



## Position paper

# Safe, Efficient, Reliable and Competitive Transport Must Remain a Top Priority!

5 September, 2011

## Summary

Tyres, being the unique point of contact between vehicles and roads, are a fundamental actor in road mobility. It is for this reason that the European Tyre Industry deems it necessary to present its view on the White Paper of Transport. The Position paper offers first general remarks about the fundamentals of the chosen policy line and then proceeds to give detailed view on some of the White Paper's initiatives, as seen through the prism of the Tyre Industry.

The key messages of ETRMA are:

- **Safety, mobility, reliability and efficiency** are the first demands in transport
- **Transport modes do not compete** but serve different needs and distance is by far the worst criteria for modal choice
- A **new strategic vision** for road transport is needed
- **New tyre technologies** are available to improve vehicle safety, to effectively reduce CO2 emissions and to affect positively driver's behaviour (e.g. winter tyres, technologies for improved wet and snow grip; tyre technologies for extended mobility such as run flat technology, tyre pressure monitoring systems (TPMS), low rolling resistance tyres, lighter tyres to provide more carrying capacity, tyre labelling as a tool for consumers to make educated choices, driving license oriented measures, roadside and periodic technical inspections. These existing technologies and measures should be actively used.)

## General recommendations

ETRMA<sup>1</sup> welcomes the White Paper on Transport: *'Roadmap to a single European Transport Area – Towards a competitive and resource-efficient transport system'*<sup>2</sup> (28 March 2011), which calls for an ambitious and visionary transport policy in the EU and taking into consideration the estimated 70 % growth of the transport sector by 2050. The White Paper deems it necessary to break the dependency on oil without sacrificing efficiency and mobility. To this end it has put together a combination of 40 concrete initiatives.

The new policy has a good spirit but raises some concerns about optimal ways for implementation of its objectives in respect of the competitiveness of the European transport-related industries. Assessing the proposed initiatives, the principal goal of the policy seems to be reducing transport greenhouse gas (GHG) emissions by 60% by 2050 compared to 1990 level. Yet safety, mobility, reliability and

<sup>1</sup> ETRMA tyre corporate company Members in alphabetical order are Apollo Vredestein, Bridgestone Europe, Continental, Cooper Tires, Goodyear Dunlop Tires Europe, Hankook, Marangoni, Michelin, Mitas, Nokian Tyres, Pirelli Tyre, Trelleborg Wheel Systems

<sup>2</sup> COM (2011) 144

efficiency are the first demands in transport. The proposal therefore leaves a question on to what extent the principal *raison d'être* of transport have to give in for other targets.

Example: The White Paper suggests that 30 % of road freight over 300 km should shift to other modes such as rail by 2030 and more than 50 % by 2050.

- However, **distance is by far the worst criteria for modal choice** as opposed to other criteria, such as, the type of goods transported, urgency of the delivery, size, weight and composition of goods, value of the content, other specific needs, for example, refrigerated containers for food delivery. We also have to bear in mind that in today's manufacturing systems the flexible just-in-time delivery plays a crucial role allowing companies to work more without stocks and therefore with increased efficiency.
- Furthermore, differences between regions in Europe (infrastructure, landscape, popular density, socio-economic situation etc.) pose very different needs leading to unavoidable **necessity of flexibility** in the overall European transport system.

For these reasons, ETRMA is of the opinion that certain **numerical targets in the proposal** (such as the 300 km road freight threshold) **should only represent rough guidelines** and not serve as strict rules. These targets are showing the direction where to go but not necessary where to end at. This is true even more when considering the very long time line set by the White Paper.

Mobility is more than transporting goods; it is access to people, places, services, goods and information. Mobility is above all a **basic social right and key contributor to quality of life and economic well-being**.

ETRMA stresses that by upgrading mobility and achieving a workable transport system in Europe – one that meets the needs and legitimate expectations of users such as reliability, safety, timely delivery – the key is to realize that **transport modes do not compete but serve various needs**. In the future, demand of mobility will grow which is a positive fact as mobility is the cornerstone of economic and societal well-being. For this reason, the statement of the white Paper that '*curbing mobility is not an option*' is much appreciated by the industry.

However, when assessing the policy in detail, it is not always clear whether the initiatives duly follow this stated policy line. Strict modal shift requirement threaten that **resources may become distributed unequally and favouring certain modes which might hinder the development of other modes while eventually all modes have to be developed and co-operate**. Demand for flexible transport solutions will continue and therefore modal shift requirements might render the already ambitious policy inoperable and, in a worst case, undermine many of the good initiatives put forward.

The challenge which the Commission still faces is to develop a policy proposal where the **claimed modality is done in a way that fully satisfies user's needs. If that cannot be achieved, there is a high risk of artificial downshifting of certain modes and thus, curbed mobility**.

**A new strategic vision for road transport is needed**, coordinated at the EU-level. The road transport suffers from congestion and other modes are unlikely to solve that problem: precisely due to the congestion, transport users would not go on already packed roads but they go there as they do not have an alternative for reasons stemming from the nature of the transported goods, urgency of delivery etc. Furthermore, we are not using our road network smartly; roads are empty at nights but crowded at day time. The current trend of increasing internet sales leads also to increasing demand for flexible goods transportation and finally, enhanced European integration materializes through more people travelling in and among the EU Member States.

Investing in infrastructure, optimising Intelligent Transport Systems and rethinking the daily driving and delivery patterns as well as exploiting the opportunities from new business models (such as car-sharing programmes) offer solutions to the problem of congestion. **Technological development and changes in driver behaviour are the two factors providing solution to challenges we face with road safety and**

**environmental impact.** The right role of public intervention is to encourage this development and change to happen, not to force them in one way or another.

Tyres already contribute positively to both environmental and safety goals of the White Paper. We underline that **new tyre technologies are available to improve vehicle safety** – e.g. winter tyres; technologies for improved wet and snow grip; tyres for extended mobility such as run flat technology; tyre pressure monitoring systems (TPMS). There is also availability of technologies **to effectively reduce CO2 emissions** – e.g. low rolling resistance tyres; lighter tyres to provide more carrying capacity; TPMS. And there are also available **solutions to affect driver's behaviour** with regard to safe and eco-driving – e.g. tyre labelling, driving license oriented measures, roadside and periodic technical inspections.

**New questions regarding the sufficiency of energy** have emerged with a direct impact on visions of future transport. The near complete U-turn in energy policies in Europe (and beyond) after the Fukushima nuclear accidents in March 2011 might lead to a necessity of revisiting the de-carbonisation target. After all, nuclear power has had a significant role in the visions to move towards CO2-neutral society.

ETRMA is of the view that the Policy should be **reviewed in 2015/2016 and a possible re-evaluation for example every five years should be undertaken** in order to allow for possible adjustments. Although for example in urban planning 10-30 years time line is normal we have to bear in mind that **transport needs are based on current real-world conditions**. Therefore, a 40-years time line for transport policy is unpredictable at best and might be irresponsible at worst.

ETRMA remains committed to offer active support and is keen to contribute in a balanced and complementary way.

## **ETRMA comments on certain initiatives in the White Paper**

### ***The contribution of tyre technology for sustainable transport***

Tyres, being the unique point of contact between vehicles and roads, are a fundamental actor in road mobility. Hence the multiple functions which tyres must execute with a balance amongst various parameters: e.g. road adherence and traction without generating too high rolling resistance/fuel consumption, supporting the load, ensuring vehicle's handling and mobility at high and low speeds, reducing noise from transport. These crucial performances are expected from tyres regardless of weather and road conditions, and they relate to various safety and environmental aspects. This explains why the tyre technology can have an important contribution to the main objectives of the new transport policy. At the same time it must be understood that a meaningful transformation of road transport towards more sustainability and safety requires also the positive contribution from the other two crucial elements – road users' behaviour and infrastructure.

In the next section, ETRMA offers comments on some of the proposed initiatives by the EC viewed from the prism of tyre technology.

### **Eco-driving and speed limits (Initiative 29)**

Proper tyre choice and tyre maintenance should be regarded as part of eco-driving skills at large. They should be enhanced with the support of relevant technology.

More and better awareness on the importance of tyres for road safety can be achieved through including basic knowledge on tyres and on proper tyre maintenance and use in the curriculum and tests of novice drivers. The European Driving Licence Directive<sup>3</sup> provides for minimum required level of knowledge on mechanical aspects of tyres, as well as the principles of the construction, the fitting, correct use and care of tyres, amongst several items that should underlie the content of the theory test concerning all vehicle categories (Annex II). What remains important is that Member States properly implement and enforce the Driving Licence Directive.

More countries should consider including in the novice drivers' curriculum an obligation for driving tests with different tyres, e.g. tyres with incorrect pressure, worn out tyres, wrongly fitted tyres, inappropriate for the season tyres, in order to experience the impact on safety and learn how to take proactive care for tyre maintenance and proper tyre choice.

Infrastructure should also contribute to sustainable practices. In order to make meaningful use of technology and conscious behaviour for safety and sustainability, tyre pressure gauges at petrol stations should be in accurate conditions by means of regular inspections. Also, if tyre pressure gauges are more available at petrol stations, drivers would be more incentivised to pro-actively check their tyres and maintain them at the optimal pressure level.

### **A technology roadmap (Initiative 24)**

There are new tyre technologies available to effectively reduce CO2 emissions, e.g. low rolling resistance tyres, lighter tyres to provide more carrying capacity, tyre pressure monitoring systems (TPMS). From 1 Nov 2012 onwards, tyre labelling will allow end-users to make more informed choices concerning wet grip, rolling resistance and noise when purchasing tyres.

In terms of road transport, noise is an accumulation of the vehicle noise (engine, exhaust, transmission, aerodynamics,...) and the noise created by the contact of the tyre and road. Transport policy has rightly addressed transport noise but unfortunately not sufficiently looked at the possibilities offered by optimising the infrastructure, especially the road surface.

The first tyre noise limits were set within the EU directive 2001/43/EC<sup>4</sup> and new ambitious limits were introduced by the General Safety Regulation<sup>5</sup> in 2009. The proper implementation of tyre noise limits is further enhanced by the Tyre Labelling Regulation<sup>6</sup> In addition, the Commission is under process of drafting a proposal concerning the vehicle noise.

However, the infrastructure can either decrease or increase the noise created by the vehicle and the material used and technological choices in road building have a significant effect on the noise level created by the contact of the tyre and road. ETRMA deems it necessary to urgently examine the opportunities within the EU wide perspective for improvement in road infrastructure.

### **Multimodal freight corridors for sustainable transport networks (Initiative 35)**

The Commission, following the example of some Members States (Finland, Sweden, Netherlands), should support the utilization of European Modular System, a concept of allowing combinations of existing loading units (modules) into longer and sometimes heavier vehicle combinations to be used on some parts of the road network. This will greatly facilitate seamless logistics throughout the EU and to save CO2 emissions per ton carried.

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<sup>3</sup> Directive 2006/126/EC

<sup>4</sup> Relating to tyres for motor vehicles and their trailers and to their fitting

<sup>5</sup> Regulation 661/2009/EC

<sup>6</sup> Regulation 1222/2009/EC

## **Towards a ‘zero-vision’ on road safety (Initiative 16)**

We fully support the vision of the European Commission for zero accidents in road transport by 2050 and stress that the Subsidiarity Principle should not deter the EU for initiating actions to improve road safety within the EU.

European roads are still dramatically affected by the death of around 100 people per day. Without new technologies, future increase in road traffic will likely make it difficult to meet future casualty reduction targets.

To effectively meet the targets for reduction of road traffic casualties and serious injuries, advanced technologies for accident avoidance, as well as use of best available technologies should be promoted. The future of transport should rely also on technologies for extended mobility and intelligent vehicles to provide for safe, reliable and clean transport. Tyres will be part of these solutions. Tyre technology has a role to play amongst various other automotive technologies, e.g. winter tyres, technologies for improved wet and snow grip, tyres for extended mobility such as run flat technology and technologies for self-sealing of tyres, tyre pressure monitoring systems (TPMS). Their use should be promoted in transport safety-related legislation.

Along with technology, of importance is also drivers’ safety-conscious behaviour, translated into e.g. the right tyre choice and regular maintenance of tyres.

This is why ETRMA urges for the incorporation of the following elements into the planning of the EU transport policy:

### *a) harmonisation and expansion of winter tyre legislation across the EU*

The winter tyre technology is specifically developed for temperatures under 7°C in order to provide better grip and handling on cold, wet and snowy roads. The majority of the EU Member States and Candidate Countries have average day temperature at or below 7°C from the beginning of November to the end of March<sup>7</sup>. Yet, only part of them have so far made winter tyres mandatory through this period and adopted a relevant legislation

Road safety and mobility in the EU would be significantly improved by harmonisation and expansion of winter tyre legislation across the EU Member States. ETRMA therefore stresses the need for making mandatory the use of winter tyres at least from the beginning of December to the end of February in the Member States where the daily average temperature of the period is under 7°C. However, in the rest of the Member States it is sufficient to have readiness of using winter tyres or other winter equipment when indicated by means of a traffic sign.

Furthermore, at present there is no uniform definition of winter tyres in the national legislation of some Member States. To avoid confusion and misinterpretation of the legislation, which ultimately risks undermining the proper working of the Single Market, there should be a harmonised definition of winter tyre at EU and national level. This process is currently under way, through definition update in UNECE Regulation 117, which will also introduce a minimum required level of tyre performance on snow, and a three peaks mountain snowflake symbol to be embossed on tyres’ sidewall. This will be fully integrated into the EU General Safety Regulation further amended<sup>8</sup>.

<sup>7</sup> Out of the thirty-one capitals of the EU Member States and Candidate Countries, twenty-five have average day temperature at or below 7°C during mentioned period. In the rest of the Member States, even if the average daily temperature in the capital does not fall under 7°C, it certainly does so in other regions of the country. The only exceptions are Cyprus and Malta. Source: ETRMA, [www.weatherbase.com](http://www.weatherbase.com)

<sup>8</sup> Regulation 661/2009/EC

### b) TPMS

Fitment of accurate Tyre Pressure Monitoring Systems (TPMS) on all new vehicles will help drivers to keep their tyre pressure as close as possible to the recommended values. Monitoring tyre pressure should be systematic and regular as the tyre system (tyre-wheel-valve) naturally lose pressure over time, about 10kPa every month and it is very difficult, often impossible, to witness this loss by visual inspection. Since the benefits of TPMS for safety and environment have been recognised by the General Safety Regulation<sup>9</sup>, it should be considered to extend the obligation for TPMS in passenger vehicles to other categories of vehicles, such as light and heavy commercial vehicles and to improve its performances up to correct automatically the recommended pressure value in accordance to the actual load condition of the vehicle. When a vehicle, with tyres inflated at the nominal pressure for minimum load condition, is charged at maximum load, it runs with underinflated tyres in some cases up to 15% below the recommended tyre inflation level.

Tyre industry surveys indicate that across the EU, not less than 65% of European cars have permanently under-inflated tyres. Driving with tyres at the right pressure is of paramount importance for vehicle safety, since only properly inflated tyres hold the load, adhere to the road, consume less fuel, produce less noise, assure the best braking distance and contribute to extending the lifetime of the tyres. Indeed, under-inflated-tyres can increase fuel consumption by up to 4%, as they require extra energy to roll, while reducing tyre lifespan by 45%.<sup>10</sup>

Correct tyre pressure for each load condition of the vehicle improves both the user's safety and the environment. Safety benefit through optimized vehicle handling (cornering), reduced braking distances and risk of hydroplaning. It definitely reduces risks of tyre failure; provides environmental benefits as it enhances the efficiency of low rolling resistance tyres, and reduces CO2 emissions by as much as 5g/ for each kilometre driven.

### c) better tyre checks in periodic technical and roadside inspections

The recast of the Roadworthiness Directive<sup>11</sup> and the subsequent amendment of its annexes containing the necessary tyre tests are very welcome. However, the checklist is not comprehensive and some important elements are missing: check of tyre pressure and requirements for winter conditions. Because of the great impact of these factors to the safety of the vehicle, they should be incorporated into systematic checks. What also remains of fundamental importance is consistent and effective application of this legislation throughout the whole EU. We also believe that the Roadworthiness Directive should include in its scope also the L-category of vehicles (e.g. two-wheel motor vehicles).

What concerns roadside inspections, the relevant EU Directive<sup>12</sup> addresses at present only commercial vehicles. The scope should be extended to consumer cars and motorcycles, and for all these categories of vehicles tyres should be checked against the same criteria of the Roadworthiness Directive. A recent report on the application of the technical roadside inspection<sup>13</sup> shows that as high as 20% of the checked commercial vehicles had deficiencies on their tyres or wheels.

The Directive on roadside inspection does not specify the actual checks to be made. Crucial for proper tyre functioning are: 1) compliance with the rule of the minimum allowed tyre tread depth for passenger tyres, 1,6 mm<sup>14</sup>, 2) correct tyre pressure and 3) proper fitment for the season (summer/winter tyre) – all

<sup>9</sup> Regulation 661/2009/EC

<sup>10</sup> European Commission, Staff working Document, SEC(2008)1908 (23.05.2008.)

Annex to the Regulation of the European Parliament and of the Council concerning Type-approval requirements for the general safety of motor vehicles. Impact Assessment

<sup>11</sup> Directive 2009/40/EC on roadworthiness tests for motor vehicles and their trailers amended by Directive 2010/48/EU

<sup>12</sup> Directive 2000/30/EC on the technical roadside inspection of the roadworthiness of commercial vehicles circulating in the Community

<sup>13</sup> COM(2010)754 Report from the European Commission on the application by Member States of Directive 2000/30/EC

<sup>14</sup> Council Directive 89/459/ECC of July 1989 on the approximation of the laws of the Member States relating to the tread depth of tyres of certain categories of motor vehicles and their trailers

vital for shorter braking distances. In addition, these checks should include verification of sidewall type-approval marking which means that tyre has been legally certified and therefore meets the minimum law requirements. Tyre checks are quick and easy to undertake by highway police in roadside inspections and would offer immediate benefits for road safety and encourage drivers to pay more attention to proper tyre use and maintenance, something that would strengthen the positive impact of driving license oriented measures listed in the Annex II of the Driving Licence Directive<sup>15</sup>.

### **Vehicle labelling for CO2 emission and fuel efficiency (Initiative 28)**

The Tyre Labelling Regulation<sup>16</sup> introduces labelling requirements with regard to the display of information on the fuel efficiency, wet grip and external rolling noise of tyres. Its aim is to increase the safety and the environmental and economic efficiency of road transport by promoting fuel-efficient and safe tyres with low noise levels. This regulation allows end-users to make more informed choices when purchasing tyres by considering this information along with other factors normally considered during the purchasing decision process.

Drivers should be made aware that the actual fuel savings and road safety depend to a great extent on their driving behaviour particularly in relation to the following: eco-driving can significantly reduce fuel consumption, the tyre pressure needs to be regularly checked and adjusted to the proper level for optimum fuel efficiency and wet grip performance, stopping distances should always be strictly respected. Customers should be also made aware that these three criteria, although important, are not the only performance parameters.

### **Urban mobility plans (Initiative 31)**

The Commission must maintain a technology neutral policy when setting targets and developing measures for alternatives to the conventionally fuelled cars. Forced shifts to new technology, especially when the market is not mature enough, might bear too high costs for some and thus leading to negative impact regarding societal inequality.

### **Transport in the World: The external dimension (Initiative 40)**

The EU should prominently support the uptake and proper use of international standards in the transport sectors of the EU's neighbouring countries.

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<sup>15</sup> Directive 2006/126/EC

<sup>16</sup> Regulation 1222/2009/EC