

# ETRMA Response to the consultation on the Single Market Strategy for 2025

The European tyre industry is a driving force behind Europe's economy and society. Without tyres, Europeans cannot move, our economy would falter, and critical sectors such as defence and agriculture would cease to function. A [recent study conducted by Oxford Economics](#) on our behalf shows that 500.000 European jobs are dependent on the tyre industry which contributes about €44bn to European GDP.

However, the industry faces significant challenges in maintaining a competitive manufacturing presence in Europe. Rising energy and labour costs, coupled with growing barriers to competitiveness, are undermining the industry's value chain. These obstacles include regulatory pressure, trade and geopolitical tensions, and the ongoing crisis within the European automotive sector.

Despite recent plant closures, the European tyre industry remains a strong pillar of manufacturing and innovation, with 71 production facilities across 16 Member States. Between 2017 and 2023, the industry invested €10 billion in R&D, leading to the creation of more than 20,000 patents.

The European Tyre and Rubber Manufacturers Association ([ETRMA](#)) sees this new Strategy for the Single Market as a great opportunity to address some of these challenges - how to address barriers to the free movement of goods and services, which potential policy actions can be taken to tackle regulatory and administrative challenges and how to improve horizontal governance of the single market and the enforcement of its rules – and most of all **create a clear and predictable regulatory environment that supports European businesses.**

ETRMA would like to contribute with the following key recommendations:

## 1. Addressing barriers to the free movement of goods and services in the EU Single Market

- **Establish a sector-specific regulation for access to in-vehicle data to allow businesses to innovate and create new products and services.** The European Commission shall establish a robust, sector-specific EU legal framework that ensures open, standardized, and secure access to in-vehicle data. Today, accessing in-vehicle data remains challenging. Businesses face barriers imposed by vehicle manufacturers to access car data<sup>1</sup>. This could be done under FRAND condition, addressing security concerns and ensuring competition and innovation, especially for SMEs.
- **Introduce wide End-of-Waste criteria for tyres.** Under Article 6 of the Waste Framework Directive, the Commission has delegated powers to establish end-of-waste criteria to harmonise rules and address legal barriers in the Single Market to boost secondary raw materials and support sustainable and circular innovations within the tyre industry and other industries.
- **Make use of EU regulations instead of EU directives to promote harmonisation across Member States** for product, corporate, and service requirements, could reduce the risk of fragmented adoption of laws and the proliferation of “local” add-ons which are often in breach of the principle of free movement of goods (e.g., Triman Logo)<sup>2</sup>.

## 2. Addressing regulatory and administrative challenges in the single market and policy actions

- **Complementary strategies need to be put in place to ensure a smooth implementation of the EU Deforestation Regulation (EUDR).** The implementation of EUDR needs to be harmonised, ensuring

effective enforcement at national custom level. Furthermore, facilitation for intragroup transactions inside the EU as well as in the downstream value chain need to be foreseen.

- **Harmonisation and centralisation of reporting obligations** to the extent possible, all requirements needed for the placing on the market of products, chemical mixtures, prototypes should be centralized at EU level to avoid duplication of the same obligations in different Member States. Examples are CBAM, REACH, CLP, EUDR, CSRD, CSDDD, EU Forced Labour, Taxonomy, etc.
- **Create market incentives and public procurement schemes for high-quality and sustainable products such as best-performing tyres and retreaded tyres.** The market of high-quality and sustainable tyres is fragmented causing insufficient demand of products in certain EU countries. To achieve economies of scale at the EU level, public procurement schemes and incentives (such as those applied for EVs) should be designed and implemented to encourage the market uptake of the best products, technologies, and services such as the use of best-graded tyres that enhance safety and reduce emissions, and more sustainable products such as retreaded tyres that save energy, raw materials, supporting support EU circular economy goals.
- **Use the regulatory instruments where needed to boost market uptake of high-quality and sustainable products.** Regulatory initiatives such as tyre label for retreaded tyres, greening corporate fleet initiative; revision of the Clean Vehicles Directive could ensure that all EU citizens and enterprises (e.g. fleets) have equal access to the best products and services for their mobility.

### 3. Initiative for the horizontal governance of the single market and the enforcement of its rules

- **Ensure adequate market surveillance on tyres** to enforce the growing number of environmental legislation and establish a level playing field for all products on the European market.
- **Ensure better cooperation amongst national market surveillance authorities and customs**, earmark funding derived from penalties for further market surveillance activities, to support the costly and sophisticated tests tyres require.
- **Impact assessment on the competitiveness of legislative proposals targeting the Single market.** Impact assessments should evaluate the effects on the EU competitiveness of a legislative proposal as a way to ensure effectiveness, in particular ensuring that changes in the scope or approach of legislation could not happen without prior impact assessment.
- **Harmonization of minimum level of penalties at EU level** to avoid that certain member states become more attractive for non-compliant and unsafe goods.

#### About ETRMA

The European Tyre & Rubber Manufacturers Association (ETRMA) represent big corporates and SMEs in the EU, contributing €43.9 billion to EU GDP. The global sales of ETRMA's 14 tyre corporate members represent 70% of total global sales and 7 out of 10 world leaders in the sector are ETRMA Members<sup>3</sup>. We have a strong manufacturing and research presence within the EU, with 71 tyre-producing plants, 14 headquarters and 23 R&D centres<sup>4</sup>.

<sup>1</sup> Judgement ECJ Case C-296/22 Carglass vs FCA ([link](#)); Judgement Higher Regional Court of Cologne (HRCC) Belron vs Stellantis ([link](#))

<sup>2</sup> [https://ec.europa.eu/commission/presscorner/detail/en/inf\\_23\\_525](https://ec.europa.eu/commission/presscorner/detail/en/inf_23_525)

<sup>3</sup> ETRMA's membership: APOLLO TYRES, BRIDGESTONE EUROPE, BRISA, CONTINENTAL, GOODYEAR, HANKOOK, MARANGONI, MICHELIN, NEXEN TIRE EUROPE, NOKIAN TYRES, PIRELLI, PROMETON, SUMITOMO RUBBER INDUSTRIES AND TRELLEBORG WHEEL SYSTEMS. Furthermore, members include Associations in the following countries: Czech Republic, Finland, France, Germany, Hungary, Italy, the Netherlands, Poland, Slovak Republic, Spain and the UK.

<sup>4</sup> <https://www.etrma.org/wp-content/uploads/2024/11/The-Economic-Impact-of-the-EU-Tyre-Manufacturing-Industry.pdf>