Heavy-duty vehicles - extension of scope of procedures for determining CO2 emissions

Brussels, 9th November 2021–

ETRMA welcomes the publication of the Draft act amending Regulation (EU) 2017/2400 as regards the determination of the CO2 emissions and fuel consumption of medium and heavy lorries and heavy buses and the introduction of electric vehicles and other new technologies.

ETRMA would like to amend two points for keeping references up-to-date.

1) In the Annex IV: MODEL OF THE OUTPUT FILES OF THE SIMULATION TOOL, in part II, in point 1.2.10b the reference to the Tyre Labelling Regulation to be corrected from Regulation (EC) 1222/2009 to Regulation (EU) 2020/740. (see p.70)

2) In Annex X: (11) in point 4.2. The tests have to be performed on new test tyres in the sense of the definition in paragraph 2 of UN Regulation No 117 and not in sub-paragraph 2.18.3. This is proposed considering the fact that when a new series of amendments of the UN R117 is published the renumbering of the paragraphs may read incorrect. With the given series, the accurate reference would be paragraph 2.20.3 but, ETRMA requests to reference paragraph 2 of the UN R117. (see p.167)

Thank you in advance for taking into account our latest feedback.

About ETRMA
The European Tyre & Rubber Manufacturers Association (ETRMA) represent nearly 4.400 companies in the EU, directly employing about 370.000 people. The global sales of ETRMA’s corporate members represent 70% of total global sales and 7 out of 10 world leaders in the sector are ETRMA Members. The product range of its members is extensive from tyres to pharmaceutical, baby care, construction and automotive rubber goods and many more applications. We have a strong manufacturing and research presence within the EU and candidate countries, with 93 tyre plants and 16 R&D centres.

1 ETRMA’s membership: APOLLO VREDESTEIN, BRIDGESTONE EUROPE, BRISA, COOPER TIRES, CONTINENTAL, GOODYEAR, HANKOOK, MARANGONI, MICHELIN, NORIAN TYRES, PIRELLI, PROMETEON, SUMITOMO RUBBER INDUSTRIES and TRELLEBORG WHEEL SYSTEMS. Furthermore, members include Associations in the following countries: Finland, France, Germany, Hungary, Italy, the Netherlands, Poland, Spain and the UK.