

Proposal for the text of the Part I of the Draft Tyre GTR (Statement on Technical Rationale and Justification) (Draft after 16 September 2011)

The text reproduced below was prepared by the experts from the Russian Federation in order to clarify a possible approach to implementation of the tyre gtr.

The modifications to the current text of the draft gtr are shown in bold characters for new or strikethrough for deleted characters.

I. Proposal

After paragraph 17, insert the following paragraph 17-bis to read:

- 17-bis.** The aim of the tyre gtr is to introduce the universal worldwide harmonized requirements to the tyres included into the scope of the gtr. According to the provisions of the 1998 Agreement the contracting parties will further transpose those requirements fully or partly into their national legislation. In the case, when all the requirements of the gtr had been transposed into the national legislation and a tyre complies with all of them, than such a tyre can be considered as a “Global tyre”. Therefore it is considered advisable to transpose into the national legislation all the requirements of the tyre gtr, so that those requirements, that are not considered mandatory, could be included in an optional basis.

Paragraph 18, amend to read:

18. The Tyre Identification Number (TIN) format is based on US NHTSA’s plan to change the currently assigned 2 digit plant codes to 3 digits. A symbol, the number “1” for example, will be reserved to precede all current 2-digit codes, and be used exclusively for existing plant codes. The “1” would only be used as the prefix for existing 2-digit codes, and not be used as the leading digit for any new 3-digit codes. US NHTSA will continue to assign ~~global~~ plant codes **to the tyre manufacturers who sell their product in the United States**, and the necessary information to obtain such a code is contained with the gtr. **The tyre manufacturers, who do not sell their product in the United States, do not need requesting a plant code assignment. In order to keep the appropriate TIN format, such manufacturers shall use [XXX] symbols on the position of plant code.**

Paragraph 20, amend to read:

20. Some considerations were given to harmonise approval markings (both type approval and self certification markings) and discussions on this issue also took place in WP29 meetings. Eventually it was not possible to adopt an harmonised approval marking, **since the compliance**

assessment procedures are not yet harmonized worldwide. So this gtr, like the previous ones existing in the global registry, contains no administrative provisions on approval markings. **Therefore such marking especially that could be assigned to a “Global tyre” can be developed and introduced within the national / regional compliance assessment systems. It is considered appropriate to develop and introduce such marking within that UN Regulation of the 1958 Agreement, which provisions further will be aligned with the requirements of the tyre gtr. Thus the issue of mutual recognition of the compliance marking could be solved at least amongst the contracting parties to the 1958 Agreement. The countries non-contracting parties to the 1958 Agreement may then decide on recognition of such marking as an alternative to their applicable compliance marking taking into account that a particular tyre meets the same requirements established by the tyre gtr.**

II. Justification

1. Paragraphs 17-bis and 20:

The proposal is made in order to ensure the benefits linked to the application of the harmonized technical requirements, especially homologation costs for tyre manufacturers, even the compliance assessment procedures are not yet harmonized worldwide. It is considered appropriate to take the advantage of possibilities of mutual recognition of the compliance assessment results that are provided by the 1958 Agreement. It should be taken into account that almost all the countries – members to the 1998 Agreement are also the contracting parties to the 1958 Agreement.

Therefore probably the most convenient way to introduce a “Global tyre” concept and to create appropriate marking for such kind of tyres is to implement the tyre gtr requirements through the UN Regulation. The proposed approach could be workable, if all the gtr requirements were transposed into the UN Regulation, including those, which would be considered optional. When a tyre were type approved pursuant to all the requirements, including optional, then it could be considered as a “Global tyre”, and it could be allowed to bear a special “Global tyre” marking.

Thus, such kind of marking will be recognized by the contracting parties to the 1958 Agreement. This marking might be considered as the evidence of compliance for the countries applying self-certification scheme. And also the countries non-contracting parties to the 1958 Agreement might recognize such marking as an alternative to their own compliance marking taking into account that a particular tyre meets the same requirements established by the tyre gtr.

It is proposed to describe such an approach to reaching the worldwide recognition of the compliance assessment results in the statement on technical rationale of the tyre gtr.

2. Paragraph 18:

The proposed correction reflects the situation explained by NHTSA at the 11th tyre gtr meeting that a plant code can be assigned only to those manufacturers, who sell tyres in the United States.