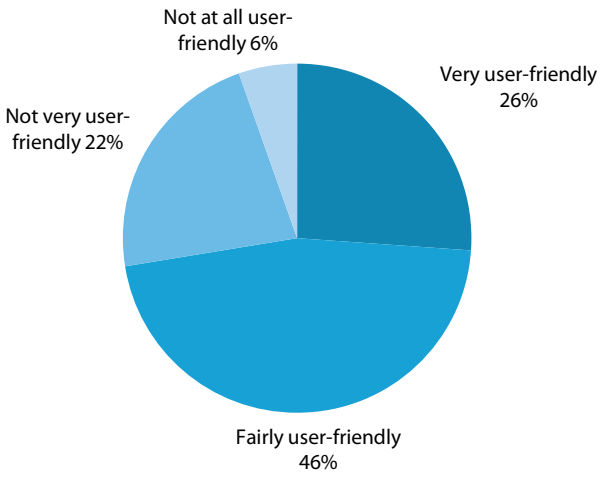
This sub-section also again presents the results of the summary assessment questions, but separates them into two categories according to website type. Each bar graph provides percentages for: (1) the retailer websites;[55] and (2) the public authority and automobile club.[56] This categorisation is the same one used previously in the information provision tables (Section 2.4.4).

User-friendliness

In response to the first assessment questions, the mystery shoppers rated the user-friendliness of each website.

Figure 92. *User-friendliness of the websites*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 50. (N=203)



As seen in the figure directly above, 26% of the websites were deemed very user-friendly by the mystery shoppers, while nearly one half (46%) were considered fairly user friendly. Only 6% were regarded as not at all user friendly, but more than one in five (22%) were assessed as not very user-friendly.

[55] The total sample size for the retailer websites is 145 (29 countries and 5 websites per country).

[56] The total sample size for the automobile club and public authority websites is 58 (2 websites per country).

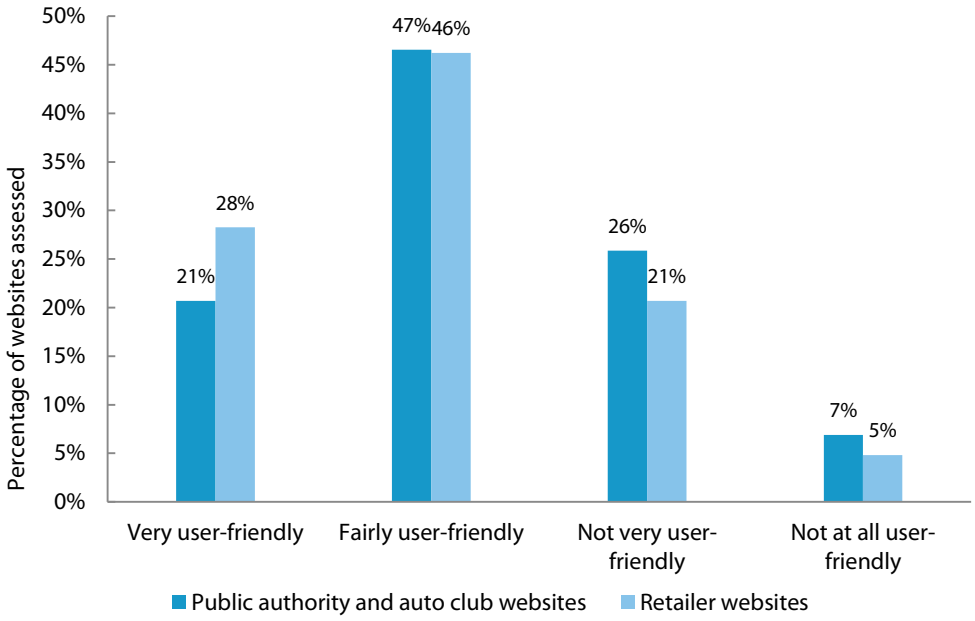
These figures bear a close resemblance to the assessment of the comparison websites' user-friendliness. A smaller proportion of the retailer, automobile club and public authority websites were regarded as very user-friendly (26% compared to 34%) by mystery shoppers, but the proportions for the three other ratings are all within 4% of each other.

Comparative assessment of user-friendliness

In terms of their user-friendliness, the retailer websites were rated slightly better than the public authority and automobile club websites.

Figure 93. *User-friendliness of the websites – comparative analysis*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 50. (N=203)



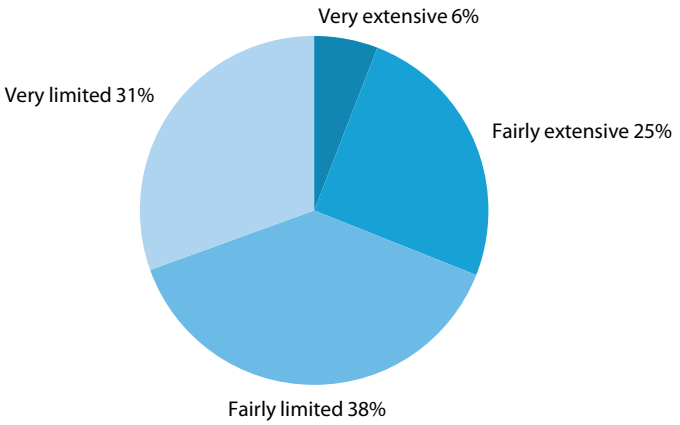
Among the former group of websites, 28% were rated as very user-friendly, while this was true for 21% of the public authority and automobile club websites. Equal proportions (47% and 46%, respectively) of the websites in each group were assessed as fairly user-friendly, but the public authority and automobile club websites were rated not very user-friendly (26% to 21%) and not at all user-friendly (7% to 5%) at a higher rate.

Extent and quality of provided information

Next, the mystery shoppers assessed both the extent of information provided on the websites as well as the quality of that information.

Figure 94. *Extent of the provision of information on the researched aspects of the market*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 51. (N=203)



Information provision was regarded as very extensive on only 12 of the 203 websites (6%). On one quarter (25%) it was assessed as fairly extensive. In total, then, information provision on more than two thirds of the websites was considered fairly (38%) or very limited (31%).

Consideration of mystery shoppers' open-ended written responses to this question provides insight into what was considered very extensive information provision. One mystery shopper gave the highest possible rating to an automobile association website in part because it contained lots of information on both fuel types and their prices. Another automobile club website, also assessed as excellent on this criterion, provided information on additives, how-to-videos, a listing of fuel types in Europe, details on biofuel and special fuel types (including LPG / Autogas), and notes on credit card fees, among other items. A third automobile association website was regarded as providing very extensive information due to its thorough sections explaining fuel types and how the vehicle's usage properties differ based on the various fuel technologies. It also offered guidelines and case studies on topics such as the choice of a vehicle.

Turning to the retailer websites, we can see that they were often deemed to provide extensive information when they offered in-depth information on fuel types. For example, one retailer's website was positively assessed because it described all of the fuel types sold by that company. This was also the case for a retailer website in another country, which provided extensive information on petrol and diesel fuels, as well as LPG. The mystery shopper for this country found particularly striking the "extensive information on the functioning and history of the different fuel types".

Similarly, a retailer website in a third country offered a large amount of information about fuel prices, as well as their chemical and technical characteristics and impact on the environment. An actual price list and clear information about fuel quality was deemed helpful on another retailer website in the same country, while the mystery

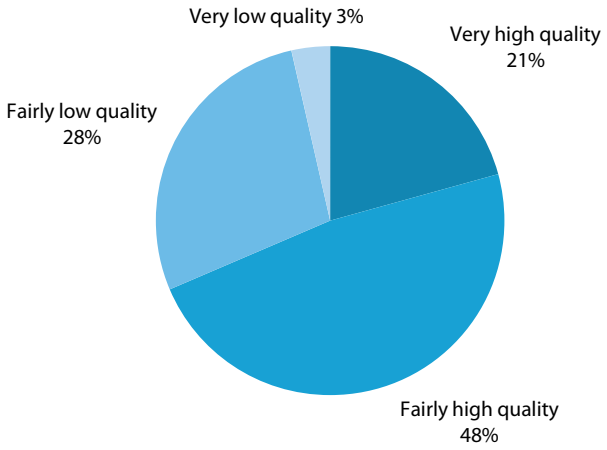
shopper for another country was impressed by technical files containing extensive information for every kind of fuel. A substantial amount of understandable information regarding alternative fuels, led to a positive assessment of a Scandinavian retailer website, and elsewhere, a retailer was rated highly for providing in-depth information that was both easy to understand and substantiated by technical data.

Notably, none of the public authority websites provided very extensive information on the vehicle fuels market, according to the mystery shoppers.[57]

The next figure displays mystery shoppers' assessments of the quality of information they found on these websites.

Figure 95. *Overall quality level of the provided information*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 52. (N=140)
Note: Excludes websites which were assessed as only providing 'very limited' information.



Where information was provided, it was generally considered to be of fairly (48%) or very high (21%) quality. On just 3% of the websites was the information of very low quality overall, though more than 1 in 4 of the websites (28%) provided what mystery shoppers deemed fairly low quality information.

Judging from comments written by mystery shoppers, ratings of 'very low quality' were applied to at least a couple of retailer websites because they contained statements which, despite being clear, were seen as too brief or superficial. In a similar comment, a mystery shopper reported that on one retailer's website "Most of the information reads like a brochure, and [is] intended to promote the company's image ... with very little information value".

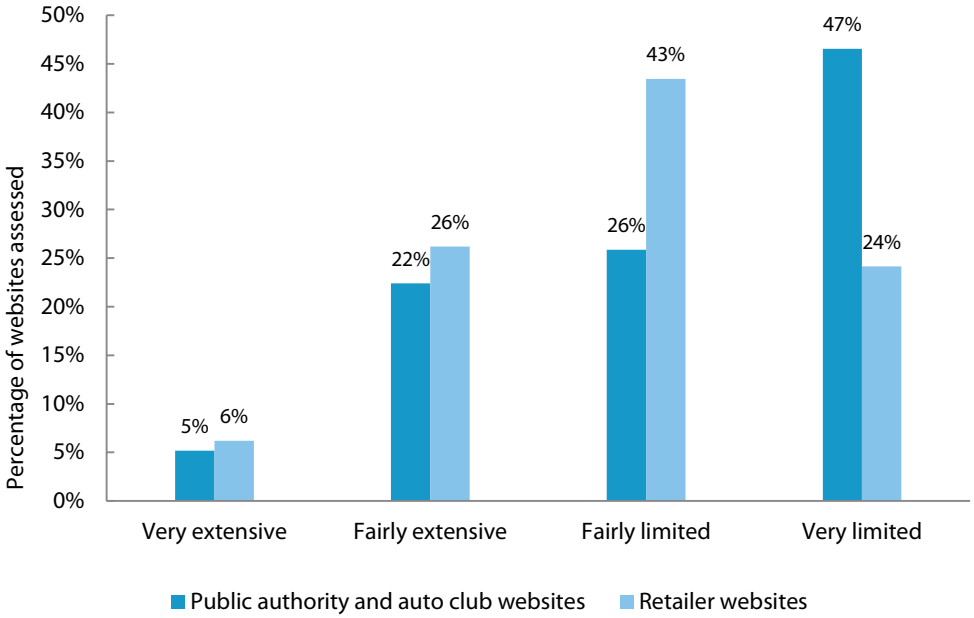
[57] This finding may result in part from cases in which mystery shoppers found multiple public authority websites which presented information on different aspects of the market. Because they had to choose only one to assess, this situation often resulted in the finding that many market aspects were left unaddressed by the chosen governmental website.

Comparative assessment of extent and quality of provided information

With respect to the amount of relevant information provided, the retailer websites were assessed more positively than the public authority and automobile club websites.

Figure 96. *Extent of the provision of information on the researched aspects of the market – comparative analysis*

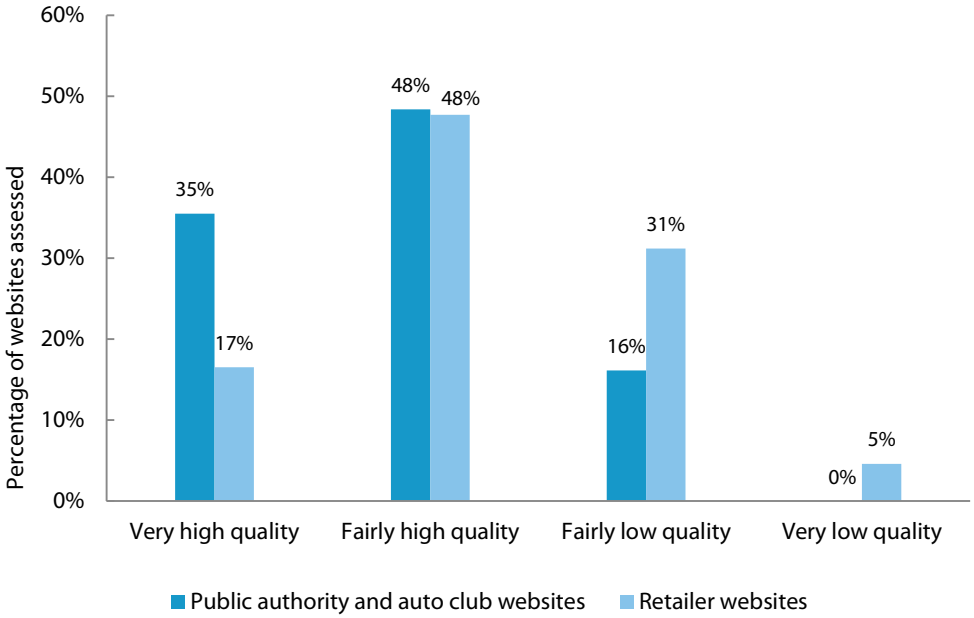
Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 51. (N=203)



Thirty-two percent of the retailer websites were considered to provide extensive information on the different market aspects that were researched, while 27% of the public authority and automobile club websites received this grade. The overall proportions of fairly or very limited assessments applied to each group of websites were similar (73% for the automobile club and public authority websites against 67% for the retailer websites); however, the public authority and automobile club websites received a much higher proportion of the lowest rating (47% compared to 24%).

Figure 97. *Overall quality level of the provided information – comparative analysis*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 52. (N=140)
Note: Excludes websites which were assessed as only providing 'very limited' information.



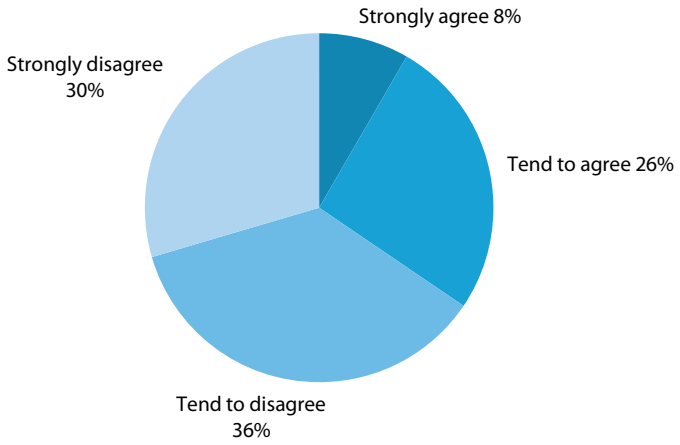
The picture changes when we consider the quality of information provision. Here the public authority and automobile club websites performed comparatively well. Thirty-five percent of public authority and automobile club websites were considered to provide very high quality information against 17% of the retailer websites. Forty-eight percent of websites in both groups were deemed to provide fairly high quality information, leaving a much higher proportion of retailer websites (36% to 16%) to be assessed as providing fairly or very low quality information.

Assessment of overall usefulness

The final assessment question solicited an overall assessment of the potential usefulness of these websites as decision-making tools for consumers.

Figure 98. *Mystery shoppers' level of agreement with the following statement: "I found this website to be useful in allowing me to make an informed choice".*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 53. (N=203)



Mystery shoppers agreed with the statement "I found this website to be useful in allowing me to make an informed choice" for only 8% of the retailer, automobile club and public authority websites. They tended to agree with the statement for an additional 26% of the websites; however, they regarded two thirds of the websites (66%) as not meeting this standard.

The proportion of positive ratings (34%) falls far short of the 70% of comparison websites that were equivalently assessed, and, likewise, the proportion of negative ratings (66%) is more than double that found for the comparison websites (30%).

For an automobile association website to receive a very positive rating regarding its ability to inform decision-making it evidently helped if the website underlined claims about fuel types with facts, provided external links to further research and generally presented a large amount of clear and relevant information targeted at consumers and small businesses making fuel-related choices. In addition, a mystery shopper for a Scandinavian country appreciated the rich amount of information provided; the provision of information on multiple topics (in addition to the one that was searched for); and the clear structuring of the website.

Characteristics and features of the retailer websites most positively assessed in terms of their ability to inform consumers included:

- Clear coverage of the basics, i.e. fuel types and prices;
- Nearly comprehensive and unambiguous presentation of relevant information;

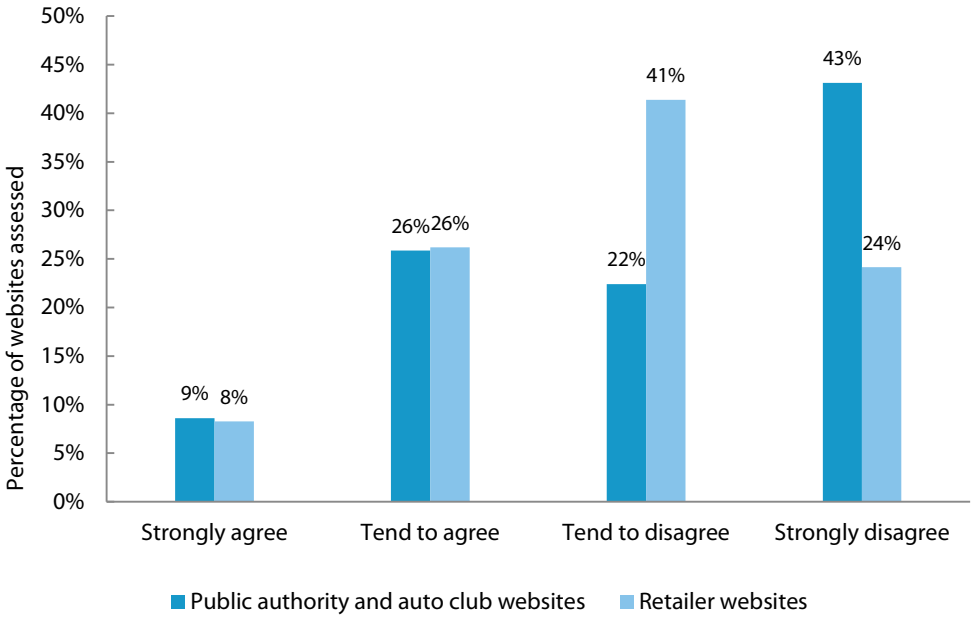
- The possibility to address a question directly to the company in the 'consultancy section';
- Inclusion, in addition to the typical fuel-related topics, of information on ethical questions and corporate social responsibility to society;
- Descriptions of all fuel products, as well as their prices and relative quality;
- Detailed information and / or test results concerning the difference(s) between the company's regular and premium petrol types;
- Communication of certain information through pictures and videos.

Comparative assessment of overall usefulness

In terms of their overall usefulness in contributing to informed decision-making in the vehicle fuels market, the two groups of websites were assessed almost equally by mystery shoppers.

Figure 99. *Mystery shoppers' level of agreement with the following statement: "I found this website to be useful in allowing me to make an informed choice". – comparative analysis*

Source: Civic Consulting evaluation of retailer, automobile club and public authority websites, Question 53. (N=203)



As is visible in the preceding figure, the positive ratings of 'strongly agree' and 'tend to agree' were applied to both the retailer websites and the public authority / automobile club websites with the same frequency. The overall proportion of websites in each group that received assessments of 'tend to disagree' or 'strongly disagree' on this criterion are identical (65%), with the only difference being that a higher proportion of the public authority and automobile club websites received the lowest possible rating of 'strongly disagree' (43% compared to 24%).

Potential improvements

As with their evaluations of comparison websites, mystery shoppers were asked – at the conclusion of the retailer, public authority and automobile club questionnaire – to note down what information and / or functionality was missing from each website. While these comments arguably reflect both objectively 'missing' information or functionality and mystery shoppers' subjective expectations, several items were mentioned by multiple mystery shoppers, including:

- Better information on different fuel types;
- More price information;
- More reporting of fuel quality norms or comparison (test) results;
- Clearer explanations of environmental issues;
- More details about specific brands and / or stations;
- More information on redress mechanisms;
- More help selecting correct fuel type;
- Better accessibility or more information for vulnerable consumer groups.

Some mystery shoppers recorded other potential improvements such as adding information and resources related to co-driving, offering driving advice, presenting key data in a graphical format, increasing clarity on which public institutions are responsible for different aspects of the market, improving search possibilities, designing websites with the user experience in mind and ensuring that explanations can be widely understood.

In three countries the mystery shopper reported being unable to find a public authority website that contained relevant information. In one other case, information was regarded as "totally insufficient", and in another instance, a mystery shopper remarked that a public website which gathered all of the information on vehicle fuels in one place would be helpful.

2.5 FOCUS GROUP SUMMARY

At the end of the mystery shopping exercise, three separate focus group discussions were conducted with distinct groups of mystery shoppers. The discussions focused on the participants' experiences with the different components of the mystery shopping exercise. In guiding the discussions, the moderators followed a list of pre-determined questions covering each of the main activities that mystery shoppers had undertaken. The discussions lasted about 120 minutes apiece, and this section summarises the key themes and conclusions that emerged.

2.5.1 Experience in assessing labelling at petrol stations

At the start of the focus group discussions, mystery shoppers were asked to recall their experience in assessing photographs of 25 roadside billboards (for the amount and clarity of information provided) and 25 cases of fuel labelling at the pump (for how easy or difficult the labelling made it to identify regular petrol 95 and regular diesel fuel).[58] The aim of that exercise had been to develop an understanding of the extent to which price displays and fuel labelling at petrol stations contribute to consumers' decision-making ability (results of the labelling assessment exercise are presented earlier).

Mystery shoppers broadly agreed that the petrol stations whose labelling practices had tended to be clearest were those which utilised certain colour codes, e.g. green for petrol and black for diesel, to differentiate fuel types. Additionally, for petrol variants, the labels at the best-assessed stations had tended to clearly display the research octane number (RON, hereafter 'octane number'), e.g. 95 or 98.

Mystery shoppers noted that when they had evaluated labelling more negatively, it had been partly due to the use of terms specific to the primary languages of the countries in which stations were located. Of course, the mystery shoppers had consistently acted as cross-border consumers, attempting to identify regular petrol 95 and diesel fuel in languages not native to them,[59] but the focus group discussions made clear that this process had been more difficult for the samples of petrol stations located in some countries than others. One specific example cited by some mystery shoppers as having contributed to unclear labelling of diesel fuel was use of the term '*gasoil*' or '*gazole*' instead of the more common, 'diesel'.

It emerged during the discussions that the commonly used terms for petrol types in certain countries had also led to some misunderstandings. In particular, the term

[58] The photographs were selected from the sample of pictures taken during the petrol station visits, which were undertaken in the capital cities of six Member States (Czech Republic, Germany, France, Italy, Romania and Finland) in early to mid-November 2012.

[59] In the limited number of cases in which mystery shoppers were presented with a photograph of a billboard or labelling at the pump from the country for which they were serving as the mystery shopper, they were instructed to largely allow the other two group members to determine the rating for that billboard or pump. This instruction was given to prevent the mystery shoppers for the Czech Republic, Germany, France, Italy, Romania, Finland heavily influencing the ratings of billboards and pumps in those countries.

'super', commonly used to identify regular petrol 95 in Germany, had been confusing for non-residents of that country, as 'super' often refers to premium fuel variants in other countries. Mystery shoppers also reported that they had found it confusing when different colour codes had been used to indicate the same fuel type at various stations in the sample.

However, a majority of the mystery shoppers indicated in the focus groups that they had been able to distinguish regular and premium fuels by the price difference between them (because they had known that premium fuels were more expensive). Moreover, while the mystery shoppers agreed that it might be possible for consumers to initially be confused when trying to distinguish between petrol and diesel fuel, they thought that mis-fuelling would be unlikely as long as sufficient attention were paid to the fuel type selection.

In terms of improving fuel labelling at the pump, broad consensus emerged in the focus groups on the use of an international colour-coding scheme and the inclusion of the octane number next to the name of the fuel. As for billboards at the road, the need for large and clear numbers was commonly mentioned, as was a desire to see advertisements on the billboards minimised or removed.

2.5.2 Experience with websites of vehicle fuel retailers, automobile clubs and public authorities

In the next part of the discussions, the mystery shoppers were asked to review their experience in assessing the websites of vehicle fuel retailers, automobile associations / clubs and public authorities. The primary aim of these website assessments had been to evaluate the provision and clarity of information on key market aspects, as well as the overall user-friendliness and contribution to informed decision-making offered by the websites.

Vehicle fuel retailer websites

In the discussions, mystery shoppers generally agreed that the websites of leading vehicle fuel retailers had provided scarce information on fuel types, their quality and their compatibility with different vehicle models. The information had generally been of an advertising nature, stated mystery shoppers, and thus geared toward the sale of the retailers' products. The websites of brands with smaller market shares and independent retailers had also generally not provided helpful information, according to the mystery shoppers. Other retailer websites had reportedly provided an overload of information, only part of which had been deemed useful.

Automobile club websites

Regarding the automobile club websites, the mystery shoppers mostly reported that they had not found them particularly helpful, in part because they had sometimes

provided out-of-date information. Where information had been found it had mostly concerned travelling, cars or driving advice, e.g. 'rules of the road'. Nonetheless, examples of automobile club websites with thorough information provision were reported by some mystery shoppers. These websites had provided information on almost all aspects for which the mystery shoppers had been asked to search, though one of them had required a membership to access all of its content and the somewhat unclear navigation structures on the other two had necessitated use of their search functions.

Public authority websites

Mystery shoppers participating in the focus groups broadly agreed on how difficult it had been to find a public authority website that addressed all of the market aspects included in the evaluation questionnaire. Often, they noted, information had been split among the websites of several different public authorities. In some cases, for instance, the websites of environmental ministries had predominantly focused on environmental aspects of the vehicle fuels market, whereas the competition authority websites had concentrated on fuel prices. Still, the mystery shoppers for a few countries reported that they considered the public authority websites they had evaluated to be particularly thorough. The mystery shopper for one of these countries highlighted the public authority website she had assessed, because it had presented complete information and backed it up with scientific research. It had also provided downloadable documents for more background information.

Summary of findings

In discussing their overall assessments of the websites they had evaluated, mystery shoppers established a consensus on the general insufficiency of information. First, they reported, information on fuel types had usually been limited. Second, detailed price information had been scarce – in most cases consisting of only general information on the development of prices. Noted exceptions included some websites in those countries where fuel prices are subject to regulation which had listed specific prices. Third, most of the retailer, automobile club and public authority websites had provided only generic statements about the environmental impacts of vehicle fuels and their sustainability. Fourth, only some of the websites had offered clear information on fuel-vehicle compatibility. For example, the mystery shoppers for three countries stated that they had found a list of engine types classified by their compatibility with different fuel types.

Nonetheless, mystery shoppers noted that they had given positive overall assessments to several websites which had stood out for their provision of thorough information on a range of market aspects.

Overall, the aspects of these websites most often criticised during the focus groups were a general lack of relevant information, as well as the inclusion of insufficient

details on pricing, difference(s) between regular and premium fuel types and associated environmental issues. Some mystery shoppers had characterised the information provided on leading brand websites as a form of advertising, and it was noted in the focus group discussions that this could be misleading for some consumers.

Another potentially misleading practice was noted by a mystery shopper: the automobile club website she had assessed had marked some petrol stations as 'advantage partners'. This, she said, could suggest the possibility of a price discount to consumers, even though the indication had only referred to a special agreement between those stations and the automobile club.

Few technical problems with the websites were reported in the focus group discussions; however, the mystery shoppers did note that the websites had primarily been designed for the residents of one country, which could limit their relevance for cross-border fuel purchasers. Several exceptions emerged, however. For example, one mystery shopper reported that on a retailer website she had assessed, consumers would actually need to select English in order to locate detailed information about the brand. Also, mystery shoppers from several less populous Member States remarked that they had generally been able to switch the websites' interface language to English; most exceptionally, the mystery shopper for a Scandinavian country had been able to switch the selected public authority website between a multitude of different languages.

In the focus groups, mystery shoppers broadly agreed that to improve, the websites needed to provide more information on the vehicle fuels market. In general, the retailer websites needed to become more consumer-oriented, suggested the mystery shoppers. More specifically, the basic terms one needs to know in order to arrive at an understanding of the market should be listed and explained, and the search functions should be re-configured, because on most websites they had lacked user-friendliness and accuracy. Moreover, many of the mystery shoppers suggested that websites should provide a chart displaying all applicable fuel types and their prices. Others suggested that a European-level body be created in order to provide objective comparisons of the various fuel types and their prices. Retailer websites could then be required to link to that independent body's website.

2.5.3 Experience with comparison websites

The focus group discussions next turned to mystery shoppers' experience in assessing and collecting prices from websites that compare the prices of vehicle fuels. This part of the discussions focused on the effectiveness these tools had displayed in their main function of comparing prices, as well as their overall user-friendliness, market coverage and contribution to informed decision-making.

Mystery shoppers reported that they had given mixed overall assessments to the comparison websites. In general, though, they had found the websites easy to use and helpful. A majority of the websites had utilised user-generated price data, meaning that individual consumers and / or petrol stations could input price observations. Some mystery shoppers identified a potential weakness associated with this crowd sourcing: the percentage of existing stations included in such a website's database, as well as the frequency of its price updates, depends on how many users it has and how actively they observe and report prices.

The mystery shoppers for two southern European countries noted that they had found the publicly-run comparison websites in their countries useful, though they also noted that these websites' task had been eased by the regulatory obligation in those countries for stations to notify their prices to the relevant public authority.

In contrast, some mystery shoppers reported limited geographical and / or petrol station coverage on comparison websites they had evaluated. For example, some mentioned that they had only been able to search for prices in the capital city or that the list of petrol stations had been clearly incomplete. In such cases, the mystery shoppers explained, they had not regarded the search functions as satisfactory. Generally, though, mystery shoppers indicated that they had found it possible to search both by fuel type and location.

Mystery shoppers reported that they had generally found it possible to identify the lowest price, as well as the address of the petrol station selling fuel at that price, on the comparison websites. Additionally, on most of the websites, the date on which the price had last been updated could be found next to or beneath the price. Some mystery shoppers explained that the more common fuel types, e.g. regular petrol 95 and regular diesel fuel, had appeared to benefit from more regular updates than the less common ones. The mystery shopper for one country reported that he had evaluated a website that was being updated every 5 to 10 minutes, and the mystery shopper for another noted that one of the websites she had reviewed deleted prices after two or three days, as they were then considered obsolete.

Mystery shoppers agreed that the comparison websites' business practices had often gone un- or unclearly explained, with the notable exception of the publicly-financed websites. Accreditation schemes, trustmarks and codes of conduct had essentially been absent among the sample of comparison websites.

Mystery shoppers noted in the discussions that they generally had not experienced technical problems while using the comparison websites, though the mystery shopper for one country did report such a technical problem: the search list had switched back and forth between petrol and diesel fuel without her input.

Website accessibility, which had been assessed through the font size and grey scale tests, was generally regarded by the mystery shoppers as sufficient. However, one

mystery shopper reported that when he had applied the grey scale test to one comparison website, it suggested the invisibility of an important function to sight-impaired users. Mystery shoppers reported that it had generally not been possible to switch the comparison websites to another language, largely limiting their usage to specific national markets.

One suggested improvement to several comparison websites was wider market coverage, both with respect to the coverage of regions and retailer brands / petrol stations. It was also broadly agreed that comparison websites for the vehicle fuels market should return the cheapest as well as the nearest station selling the searched-for fuel type. Additionally, some of the mystery shoppers noted that more frequent updating of price observations was needed, while the integration of new or improved mapping functions was another potential improvement cited during the discussions. Also, as many of the comparison websites had not provided detailed information about the petrol stations, e. g. their opening hours or services provided, some mystery shoppers thought it would be helpful for the websites to include such information. Finally, one mystery shopper suggested the inclusion of a graph showing price developments throughout the week so that price cycles could be easily identified.

2.5.4 Best practice examples and recommendations

During the concluding phase of the focus group discussions, mystery shoppers were asked to comment on how their understanding of the vehicle fuels market had changed as a result of the mystery shopping exercise. They were also requested to identify any websites or labelling practices that they recalled as particularly good, or, conversely, any problems they had encountered that might require urgent changes in order to improve consumers' ability to identify fuel types, compare prices and make informed choices.

Overall, mystery shoppers noted that their general understanding of the various fuel types had improved during the course of the exercise. They reported feeling especially informed about newer fuel types, for instance, biodiesel and E10 fuel. However, focus group participants noted that this increased knowledge of certain fuel types had generally not been acquired on the websites they assessed, but through complementary research conducted in parallel to the exercise (e.g. by visiting Wikipedia and other online information sources). Accordingly, one mystery shopper noted that, in his opinion, consumers need more help in this market, and that more transparency is also required.

Mystery shoppers also tended to report that their understanding of price variations had improved. Moreover, many indicated that the exercise had raised their awareness of the branding associated with premium fuels: most of the mystery shoppers noted that they had not previously understood the rationale behind the terms attached to premium fuels.

Several potential best practice examples were mentioned during the focus group discussions:

- The mystery shoppers generally agreed that the billboard and fuel labelling practices depicted in the photographs of a sample of petrol stations from Finland had been the clearest among the selection of petrol stations surveyed during the labelling assessment exercise;
- Mystery shoppers for Belgium, France and Finland indicated that the public authority websites they had evaluated were particularly informative;[60]
- Regarding the automobile club websites, mystery shoppers for Germany, the Netherlands and Austria all reported informative websites that had covered a wide range of market topics, including fuel types and prices;[61]
- Finally, the mystery shoppers for Greece, Portugal and the United Kingdom emphasised the user-friendliness and accuracy of comparison websites they had used.[62]

Mystery shoppers' comments in the focus groups suggested that the key problems they had encountered were a general lack of relevant information and hard facts, as well as difficulty in distinguishing fuel types. In associated comments, mystery shoppers noted that textual information on the websites of both retailers and public authorities could benefit from simplification to make it more accessible to the average consumer. Similarly, some mystery shoppers mentioned that information could often be presented more clearly in graphical format.

Notably, there was broad agreement within the focus groups that an EU-wide colour-coding scheme would constitute an improvement to the clarity of billboards and

[60] The public authority websites evaluated in France and Finland both received unanimously positive ratings on the four summary assessment criteria; the website assessed for Belgium received a mildly negative rating on its user-friendliness, but positive ratings otherwise, including the top rating on its overall usefulness in allowing an informed choice. Aside from these three websites mentioned during the focus group discussions, it is notable that public authority websites in Estonia, Spain, Ireland, the Netherlands and Norway all received positive ratings on each of the four summary assessment criteria, and the governmental website evaluated in Italy received such a rating on three out of the four criteria.

[61] The automobile club websites in the Netherlands and Austria both received positive ratings on all four of the summary assessment criteria, and the evaluated automobile club website in Germany received the highest possible rating on each of these criteria. In addition to these three websites, which were specifically mentioned during the focus group discussions, automobile club websites in Denmark, Italy, Finland and the United Kingdom also received positive ratings on each of the four summary assessment criteria, with those in Denmark and Finland receiving perfect or near-perfect assessments.

[62] Two of the three comparison websites evaluated in Greece received near-perfect summary assessment ratings. In fact, one of these websites received the highest possible rating on each of the six criteria; the other received the top rating on five of the six criteria, with the lone exception originating in somewhat unclear dating of its price observations. The third comparison website evaluated for the Greek market also received positive ratings on five of the six assessment criteria, but the mystery shopper tended to disagree that it was useful in allowing an informed choice because it only covered one fuel type in the capital city. Both comparison websites assessed for the Portuguese market received positive ratings on each of the six assessment criteria. Similarly, the one comparison website evaluated for the United Kingdom received the top rating on four of the six assessment criteria, and a positive rating on the other two. While these comparison websites are cited here because they were explicitly mentioned during the focus group discussions, it is important to note that comparison websites for several other countries received the highest possible rating on the final assessment criterion ("I found this CW to be useful in allow me to make an informed choice"). This applies to one or more of the comparison websites evaluated for Germany, Denmark, Spain, France, Italy, Cyprus, the Netherlands, Austria and Slovakia.

labelling at the pump. Moreover, it could be made a requirement that the octane number always appear on petrol labels.

Mystery shoppers consistently reported that hard facts, especially regarding the differences between fuel types, had been scarce, so it was not surprising when the suggestion to establish an independent body specialised in objectively informing consumers about fuel types emerged during the discussions.

Finally, and based in part on the experiences reported by those mystery shoppers who had conducted the exercise for countries in which this was already a regulatory requirement, some mystery shoppers suggested that legal rules be established obliging petrol stations to regularly report their prices to a public authority, which, in turn, could operate an effective price comparison website.