

PSA Answer to Commission's questions on Tyre Labelling

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)?

Yes, we agree. Compared to noise and wet grip, the rolling resistance is the most important information for the customer. There should be only the information of rolling resistance. As a fallback position, the information of the three independent parameters rolling resistance, noise and wet grip may be given. However, this would complicate the grading scheme. In any case, a mixture of all three parameters in one indicator is not acceptable from the manufacturer's and the customer's point of view. The grading of rolling resistance should be done in intervals of 1 kg/t.

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, the customer will get confused with different rating schemes. The energy consumption depends on the rolling resistance. If the rolling resistance of a certain tyre type (for instance M+S) is worse than other types, the customer has the right to know it.

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

No, regulations should define acceptable minimum requirements for the level of noise and wet grip. However, a grading with different classes is only necessary for rolling resistance. Rolling resistance is more important for the customer's choice of a tyre than noise and wet grip. The grading system should be kept as simple as possible.

Q4: Should a grading on wet grip also include C3 tyres? => See Q3

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?

No, maximum noise levels for tyres and vehicles may be prescribed by regulation. However, the customer does not mind the tyre noise level. A well acoustically isolated vehicle may compensate a noisy tyre.

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

In theory, it would be good to have the same requirements for retreaded tyres as for new tyres. However, this may be practically unfeasible.

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, we think so.

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

Yes, even today the customer is informed about the possibility to have low rolling resistance tyres. However, as there is no official grading, an objective comparison is not possible for the customer.

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?

A good solution to encourage vehicle manufacturers to offer tyres with improved rolling resistance would be to do the emission measurement with the mostly sold tyre instead of the worst case tyre.

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

In our opinion, the best way would be to mark the rolling resistance with a colour code on the tyre tread. In this case, the falsification is more difficult than for a simple label. The colour may disappear after a certain mileage when the tyres are in use.

It may be unfeasible for tyre manufacturers to permanently mark the rolling resistance on the tyre because the same mold may be used with different materials (different rolling resistance, noise, wet grip etc.). In addition, the tyre sidewalls are already full with different markings.

A labelling with a sticker makes two main problems:

- 1) The label has to stay on the tyre from the production process of the tyre, during the mounting on the vehicle, during the transport of the vehicle until the delivery of the vehicle to the final customer. It seems to be difficult to assure any loss of the label during this process.**
- 2) A label can be exchanged easily. In consequence, it would be a high risk that some retailers put wrong labels on the tyres, which indicate a too low rolling resistance.**

Q11: What should be the role of the retailers?

The risk of a falsification by retailers should be limited. A possible solution would be a colour code on the tyre tread (see Q10).

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...)?

We do not see the need for such measures.