

Executive Summary

- ETRMA has been clearly supporting the introduction of the tyre label, which has encouraged competition and products differentiation based on performances. First implemented in November 2012, **the label is still a relatively young tool** and – as assessed by the Commission itself¹ - the consumers' awareness of the label still needs to improve. ETRMA therefore believes that **it is too early to fundamentally change the label and its classes** and that the focus of the revision of the Regulation should be on increasing awareness as well as incentivisation and market surveillance.
- ETRMA welcomes in particular those elements of the proposal aiming at **strengthening market surveillance through sanctions and penalties, increasing the visibility of the label – especially concerning distant selling – and introducing stronger obligations for Member States.**
- Furthermore, **ETRMA supports the introduction of future labelling for retreaded tyres, upon a feasibility assessment to be carried out as part of the delegation of powers, as well as of ice and snow performance information.** This should be based on robust technical elements whilst ensuring that consumers are not confused by the way in which such information are displayed. ETRMA recommends that the snow and ice grip logos are shown as alternatives on the label. The conditions of use of each logo are strictly defined in Annex I, parts D&E.
- ETRMA is in favour of the adaptation to technical progress and in particular **the alignment of the wet grip test method with UNECE Regulation 117 and its future developments.**

The following elements should be given instead serious consideration:

1. **Proposed re-adjustment of the label classes:** the European tyre industry believes that the **tyre label still needs stability in order to achieve its objectives in terms of decarbonisation of transport and safety and also with regard to awareness and market acknowledgement.**

It is therefore too early to move for the following reasons:

- ✓ First, according to studies carried out both by the European Commission² and ETRMA³, **tyres rated A in both rolling resistance and wet grip are less than 1% of the market.** In this context, **it is difficult to understand the decision of the European Commission to further shift upwards the current classes. This will result in the first class being empty for several years** and is in contrast with the Framework for Energy Labelling Regulation 2017/1369, which in article 11, para 6 underlines that a rescaling could be deemed necessary when the first class would be populated by more than 30% of products on the market. **This is certainly not the case for tyres.**

¹ EC Report COM(2017) 658 final

² EC Impact Assessment, Part 1/3, page 22.

³ LIZEO market assessment study, 2018

- ✓ Second, for rolling resistance, given the strict relationship between the tyre label and the World Harmonised Light Vehicles Test Procedure (WLTP), re-adjusting the label classes as proposed by the European Commission, would mean that any further innovation achieved by the tyre industry would not be rewarded financially by original equipment manufacturers (OEMs).
- ✓ Third, it should be recalled that tyre label regulations in the world are built on the example of the European Regulation. Therefore, if the EU chooses to change its labelling so fundamentally, tyre manufacturers will struggle to manage the situation and maintain coherence with other legislations worldwide.
- ✓ Finally, tyre development faces a multiple set of performance requirements which often conflict with each other as well as strict customer-oriented and regulatory performance demands. High performance demands by OEM customers have already led to high tyre performance levels that have reached a degree that will not allow for technological progress to continue at the same pace moving forward. With regard to rolling resistance, industry has already made a very significant progress, and, while the industry is fully committed to continue those progresses, further improvement will require more time and will be much more difficult to achieve.

ETRMA proposes to maintain the label scheme for rolling resistance (RR), wet grip (WG) and Noise unchanged from Regulation 1222/2009.

2. The **European Product Database**: ETRMA supports **all tools that help market uptake** of the best graded tyres as well as enforcement and market surveillance. However, it is still unclear how such a database would work and **some adjustments are needed**, especially with regard to the information to be included in the database and its implementation timeline.
3. **Incentives**: such instruments can be a powerful asset to encourage market uptake of best graded tyres. **ETRMA recommends keeping eligibility for national incentives for tyres graded C and above**, as indicated in the current Regulation (1222/2009), as the top classes are still too scarcely populated.
4. **[Future] inclusion of mileage and abrasion**: mileage and abrasion rates do not represent the same performance of a tyre and should not be considered as equivalent or strictly correlated. The European tyre industry is fully engaged in dealing with the issue of Tyre and Road Wear Particles (TRWP) and is **already working towards assessing the feasibility of a reliable and representative test method for measuring tyre tread abrasion**. As for mileage **Industry has not been able to develop a standardised testing method with both good levels of representativeness and reproducibility** and therefore, any attempt to introduce this parameter on the label would lead to information which is unreliable and ultimately counterproductive. As for the legislative procedure to arrive to such labelling **for mileage and abrasion, ETRMA believes that this would be a substantial amendment for which a full revision of the Regulation would be necessary**, rather than simply relying on a delegated act.
5. **Obligation to inform the tyre approval authority of the label declaration**: the modalities and the impact of this measure are under assessment with the European Commissions' services. If this measure were to help Market Surveillance Authorities and the credibility of the tyre label, the industry would support it. However, it should not result into an excessive additional burden on the industry.
6. **Implementation lead time and transition period**: the timeline set by the European Commission is too ambitious, given the introduction of new parameters and the change in the format of the label as well as the process of registration. Furthermore, for tyres, the **date of reference for implementation should be the date of production** (which is fixed and embossed on the tyre) rather than the "date of placement on the market".

Proposal: The new obligations should apply from 1 June 2021 (or at least 18 months after the coming into force of this Regulation) for tyres produced after 1 January 2021 (or at least 12 months after the coming into force of this Regulation).

7. **Sticker for C3 tyres:** The specific reference in Article 4 to a sticker in order to display the label is not consistent with the rest of the Regulation, which makes reference generally to the “label”. In this context, it makes sense to have the label on a sticker on tyres on display (passenger **car** tyres), but not on C2 and C3 tyres, as the choice of truck tyres rarely takes place in a shop. Therefore it would be more efficient to show the label information through other materials, such as the product information sheet.
8. **Format of the label:** the proposed format poses **several issues both in terms of technical feasibility** (eg.: use of colours) and **content:** absence of tyre category (C1, C2, C3) and further visual imbalance towards rolling resistance at the detriment of safety; As a result, some necessary changes in the proposed format of the label will be needed. **QR code:** the proposal of the new label regulation envisages the inclusion of a QR code. The tyre industry would like to be involved in the definition of the information requirements relating to the QR code to ensure consistency with other tyre industry initiatives that are currently underway for the creation of a unique tyre identifier.
9. **Visual advertisement:** Article 6 paragraph 2 of the proposal introduces the obligation for the distributors to ensure that any visual advertisement for a specific type of tyre shows the label. In order to ensure the implementation of such provision, there is the need to clarify which media tools are included in the definition of visual advertisement.

Supporting Technical Annex

Introduction

ETRMA strongly supports the tyre label as it has empowered consumers and fleet owners to make better-informed purchasing choices based on performances. The introduction of the tyre label has also resulted in a healthy competition between tyre manufacturers on performances and innovation, with great benefit for the competitiveness of the European automotive industry and sustainable mobility.

Since its implementation in November 2012, the greatest challenges for the tyre label have been its uptake as well as market surveillance.

For this reason, the European tyre industry welcomes any measure suggested in this proposal that would support the market uptake of the label and its enforcement.

On the contrary, fundamental changes in the structure, format, and classes of the label appear to be premature and risk constituting a further obstacle for its use by the consumers, who risk to be confused by the label transformation. Such stance had also been expressed by the preparatory Study⁴: *“it is considered premature to revise the labelling scale requirements for both wet grip and fuel efficiency, and even noise, while efforts should be dedicated to increase awareness and market surveillance efforts”*.

Furthermore, it should be recalled that tyres are technologically complex products and their development faces a multiple set of customer-oriented performance requirements, which often conflict with each other and require complicated engineering developments.

Against this background, the current scaling system of the three performance categories is already challenging and will remain such in the foreseeable future.

ETRMA's priorities in the EC Tyre Label Proposal

Re-adjustment of the label classes

Annex I provides for a full revision of the labelling scale requirements for rolling resistance (Part A), wet grip (Part B) and external rolling noise (Part C).

The revision proposed contrasts with the advice provided by Viegand Maagøe A/S, the Consultant hired by the European Commission to carry out a preparatory study on the revision of the tyre label. Furthermore, it is at odds with the conditions set by the European Commission in the Framework for Energy Labelling Regulation 2017/1369, where the EC established that it should rescale the label, if 30% of products would be in class A.

According to a study carried out by the European tyre industry⁵, only 0.3% of the tyres in the market are graded AA1. According to this assessment, for rolling resistance only 0.5% (20 out of 3840 references) are in grade A. This result is in-line with data gathered by the European Commission in its impact assessment and concluding that currently tyres rated A in both rolling resistance and wet grip are less than 1% of the market.

According to the proposed revision, the current class A for rolling resistance would become class B. Class A for wet grip would become class B and the current one wave for external rolling noise would become two waves. In the case of the latter performance, since noise is measured through a logarithmic scale, subtracting 3dBs would result in dividing by two the noise produced by tyres.

⁴ March 2016, Viegand Maagøe A/S, Final Report Review study on the Regulation (EC) No 1222/2009 on the labelling of tyres: https://ec.europa.eu/energy/sites/ener/files/documents/Study%20in%20support%20of%20the%20Review%20of%20the%20Tyre%20Labelling%20Regulation_final.pdf

⁵ Lizeo market assessment study, 2018.

In this context, shifting up the labelling scale would mean that classes A for rolling resistance and wet grip would remain empty for several years and that the bulk of the tyre market would move down to CC tyres or lower. What would be the message to the consumer?

ETRMA is therefore concerned that such a shift in the upper classes would be little understood by the targeted audience of this Regulation, as it would create confusion and give the misleading impression that tyres are deteriorating rather than improving their performances. The coexistence of the current and future label would also be problematic as dealers would have to explain why the same tyre with different dates of production would show a different label.

One further consideration regards the interaction with original equipment manufacturers (OEMs) and the relations between the tyre label Regulation and the one on WLTP. Because of the way the Regulation and its calculations are built, OEMs are in general requesting tyres with measured values at the median of class A. In case an even better performing tyre might be needed, special procedures are put in place and the extra performance is rewarded financially. As the new scale does not foresee an upper limit, the concept of “median value” would result in tyres with extra performance that would not be rewarded. In short, the proposal of the Commission might aim at pushing innovation, but the tyre manufacturers would not be rewarded for it.

Finally, it should be noted that other labelling regulations worldwide are built on the European example. If the EU chooses to change its labelling Regulation so fundamentally, tyre manufacturers will struggle to manage the situation and maintain coherence with other parts in the world.

As a result, European tyre manufacturers cannot support the Commission new proposal and urges the co-legislators to keep the label classes for RR, WG and Noise, unchanged, as they are currently in Regulation 1222/2009.

Registration of tyres in the European Product Database

Article 5 introduces the obligation for tyre suppliers to enter information in the new product database. This is information that manufacturers currently have to provide upon request to national Market Surveillance Authorities.

ETRMA understands the importance of this step as, on the one hand, it could help the work of Market Surveillance Authorities and, on the other, possibly also support the market uptake of best graded tyres. However, it is currently not very clear exactly which information will have to be provided and how. The most immediate questions regard the following details:

- As for the information to be included in the database, **Article 5** makes reference to Annex I of the Regulation (EU) 2017/1369. However, an exception should be made for the publication of tyre specific performance values, which goes beyond the printed labelling information. This is competitive information.
- **Article 5 paragraph 1** imposes the obligation of registering tyres on **suppliers**. However, as per the definition in Art. 3 para 14, suppliers mean manufacturers, authorised representatives or an importer. In this context, there is a risk of double registration for the same tyre due to the possible multiple entry points, since some of our Members can be at the same time manufacturers, importers and authorised representatives.

National incentives

Article 10, paragraph 2 of the proposal establishes that Member States shall not provide incentives with regard to tyres below class B with respect to either fuel efficiency or wet grip. Given the proposed revision of the label scale, only tyres currently graded AA would have access to these incentives. As a

result, such provision would remain completely unused and would miss its objective of supporting the market uptake of best graded tyres.

For this reason, **ETRMA would recommend keeping this Article as it is in the current legislation, which grants the possibility to access national incentives to tyres graded CC and above.**

Introduction of ice and snow performance information – separately on the label

ETRMA supports enhancing consumer information for winter tyres and therefore shares the intention of the Commission to introduce an ice threshold logo for passenger tyres (category C1 only), in order to provide drivers in Nordic countries with meaningful information on tyres specifically designed for icy roads in that region. To this end, an ISO norm is under finalisation and should constitute the basis of the labelling Regulation – and the same symbol should also be used.

ETRMA supports this initiative and underlines the need for this information to be provided as clear as possible to the consumers. For this reason, ETRMA recommends that the label should only show **the 3PMSF (three-peak mountain snowflake) logo as alternative to the ice grip logo**. Placing both symbols together on the same label will risk creating confusion for the consumers. Therefore, **the configuration of the label showed in Annex II with both the 3PMSF and the ice symbol should be avoided.**

Introduction of retreaded tyres in the scope of the Regulation

Article 2 determines the scope of the Regulation and introduces retreaded tyres.

Tyre retreading is a process used to extend the life of tyres and is particularly relevant for C3 tyres, with positive effects both on resource efficiency, energy savings and the circular economy. Furthermore, the industry hopes that having a specific label scheme for retreaded tyres could help boosting the use of such technology. However, as no suitable testing method exists, the EC Proposal suggests to consider using delegated powers to include retreaded tyres in the future, once an appropriate test standard is finalised.

This option is fully supported by the European tyre industry, only upon a feasibility assessment to be carried out as part of the delegation of powers.

The industry is engaged in the development of a reliable test, grading and verification method.

Future inclusion of mileage and abrasion

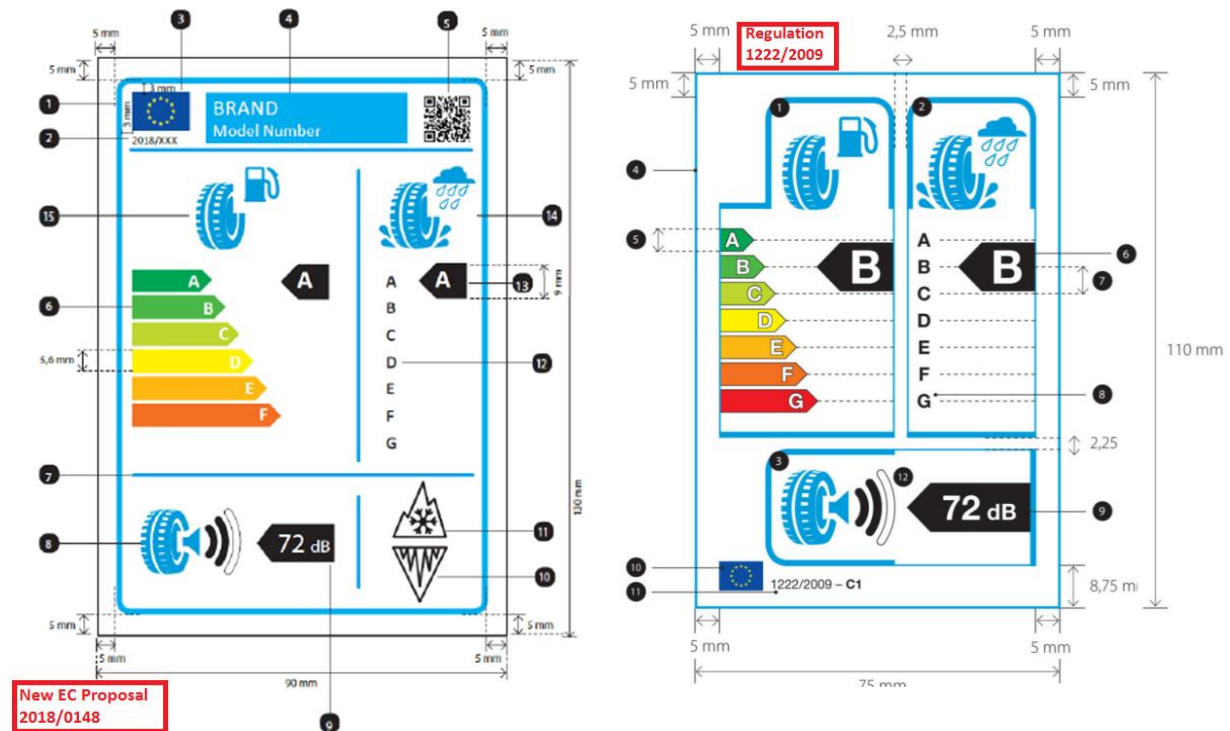
Article 12 paragraph b, concerning the delegated acts, includes the possibility of introducing new information requirements in the Annexes through delegated acts regarding, but not restricted to, mileage and abrasion, when the relevant test methods would be available.

ETRMA's members are currently engaged in research on TWRP as well as in studying the feasibility of developing a test method to measure tyre tread abrasion. However, the inclusion of mileage and tyre abrasion would be a fundamental change to the label as it currently stands. For this reason, **ETRMA recommends that any such fundamental amendment should happen through the next revision of the label scheme rather than through delegated acts.**

Format of the label

Annex II provides three examples of how the new label should look like.

ETRMA has a few comments on this new format as the industry is both worried about the feasibility of the proposed changes as well as for the message that the new format might give to the consumers.



- **Presence of both snow and ice symbols:** as explained above, having both symbols on the label may be confusing to the consumers. Only one symbol should be displayed.
- **Blue background in the window indicating the tyre brand and model number:** all the printers are made to print in black and cannot produce colour. **It is therefore recommended to remove the coloured background.**
- **Indication of the model number, but not of the tyre size or the category:** the alphanumeric model number reported under the brand name will not be easily understood by the consumer, who, on the other hand, would be most likely interested in knowing the tyre's size and category (C1, C2, C3). **It is therefore recommended that the tyre category is displayed on the label rather than the model number.**
- **Message:** the rolling resistance part of the label has been further expanded, narrowing the section of the label reporting the class for wet grip. It should be recalled that **the first and foremost function of a tyre is that of guaranteeing the safety of the vehicle on the road.** The new design of the label, instead, further limits the importance of wet grip by giving it an even smaller space on the label. ETRMA believes that **the previous format** (the one established in the current legislation) **was fairer to all performances.**
- **Size of the label:** the new label is about 1.5cm larger than the current one. This might create a problem for its printing as all manufacturers have acquired printers for the current label size and changing it would mean changing all the printers for the labels. **It is therefore recommended to keep the current size.**