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Brussels, 30 May 2008

EU COMMISSION CONSULTATION DOCUMENT ON TYRE LABELLING

IRU Observations on the EU Commission Consultation document on tyre labelling.

I. BACKGROUND

In its Energy Efficiency Action Plan (COM(2006) 545), the EU Commission announced the preparation of a proposal for a directive on energy labelling of tyres. The aim of this proposal would be to promote market transformation towards low rolling resistance tyres (LRRT) as significant fuel savings and CO₂ reduction can be achieved through their increased use.

On 28 April 2008, the EU Commission produced a document on this topic in order to allow the consultation of the different stakeholders. This document raises twelve different questions relating to technical aspects.

In addition to giving some general observations, the IRU has answered these questions below.

II. GENERAL OBSERVATIONS

The IRU welcomes the EU Commission initiative relating to the labelling of tyres. However, the initiative should be placed in a wider perspective and should not solely be aimed at the reduction of fuel consumption and CO₂ emissions. Harmonised criteria per tyre size (width and height) recognised by all EU Member States for the ranking of low rolling resistance should be put in place if the objectives of a new Commission proposal are to be reached. There should also not be any loss in relation to existing tyre properties such as braking, stability and durability, because this will have a negative impact on road safety. It is also essential to consider the different road surface irregularities, otherwise optimal benefits of such a proposal will be seriously limited.

It would also be useful to add wet grip into the ranking. It should be avoided that any measure relating to the promotion of LRRT increases current noise levels.

Better harmonised measurement methods taking into consideration all those "technical" aspects are needed.

III. QUESTIONS RAISED BY THE EU COMMISSION

Q1: Do you agree that a grading on rolling resistance, for C1 (private cars)/C2 (light commercial) and C3 (heavy commercial) 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 key issue is to have a correct and harmonised flow of information with real facts to present to the end users and retailers. Small and efficient marking (coloured) on the tread wear should be enough to indicate that a tire complies with LRRT. Grading tyres because of better rolling resistance or wet grip or noise could give important information allowing the end user to make the right decision. There should not be different grading for rolling resistance. All LRRT should use the

same standards to target harmonised criteria for the rolling resistance for each size, without jeopardising the actual performance of existing tyres such as braking properties. A tyre that we consider good must be correctly balanced in combination with other properties such as offering the lowest possible rolling resistance and, at the same time, good braking and grip performances.

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)?

No, as mentioned above, if we have established the LRRT for each size, there should be no difference for winter and summer tyres. Different grading schemes will only confuse the end users, and if an advantage is given for one type, it could force the end users to swap tyres too early, with dramatic results in case of an incident. Winter tyres are known to have a worse rolling resistance, meaning higher fuel economy. LRRT should not mitigate the performance versus conventional existing tyres.

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

It is important that wet grip is taken into consideration along with rolling noise. Under bad weather conditions such as rain the speed needs to be adapted anyway and continuous campaigns regarding this subject should be made.

It is a sine qua none condition to link grading LRRT and wet grip together but we need to consider the rolling noise level criteria as well, which is also an important contributor to the environmental issue.

Again, the criteria need to be harmonised by family of tyre sizes.

Today, tyre manufacturers without the wide-ranging technical know-how of vehicle manufacturers are able to produce tyres with low-rolling resistance but performance-wise they are different, so including two or three technical aspects into the ranking will keep the tyre business at a higher value without penalising safety or the environment.

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

Not necessarily, as C3 tyres are for heavy vehicles, and the wet grip is not the number one priority in the commercial road transport sector. But it would be necessary to associate the rolling noise into C3.

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?

Yes, in the same way as the LRRT would be. The rolling noise absolutely needs to be included in all three category sectors. Today vehicle interiors are soundproofed by acoustic materials which increase the empty weight and therefore the fuel economy. So by targeting rolling noise, we can reduce empty weight and thus benefit vehicles' fuel consumption. But a high source of noise is coming from the road surface due to the friction of the tyres. Road surfaces vary considerably from region to region and thus the rolling noise can be penalised. Tyres can certainly effectively reduce up to 2dB for heavy vehicles, but road surfaces can easily reduce the noise of the vehicles by 8-10 dB.

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

Yes, as retreaded tyres are the most used in the heavy vehicles sector.

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?

Yes, but end users need to have real incentives concerning the lifespan of the tyres when purchasing such product.

Everyone involved in the road transport chain will have an advantage, but the major beneficiaries will be the vehicle and tyre manufacturers. The end users need to get real incentives when purchasing such new performance tyres.

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

Not necessarily as it will be part of a package. But if we have a distinguishing coloured marking, the information should be circulated correctly with adequate incentives in force for the professional users.

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?

Several analyses demonstrated that LRRT are cost-effective. A great interest from the end users to reduce their fuel consumption and emissions are very crucial points. It is important that vehicle manufacturers offer LRRT tyres upon purchase of new vehicles, in order to educate at source the end users to reach the targets in the long-term.

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

The information should be made available firstly to the road transport industry with professional activities, with a correct message and then to the media all year round. Such information has to be available for end users in order to make a safe and fair comparison on tyres available.

Q11: What should be the role of the retailers?

To inform and give correct information to the end users concerning the labelling schemes for their products.

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...)?

For the professional, the scheme should be accompanied by fiscal incentives for OE and replacement tyres.

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