

Contribution to the Roadmap on the EU Strategy for a Sustainable and Smart Mobility

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Introduction

ETRMA welcomes the publication of the Roadmap as well as its focus to combine green and digital transitions with competitiveness and resilience.

The same elements play a key role in the identified [pathway for recovery](#) published by ETRMA on 12 May, when the sector asked to prioritize the initiatives to achieve climate neutrality and digital transition, and requested a supportive and reasonable timing to the overall changing regulatory framework.

In this context, ETRMA welcomes the coherent approach between the projected new transport strategy, the Green Deal and the EU COVID-19 recovery plan and is happy to contribute to this consultation and indicate ways to make the best use of existing tools to achieve these shared objectives and to indicate the gaps that need filling to deliver on such objectives.

High level, modular and future proof

The 2011 White Paper on Transport has been an important tool to define a roadmap towards a competitive and resource-efficient transport system but since then and notwithstanding the shocks of the past six months due to the COVID-19 crisis, transport has evolved enormously and in ways that the White Paper could not foresee.

In particular, the implementation of Artificial Intelligence in transport, mobility as a service, vehicle connectivity and the possible use of data (B2C, B2B and B2G) generated by the vehicle and its parts made the White Paper quickly obsolete.

In this context, ETRMA recommends that the new Strategy for a Sustainable and Smart Mobility is high level enough to cover key principles that should guide the upcoming regulatory action of the European Commission. These should be realistic, achievable and measurable. At the same time, in such a rapidly changing environment, the strategy may need to be revised faster than in the past and its regulatory actions should be treated like modular building blocks to allow for adaptations in case of the emergence of new disruptive trends.

Together with the technological changes mentioned above, modifications in consumers' mobility behaviours will also drive changes in transport patterns and multimodal solution options will facilitate access to mobility for autonomous driving.

In this context, ETRMA recommends that the European Commission effectively integrates different transport systems in its regulatory efforts. Now more than ever there is the need to consider each application for its specific purpose, but integrated in a larger transport eco-system. From micro-mobility solutions, to public transport, from last-mile delivery systems, to platooning of large trucks, all of these options have a role to play to ensure that transport will continue to be the "resilient enabler" that the European industry, internal market and society need.

Reap the benefits of the work done so far to achieve the objectives of the strategy

A. Road safety and tyre maintenance

Tyres are the only point of contact between the vehicle and the road and this is no larger than the surface of a postcard for a passenger car or an A4 sheet for truck tyres. As such, the primary purpose of a tyre is that of steering and holding the road. Contributing to road safety is therefore essential for the European tyre industry.

In this context, it is important to underline that none of the benefits from the use of best performant tyres would be enjoyed if these are not properly maintained.

A.1. Recommended actions

Authorities at EU and national/local levels have a clear role to play:

1. **Ensure that road-worthiness tests and road-side inspections include tyre checks. This means ensuring not only that the vehicle mounts tyres respecting the legal thread depth and that these are not visibly damaged, but also that tyres are properly inflated and they respect local rules with regard to the type of tyres to be used according to the season.**
2. **National and local authorities should continue and reinforce their work in sensitising drivers on the importance of tyre maintenance.**

B. Not just market uptake of lower and zero emission vehicles, tyres are essential enablers!

Tyres can make a sustainable contribution to the decarbonisation of transport.

Decarbonising transport does not mean just focussing on lower and zero emission vehicles, it also means making use of the most advanced tyre technology, which is essential to increase energy efficiency, especially since tyres are replaced several times throughout the life of the vehicle

Mainly because of their rolling resistance (RR), tyres account for up to 30% [HDVs], 20% [Cars] and 10% [LDVs] respectively of the fuel consumption of vehicles (when tyres are properly inflated and maintained).

The EU tyre industry has taken a proactive approach in reducing CO₂ emissions through new and advanced tyre technologies whilst promoting road safety. This engagement was reflected by the industry's commitment to the establishment of both tyre minimum requirements (since 2009) and tyre labelling (whose review was concluded earlier in 2020).

On top of implementing these regulatory requirements, already in 2016, the European tyre industry committed to further reduce the rolling resistance coefficient of truck tyres by 1% per year until 2030. Taking into account the forecasted increase by 18% of road transport, this will result in removing from the European roads the equivalent of 81,000 40 tonnes trucks every year.

In this context, it should be noted that, whilst the European tyre industry is investing in increasingly performant tyres, excelling in balancing contrasting performances for safety and rolling resistance, the market uptake of tyres with the best environmental and safety performance still has a huge potential to grow.

B.1. Recommended actions

To ensure the full impact of the progress made by the industry so far and particularly to exploit fully the benefits of the tyre labelling regulation, there is the need to support the market uptake of best graded-tyres for both private consumers and public authorities.

The need to *“Support the market take-up of fuel efficient, safe and low-noise tyres”* was already recognised in the 2011 White Paper on Transport. Nonetheless, this objective remained widely unattained. For this reason, ETRMA would be in favour of a more prescriptive approach in order to:

3. **Actively encourage Member States to implement public procurement directives setting minimum targets for the procurement of tyres with the best safety and environmental performance.**

4. Incentivise for market uptake to foster market demand for products aligned with EU environmental objectives and targets

C. Not just reducing emissions from the transport use phase, but also saving resources in production, use phase and end-of-life

Supporting low emission mobility means also supporting models that help the conservation of resources and avoiding emissions in the production process.

In the context of tyres, and more specifically of aircraft tyres, truck & bus tyres, off-road/earth moving tyres and agricultural tyres, this means looking at their circular economy.

The commitment of the tyre industry to circular economy starts from the design phase, by conceiving lighter, fuel efficient and more durable tyres, while maintaining the same performance. Furthermore, for the specific tyres mentioned above, the industry designs them to be ready for remanufacturing through retreading & regrooving, to give them more than one useful life. Provided the casing is in a sound condition, and has been designed for this purpose, used tyres can be given a new tread, thereby extending their first useful life.

For truck tyres, retreading and regrooving can be complementary strategies to significantly extend their useful life. Both practices save raw materials compared to manufacturing a new truck tyre, as the tyre casing is reused. A typical truck tyre can be regrooved three times and retreaded twice. As a result, the lifetime of the tyre nearly quadruples compared to that of a new tyre, saving more than 160 kg of raw materials.

C.1. Recommended actions:

Since 2015, this virtuous model has been under threat because of a growing number of imported single-life truck tyres into the EU. To support a resource efficient, circular, shift through remanufacturing models such as re-treading, the following actions should be carried out:

5. **The regulatory action should be focused on attractive business models through subsidies for fleets to use re-treaded tyres. Options to consider are bonuses for commercial fleets using re-treaded tyres (e.g. De Minimis in Germany) and priority in Public Procurement for re-treaded tyres on heavy duty vehicles (lorries, buses) and public transport fleets.**
6. **To develop the market for circular economy, the public sector should be encouraged to procure services and to buy services rather than products.**

Fill the regulatory gaps to boost digitisation in the tyre sector (Tyre-as-a-Service)

A. Tyres-as-a-Service: digital innovative solutions in need of a regulatory framework

The Roadmap as well as the EU Green Deal affirmed the need to rapidly deploy digital technologies to support transport sustainability and the competitiveness of the EU industry on the global scene.

For years, and despite the health crisis of the last few months, the European tyre industry has continued to develop digital mobility solutions around tyres.

Already today, tyre industry digital solutions translate vehicle data into alerts and advice used for: repair & maintenance, remote dia- & prognostic services and spare parts wholesale & retail.

Tyres-as-a-Service can bring the following benefits to drivers and fleet operators, such as:

- Saving fuel;
- Increasing road safety;
- Increasing vehicle uptime;
- Reducing congestion;
- Contributing to decarbonisation and clean air.

Tyre-as-a- service digital solutions can support public entities meeting green public procurement implementation by:

- Supporting the market uptake of products and services which contribute to the clean and sustainable mobility;
- Helping administrations to avoid high upfront investments.

For the future, Tyres-as-a-Service can address freight transport (e.g. truck platooning) and infrastructure quality management.

A.1. Recommended actions:

To make this happen, the EU needs to speed up a consistent regulatory work on smart mobility and especially on access to in-vehicle data (such as DG GROW study on policy options) but also on more comprehensive proposals on data (like Data Act) and on Artificial Intelligence. A lack of timely, comprehensive regulation may cause market failures with regard to technology adoption, platform interoperability and unjustified barriers to competition.

As recognised by the Roadmap, there is the need to set the right regulatory and non-regulatory framework for a leading European transport industry, both in clean and connected mobility

In particular, the following regulatory actions should be considered to boost tyre digitisation:

1. **The revision of the type approval of the vehicle communication interface (clarify the means of connection, define the data scope and the data standards – EC 715/2007)**
2. **The revision of the liability framework to integrate connected and intelligent devices and define the responsibilities and roles of each party.**
3. **The revision of the ITS Directive and its delegated acts, consistently with the new regulated data governance model.**

Furthermore, this governance model can be realised through the introduction of:

4. **An approval regulation of the on-board telematics platform independent from the vehicle, allowing the vehicle owner to choose their data operator independently from the vehicle manufacturer and opening the way to a free market for connected mobility services.**
5. **An ENISA cybersecurity certification scheme for connected transport, so as to ensure secure and non-monitored access to vehicle data for all parties in the connected mobility ecosystem**

Support research and innovation

A. Next Generation EU & EU budget for research: different instruments for one purpose

ETRMA also supports the objective of the Roadmap to mobilise research and foster innovations to support clean and connected mobility – including investments in the needed infrastructure, through a holistic approach to road transport.

In this context, it is key that funds for research and development are earmarked and that financial support to research activities is confirmed strongly, especially in light of the cuts made to these headlines in the deal recently reached on the next EU budget with respect to the Commission proposal.