

**Minutes of the
11th Ad-Hoc Working Group Meeting for a gtr on Tyres
September 16, 2011 (9:30 – 17:30)
Geneva**

1. Welcome and organisational matters.

Mr. I. Yarnold, Chairman, welcomed the participants.

2. Approval of the Agenda (TYREGTR 11-04)

The agenda was approved as per document TYREGTR 11-04

3. Approval of the minutes of last meeting (TYREGTR 11-01)

The report of the last meeting was adopted without observation.

4. Feedback from WP29 decision on the following topics:

- i. Proposal to include Rolling Resistance test.
- ii. Wet grip test requirement from the core module to an optional module.

The Chairman reported there was a long discussion on those issues. The decisions were as follow:

- Although the European Commission proposed to include the Rolling Resistance test in the gtr for Tyres, AC3 agreed to defer the inclusion of the RR test to the second phase of the gtr.
- On the second issue related to the Wet Grip test, AC3 was in favour of keeping wet grip in the mandatory module and leaving to the CPs the decision on how they will implement the gtr in their national regulation.

The representative from India confirmed they could agree to Wet Grip being included in the mandatory module.

The representative from China indicated that as the wet grip test has not been adopted widely enough to mandate it by all CPs. The harmonised gtr should consider the different situations of CPs and provide the flexibility for CPs to decide whether to mandate the Wet Grip Index (G) limits. The wet grip test and corresponding performance requirements should be optional.

The Chair noted these concerns and explained that the 1998 agreement provides the flexibility when CPs transpose the GTR into national regulation.

One CP (Canada), and also the representative from OICA, observed that the current draft circulated to CPs does not include a listing of “mandatory vs. optional” items. It was observed by the USA that even with mandatory and optional categories, CPs , can choose to mix the minimum/optional requirements as they choose for their own domestic requirements. That being the case, the Netherlands suggested there could be a simpler approach where all items/topics were placed into “one big box” from which the CPs can select their minimum national requirements. The implication being that if a tyre exceeds the national minimum specification of a CP then it is assumed to comply. Other CPs preferred a minimum set of requirement for all GTR tyres. Japan indicated they prefer a “Mandatory (A)” plus an “Optional (B)”, “Core + A” or “Core + B” approach.

The representative from China suggested that all requirements for Passenger and Light Truck/Commercial tyres should be included in a single document, but classification of “mandatory” and “optional” should not be specified, but left to the discretion of the individual country.

In summarising the discussion, the Chair observed that “wet traction performance” is an important characteristic and, following the advice of AC3, should be included in the gtr (based upon ECE R117). He nonetheless acknowledged that the AC3 Executive Committee will make the final policy decisions on the mandatory/optional issues.

5. Justification for the gtr on tyres: review of the document TYREGTR 11-03 for approval.

The new proposal from MM Gauvin (Sponsor) and Yarnold (Chair) was considered. This document, last updated on March 16, 2011, is the statement of technical rationale and justification for the tyre gtr. This document includes a discussion of mandatory and provisional requirements in the tyre gtr.

It was agreed to change the words “Mandatory module” and “Optional modules A and B” by “General module” and “Option 1 and 2”.

In clause 16 (document 11-03), it was agreed to remove the empty cells of the table.

In clause 26 it was agreed to delete the sentence “In the case of USA and of the countries which apply the 1958 Agreement regulations on tyres, the safety benefits will be marginal.”

Again, it was noted that the justification document does not include rolling resistance grading for tyres in either the passenger car or LT/C harmonization phases which are scheduled for completion by the end of 2014. But such RR harmonization could be undertaken after 2014, if there are suitable existing national or regional standards at that time, and if the CP’s agree to such action.

The USA noted a general scrutiny reserve on the text – seeking more time to assess the proposal and to comment. India noted that in clause 3 there is no mention of medium or heavy truck/bus tyres - and they asked CPs to consider possible future homologation to harmonize these tyres, possibly within the gtr provisions. The Chair welcomed the suggestion to continue the harmonisation of tyres but noted that as the informal group is charged with creating technical requirements for passenger car tyres and to harmonise LT/C, a further mandate from AC.3 would be required. Hespeculated this might be something for India to consider in the future.

Participants in the meeting were asked by the Chair to review document 11-03 and to submit comments to the secretariat (Mr. Noirhomme). Target is to formally adopt this document in February.

6. Review of the document TYREGTR-11-02 starting at paragraph 3.9.

With direction and guidance from Mr. Yarnold, the group began a line-by-line review of the existing tyre gtr draft (Tyre GTR-11-02e). Keith Hodges (ETRTO) presented the draft and captured the approved changes throughout the document.

The following points were discussed:

- Decision: Strikeout all the words “radial” through the document.
- Clause 3.9.2.1
China requested that the test temperatures in paragraph 3.9.2.1, 3.9.3.2, 3.10.3.5, 3.11.2.2, 3.11.3.6 and 3.11.5.4 should all be changed to 38°C +/- 3°C as specified in 3.13.2.2 because the test equipments and conditions for these tests are all similar.
ETRTO: most of the tests are harmonized to 35°C+/-3°C. The run flat test is indicated at 38°C+/-3°C but should be harmonized to 35°C+/-3°C. The high speed test is between 20°C and 30°C (as per Reg.30) and should not be harmonized because this increase the test severity.
India and USA were content to align the tests at 35°C+/-3°C
China: noted that as tyres sometimes have to be prepared in the same room for different tests it is logical to have the same “soak” temperature.
Decision: to amend the run flat test temperature to 35°C+/-3°C (§ 3.13.2.2) and to retain 20°C to 30°C for high speed test for T rated tyres and above.
- Clause 3.11.1.3
Decision: agreement in principle to change 6 hours to 2 hours but the group needed data from industry to justify the change.
Action: industry to provide data.
- Clause 3.11.4.2
Decision: use the word “Extra Load tyre” “Light load tyre” and “Normal load tyre” throughout the text). Then remove words “reinforced” from § 3.3.6. Make a note on the meaning of “reinforced” “In the past, the word “Reinforced tyre” was sometimes used instead of “Extra load tyre”.
- Decision: Add a paragraph number to each definition in section 2.
- Clause 3.12.2.1.2
Decision: Amend to read: “It shall be established prior to testing that the characteristics of the test track comply”
- Clause 3.12 in general:
Actions: USA will check if the text is sufficiently generic (example with 3.12.1.1.1 and 2). Refer to what has been included in the motorcycle braking GTR for the definition of the test surface. Tyre Industry to check if all the tests can be done repeatedly & reproduceably by Type Approval Authorities, Technical Services, Industry laboratories...(to be certification neutral).
- Clauses 3.12.3.1.2.13 and 3.12.3.2.2.12: “entyre” to read “entire”
- Clause 3.12.4
Decision: this paragraph should be moved to an appendix to the gtr because it could be interpreted as being a mandatory requirement when it is not necessary for self certification. The appendix should indicate that it is mandatory for Type Approval (See gtr 4 as an example).
Canada would prefer to remove test reports from the gtr.
Decision: preference to retain them somewhere.
- Clause 3.14.1 and 2
Decision: These 2 paragraphs need to be replaced by the text as per document TYREgtr 11-05.

- Clause 3.16.4.7
Decision: To amend “tyre speed category” to read “tyre speed symbol” – and to ensure this is consistent throughout the document..

- Clauses 3.17, 3.18 & 3.19 Endurance test, Low inflation pressure & high speed performance test as per FMVSS 139:
India raised the issue of testing speed mismatch for LT/C category of tyres having “M” and below speed rating.
ETRTO suggested that as these tyres were unlikely to comply with the FMVSS139 test, they would not be sold in USA/Canada. As such they could not be included in the gtr. As an alternative, India proposed to discuss this issue during second phase of the gtr, and this was supported by European Commission.

The USA confirmed they do not have tests based on the speed rating. The maximum probable (but not legal) speed on highway is 100 miles per hour (160 km/h) and tyres must have a minimum performance requirement that meets or exceeds this speed.

Decision: to defer the discussion to the 2nd phase of the gtr.

- Clause 4.1 (Equivalent test methods)
The Chair indicated that it would be difficult to handle this kind of sentence in the framework of a gtr. It is perhaps conceivable from a Type Approval perspective but probably not for self certification.
The USA confirmed that this sentence would not be possible in a self certification regime whereas with TA there is the opportunity to demonstrate equivalence.
Canada did not see a problem because a detailed documentation is requested before the product is placed on the market. But as no such provision exists in FMVSS this would be a completely new concept to include.
China indicated that they could accept this clause especially for LT/C for which regulations are not harmonized yet. The Russian Federation felt it would be better not to include the sentence in the gtr. No automotive regulations in Russia follow this approach.
China underlined that some more time is needed before the harmonized LT/C technical requirements is completed and, therefore, during the transitional period, it would be helpful for the Chinese Authorities to retain their existing national regulations. They confirmed it will be difficult to adopt UNECE or FMVSS regulation currently.

The Chair reminded the group of the timetable for harmonising LT/C - as planned within 3 years (2014, Q4). OICA mentioned the fundamental difference between TA and self certification that allowed for TAAs to apply expert judgement about such equivalence.

Decision: The Chair noticed there are significant reservations from some CPs. He thanked China for their proposal of flexibility and, following a further intervention, proposed to delete the Equivalent test provisions but to include text – probably in the rationale or by a footnote - to explain that, before harmonization of LT/C is completed, CPs are permitted to retain their national regulation but encouraging CPs to follow the GTR tests wherever possible.

Action: The Chair to propose draft text.

- Appendix 1: India requested to delete speed symbols F, G, J because they are not relevant.
ETRTO indicated that a tyre with speed symbol F could nevertheless pass any test in the gtr. This was supported by the NL – and so it was agreed to retain the current drafting.
Decision: no need to change.
- Appendix 6 new version of ISO 10844 (version 2011) has been released and should be adopted by GRB at the next session but too early to be incorporated in Reg.117.
Question from the Chair: if adopted by GRB, would it make sense to refer directly to ISO instead of copying the text? He asked CPs to consider this so a decision could be taken at the next meeting.
- Appendix 7:
Action: Tyre Industry needs to check this table. It appears to include heavy truck tyres in addition to LT/C tyres.

7. Review of the document TYREGTR-11-02 up to paragraph 3.8 for the validation of changes agreed during the 10th meeting and consideration of remaining open points.

- All proposals for amendment according to document 11-05 were adopted.
- Scope of the gtr.
China proposed to amend the scope to read:

~~“This global technical regulation covers new radial pneumatic tyres **of Class 1 and Class 2** designed primarily for vehicles in category 1 and 2, all with a mass limit of 4,536 kg, as defined in the Special Resolution Number 1 paragraph 2.”~~

Justification:

In actual application it's very common that identical tyres are fitted on vehicles of different masses or vehicles of the same mass are equipped with different sizes of tyres. Therefore it is inappropriate to categorize scope by vehicle mass as this results in an inexplicit definition of tyre scope. Since the definitions of tyre classes in section 2 of this GTR are clear and accurate, China proposes to remove the restriction on vehicle mass mentioned in the scope.

In addition, deleting the mass limit potentially provides for the extension of the GTR scope – but also does not prevent the CPs from narrowing the scope in their territories by limiting the vehicle mass in their own standards or regulations.

The Chair indicated that it will be difficult to change the group's mandate from AC3. C1 and C2 tyres are classifications that were initiated with the UNECE noise regulation. At the start of the gtr on tyres, we had to move away from that concept because of the US/CAN federal regulations. China noted these observations but, nonetheless, asked to keep the proposal as a possible improvement.

- India: Scope – questioned whether by making reference to Special Resolution No.1 was further complicating the gtr text and usability – suggesting instead to specify in the tyre GTR the vehicle categories. .

The Chair reminded the group that SR1 is a well known document which, in addition, is available on the UNECE website. In conclusion he preferred to retain the current approach of cross-referring to SR1. .

- India: Snow tyre and snow tyre for use in severe snow conditions.
The definitions given do not clearly distinguish the differences between the two types as well as the qualification criteria for the M+S mark. They observed that the two categories will lead to confusion by consumers in their purchasing decision. This gave rise to a potential legal issue about which definition/tyre would be acceptable in Countries where snow tyres are mandatory.

The European Commission expected the gtr to be updated when Reg. 30 and Reg. 54 are amended according to R117.02 - and not before. ETRTO suggested including any changes during the gtr second phase . The Chair and the Russian Federation agreed in the GTR being harmonised with the new definitions being introduced under the 1958 agreement China and OICA suggested adopting the FMVSS139 definition or, at least, to start with.

Decision: to include FMVSS definition in square brackets.

8. Harmonisation of LT / C tyres follow-up – Tyre industry: next meeting.

9. Next steps.

February 2012 should mark completion of phase I of the tyre gtr (passenger tyres).

Informal group meeting, if needed, to be scheduled between October 2011 and February 2012. It was noted that there may be the need for more than one meeting.

10. Any other business: nothing to report.

11. Close of the meeting

The Chair closed the meeting and thanked all the participants for their contribution during the discussion.