ETRMA represents the 11 top tyre manufacturers producing tyres for all type of vehicles in the EU i.e. Bridgestone Europe, Continental, Cooper Tires, Goodyear Dunlop Tires Europe, Marangoni, Michelin, Mitas, Nokian Tyres, Pirelli Tyre, Trelleborg Wheel Systems and Vredestein.

The European tyre manufacturers welcome the EC Green Paper on Urban Transport and support the definition of conditions for accessible, safe and secure urban transport for all European citizens.

In the frame of the EC consultation, we wish to share what could be the “tyre” contribution for reaching these objectives, in providing industry feedback to the following questions:

**Question 4: How could the use of clean and energy efficient technologies in urban transport be further increased?**

**Question 7: How could eco-driving be further promoted?**

To reach these objectives, it appears fundamental that road users awareness is significantly increased to alert them on the effects of their behaviours and orientate their choices towards the cleaner and more energy efficient ways to fulfil their transport needs.

With regards to tyres, ETRMA launched in the frame of the European Road Safety Charter, a wide ranging programme of safety oriented education campaigns to promote safer and environmentally friendly driving behaviour. These campaigns are targeted towards road users but also national authorities and insurance companies. As part of the message delivered is the importance of driving with tyres at the right pressure at all times.

Indeed inflation pressure has a strong influence to determine vehicle fuel consumption. Depending on the type of road and driving style, rolling resistance represents 20% of the total force on a vehicle. Since low inflation increases rolling resistance, it has a direct effect on both vehicle fuel efficiency and emissions. And with a 25% loss of pressure, the tyre rolling resistance is increased by 10%, which in turn results in 2% more fuel consumption!

It would therefore be most appropriated if local authorities would initiate frequent campaigns/events to further sensitise urban transport drivers and users on the energy efficiency benefits of performing a simple and regular checking of the pressure of their vehicles tyres. In the meantime, ETRMA members will continue organising such dedicated programmes in various European cities.

Additionally, we wish to stress that to better guarantee cleaner urban transport and urban noise in particular, more noticeable results could be obtained through road surfaces improvements. ETRMA members would therefore urge the European Commission to initiate the process to launch dedicated road policy measures.
Question 20: Should all stakeholders work together in developing a new mobility culture in Europe? Based on the model of the European Road Safety Observatory, could a European Observatory on Urban Mobility be a useful initiative to support this cooperation?

Urban Transport being mainly addressed at local/regional level, the subsidiarity principle should apply to develop a new mobility culture. This implies the involvement of all stakeholders concerned: local authorities, professionals of the transport sector, consumers, …. Such network could encourage the exchanges of best practices and experiences.

ETRMA is not convinced that a specific observatory needs to be created. However it would be important that the European Commission acts as a central point and coordinates the various initiatives carried out locally so that an inventory can be set up. In any case, a cost-benefit analysis should be carried out to assess whether such structure would be necessary.

The European tyre manufacturers are willing to further contributing to the setting up of a new urban mobility culture in Europe and to contribute as appropriate with the involved stakeholders.

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