

European Tyre Industry's contribution to a public consultation relating on Periodic Technical Inspections

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The European Tyre Industry would like to thank the European Commission for consulting stakeholders on improving Periodic Technical Inspections.

To place the sector in an economical perspective, the European Tyre & Rubber Manufacturers' Association (ETRMA) represents 12 tyre corporate companies, 7 out of 10 world leaders (which globally represent 77% of world sales). Tyre producers have widespread production facilities in Europe, with 90 tyre producing plants. Manufacturers directly employ 200 000 persons and another 800 000 indirectly.

Tyres play a crucial role in terms of safety, being the sole point of contact with the road. Based on this reality, our industry has intensively pursued its investments in technological innovation and has initiated dedicated and Europe-wide safety campaigns towards consumers and authorities to raise awareness on the most responsible tyre related actions that could be made to improve safety on roads when driving.

Regarding the three possible models for PTI proposed by DEKRA (economical, medium, highest), ETRMA supports a model from medium to highest level. Regarding the proposal for mutual recognition of PTI, ETRMA prefers mandatory EU wide basis provided that an agreement on minimum standards is reached.

TRMA welcomes the Directive 2009/40/EC of 6 May 2009 on Roadworthiness test for motor vehicles and their trailers and the Directive 2010/48/EU amending the Annex II of the Directive. Annex II describes various checks of the condition of tyres but is not comprehensive.

In this regard, ETRMA would like to remind consumers that driving with tyres at the proper inflation pressure is one of the most important things a consumer can do in terms of tyre maintenance and safety. Proper inflation is what carries the load and a properly inflated tyre will contribute to less fuel consumption and produce less noise. Under-inflation is the leading cause of tyre failure, and in such a case the result can be proper damage, serious injury or death.

ETRMA supports drafting of guidelines on fundamental and necessary tyre checks as part of vehicle compulsory technical checking destined to national vehicle control authorities. However, the current tyre check list must be revisited against the following checks.

ETRMA is also in favour of motorized two wheel vehicle inspection in Europe. It will contribute to enhancing road safety and will help fighting against various frauds (tampered engines, non compliant tyres).

The following checks should be included in the PTI (also on moped, scooters and motorcycles):

- ➔ tyre's size designation in compliance with vehicle's type approved tyre sizes or vehicle's registration document;
- ➔ presence of the EU required tyre type approval marking ("e" marking or/and "E" marking); Indeed this will help to strengthen safety, to fight against counterfeit and will contribute to the adequacy of the tyre to the user's needs;
- ➔ tyre damages and tyre deformation (e.g. sidewall bulges, deep cuts in the tire exposing cords), tyre wear – to be checked on the two sidewalls of tyres, not only the outboard one; tyre rubbing against other components;
- ➔ presence of tyre wear indicators, including the spare tyre when it exists ;
- ➔ tyre tread depth in compliance with the minimum legal requirement , also on moped, scooters and motorcycles and including the spare tyre when it exists;
- ➔ tyre/wheel assemblies per axle (mixing on the same axle is not permitted);
- ➔ inflation pressure of tyres in accordance with the vehicle manufacturer's recommended inflation pressure and the lack or the excess of inflation pressure below a certain threshold, for example 0.5 bar below the lowest inflation mentioned on the vehicle or above the highest one must be subject of a warning on the inspection report;
- ➔ inflation pressure of the spare tyre, when it exists, in accordance with vehicle manufacturer's recommended inflation pressure;
- ➔ re-grooved tyres not in accordance with requirements (only for Commercial Vehicle tyres);
- ➔ proper functioning of tyre pressure monitoring system (TPMS).

The above list must be checked against what already is included in the Directive 2010/48/EU amending the Annex II of the Directive 2009/40/EC and complemented accordingly.