

May 26, 2008

To DG TREN
Mr André Brisaer

European Tyre Industry answers to EC Consultation document on tyre labelling

General comments:

- ETRMA thanks the Commission for the invitation to respond to the Working Document and to the consultative meeting on May 26, 2008.
- ETRMA has and will continue communicating through interviews and documentation to GHK&TNO, consultants in charge of the impact assessment;
- The European tyre industry, herewith represented by ETRMA, has contributed to the workshop on May 26 with a one unanimous position of its members, positions developed during numerous technical exchanges at all level inside the representative organisations (ETRMA and ETRTO).
- When developing its views, the tyre industry has fully evaluated the affordability, capability and also sustainability of the proposed standards and methods –able to support a solid regulation.

The following responses are strictly limited to the questions raised in the Working Document.

Q1: Do you agree that a grading on rolling resistance, for C1/C2 and C3 tyres, being made available to end users and retailers, would be effective in fostering market transformation towards LRRT? What conditions would need to be met (e.g. simplicity of markings, transparency of data)?

With regards to C1/C2 tyres, along the lines of “tyre performances integrated-approach!” (TPIA, July 2007), the European Tyre Industry is of the opinion that a grading on RR integrated with a grading on wet grip, would be quite effective in fostering market transformation towards balanced- better energy & safety performing -tyres.

With regards to C3 tyres, considering that the supply chain of C3 tyres is different from tyres of categories C1/C2, the tyre industry considers that no grading is needed in addition to the information already provided to the customers on individual company basis. The customers of this category of tyres are regularly informed about the tyre performances like mileage, retreadability, regrooveability, load capacity, grip (for traction tyres) and over all cost per km.

Q2: Is there a need to adopt different grading schemes on rolling resistance for winter (M+S) and summer tyres (assuming that suitable criteria to distinguish the two categories can be agreed)?

Under work progress

Q3: Are you in favour of a grading of both rolling resistance and wet grip for C1 and C2 tyres? If not, why?

As expressed already in the TPIA, the European Industry is in favour of a grading on both rolling resistance and wet grip for C1/C2 tyres in an integrated form. A RR grading alone would have adverse effects on wet grip.

There is a need for a balanced approach not to create a distortion of the market and of consumer perception.

Q4: Should a grading on wet grip also include C3 tyres?

The Tyre Industry does not support this proposal. For the moment, there is no ISO testing method. It will be a complicated issue and the wet grip performance will depend on the vehicle configuration and the position of the tyres on the vehicle (drive, free rolling). In the TPIA, Tyre Industry did not express the need for such grading.

Moreover, considering that the supplying chain of C3 tyres is different from tyres of categories C1/C2, the tyre industry considers that no grading is needed in addition to the information already provided to the customers on individual company basis. The customers of this category of tyres are well informed about the tyre performances like mileage, retreading capability, rolling resistance....

Q5: Is the display of the measured noise value in a labelling scheme technically feasible and understandable for consumers? Do you think that it would have any significant effect on the market below the limit values set for rolling noise?

A labelling scheme of the measured noise value will have no effect on the market as this information will be totally misleading for the following reasons:

- a. The ISO test track variability will not allow a fair comparison between the values measured. An M+P study has shown that there is currently a spread of more than 5 dB(A) between various ISO surfaces making impossible direct comparison between the measured values .
- b. It may result in causing major problem for Type Approval Authorities and tyre manufacturers because independent testing will not always confirm the value labelled due to the test track variability.
- c. The future limits are too tight to allow any valid differentiation between the remaining values. If we accept that a slick tyre radiates approximately 68 dB(A), then for tyres where the limits will be 70 or 71 dB(A) the whole range of possible values will only be 2 or 3 dB(A) which is a difference just noticeable and smaller than the possible variation due to the current spread between different ISO surfaces.

- d. Some consumer may expect that the interior noise will be reduced which will not be necessary the case as interior and exterior noise are not well correlated.

For all the above reasons, The European Tyre Industry **cannot support the idea of a labelling scheme of the measured noise values.**

Q6: Do you consider that some of the issues raised in the preceding questions should be considered for retreaded tyres?

For retreaded tyres:

- there is a huge mixing of carcasses and treads. Since there is an interaction between carcass and tread, it is not conceivable to certify the wet grip performance and grading since we do not have a unique tyre type (same model);
- current Reg. 117 has no prescription concerning retreaded tyres;
- there is no measurement method for RR available for retreaded tyres;
- it would be very difficult for SMEs to handle a grading system –economically not affordable;

For the above reasons, the European Tyre Industry does not support a grading for retreaded tyres.

In any event, before proceeding any further, there is a need for a complete impact assessment and a feasibility study to be performed.

Q7: Do you think that a grading scheme could be used by car manufacturers to offer better performing tyres to their consumers? Do you think that car manufacturers can take advantage in their marketing strategy from a tyre labelling scheme?

As of today the OE products comply to specific performances imposed by the car manufacturers. Therefore OE grading does not bring any added value since the car manufacturers are well informed of the product that will equip their cars.

Q8: Should the grading of OE tyres (tyres originally fitted to new vehicles) be made available on catalogues and advertising tools on cars?

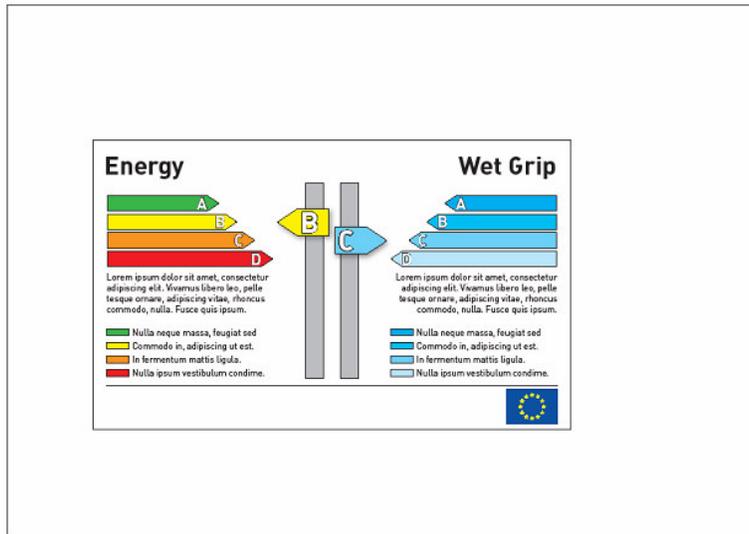
Q9: What will be the likely impact of the worst tyre principle defined for emissions measurement, on average rolling resistance of OE tyres? Is there a need to encourage car manufacturers to offer tyres with improved rolling resistance compared with the 'worst case' tyre used for the mandatory tyre-approval measurement?

Q10: How do you suggest the information on tyres should be provided (how, to whom and when)?

The information shall be provided in the Internet and at the point of Sale.

The information display to be as simple as possible: combined information display design that is not reporting any technical features related to RR and Wet Grips tyre performances; no values should be indicated –only rating by letters. An example of grading is shown here-below; any other layout as simple as this one would also be accepted.

The European Tyre Industry does not support any legal (mandatory) requirements for sticker on the tyre, nor marking requirements on the tyre.



Q11: What should be the role of the retailers?

Tyre retailers are requested to follow the instructions and recommendations from the tyre manufacturers in order to give the correct information to the customer.

Q12: Do you think that the labelling scheme should be associated with other types of measures designed to accelerate the market take up of LRRT (e.g. specific criteria or guidelines for public procurement of replacement tyres, fiscal incentives...)?

The guidelines, if any, shall specify balanced performances products.