

ETRMA

Feedback on European Commission's Proposal on Euro 7

Brussels 09th February 2023

Executive summary

The European Tyre and Rubber Manufacturing Association (ETRMA) supports the European Union's (EU) goal of cleaner mobility also beyond tailpipe, as well as the initiatives taken to regulate tyre abrasion. Regulating tyre abrasion by setting minimum standards is an appropriate lever to reduce the emission of Tyre Road Wear particles, which are considered a significant source of microplastics. The European tyre industry has been engaged on this issue for several years in particular, by supporting the development of a test method that could be used for regulatory purposes.

Regulating tyre abrasion as a means to reduce microplastics will set a milestone in greening mobility beyond the tailpipe. ETRMA strongly recommends that **any measures adopted be based on the testing method being developed at the UN level and that the future European limits will be aligned to those agreed in the UN**. However, the Commission's proposal appears to cover only those tyres intended to be fitted on EURO 7 vehicles, whereas the established tyre type approval scheme under the EU General Safety Regulation does not limit its provisions to certain vehicles. **ETRMA strongly recommends using the mechanisms of the General Safety Regulation (GSR) as a reference, especially during the definition of implementing and delegated acts in Euro 7, to ensure holistic consideration of tyre performance and to accelerate the application of tyre abrasion requirements in the European market.**

To achieve our shared green mobility goals and ambition of the legislator and of industry, we call for the following elements to be taken into account during the legislative process:

- A **synchronization between the work at UN and EU levels**: UNECE sets global safety and environmental performance requirements that help the whole of the EU automotive sector to compete globally. The EU has consistently aligned with these standards and should continue to do so in the case of tyre abrasion limits;
- Reference to the reliable, reproducible, and representative **test method**, currently being defined at the UN WP.29 GRBP Task Force on Tyre Abrasion;
- A transparent, encompassing, and rigorous **market assessment** allowing for science and quality ensured rule setting;
- Based on this, align both the **limits and tyres classification to those defined and agreed at United Nations WP.29 level** in adherence to the UNECE 1958 Agreement;
- Euro 7 tyre abrasion requirements should apply to all tyres produced after a certain date and not only to those intended to be fitted on Euro 7 vehicles; and
- Establish a specific timeline for the enforcement of tyre-related obligations in Euro 7, which includes projected time for homologation and consideration of parallel changes in tyre type approval requirements. These include limits for rolling resistance; rolling noise and wet grip (new and worn state), as per Regulation UN 117.

Finally, it is important that these new rules are supported by effective enforcement and market surveillance to ensure a level playing field in Europe and internationally. This means ensuring that all market actors are subject to and respect the same rules and that authorities are well equipped and funded to perform market surveillance activities.

Context

When tyres interact with the road, as a result of this unavoidable contact and friction, particles are released. They are a mixture of rubber and of dust/minerals from the road – hence the appellation of “tyre and road wear particles”. This friction between tyre and road is essential to ensure grip, traction, mobility and ensure the vehicle’s safety. At the same time, it has a wearing effect on both the tyre and the road. Abrasion is therefore a side effect of several essential performances that a tyre has to meet, such as fuel efficiency, grip on roads with various conditions (dry, wet, snow, ice), noise reduction, comfort, etc.

In addition to tyre design, there are several other influencing factors on tyre wear, such as driving style, road surface, curviness and typology, some vehicles characteristics (such as load), and weather conditions. **We expect the EU legislator to identify and apply appropriate regulatory instruments that address effectively these non-tyre related sources of tyre and road wear particles.**

Main points of attention

The need for a reliable test method defined at UNECE level

Since 2018, industry and authorities have been cooperating to arrive at the definition of a reliable, reproducible and representative test method. Such a robust method has been presented by industry end of 2022 at both EU and UN levels, and the work is now moving ahead in UNECE WP.29, and rolled out along with international partners e.g. Japan, UK, etc. The key elements of the work ahead are:

- a) The finalization of the test method aimed to be representative of real driving conditions, repeatable, reproducible, cost efficient and practicable. This should be usable for regulation purpose (including market surveillance); and
- b) The market assessment as soon as the test method is validated.

These are necessary to ensure the definition of ambitious limits for tyre abrasion performance rate, considering context of status quo in the market and a holistic view of regulated tyre performances. The test method will first look at the passenger car tyre segment, using a convoy of vehicles including one vehicle equipped with a reference tyre.

Synchronisation of ongoing technical work and policy ambition for EURO 7

“Define abrasion limits for tyres in order to limit the emission of microplastics to the environment” is a defined objective and task of the ongoing work at UN level (see 75th GRBP, 8-11 February 2022, agenda item 11, [terms of reference](#) submitted by the expert from European Commission and France). This work should neither be duplicated nor undermined, but referenced in the EURO 7 Regulation, ensuring a full synchronisation of the work of the two institutions.

Recital 12 of the Commission’s Proposal foresees a report from the Commission and this should reflect the work conducted at UN level, so that future emissions limits can be approved at the same time at UN and EU levels.

In the case of the Euro 7 proposal, this would have to be integrated, as foreseen by Article 14, by a delegated act. Despite announcing tyre abrasion rate limits, **the text of the proposal should clarify that the European Commission will not be establishing “EU-only abrasion limits”, but will ensure that it is done in full synchronization with the UN, with specific tyre-related obligations.**

Related definitions for the purposes of tyre abrasion to be included in synchronisation with the UN Regulation

The definitions included in Article 3 should be better refined to ensure full alignment between EU and UN regulations. This further precision should be provided by delegated act, as it had already been done in the GSR Regulation.

Finally, abrasion measure is indicated in the proposal as “tyre mass loss in g/1000km”. The tyre industry agrees that in order for all scoped tyres (categories C1, C2, C2) to efficiently contribute to improved abrasion performance it is key to measure abrasion in “gram/(1000km*ton)”. Not taking into account the load carried would put at risk tyres with a heavier load, such as those mounted on EVs.

Timeline: Feasible lead time for implementation required

The following consecutive steps and timeline are foreseen in UN WP.29 to ensure the quality of the regulatory outcome:

- Establish and approve abrasion test conditions and method (currently foreseen for February 2024); and
- Carry out a market analysis to make a picture of the state of the art of the abrasion performance of tyres currently on the market and make an ambitious and feasible assessment of the abrasion limits that will improve it.

The timeline for the Report of the European Commission on tyre abrasion foreseen for end 2024 would be challenging. At least the following conditions need to be met:

- Test method description shall be fully finalised and adopted at GRBP;
- A robust and comprehensive market assessment, done by:
- Defining, like for other newly introduced performances requirements, a mandatory reporting period for tyre placed on the market¹. This will provide a comprehensive image of the whole market;
- The European Commission ensuring that type approval authorities will accept test results obtained on the basis of a GRBP approved test method. This will allow for the testing data to also be used for the future type approval purpose. This can be done with a timeline answering the ambition of the institutions.
- Should this not be possible, the European Commission, by providing resources² and running the market assessment with a consistent and representative number of tyre types. This process should be supported through the technical expertise by the tyre industry to ensure that the outcome is representative and can be used to cover the full market.

Furthermore and similar to any other provision on tyre performances, it is crucial to allow a feasible lead time for the industry to implement the requirements. Tyre types need to be tested for homologation purposes and potential adaptations need to be made bearing in mind parallel changes in regulatory provisions for interrelated tyre performances.

Finally, any date of entry into force of abrasion limits for tyres should be based on the tyre date of production (which is moulded on the sidewall of each tyre), rather than based on the date of placing the tyre on the market or installation.

As a result, it is necessary to set a separate timeline of implementation for tyres, including taking into account a phasing in for new tyre types and for all tyre types, as it was also done in the GSR Regulation.

Application scope: Towards more immediate environmental benefit

Tyres are replaced 4-5 times in a car lifetime. As such, they can give almost an immediate contribution to the upgrade of the EU’s vehicle fleet once new abrasion limits are adopted. However, by limiting the application of abrasion rate limits only to tyres fitted on Euro 7 vehicles, the impact on the market will be negligible for several years.

¹ This has been the case when setting the CO2 targets for HDV Regulation (EU) 2018/956 or, at UN level the similar UN R101 as well as R51.03, for the vehicle noise requirements according to the ASEP methodology (Proposal for Supplement 7 to 03 series of amendments to UN Regulation No. 51 (Noise of M and N categories of vehicles).

² The tyre abrasion test will be the most expensive and elaborated ever applied to tyres. In case of a vehicle test method, the testing of one tyre would require 16 to 20 days over 8000 km with a cost of around 11ke/tyre. The test would thus imply resources and impacts: it will be important not to waste the data accumulated for the creation of the State of Art.

Therefore, ETRMA calls on the Commission to indicate that any new requirements will apply to all tyres produced after a certain date, to be decided according to the already consolidated approval process of test methods and abrasion limits defined in synchronization with the UN.

Enforcement and market surveillance

An important element for the success EURO 7, as with previous type approval regulations, is to pair the new obligations of producers with effective enforcement and market surveillance. With the European tyre industry heavily investing in compliance and consumers increasingly trusting the products that they acquire, there is the necessity to both secure these investments and protect the trust of the consumers, by making sure that all products in the market are compliant with these high standards.

To do so, national authorities need a sound infrastructure, good organisation, appropriate legal powers, suitable facilities and skilled officers, benefiting from high quality training.

Conclusions

ETRMA is fully committed to this legislative proposal and to the setting of minimum requirements for tyres with regard to tyre abrasion.

However, as it stands, the Proposal of the European Commission is incomplete with regard to tyres. Not only because the work done at the United Nations needs to be finalised and synchronised in Euro 7, but also because it lacks many of the regulatory elements that would allow for a smooth implementation. These include specific tyre-related obligations, the application of these obligations to all tyres produced after a certain date and not only to those fitted to Euro 7 vehicles, a progressive timeline of implementation for such obligations and the possibility to review definition of tyre types according to the future test method and limits.

Finally, strict enforcement and market surveillance should be applied in order to ensure both the achievement of the objectives of this Regulation and a level playing field on the European market.

ETRMA remains available to cooperate with the European Commission and the co-legislators to tackle these shortcomings during the legislative process. We are committed to achieve a Regulation that will be fit to include future tyre limits for abrasion and that will deliver sure and quick results in improving the contribution of tyres to the overall objective of cleaner mobility in Europe.
