Views from the **Norwegian Public Roads Administration** on the questions asked in the working document.

The Norwegian Public Roads Administration supports the labelling of tyres with the ranking of **rolling resistance.** To include a ranking on wet grip may also be useful, although we understand that the present measuring method has deficiencies and may need to be improved. **We strongly advise that exterior noise should be included in the tyre labelling.** We believe the consumers have a right to know whether they are buying a noisy tyre (with adverse effects for their fellow human beings) or a quieter tyre. From our point of view there will be minimal or no extra cost of including a noise mark in a label that will be produced for rolling resistance.

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?
YES

What conditions would need to be met (e.g. simplicity of markings, transparency of data)?

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)?
We think it is sufficient to include only summer tyres. Summer tyres represent the main market share. Under winter conditions other factors like ice and snow influence on the rolling restistance, wet grip and noise, and therefore it is less important (and too complicated) to include winter tyres.

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

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

Q5: Is the display of the measured noise value in a labelling scheme technically feasible and understandable for consumers?
YES
The FEHRL report gives a good overview of the potential to reduce noise from tyres. There is a big gap between the worst and the best tyres, and this should be made visible to the consumers. Many consumers will not understand a decibel-value. In our opinion a class system would be more sufficient, i.e. class A, B and C (see the proposed principle in the end of this document). However, it is important that the measured noise value also is given. This

will be of importance to retailers, public authorities in public procurements, fiscal incentives etc.

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

YES. If consumers have the opportunity to choose a tyre they know is more environmentally friendly over another, there will be greater awareness on this topic from both consumers and the media. This will most likely result in an alteration in the market. The effect may be greatly enhanced if incentives are introduced by national or local authorities. In Norway we are now considering possible national incentive schemes.

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

YES

Q7: Do you think that a grading scheme could be used by car manufacturers to offer better performing tyres to their consumers?

YES

Do you think that car manufacturers can take advantage in their marketing strategy from a tyre labelling scheme?

YES

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

YES

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?

Studies show that LRRT are cost effective, as the potential price increase in purchasing the higher performing tyre will be compensated with savings over its lifetime. There is therefore a direct interest for tyre purchasers to reduce their fuel bill and for society as a whole to reduce its emissions due to road transport. On these bases it will be useful to encourage car manufacturers to offer tyres with improved rolling resistance compared with the “worst case” tyre for the mandatory tyre-approval measurement.

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

It is important that the information on tyre characteristics/performances reach out to the consumers in such a way that consumers and stakeholders have the ability to make informed choices when buying replacement tyres. Such information has to be available for consumers at their point of decision so the consumers can make a safe and fair comparison of the tyres on the market. We suggest making the data from type approval publicly available and that data

from type approval should be employed. To inform consumers and professional buyers the data should be provided in large fonts on stickers on the tyres, in sales material, and in databases.

We see that a labelling scheme such as the one used for energy labelling on household appliances are already well known amongst consumers and therefore easily can translate to tyres with success in the terms of consumer habits shifting in favor of the best tyres available.

Q11: What should be the role of the retailers?
The retailers should be an important channel where consumers can get objective and reliable information on the different types of tyres and they should contribute to awareness-raising. They should provide information on the labelling scheme and help consumers choose tyres with good safety, energy and noise performances.

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…)?
YES – The labelling scheme should be designed with other types of measures aiming at accelerated market take up of LRRT and low noise tyres in mind. However, design or guidelines for such schemes should be left to subsidiarity. Emphasis should be given on enabling an efficient internalisation of the external costs of tyre noise.

Proposal for principle for a mandatory tag (attached to the tyre):