

Public consultation on outline proposals for a Framework Regulation for Agricultural Vehicles

European Tyre Manufacturers' contribution

Brussels, 12 September 2008

The European tyre manufacturers¹ would like to thank the European Commission for offering the possibility to comment its outline proposals for a new Framework Regulation for Agricultural Vehicles.

As a general comment, we welcome that in line with CARS 21 recommendations the Commission intention is to “better regulate” the type-approval procedure for agricultural vehicles through a simplified legislation based on existing international regulations such as those developed under the UNECE 1958 Agreement. In particular UNECE Regulation 106 lays down requirements for agricultural tyres.

More specifically, our contribution relates to **Section 6. Proposed Scope and general structure of the new Regulation:**

Question 5: what is your opinion on the scope ? Do you have other suggestions in terms of scope and coverage ?

The tyre manufacturers support that agricultural tyres are targeted in the new Regulation. Concretely in application of the approved EC Regulatory Approach, the text of reference should therefore be the **UNECE Regulation 106**.

The adoption of new type-approval requirements for agricultural vehicles will imply for many suppliers and type-approval authorities that necessary time and resources along with dedicated costs, which include reworking of moulds, are allocated to properly comply with the new criteria.

For these reasons, the European tyre manufacturers require that the following timetable is applied for a full implementation of the UNECE Regulation 106:

- From the date of publication of the new Directive : all the new EC Agricultural tyre type approvals must comply.
- From the date of publication of the new Directive + 5 years : all metric radial tyres fitting new agricultural vehicles must comply.
- From the date of publication of the new Directive + 7 years : all tyres fitting new agricultural vehicles must comply.
- From the date of publication of the new Directive + 10 years : all tyres manufactured must comply.

¹ **Bridgestone Europe, Continental, Cooper Tires, Goodyear Dunlop Tires Europe, Marangoni, Michelin, Mitas, Nokian Tyres, Pirelli Tyre, Trelleborg Wheel Systems and Vredestein**

ETRMA would be pleased to further exchange with the Commission services on the rationale behind this schedule and the Industry recommendations during a joint meeting to be organised at EC earliest convenience during the drafting stage of the proposed Regulation.

Finally we support that an Impact Assessment covering all aspects of the Regulation is carried out prior the drafting of the Proposal. To this end, the European Tyre Industry remains available to provide the necessary economic and technical input to perform an objective assessment.

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