

### ETRMA response to AQEG study on non-exhaust emissions

12 July 2019

As a responsible industry committed to a clean environment and safe roads, the European Tyre and Rubber Manufacturers' Association (ETRMA) welcomes recent research by the Air Quality Expert Group (AQEG) on non-exhaust emissions.

We are carefully reviewing [AQEG's report](#) and share the Expert Group's views on the need for further scientific understanding of non-exhaust emissions, including tyre and road wear particles (TRWP). Their recommendation to address the current knowledge gaps is in agreement with the objectives of the European TRWP Platform, which brings together stakeholders from all relevant sectors to share scientific research, increase understanding and co-design TRWP mitigation options.

ETRMA also supports AQEG's recommendation of further inquiry into the feasibility of a standardised test method for measuring tyre abrasion rate, which is currently being looked into by the European Commission with support of Industry. However, as mentioned by the report, the tyre industry's efforts alone will not be enough to address the TRWP challenge. AQEG therefore also proposes, and ETRMA fully agrees, that the debate considers both tyre design and the diverse external factors at play when finding solutions for reducing TRWP generation, such as driving behaviour, vehicle and road characteristics and traffic conditions.

ETRMA notes that AQEG has largely based its results on laboratory tests carried out in the 1990s. Furthermore, the Group itself has recognised that these tests are no longer scientifically robust, which highlights the need for additional research. ETRMA therefore would like to bring to their attention the results of more recent peer-reviewed research regarding the nature, size, density and dispersion of TRWP. For example, The Tire Industry Project (TIP) conducted a sampling of urban and suburban environment to evaluate the presence of TRWP in airborne particulate matter. It concluded that dust from tyres only makes up a very small concentration of the total dust particles in the air (on average, less than 1% of PM10 and PM2.5ii) because TRWP are physically larger and denser than other airborne PM emissions.

The European tyre industry is committed to the sustainability of its products. We are continuously improving the composition and structure of tyres to enhance performance and durability. In addition to the cross-industry collaboration initiated through the TRWP Platform, ETRMA welcomes further collaboration and research on the topic to increase understanding and inform solutions.

For more information on tyre and road wear as well as industry initiatives, please visit <https://www.tyreandroadwear.com/> and contact us at [info@etrma.org](mailto:info@etrma.org).

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[https://www.researchgate.net/publication/236854096\\_Measurement\\_of\\_airborne\\_concentrations\\_of\\_tire\\_and\\_road\\_wear\\_particles\\_in\\_urban\\_and\\_rural\\_areas\\_of\\_France\\_Japan\\_and\\_the\\_United\\_States](https://www.researchgate.net/publication/236854096_Measurement_of_airborne_concentrations_of_tire_and_road_wear_particles_in_urban_and_rural_areas_of_France_Japan_and_the_United_States)

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<https://www.mdpi.com/2073-4433/10/2/99/pdf>

**The European Tyre & Rubber Manufacturers Association (ETRMA)** <sup>[1]</sup> represent over 4.400 companies in the EU, directly employing over 370.000 people. The global sales of ETRMA's corporate members represent 73% of total global sales and 7 out of 10 world leaders in the sector are our Members<sup>[2]</sup>. We have a strong manufacturing and research presence within the EU and candidate countries, with 86 tyre-producing plants and 16 R&D centres.

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<sup>[1]</sup> European Tyre and Rubber Manufacturers' Association members ([www.etrma.org](http://www.etrma.org)).

<sup>[2]</sup> The product range of ETRMA members is extensive from tyres to pharmaceutical, baby care, construction and automotive rubber goods and many more applications. ETRMA members' turnover in 2018 was approximately € 75 billion, of which up to 5% continues to be invested in R&D, annually. ETRMA's membership include the following tyre manufacturers: APOLLO VREDESTEIN, BRIDGESTONE EUROPE, BRISA, COOPER TIRES, CONTINENTAL, GOODYEAR, HANKOOK, MARANGONI, MICHELIN, NOKIAN TYRES, PIRELLI, PROMETEON, SUMITOMO RUBBER INDUSTRIES AND TRELLEBORG WHEEL SYSTEMS. Furthermore, members include Associations in the following countries: Belgium, Finland, France, Germany, Hungary, Italy, the Netherlands, Poland, Spain and the UK.