

**Draft Report on the 3rd Meeting of the GRB/GRRF Informal Group on
Special Tyre Definitions, Geneva, 16-17 November 2009**

Present:

Contracting Parties: European Commission, France, Germany, Italy, Japan, Netherlands, Norway, UK. (see list attached)

NGO's:- , ETRTO, OICA, BIPAVÉR.

This was the third and final meeting of the group which had been set up to agree test methods for tyre rolling resistance and definitions for the categories of tyres which would be allowed extra allowances for noise and rolling resistance under UNECE Regulation 117 (and hence the General Safety Regulation). The purpose of the meeting was to agree a document for presentation to the GRRF and GRB meetings in February 2010. The main points discussed, in agenda order, were as follows:

1. Report of previous meetings (STD 01-06 rev 1) (STD 02-07)

The final reports of the 1st and 2nd meetings were agreed.

2. Adoption of Agenda.

The agenda was adopted as proposed, with the clarification that the documents proposed under item 3a were from France and not France/ETRTO.

3. Proposals for inter-laboratory comparisons for Rolling Resistance testing

a) proposal / presentation from France (STD-03-03) (STD-03-04)

As requested at the previous meeting, France (UTAC) came forward with a proposal for aligning the rolling resistance test results obtained by different test laboratories. An alignment procedure had been considered necessary by the tyre industry particularly with respect to the forthcoming Regulation on tyre labelling. Inaccuracies between test laboratories can cause variations in results which can result in differences of more than one test 'band' in the proposed labelling categorisation, which would mean that the labelling system could lose credibility. However, Regulation 117 is primarily a type-approval regulation, and France considered that the current procedures are sufficient for the purposes of type-approval (which normally considers a simple pass/fail criteria rather than a system of fine grading). Therefore the proposal by France was that its scheme for an alignment procedure, which involved the setting up of a Technical Services Group (TSG) should be contained in two 'informative' annexes (8 and 9) to regulation 117, which would not form part of the main regulation.

During an exchange of views, the UK asked about the level of resource needed to set up a TSG. OICA questioned how the system of adjusting the measured values according to the calibration process would work in practise – would this lead to a 'floating' limit value rather than an absolute one?

ETRTO was unable to give a formal position on all aspects of the French proposal, but indicated that it preferred annexes 8 and 9 to be part of the main Regulation rather than just 'informative'. It also expressed concern that the proposed text did not reflect the ISO 28580 provisions which were referenced in the EC General Safety Regulation. The Commission representative replied that the mention of ISO 28580 in the General Safety Regulation was intended merely as a reference for the rolling resistance threshold values.

Germany suggested that the annexes could be 'informative' initially, but with the possibility of becoming part of the main Regulation in the longer term, depending on the results of the experience gained in using the annexes. There was general agreement on the content on the French proposal, apart from some 'square bracket' issues such as the number of test tyres required for alignment purposes, which it was agreed should remain at [1-5] for the time being.

It was therefore decided to incorporate this proposal into the document for GRRF/GRB, but the new Annexes would have the subtitle 'informative' in square brackets to allow Contracting Parties to decide in GRRF or GRB whether or not these annexes should be part of the main regulation.

b) Document from Russian Delegation and ISO based on informal document GRB

50-7.

The delegate from ISO/ETRTO presented document STD-03-06 which addressed some of the issues raised in the document GRB 50-7 which had been presented to the previous GRB meeting by the Russian Federation. The main issues concerned the equivalence of the four measurement methods proposed under ISO 28580 and the introduction of an alternative deceleration measurement technique as described in ISO DIS 18164 .

Regarding the equivalence of the four ISO 28580 measurement methods, the experts of ISO/TC31/WG6 had concluded that these four ways of determining tyre rolling resistance were equally valid, and no public document known to the experts of the group demonstrated the contrary.

Regarding the alternative deceleration measurement technique as described in ISO DIS 18164 , the conclusion of the ISO group was that the low sampling rate of the proposed technique led to an unacceptable variation in measurement results, particularly if, as proposed in GRB 50-7, the technique was used on a machine which was not originally designed to measure rolling resistance.

During the ensuing discussion, there was no support for the addition of the DIS 18164 test method. Regarding the ISO 28580 measurement methods, Germany suggested that the number of methods should be reduced from four to a lower number. However, it was eventually decided that, in the absence of any evidence to suggest the inferiority of any particular method, the four ISO 28580 methods would remain in the document.

4. Further discussion on snow tyre thresholds (further information available from Norway)

Norway introduced document STD-03-08 which re-examined the tyre performance data previously presented by ETRTO, presented in order of the date of approval of the tyres under study. It also examined data from tests conducted by motoring magazines. The general conclusions were that there appeared to be a continuing improvement in the snow performance of tyres, with all recently approved tyres meeting the 107% proposed threshold value. However, there was a poor correlation between braking efficiency on ice and braking efficiency on wet surfaces (above freezing point). Further research was planned to compare the performance of Nordic winter tyres and mid European winter tyres under various conditions.

ETRTO presented STD-03-09 which gave a summary of recent ADAC braking-on-snow test results. Most tyres were able to meet the proposed threshold of 107% (in relation to the SRTT) but not by a large margin. Nordic winter tyres would be able to achieve better snow braking results, but at the expense of other performance requirements such as wet grip.

It was concluded that the threshold values in the STD-03-02 document would remain, at least for the current proposal.

5. Final review of revised Regulation No. 117 document (STD -03-02)

Tyre Definitions

Traction Tyres. It was agreed that a performance-based definition would be preferable to a design-based definition, but since it would not be possible to complete work on a suitable performance test in the available time, the initial text for the definition would include the options of a design-based definition (based on an ETRTO proposal) and a performance-based method. However, the performance-based method could not be applied until the method and limit values had been agreed. This would require considerable input from the tyre industry, and would therefore need to be the subject of a further amendment to the regulation.

Germany and UK suggested that the traction tyre definition should include reference to the M&S marking (as in the General Safety Regulation) instead of 'TRACTION'; as in the current proposal. The Commission representative replied that the Articles of the General Safety Regulation allowed more precise definitions to be used for the implementing regulations, and the current proposal was in line with that principle.

Special-use tyres. There was still disagreement over whether one or both of the two design criteria (tread depth and void-to-fill ratio) would be required to designate certain sizes of tyre as 'special use' tyres. The UK suggested that void-to-fill ratio alone might be used, at least for C2 and C3 tyres.

Therefore, it was agreed that a large part of the definition for C2 and C3 special use tyres would remain in square brackets until the February GRRF/GRB meetings. With respect to the void-to-fill ratio, the manufacturer would need to supply the type approval authority a drawing of the tread so that this could be verified (see new paragraph 3.2.3)

Snow tyres. It was agreed that snow tyres would be assessed on the basis of the test procedure(s) proposed in the new Annex 7, using the 14 inch SRTT. The limit

values would be as proposed in STD-03-02 (see item 4 above) although, on a suggestion from the UK, they will be expressed in terms of an index (in the same way as wet grip) rather than as a percentage.

Professional Off-Road tyres The proposal in STD-03-02 was agreed.

Reinforced (extra load) tyres. The proposal in STD-03-02 was agreed with the clarification that it only applies to C1 tyres.

Other points.

Norway referred to document STD-03-07 which made proposals on the definitions of 'type' and the Conformity of Production requirements.

With regard to the definition of type, Norway proposed that the material compound should be included as a criterion for defining the tyre type. However, the group was not convinced of the need for this change.

With regard to the provisions for Conformity of Production, Norway proposed that the production conformity (including the additional allowances for noise and rolling resistance contained in paragraphs 8.3 and 8.4) should be based on the original values achieved at type-approval rather than the limit values prescribed by the regulation. German indicated that it would be prepared to consider such an idea, and would possibly offer its own proposal for the next GRB session.

Japan remarked that it supported the wording 'shall comply' rather than 'shall be accredited' with respect to the conformity of reference laboratories to the ISO ISO/TS 16949:2002 or ISO/IEC 17025:2005. (Note: this wording appeared in paragraph 7.2.1 to Annex 6 but the paragraph has now been deleted.)

A number of other editorial points were agreed, including the replacement of reference to 'category' by 'Class' (when referring to C1, C2, and C3 tyres) and the replacement of references to tyres intended for particular classes of vehicle (for example 'passenger car' or 'heavy truck') by references to the appropriate tyre class (C1, C2 or C3). OICA said it would also submit additional editorial comments.

Next Steps.

The Chairman proposed that the ETRTO document STD-03-02, as modified during the meeting and including the changes proposed under STD-03-03 should be used as a basis for the proposal to GRB/GRRF in February¹ as a proposal for a revision to Regulation 117. This was agreed, although Germany and Italy expressed general reservations.

It is not proposed to hold any additional meetings of the group.

¹ It was subsequently agreed with the GRB/GRRF secretariat that the completed document could go forward to the February GRRF /GRB sessions as a formal (English only) document provided it was received by the secretariat by early December.

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