

European Commission Consultation on the revision of the Energy Labelling Directive 92/75/EEC

European Tyre Manufacturers' contribution

Brussels, 21 February 2008

The European Tyre Industry welcomes the opportunity to contribute to the European Commission consultation on the revision of the Energy Labelling Directive 92/75/EEC.

Our comments will particularly focus on the following question:

<p><u>Question 6:</u> Would you like to add other products to the scope of the labelling Directive than those covered at present ?</p>

The Tyre Industry supports the efforts of the European Commission towards reinforcing the information for all potential tyre purchasers on the energy and safety performances of tyres put on the market.

Before extending the scope of the Directive 92/75/EEC to any new products, ETRMA believes that a proper impact assessment must be performed to determine whether this instrument would be the most appropriated one.

With regards to tyres, we wish to reiterate that it is only through integrating policies relating to tyre performances that measurable benefits will be drawn for the legislator, the consumers and the industry. In other words, legislation on any tyre performance characteristic, must always consider the effects of any new isolated regulatory prescriptions on the tyre's other performance characteristics.

In the frame of this specific initiative, the European tyre manufacturers therefore recommend the parallel introduction of a reliable Rolling Resistance and Wet grip Grading System for tyres that would set minimum wet grip and maximum rolling resistance limits for all new passenger car, light truck, and truck bus tyre lines. This would significantly help end-users to evaluate the different impact on vehicle safety and fuel consumption between different tyres. Consequently consumers would be able to make a well-informed choice. At the same time such grading system would avoid the risk that only one performance parameter is pushed to the detriment of others, including safety.

The European Commission recent release of its Annual Policy Strategy for 2009, COM(2008)72, confirms it will propose as part of the implementation of the Energy Efficiency Action Plan, a new initiative on energy labelling of tyres, which will cover energy efficiency and safety aspects. ETRMA welcomes this decision as the opportunity to prepare the best framework for the introduction of a reliable Rolling Resistance and Wet grip Grading System for tyres. ETRMA is willing to assist the European Commission in this ambitious endeavour.

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