

## **Rhodia Answers 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)?*

Tire Rolling Resistance has a significant influence on vehicle fuel consumption (20%) & related emissions, in this context, Rhodia is convinced that a grading both for C1/C2 and C3 tyres would enhance the conversion towards LRRT. The usage of the seven band scheme, commonly used for white goods labelling, with a band of 1 kg/T would facilitate the understanding of such a system.

*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)?*

To avoid confusion with different labelling systems, Rhodia recommend using the same grading whatever the nature of the tyre.

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

Rhodia has no opinion on this question.

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

Rhodia has no opinion on this question.

*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?*

Rhodia has no opinion on this question.

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

Rhodia has no opinion on this question.

*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 take advantage in their marketing strategy from a tyre labelling scheme?*

This appears technically possible, there are several recent examples in Europe and the US of different OEMs promoting LRRTs on their new models in the press and in their marketing material.

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

This appears technically possible, Rhodia notes that a number of OEMs are already including information on the use of LRRTs in their marketing material. Rhodia thinks that an OE grading system would be a good idea.

*Q9: What will be the likely impact of the worst tyre principle defined for measurement, on average rolling resistance of OE tyres? Is there a need car manufacturers to offer tyres with improved rolling resistance compared worst case' tyre used for the mandatory tyre-approval measurement?*  
Rhodia believes that this is likely to push OEMs to increase their use of LRRTs.

*Q10: How do you suggest the information on tyres should be provided (how, to whom and when)?*  
The information should be readily available at the point of sale and on the internet sites that consumers use to aid their decision process on tyre purchase (for example the tyre manufacturers' sites).

*Q11: What should be the role of the retailers?*  
Retailers should be able to explain to consumers the practical implications of different rolling resistances (the financial/environmental benefits and costs). In Rhodia's opinion this would be a key driver for adoption of the technology.

*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, Rhodia thinks that a combination of measures in addition to the labelling scheme would accelerate the penetration of LRRTs and consequently generate greater CO2 emissions savings.