

Draft

**Report on the 4th Meeting of the GRB/GRRF Informal Group on
Special Tyre Definitions, Geneva, 26-27 May 2010**

Present:

Contracting Parties: European Commission (Chair and Sec) Canada, France, Germany, Italy, Japan, Norway, Russian Federation, Spain, UK

NGO's: ETRTO, ISO

This was the fourth meeting of this informal group. The third meeting had finalised the document for the 02 series of amendments to Regulation 117 and this had been adopted, with minor changes, by GRRF and GRB for transmission to the June 2010 session of WP29. However, there were a number of additional issues raised at the February 2010 GRB meeting, and it had been agreed that a further meeting of the informal group should be arranged to deal with these matters, and if necessary prepare a supplement to the 02 Series of amendments to Regulation 117. The main points discussed, in agenda order, were as follows: (all documents are available on the UNECE website at:

<http://www.unece.org/trans/main/wp29/wp29wgs/wp29grrf/grrf-std4.html>)

(1) Adoption of draft agenda

The agenda STD-04-01 was adopted.

(2) Informal documents GRB-51-9 and STD-04-06 from Russia regarding the rolling resistance

The representative of the Russian Federation, Professor Petrushov, presented a new method for the measurement of the tyre rolling resistance, called 'time-distance' method. The presentation given can be found on the dedicated website of UN/ECE. This new method is today not part of an ISO standard and is not accepted for the purpose of type-approval and tyre labelling. During the meeting it was not possible to discuss all technical aspects of the Russian proposal. Therefore it was agreed that the responsible ISO committee ISO/TC31/WG6 should look at the matter more closely, discuss the issue with Professor Petrushov and report back to UN/ECE at the occasion of the next GRB meeting to be held from 6 – 8 September 2010.

The most important questions to be answered are:

- Is the new method proposed by the Russian Federation acceptable for inclusion into UN/ECE Regulation No. 117, in addition to the 4 test methods already accepted (force, deceleration, torque, power)?
- If the method as proposed by the Russian Federation is not acceptable for use in UN/ECE Regulation No. 117 it should be clarified what are the reasons and what modifications are necessary prior to acceptance?

(3) Informal document from Norway proposing additional tyre requirements;

Norway submitted a document (STD 04-08) which proposed a number of modifications concerning the information given to type approval authorities, and tighter Conformity of Production (COP) limits. One of the main proposals was that any change in the rubber compound should be notified to the type approval authority. This was not supported by the group since it was considered that there were already adequate provisions in paragraph 7.1 of the Regulation which covered changes in the tyre specification likely to affect the performance.

With regard to COP, Norway proposed that the additional limits for COP for noise and rolling resistance should be based on the original type approval values rather than the limit values (because this would make more sense in the context of testing for labelling categorisations, since the type approval limit would not necessarily be relevant in this case). As a compromise, it was initially agreed that for labelling requirements (i.e., the cases where the additional provisions of Annexes 8 and 9 were called up) the COP limit should be based on the original measured value. However, in all other cases, the COP allowance should be based on the limit value, as at present. (Note: following a discussion later in the meeting it was agreed that the requirements relating to COP for labelling should not be included in Regulation No. 117 but in the implementing requirements for the tyre labelling Regulation, 1222/2009).

(4) Informal document GRB-51-14 from France regarding the minimum number of test tyres;

Most of the issues raised in this document had already been incorporated in the final document to WP29 (WP29/2010/63). The issues relating to the number of test tyres were to be addressed under Agenda point 8.

(5) Informal document GRB-51-25 from Norway (together with the presentation from ADAC)

Norway provided further test data (STD-04-09 and STD-04-10) concerning the results of tests on snow, ice and wet surfaces using summer tyres, all-season tyres, 'European' winter tyres and Nordic winter tyres. Some of the results showed surprising variability resulting from relatively small changes in test temperature. Because of this variability, Norway proposed that each test should be carried out at least three times, each on a different day, and an average taken. ETRTO pointed out that the current requirement was for a minimum of six tests, and in practice these were carried out over two days. There was no support from the group for changing the current text in Annex 7.

With regard to the limit values, Norway proposed increasing the threshold values for the 'snow' tyres performance index since Nordic tyres were easily capable of exceeding the current limits proposed for Regulation 117, and there was a danger that maintaining the current limit would allow 'all-season' tyres to be classified as snow tyres, which would allow tyres with higher noise and rolling resistance limits to be used all year round. The ETRTO response (see STD-04-13) was that there

were no 'all season' tyres capable of meeting the current proposed criteria, and increasing the threshold to allow only 'Nordic' tyres could have unintended safety consequences since Nordic tyres tended to have poorer wet grip performance.

It was agreed that further work would be useful in this area, particularly with regard to the different properties for 'snow tyres' and 'ice tyres'. However, there was insufficient evidence to justify increasing the snow tyre threshold value at the present time.

(6) Request from NL for an additional 4th requirement for professional off-road tyres (introducing an additional design criteria for the groove)

As there was no document or representation from the NL on this topic, this agenda item was not discussed.

(7) Concerns raised by Canada about Annex 7 traction test and a necessary reference to the test surface to be used within the applicable ASTM standard

Canada presented document STD-04-02 which proposed to clarify some aspects of the snow test procedure. Most of the proposals were accepted, although the group agreed not to delete completely the reference to an acceleration test. Although such a test did not yet exist, it was envisaged that one would be developed, so it was agreed to insert a suitable reference in a footnote.

(8) Discussion on Annexes 8 and 9, including:

- a) Informal document GRB-51-23 from Japan,**
- b) Informal documents GRB-51-14 and STD 04-04 from France,**
- c) Informal document STD-04-05 from ETRTO**

Annexes 8 and 9 were the two 'informative' Annexes which had been included to enable a procedure on inter-laboratory alignment to be carried out to ensure consistency of measurement of rolling resistance between test laboratories. This was particularly important in the context of the tyre labelling requirements contained in Regulation (EC) 1222/2009.

Discussion was based on the above papers submitted by Japan, France and ETRTO, plus a new paper from Japan (STD-04-18 - which was based on the French proposal). ETRTO presented STD-04-14 to explain its proposal on inter-laboratory alignment, and later compiled STD-04-17 which provided a comparison between the French and ETRTO proposals. Although there were editorial and presentational differences between the documents provide by three parties, much of the content was similar, and it was agreed that a consolidated version of Annexes 8 and 9 could be produced by France on the basis of its own document, but also taking into account aspects of the Japan and ETRTO documents. The main unresolved issues on the content of Annexes 8 and 9 were as follows:

- Selection of tyres for alignment - Tyres selected for alignment testing need to cover a full range of Cr values without being too close in terms of the Cr value. ETRTO said that it would be a significant challenge to select a sufficient number of tyres while still maintaining a Cr gap between them. France and Japan had

different approaches to this problem, and France agreed to try to include both approaches in its consolidated document.

- 'Round Robin' testing – it still needs to be agreed whether these should be carried out in parallel or in sequence.
- Japan questioned the reference in the existing document of ISO 5725, which it felt was too general. France will provide further justification or delete this reference.
- Germany considered that only test labs, not technical services, should be involved in the inter-laboratory comparison.

ETRTO emphasised that it was urgent that a Technical Service Group should be set up to administer the inter-laboratory alignment process, and proposed setting up a workshop before the next GRB to discuss this topic. Japan and France showed interest in participating in this workshop. Germany did not wish to participate, and UK, Spain, Italy and the Russian Federation said that they were willing to participate in principle, but this would largely depend on the resources available.

General Status of Annexes 8 and 9

A major point of discussion centred on the status of Annexes 8 and 9, i.e. whether they should be mandatory, informative or deleted altogether.

The position of Germany was that the two Annexes should either be mandatory for type-approval or deleted altogether. Speaking in his position as the GRB chairman, the German representative said it was not the role of GRB to develop requirements for labelling schemes which were not directly related to type approval. If it was necessary to apply Annexes 8 and 9 for reasons of inter-laboratory consistency, then these requirements should apply for the purposes of type approval.

France considered that the provisions of Annexes 8 and 9 were not necessary for type-approval. Such a procedure was not normally required in type-approval regulations, and to introduce such a procedure in Regulation 117 could set an undesirable precedent.

Japan asked that the scopes of Annexes 8 and 9 should be clarified, to confirm whether not they should be mandatory for the purposes of type approval.

The UK suggested that the content of Annexes 8 and 9 should be taken over, or further developed, by ISO. Although the original ISO standard on inter-laboratory alignment had been rejected by this group (due to the use of a single reference laboratory) the current proposal, using a 'virtual' reference laboratory, could be used as the basis for a future ISO standard, and the results of this work could be reported to GRB and possibly referred to in Regulation 117. ETRTO considered that the development of a new ISO standard would take too long, bearing in mind the proposed implementation dates for the rolling resistance requirements.

It was agreed that status of Annexes 8 and 9 would be a matter for GRB and, ultimately, WP29.

(9) Request to add the regulation number to the approval mark

No documents were presented for this agenda item, so it was not discussed

(10) Editorial amendments (STD-04-03)

Various editorial amendments proposed by France in STD-04-03 were adopted. Further changes were proposed by ETRTO in document STD-04-12, involving changes to the wording of the transitional provisions (which are due to be agreed in the June WP29) including a new provision which would allow a 30 month sell-off period for non-conforming tyres, in line with the provisions of the General Safety Regulation.

ETRTO requested a clarification concerning the 'S' marking to denote compliance with the rolling sound requirements (see document STD-04-16). They suggested an additional note to clarify that the requirements on tyre rolling sound emissions at stage 1 were the same as those for the first series of amendments, so that the suffix S applied in the first series of amendments should be considered equivalent to the suffix S1 applied in the second series of amendments. However the chairman considered that it was self-evident that the rolling sound requirements for phase 1 of the 02 series of amendments were identical to the requirements of the 01 series of amendments, and adding such a note might cause confusion rather than clarification.

With regard to the general wording of the transitional provisions, the GRB chairman commented that it was best to keep to the existing wording, which had been agreed with the UNECE secretariat. Concerning the additional 30 month period, the EC representative reminded the group that this had been agreed as part of the General Safety Regulation to address a problem that existed in the EU, and was subject to a cost-benefit study to see if this period could be shortened. The same problem might not exist for Contracting Parties outside the EU, so it should be up to individual Contracting Parties to decide whether they would allow any additional time for the sell-off of existing stocks if they mandated Regulation 117. Therefore the EC could not support the proposal for an additional 30 month period as it stood. It was decided that the paragraph allowing the additional 30 months should be put into square brackets for GRB to decide.

Next steps

The secretariat will prepare a new document for GRB in the form of a draft supplement to Regulation 117.02 including the points agreed at the meeting. France will contribute the revised Annexes 8 and 9, taking into account aspects some of the Japanese and ETRTO proposals. The final combined document will need to go to the UNECE secretariat by June 11 to be tabled as a formal document for GRB at its September 2010 session. In addition, some obvious and non-controversial editorial errors in document WP29/2010/63 that had been identified by the group (for example, the obsolete reference to paragraph 6.5.2 in paragraph 6.5, and some errors in the marking examples) would be corrected by the UNECE secretariat at the forthcoming WP29 meeting in June.