

Comments of BIPAVVER to the Consultation Document on energy labelling of tyres

The Independent Tyre Retread Industry Bipaver thanks the Commission for the invitation to respond to the Working Document and to the Consultative meeting last Monday.

General comments :

- Bipaver welcomes the initiative of the Commission to improve the consumer awareness of tyres in general and energy emission in particular.
- Bipaver represents the interests of independent retreading industry in Europe, mainly SME companies throughout the entire Union.
- Bipaver already communicated through the interviews and documentation to GHK, Consultant to the Commission.
- Due to similar initiatives the comments of Bipaver will be focussed strictly to the subject mentioned in the Working Document.

Q1: Do you agree that a grading on rolling resistance, for C1/C2 and C3 tyres, being made available to end users and retailers, would be effective in fostering market transformation towards LRRT? What conditions would need to be met (e.g. simplicity of markings, transparency of data)?

The question related to C1 and potentially C2 tyres can be answered easily. However, our experiences with retail and the interest that consumers show during the purchase process gives little trust in changing consumer behaviour. It is clear that with an average under pressure over appr. 50% of all motorists in the Union every step and initiative to improve this situation is of added value to the consumption of energy, to road safety and to the environment.

For C3 tyres the case is somewhat different. Transporting companies are very much aware of the effect of tyre pressure and the Rolling Resistance of Tyres due the exploitation costs involved in tyres and the thorough information that is provided by industry and retail to their customers directly.

With few standards available in the market it is also accustomed that industry uses their steps forward in comparison to former patterns and designs to make their case to the end user.

Concerning the definition of markings in tyre industry Bipaver is not in favour of additional side wall markings. The economic impact is too important. Bipaver believes that information, if correct and controllable, should be communicated in line with the actual transmission of data, i.e. with Article Coding (basically

provided to use information technology in logistics and invoicing) or made available through the internet.

Q2: Is there a need to adopt different grading schemes on rolling resistance for winter (M+S) and summer tyres (assuming that suitable criteria to distinguish the two categories can be agreed)?

The growing awareness and application of winter tyres almost forces us to confirm the need of an additional grading scheme, but so would, special (4x4, OTR, etc) and spare tyres.

Q3: Are you in favour of a grading of both rolling resistance and wet grip for C1 and C2 tyres? If not, why?

Bipaver is in favour of combining the grading of Wet Grip as an trustworthy indicator for safety with Rolling Resistance for the Energy Efficiency of the tyre. Bipaver asks the Commission to be careful with the use of technical terminology in their communication with consumers. Promises are only achievable if motorists take their responsibility in the maintenance of the tyres fitted under their vehicles. Our experiences in retail and the collection of used tyres shows the lack of interest for more than 70% of all consumers.

Q4: Should a grading on wet grip also include C3 tyres?

As already indicated the end user of C3 tyres do have an important awareness and are 'informed' in the commercial process by new tyre and retread industry and consequently 'coached' by their retail supplier. Bipaver does not support the grading of wet grip and rolling resistance for C3 tyres.

Q5: Is the display of the measured noise value in a labelling scheme technically feasible and understandable for consumers? Do you think that it would have any significant effect on the market below the limit values set for rolling noise?

Within the frame is this particular Working Document, being focused at energy efficiency, Bipaver cannot respond to this question.

Q6: Do you consider that some of the issues raised in the preceding questions should be considered for retreaded tyres?

The complexity of the retreading process makes it very difficult to indicate values to retreaded tyres as such. The European market of Commercial Tyres consists of approximately 100 brands of tyres (the used tyre is the basic material for the retread industry) and more than 80 brands of pre cured and hot cured treads, respectively side walls. That alone makes a matrix of more than 8.000 varieties in one size alone. No need to indicated the economic effect of testing tyres in a

SME environment. All beside the fact that there is no standard available today for C3 and their retreads.

Bipaver informs the Commission that initiatives have been undertaken to take their responsibility and is willing to prepare a format, bearable to SME retreaders, to indicate the energy and rolling resistance performance by means of experiences and worst case proceedings. Thus giving their (associated) members a 'Code of Conduct'.

Q7: Do you think that a grading scheme could be used by car manufacturers to offer better performing tyres to their consumers? Do you think that car manufacturers can take advantage in their marketing strategy from a tyre labelling scheme?

Q8: Should the grading of OE tyres (tyres originally fitted to new vehicles) be made available on catalogues and advertising tools on cars?

Q9: What will be the likely impact of the worst tyre principle defined for emissions measurement, on average rolling resistance of OE tyres? Is there a need to encourage car manufacturers to offer tyres with improved rolling resistance compared with the 'worst case' tyre used for the mandatory tyre-approval measurement?

Essentially the retread industry is not active in OE manufacturing, with the exception of the local construction of garbage trucks, special vehicles, etc. The type approval of commercial tyres, followed by the regulations 108 and 109 (2006/443/EC) does not leave space of OE activities. Furthermore the fall back of retreaded passenger car tyres over the last decade, due to cheap imports from Asian countries, retreading is not economic anymore with the exception of special patterns.

Q10: How do you suggest the information on tyres should be provided (how, to whom and when)?

The infrastructure of the points of sale today, i.e. a workshop where consumers are prohibited to enter for reasons of health & safety and a reception separately, the consumer does not see physically a label on the tyre. Furthermore, with the lack of space and readability of markings on the side wall of the tyre, Bipaver is in favour of using internet facilities and the communication between industry, importers and their retailers as the basic foundation for the information towards consumers and end users.

Q11: What should be the role of the retailers?

By definition retailers are the first contact in the purchase process thus having a key position in communicating the essentials. Bipaver wishes to underline that today consumers give priority to wear (mileage), price and safety.

Q12: Do you think that the labelling scheme should be associated with other types of measures designed to accelerate the market take up of LRRT (e.g. specific criteria or

guidelines for public procurement of replacement tyres, fiscal incentives...)?

The cost of the tyre hardly changes over the last years and there is little space in margin today for retailers to benefit in pushing certain aspects. We feel however that the (marketing) benefits should be in the hands of the Point of Sale. The benefits for the motorist is clearly in the saving benefits.

Leiden, May 23rd 2008.