

Department for **Transport**

Ms Alix Chambris
European Commission
Directorate-General for Energy and Transport
Unit D3 - Energy efficiency of products & Intelligent
Energy - Europe
Office DM24, 04/149
Rue de Mot 24-26
B-1049 Brussels

By email to Alix.CHAMBRIS@ec.europa.eu

Eur Ing Robert Falk
Senior Engineer
CFV3
Department for Transport
1/34 Great Minster House
76 Marsham Street
London
SW1P 4DR
Direct Line: 020 7944 2077
Fax: 020 7944 2605
robert.falk@dft.gsi.gov.uk

Web Site: www.dft.gov.uk

Our Ref: 007\005\0006

21 May 2008

Dear Ms Chambris,

UK Government preliminary response to questionnaire on tyre labelling

I refer to your email with attachments on tyre labelling, and the meeting scheduled for 26 May.

We have some general comments and questions, and have responded to your questions below.

Has an impact assessment been done on all of the measures proposed here?

Given the importance placed on reducing CO2 from new cars, both from tailpipe emissions, but also from complementary measures such as the proposal from tyres, what steps is the Commission taking to ensure that the various proposals being put forward by different DG's are joined up with a strategic overview of the objectives of the proposals and their environmental benefits, ensuring that CARS21 better regulation principles apply?

We note that the placing the rolling resistance of tyres into categories, now here, is useful to indicate to the consumer the merits of one tyre relative to another provided the consumer sees that information. However, there needs to be collaboration between the different DGs in Brussels over this, particularly on maximum rolling resistance and the size of the different bands - they were 1.5 kg/tonne but I am led to believe this may change to 1.0 kg/tonne.

The discussion on wet grip under heading "Questions to the stakeholders" paragraph 4.1. "Information on tyre parameters to be provided on the labelling scheme" implies that wet grip requirements may be made mandatory from 2012. However, UN-ECE Regulation 117 in Geneva will make the wet grip requirement mandatory on new approvals of C1 tyres from **February 2009**.

It is quite surprising that the ETRMA are volunteering to increase the wet grip limits. During negotiations of current wet grip index limits they inferred that these represented the absolute 'state of the art' and some tyres would have to be taken out of production as they could not meet such stringent limits. However, if ETRMA are now confident that such

improvements to wet adhesion can be made without compromising the other aspects (Rolling Resistance and Noise) we can support this initiative providing that cost benefit analysis is favourable.

The discussion on labelling in paragraph "Display and design of the labelling scheme – use at point of sale and in advertising tools" in paragraph 4.2 uses the example of the energy rating scheme for domestic products. Whilst this is fairly well established and accepted by consumers - tyres are a totally different product and are not put on display in showrooms - they are generally held in racks in warehouses without any public access.

Currently, when tyres are fitted the labels are removed and discarded by the fitter so there is a real possibility that the consumer would never be exposed to such information. Therefore, to ensure that there is no misunderstanding on the behalf of the consumer we believe that this information should be moulded into the tyre sidewall to ensure that the information is always available.

We note the decision not to include tyre life in the labelling proposal. The commentary indicates that the market is self regulating although there is no evidence to support such a statement. Many tyre purchases in the UK are referred to as 'distress' purchases due to necessity with cost cited as a major deciding factor as opposed to tyre life. Consumers generally understand that if they purchase a 'budget' tyre longevity may not be the tyre's best asset.

There are schemes designed to inform the consumer of some aspects of tyres to help them make an informed decision. There is one such scheme in the USA referred to as Uniform Tire Quality Grading (UTQG). This offers consumer information relating to Treadwear, Traction (Wet grip) and Temperature (Resistance to the generation of heat). UTQG could form the basis of a European a model if such information is considered beneficial.

In answer to specific questions that you pose:

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)?

Informing the consumer about the rolling resistance of tyres would be a positive step in possibly making the consumer more aware.

We request that the Commission consider whether it would be appropriate to require tyre sidewall marking with the rolling resistance band identifier label / mark.

The rationale is that the benefit of fitting lower rolling resistance tyres to new vehicles to reduce CO2 would be lost if replacement tyres are of a higher rolling resistance than the original equipment tyres. Whilst we are not aware of any plans to mandate the rolling resistance of replacement tyres should be of the same as or better than original equipment, should the Commission consider this in the future labelling would offer a form of quick identification. By placing the label on the tyre from the outset, the principles of

Better Regulation would be served on two counts, firstly, we would not have to debate the issue again, and secondly, manufacturers would not have to modify their tyre moulds.

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)?

What would the purpose be of this move?

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

Grading rolling resistance is acceptable, provided that the wet adhesion performance of tyres with regards to the index limits we have today are increased and not eroded.

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

Before a decision is made to include a grading scheme for the wet adhesion qualities for C3 tyres, we believe that the Commission should undertake some research to evaluate the benefits to society.

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, we do not consider that this is likely to be understood by consumers or influence the market towards quieter tyres.

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

Yes, especially for C2 and C3 tyres because in the UK approximately 50% of the replacement tyres fitted to vehicles in these categories are retreaded. However, some of the provisions may be difficult to apply because of the variability of the carcasses. The retread manufacturing industry should be in a better position to answer what difficulties such technical requirements may pose on them. Caution should be exercised before mandating requirements that the industry targeted, in this case the tyre retread industry, may not be able to meet.

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?

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

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?

Questions 7 to 9 should be posed to industry.

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

If there is a possibility that the information may be used in future for regulation, then it might be beneficial if the information were placed on the sidewall of the tyre.

Q11: What should be the role of the retailers?

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...)?

If there is a possibility that the information may be used in future for regulation, namely, a tyre of a particular quality (rolling resistance for example) shall be fitted at replacement, then consideration should be given to placing the information on the sidewall of the tyre.

Should you have any questions for us, please do not hesitate to contact me.

Yours sincerely,

Robert Falk

Eur Ing Robert Falk