



Public consultation on the Evaluation and Revision of the Action Plan for Energy efficiency, COM(2006)545

ETRMA contribution

30 July 2009

1- General questions

Question 1.1. The Action Plan for Energy Efficiency of 2006 identified 6 key areas and proposed 10 priority actions (out of a total of 85 actions and measures). Which of the actions and measures of the 2006 EEAP should be continued / redefined / discontinued, and why? (Max. 4000 characters) **optional**

As a general remark, ETRMA wishes to stress that with regards to tyres, the safety parameter cannot be dissociated from the environmental performances. For this reason, both performances will be equally considered in the replies to this consultation.

The Action Plan for Energy Efficiency of 2006 identified a series of tyre-related measures, i.e. lower tyre rolling resistance, compulsory fitting of tyre pressure monitoring systems (TPMS), and labeling scheme for tyres, which have all been considered in the following regulations: general safety of motor vehicles (COM(2008)316) and labeling of tyres with respect to fuel efficiency and other essential parameters (COM(2009)348).

Europe is ahead in tyre technology and fuel efficiency versus the rest of the world. The regulation requires reductions in tyre rolling resistance levels. Lower rolling resistant tyres, together with tyre pressure monitoring systems fitted as standard equipment to the vehicles on the European roads will contribute to reducing fuel consumption, saving 5 to 7 million tonnes of CO₂ annually, or in other words, reducing CO₂ emissions by about 5 gm per kilometre driven. This shows the commitment of the tyre industry toward lowering CO₂ emissions.

For the first time, by setting lower rolling resistance requirements also for truck tyres (COM(2008)316 and COM(2009)348), the EU is anticipating CO₂ provisions beyond the current European automotive policy targets, which only foresee minimum mandatory requirements for passenger vehicles.

2- Specific questions

Question 2.2 Sustainable transport and energy consumption of cars is currently addressed in the Greening transport package (COM(2008)433), the Regulation on Emission performance standards for new passenger cars (COM(2007)0856), the proposed Directive on labeling of tyres (COM(2008)0779), the proposal on greening car taxation (COM(2005)261) and the Green Cars initiative. The Commission is also working on a proposal on light commercial vehicles and a revision of CO₂/cars labelling.

Do you consider that additional measures at EU level need to be undertaken? **Compulsory**

In your view what should these measures be? (Max. 4000 characters) **optional**



The tyre-related measures identified in the Action Plan for Energy Efficiency to improve vehicle energy efficiency, i.e. lower tyre rolling resistance, compulsory fitting of tyre pressure monitoring systems (TPMS), labeling scheme for tyres, have been proposed, as announced, in two respective legislations, i.e. new type-approval requirements for the general safety of motor vehicles (COM(2008)316) and labeling of tyres with respect to fuel efficiency and other parameters (COM(2009)348).

The following complementary initiatives could significantly contribute to enhancing the benefits of these regulations:

a) **Mandatory fitting of accurate TPMS on commercial vehicles**

The measure will help consumers save money in fuel and tyre costs, and help optimize vehicle safety.

b) **Mandatory installation and proper maintenance of accurate and reliable air pump and tyre pressure gauges**, with 'free of charge' access to consumers, at the 110 000 petrol stations located into Europe which serve millions of customers a day¹;

Besides energy benefits, driving with tyres at the right pressure is the most important tyre safety parameter. Indeed a properly inflated tyre holds the load, adheres to the road, produces less noise and as already stated consumes less fuel. Consequently there are obvious and fundamental energy efficiency AND safety benefits to render mandatory the installation of devices checking tyre pressure and air pump filling in at petrol stations.

c) **Mandatory road infrastructure improvements** at national level to reduce rolling resistance level and respecting the necessary balance between safety/grip, noise and fuel efficiency.

2.4. Lack of access to appropriate financing is an important bottleneck for making a real step forward in our ambitions on energy saving. Innovative financing instruments are now being developed by institutions such as EIB, EBRD, national promotional banks and private banks in particular in association with the Covenant of Majors initiative. Demonstration projects of the application of energy efficient technologies in a competitive manner, e.g. 'smart cities', could also be considered. Do you think other financing measures at EU level are needed? (compulsory)

Yes

No

No opinion

Independently from financing instruments developed by European institutions, industry recommends that the European Commission takes necessary actions to ensure that any measures put in place at national level are harmonized to avoid distortion of internal market functioning. Concretely fiscal incentives at national level should be granted to products for which safety is primordial such as tyres only if energy efficiency and safety are both

¹ National Oil Industry Associations (NOIA), 2007



considered. (For products like tyres, any other performance criterion is complementary to safety).

Energy efficiency should be actively stimulated also through the financial instruments of the EU regional policy.

Question 2.5. Well targeted fiscal incentives could be a driver for energy efficiency investments and innovation. The EU has already taken measures to make it easy for Member States to allow for more advantageous VAT rates for some labour-intensive services, such as renovation and repairing of private dwellings. Do you consider that additional measures at EU level need to be undertaken to shape consumer choices? (compulsory)



Yes



No



No opinion

In your view what these measures should be? (Max. 4000 characters) (optional)

Yes, the choices presented to consumers should gather the entire diversity of the products characteristics available on the market. As the cost of new articles to be purchased represents a key factor in the final consumer decision, and that new technologies are usually at higher costs, fiscal incentives could also be granted for tyres graded at least “C” both for fuel efficiency and wet grip. This would ensure respect for the integrated approach between fuel efficiency and safety of tyres. In practice, such measures could be part of green public procurement (by combining fuel efficiency and safety parameter) in a way for public authorities to demonstrate the importance of adopting energy efficient behaviours and in national incentives packages when buying a ‘green’ car.

Question 2.6. Education and training on energy efficiency are vital ingredient of a successful energy efficiency policy. These were already mentioned above regarding buildings but the challenge is much broader. Do you consider that measures/actions at EU level to catalyze training at school and university level should be undertaken? (compulsory)



Yes



No



No opinion

In your view what should these measures be as regards different target groups? (Max. 4000 characters) (optional)

Yes, some fundamental and simple behaviours leading to adoption of good reflexes should be taught as soon as possible to ensure that the new generation takes for granted the need of further developing energy efficient measures and road safety initiatives.

The industry is therefore supportive of actions that would be carried out at schools and universities to sensitize young people on adequate safety and energy efficient behaviours that could be adapted to their respective ages. Additionally the safety/ energy efficiency message would certainly go beyond schools/universities and be delivered to relatives that would significantly enlarge the audience.

With regards to tyre measures to be promoted, the industry is ready to build up a partnership with the European Commission through best practices to raise and demonstrate the safety and fuel efficiency benefits brought by an eco-driving attitude. This includes the regular maintenance and checking of tyre pressure of all type of vehicles, i.e. cars but also cyclo and motorcycles, which are largely used by young people.



As a matter of fact, proper tyre inflation helps increase fuel efficiency thereby reducing greenhouse gas emissions. On the one hand, under-inflated tyres can increase fuel consumption by up to 4%², as they require extra energy to roll. Independent industry surveys across EU indicate that around 64% of European cars have permanent under-inflated tyres, therefore regular checking of tyre pressure should become a normal driving behaviour. On the one hand, maintaining tyre pressure is a small line item in one's busy daily routine, but it adds up to a potentially significant environmental consequence. On the other hand, having tyres properly inflated contributes positively to the safety of the car and of its occupants.

Additionally, the tyre industry would recommend that EU lays down in the driving licence programme a compulsory part on tyre safety and rolling resistance.

Question 2.7. Awareness of final consumers on energy savings possibilities and their benefits is still low. This in particular concerns domestic consumers and SMEs. Some actions to target different groups are already undertaken at national and EU level. For example, the Sustainable Energy Europe Campaign is focusing on grouping social stakeholders and market actors to undertake joint action. Do you think that further communication action at EU level is needed? (compulsory)



Yes



No



No opinion

Which would be the content of such a communication strategy as regards each of the target groups concerned? (Max. 4000 characters) (optional)

Yes, a more active awareness campaign including concrete examples towards final consumers and focused on adequate behaviours and products of daily life should be developed by the European Commission. Depending on the area of sensitization, some particular groups of consumers could be identified.

To give examples from the tyre sector, more active awareness campaigns to consumers should include the upcoming EU tyre labeling scheme, and tyre maintenance/tyre pressure with regards to fuel consumption.

The campaigns could concentrate on how to identify best the most energy efficient products be they white goods or office equipment, for renovating/installing adequate heating, air conditioning or lighting in buildings, or for mobility purposes, including proper tyre maintenance, ...

Question 2.8. Furthermore, small and medium size companies (SMEs) are the backbone of EU's economy as they make up more than 99% of all firms and employ 67% of the EU's workforce but may need more support for implementing energy saving measures. Do you consider that specific measures to target SMEs are necessary? (compulsory)



Yes



No



No opinion

In your view what should these measures be? (Max. 4000 characters) (optional)

² EC Impact Assessment on a Proposal for a Regulation on type-approval requirements for the general safety of motor vehicles, SEC(2008)1908, of 23 May 2008



Yes, specific measures should be adopted to help SMEs having access to the latest technology at a limited cost. Having dedicated and balanced incentives for tyres equally ensuring safety and environmental benefits could encourage entrepreneurs to equip their companies' fleets with tyres at minimum graded "C" for fuel efficiency and wet grip. This financial assistance could also include the possibility for employers to provide funds for inciting employees to change when needed, the tyres on their own cars with tyres graded "C" and to deliver road safety message on proper driving behaviours.

Such measures would allow enlarging the number of people sensitized to the benefits of adopting energy efficient and road safe behaviours, which focus on energy efficiency and more road safety.

Question 2.9. Public sector should lead by providing best practice examples. Positive progresses have been made under the voluntary Green public procurement policy and the proposals for mandatory procurement of energy efficient products in the framework of the recast of the Energy Labelling Directive. The leading role of public authorities has also been emphasized under the recast of Energy Performance of Buildings Directive proposal. Do you consider that further actions at EU level should be undertaken? (compulsory)



Yes



No



No opinion

In your view what should these measures be? (Max. 4000 characters) **optional**

Yes, public authorities are expected to be leader in promoting as widely and broadly as possible, the right eco-friendly behaviours to be adopted, in a way to further influence citizens' attitudes and purchasing decisions. For these reasons, it is essential that public authorities publicly inform of the reasons having motivated the choices they made and especially in the frame of public procurement where specific request for more energy efficient products can be made.

Such promotion policy, when integrated with attention for safety of products, applies perfectly to what should be the public authorities approach regarding tyres. Indeed tyre being a key active safety product, which is designed and manufactured to ensure the maximum safety for the road users, it is also public authorities role to regularly alert drivers on the necessary precautionary behaviours and actions that any vehicle' owner has to perform to remain safe on the roads. The green public procurement should take into consideration the safety criteria for tyres expressed by *inter alia* the wet grip parameter.

The industry suggests qualitative criterion to be added in Road public orders (on noise level and Rolling Resistance) and in vehicles/tyres public purchase (on Wet Grip and Rolling Resistance).

The industry is ready to assist the European authorities to develop kind of 'good practices' that could encourage the replacing of worn out tyres with more performing tyres and to properly maintain tyre condition and pressure, which will result in more fuel efficient vehicles and safer roads.

Question 2.14. Measurement and verification of energy savings is essential aspect for monitoring the results of any measures introduced at national and EU level. Although some targeted measures are being implemented, do you consider that more systematic and harmonized approach at EU level is needed? (compulsory)



Yes



No



No opinion

In your view what should these measures be? (Max. 4000 characters) *optional*

Yes, the EU should develop harmonized measures allowing measurement and verification of the real energy savings realized with the new behaviours and products. This could further provide the support of consumers to a more energy-efficient society.

In this regard, the tyre industry is supportive of a common fuel saving calculator still to be developed, based on harmonized methodology taking into full consideration tyre essential parameters. The development of a harmonized method should be done in full cooperation with the tyre industry.

2.15. Energy efficiency should become a vector of international co-operation and a subject of international financing programmes, in particular regarding EU neighbouring countries. Do you agree with statement? *compulsory*



Yes



No



No opinion

In your view what should these measures be? (Max. 4000 characters) *optional*

Yes, EU actions should be promoted especially in neighboring countries to guarantee a maximum of continuity and results of the measures taken. However the effects of the EU actions will be marginal on the global scene if only the European region takes concrete and regulatory targets to generate energy savings. The international cooperation is therefore crucial for increased benefits.

In this respect, the adoption of an international agreement promoting energy efficiency targets and the development of internationally harmonized test methods could significantly help reaching such goal.

In addition, EU should promote its environmental Regulations with its international partners in order to favor a level playing field for European global players.

Additional compulsory questions of the Consultation

Question 2.3. The Eco-Design (2005/32/EC) and Energy Labelling (92/75/EEC) framework Directives are significant steps as regard to product policy. A number of implementing measures have been already or are soon to be adopted and the ongoing amendments of the two Directives provide for their more ambitious and wider application. Do you consider that additional measures can be taken forward in order to increase the impact of these instruments? *compulsory*



Yes



No



No opinion

In your view what should these measures be? (Max. 4000 characters) *optional*