

Brussels, 11 April 2012

### **Aspects to be taken into consideration when evaluating Regulation 2011/856**

The European Tyre Industry supports EU efforts to further reduce environmental noise in order to improve the quality of life of European citizens. However, ETRMA would like to draw the attention of the legislator to the **following aspects** that must be taken into account when assessing the impact that the new proposal aiming to reduce the sound level of motor vehicles could have on tyres:

- **Specific noise requirements for tyres have recently been tightened through the General Safety Regulation (EC) 661/2009 and UN Regulation 117.02 (the first tyre noise limits were set in Directive 2001/43/EC).** The new rules apply as of November 2012 and cover all categories of tyres: tyres to be fitted on new vehicles and tyres destined for the replacement market. The European tyre industry is already making significant efforts to comply with them. This new regulation will reduce tyre noise of an average of 3.8 dB(A).
- Both regulation 661/2009 and the tyre labelling regulation 1222/2009 will enter into force in November 2012. **Any proposal for further reduction of tyre noise should wait for this legislation to be fully implemented and assessed. The following should also be taken into consideration:**
  - **All tyre performances – those that are regulated by 661/2009 (wet grip and rolling resistance together with noise), but also others – are interdependent.** This means that changing one has a direct effect on the others. No one tyre characteristics should be regulated in isolation from the others!
  - **Tyre labelling is expected to positively contribute to achieve better tyre performances.** The rolling noise grading includes the possibility of having tyres up to 3 dB(A) lower than the limits imposed by 661/2009.
- **The most immediate action that can have a direct impact on tyre noise after the implementation of 661/2009 and 1222/2009 is that of market surveillance.** It is our experience that not all players in the market accept to play by the same rules with the result of distorting both the effects of this legislation and competition. Furthermore, illegal tyres pose a serious threat to the safety of European drivers and to the environment.
- **COM 856/2011 introduces a new test method whose results cannot be compared with the test method in 661/2009 and which shifts part of the noise burden from the vehicle to the tyre.** This effectively results in double legislation which could mean that the same tyre could be compatible with one regulation, but not with the other one.
- **The noise produced by tyres greatly depends from the type of pavement on which the tyres roll.** Recent studies underline that a significant reduction – up to 11 dB(A)<sup>1</sup> – can be achieved by changing the type of road. Concrete proposals to tackle also this contributor to road noise include:
  - **Definition of harmonised testing procedures for low noise pavements**

<sup>1</sup> Yves Meunier – USIRF/ROUTIER MORIN: *LOW-NOISE PAVEMENTS: THE SOLUTIONS OFFERED BY FRENCH ROAD BUILDING INDUSTRY, Internoise 2001, The Hague, The Netherlands.*

- Making use of the **standard reference tyre** for road/surface interaction evaluation for a road grading procedure.

**ETRMA recommends:**

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- ETRMA notes that the Commission draft proposal (COM 2011/856) limits the distortion created by the new vehicle test method therefore minimising the double regulatory impact on tyre rolling noise emissions (as requested within Cars21<sup>2</sup>, Interim Report).
- Major improvements in tyre's noise performance will be achieved through General Safety Regulation 661/2009.
- The proposed implementation time for the two steps must take into consideration the time necessary for technological developments and **should therefore not be less than 5 years between each step.**
- The request for stringent limits on the overall vehicle noise must not disregard the **contribution from other stakeholders, more specifically from the road, which** plays a role in environmental noise reduction. Concretely, ETRMA proposes that:
  - **Definition of harmonized testing procedures** for low noise pavements
  - Making use of the **standard reference tyre** for road/surface interaction evaluation for a road grading procedure.

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<sup>2</sup> Tackling vehicle noise emissions – recommendation 5, page 22,