

**Contribution to the consultation on the working document by DG Energy&Transport
on tyre labelling**

**on behalf of the Air, Nuisance, Risk Management, Environment and Health Division of
the Environment, Nature and Energy Department of the Flemish government**

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Contribution:

General

In its Consultation Document on Tyre Labelling, the European Commission has outlined elements for a proposal on mandatory labelling of tyres with their rolling resistance characteristics and with their wet grip characteristics.

However, the current document questions if labelling tyres with their *rolling noise* characteristics would be effective. Question 5 of the consultation reads: “*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?*”

The answer of the Air, Nuisance, Risk Management, Environment and Health Division of the Environment, Nature and Energy Department of the Flemish government to both questions is positive (see below).

We would like to stress the fact that noise is a major environmental nuisance, as stated firmly in the Green Paper on Future Noise Policy (1997):

“Environmental noise, caused by traffic, industrial and recreational activities is one of the main local environmental problems in Europe and the source of an increasing number of complaints from the public”.

Rolling noise from car and truck tyres is one of the principal sources of noise pollution. **Therefore we believe it to be justified to include rolling noise in the labelling scheme, together with rolling resistance and wet grip.**

Answers to the questions

1. *Is the display of the measured noise value in a labelling scheme technically feasible and understandable for consumers?*

Yes. A labelling scheme involving rolling noise could be performed in two ways:

- by referring to the *emission* of noise (dB) achieved in the tyre type approval tests; this information is readily available out of the type approval results
and/or
- by labelling tyres which are an agreed threshold below the noise limit as “*low noise*” tyres; this information is readily available out of the type approval results; moreover it is possible that a “low noise” label is easier to understand by customers.

2. Do you think that it would have any significant effect on the market below the limit values set for rolling noise?

Yes, we do. In fact, labelling tyres with their rolling noise characteristics was one of the recommendations included in the report by the *Forum of European National Highway Research Laboratories* informing the European Commission on the revision of the tyre noise regulations (http://ec.europa.eu/enterprise/automotive/projects/report_tyre_road_noise1.pdf):

“The directive should specify that tyres must be stamped (labelled) with the noise level achieved in the type approval test.” (Recommendation 28, p. 109).

Labelling could improve the effectiveness and impact of the directive on tyre noise, which is currently under revision in three ways:

- It improves *consumer choice*. Certain consumers wish to demonstrate environmental responsibility. The possibility to demonstrate this by choosing a “low noise”-labelled tyre would increase the share of low noise tyres sold. This would reduce the average level of tyre noise, further reducing the total annoyance caused by road traffic throughout Europe.

Other customers would prefer low noise tyres because they reduce the noise level inside the car during driving, reducing the traffic noise in a similar way.

- An explicit indication of the noise level of a tyre could improve *public awareness* on the noise issue, which is an explicit objective of the European Directive on Environmental Noise (2002/49/EC) (art. 1.1.b).
- It would assist member states that are considering (e.g. financial) *incentive schemes* to create a market for low noise products. Such schemes could for example be considered when designing action plans to reduce noise annoyance, in accordance to the European Directive on Environmental Noise (2002/49/EC). The effectiveness of such schemes could be demonstrated with reference to
 - o The fact that such *source-oriented measures* are highly effective and have a beneficial cost/benefit ratio. This has already been demonstrated in several studies, leading the Working Group on Health & Socio-Economic Aspects¹ to recommend source-oriented measures as a priority measure in their *Position Paper on the Effectiveness of Noise Measures*.
 - o The fact that imposing more stringent limit values - by the nature of the limit values themselves – only has a *restricted impact on the average noise level of tyres*. More stringent limit values address only the maximum noise levels of the loudest tyres without affecting the level of the medium and quiet tyres which are already under the proposed limit values. The FEHRL-report points out that the proposed reduction in limit values will not lead to an equivalent reduction in average noise levels, because the distribution will not simply be shifted downwards by the change in limit values but instead will become more

¹ The WGHSEA is a working group related to the EU noise Expert Network, which was created in 1998 by the European Commission.

narrowly located close to the new limit value. The introduction of some kind of label could help to avoid this situation by favoring low noise tyres, even if these tyres are already below the proposed limit value and are not directly affected by the proposed changes. This point was e.g. also made by the *I-INCE Working Party on Noise Emissions of Road Vehicles* in its July 2001 study *Noise emissions of road vehicles effect of regulations*.²

- The fact that the European Commission has repeatedly stressed that “it increasingly favours economic and market-based instruments”, acknowledging the fact that “they provide a flexible and cost-effective means for reaching given policy objectives” (Green paper on market-based instruments for environment and related policy purposes, COM(2007) 140 final). Assisting member states developing (financial) incentive schemes by introducing the possibility to label low noise tyres in the revised directive, would be in line with the position of the EC.

² “It would be favourable if a means of affecting the noise levels of the vehicles that emit medium and low noise levels can be found and applied. Introduction of some means of commercial arguments for lower exterior noise emission would be beneficial. Means for encouraging the use of vehicles that are as quiet as possible may include tax incentives connected to noise levels, exemption from toll for low-noise vehicles, limitation of travel based on a quota system with “environment-affecting” points, as well as permits (connected with noise classification) to travel in restricted low-noise areas, on restricted roads or at restricted times.”