

**Informal Document for discussion at the GRRF Meeting on 16-18 September 2002.**  
(Transmitted by the expert from BIPAVER)

ECE Regulation 109 – Upgrading Information

The following are two paragraphs from ECE 109.

*“The service description of a retreaded tyre shall not show either a higher speed symbol or a higher load index than that of the original, first life, tyre unless approval has been granted to the manufacturer of the original, first life, tyre for that same carcass to be used at the revised service description.*

*Information that an original, first life, carcass has been upgraded in this way shall be made freely available by an approval authority to any retreading production unit and shall be communicated to other parties to the 1958 Agreement (see Article 5 of the Agreement Concerning the Adoption of Uniform Technical Prescriptions for Wheeled Vehicles, Equipment and Parts which can be Fitted and/or Used on Wheeled Vehicles and the Conditions for Reciprocal Recognition of Approvals Granted on the basis of these Prescriptions - document E/ECE/324-E/ECE/TRANS/505/Rev.2).”*

This was put into the specification in the original technical discussions at the insistence of the Independent Retreaders. Upgrading of tyres by the manufacturers takes place by retesting to a higher category. The size 295/80R 22.5 was upgraded three times by all manufacturers in its load rating by retesting the tyres. The fear of the independent sector is that should a new truck be produced with upgraded tyre requirements only the manufacturers could uprate the existing casings so discriminating against the independent companies.

To illustrate the above we can use the size 205/75R 17.5, presently coming into factories for retreading, which are two types load rated 123/121M and 124/122M. The demand in the market is for 124/122M only. Manufacturer's remoulds are at the higher rating so some casings have been upgraded.

We have tried to get the information for upgrading tyres from the regulating authorities in France, Holland and Luxembourg but have not been successful.

It was envisaged at the time the specification was written that the regulating authorities could provide details of the changes that took place with regard to the tyres they were controlling. This does not seem to be so.

There is a further complication when the tyre is upgraded. It can retain the same E number in some cases or get a new E number in others. The theory is if a new tyre is given a new number there was a design change. This is not seen in the tyre construction or in the actions of the manufacturer who upgrade the lower ones to the new rating when remoulding.

None of the information required to implement the specification has so far been available. A suggestion to overcome this problem has been to not allow upgrading at all whether by manufacturers or independents. This would produce more scrap tyres which we know could perfectly well be used as they have always previously been. There have always previously been upgrades.

The independent remoulders are very concerned about this problem as they can at present be very seriously affected by changes to new tyre specifications designed to discriminate against independent retreaders.

We asked BLIC for their views who responded:

*"The issue was discussed at the meeting of the BLIC Retreading Group on 11 July. There is no intention on the part of the new tyre manufacturers that information of this sort should be withheld. Rather it seems that the fault lies with the certifying authorities in not having adequate procedures in place to retrieve the information that they should already have and make it available when needed. It is they that should be pushed to improve their procedures.*

*BLIC would support any move to take up the issue with GRRF. It does not favour the alternatives of not permitting upgrading at all or permitting retreaders, on the completion of satisfactory drum testing, to upgrade tyres by no more than one category of load."*

BIPAVER suggests BIPAVER, BLIC and ETRO and any interested parties arrange to look at this problem and propose a solution. In the meantime, the independent sector will continue to test and prove to the changed load rating. When a satisfactory information system is in place this will stop.

John O'Connell

**BANDVULC TYRES LTD**

**On behalf of BIPAVER Retreading Division**