

Public consultation - Update for units of measurement directive

Subject : Consultation on Units of Measurement Directive (80/181/EEC)

Attach a response on behalf of the UK Tyre Industry Federation to the Commission Staff Working Document on units of measurement dated 22 December 2006.

Yours faithfully

John Dorken

A J DORKEN
Secretary
Tyre Industry Federation Ltd
UK-London



Units of
Measurement consult.

Attachment :



European Commission
DG Enterprise and Industry (ENTR/H/6)
195 avenue des Nerviens
B-1049
BELGIUM

28 February 2007

Dear Sirs

COMMISSION CONSULTATION DOCUMENT ON UNITS OF MEASUREMENT

I am writing on behalf of the Tyre Industry Federation in response to the consultation document on the above issue. The Federation consists of all the main associations concerned with the tyre industry in the UK – British Tyre Manufacturers' Association, Imported Tyre Manufacturers Association, Industrial Tyre Association, National Tyre Distributors Association, Retread Manufacturers Association and Tyre Recovery Association – and can be seen as the authoritative voice in the UK for the entire supply and recovery chain for the sector. The Federation represents businesses with a combined turnover exceeding £2bn in the UK.

The European Tyre and Rubber Manufacturers' Association has, I understand, already responded separately on behalf of the European tyre manufacturers to the consultation document. Our Federation endorses its views, particularly with regard to the need to ensure that there continues to be no legal impediment to the use of markings on tyres that has been standard in the industry globally over many years. Any requirement to change that system, just because it derives from a mix of imperial and metric units, could lead to substantial costs in terms of both the need to change the moulds used for manufacturing tyres and the disruption to trade in tyres that would ensue if different marking systems were required for different markets.

The particular interest of the UK industry is in Question 7: "Should the use of supplementary indications in Article 3 in Directive 80/181/EEC be able to continue?" We strongly believe that this use should continue to be permitted on a permanent basis. One of the advantages of dual marking is that it allows consumers the freedom to evaluate the products in question in units with which they feel most comfortable. In other words it is a provision geared towards consumer information and protection. In the case of tyres in particular pressures are customarily expressed in both pounds per square inch and in bar. Some motorists prefer to work in terms of the former, some in terms of the latter. If expression was limited to the latter then undoubtedly a significant proportion of motorists would be confused, at least

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Constituent Associations

- British Tyre Manufacturers' Association •Imported Tyre Manufacturers Association •Industrial Tyre Association
- National Tyre Distributors Association •Retread Manufacturers Association •Tyre Recovery Association

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Certificate of Incorporation No: 5333857

initially. Such confusion would not be just a matter of inconvenience but one giving rise to safety concerns: the tyre is a safety-critical element of a vehicle and if the motorist incorrectly inflated his tyres because of confusion over units he could be putting himself and other road users at risk. We can see no countervailing advantage in moving to end the use of supplementary indications and we would like to see the current regime continue indefinitely.

Yours faithfully

John Dorken

A J DORKEN
Secretary, Tyre Industry Federation