

Proposal for amendments to ECE/TRANS/WP29/GRRF/2015/3

This document amends the official document GRRF/2015/3. The amendments to document GRRF/2015/3 are indicated in **red** characters for new text and strikethrough characters for deleted text.

I. Proposal

Paragraph 6.4.4.1(c), amend to read:

- "(c) ~~at least every [two] years, a copy of the test report(s) of a representative tyre issued by a designated Technical Service** demonstrating conformity of production of the snow performance.~~
a copy of the measures taken to ensure the conformity of production. These measures shall include test results demonstrating that the minimum levels of the snow performances required in paragraph 7.2.1 will be maintained."

Paragraph 6.4.4.2(c), amend to read:

- "(c) a copy of the ~~last~~ report(s) of the Conformity of Production as required in UN Regulation No. 117."

Paragraph 9.2.2, amend to read:

- "9.2.2. at least **[1]** tyre once every [two] years in order to verify conformity of the performance of the snow tyres for use in severe snow conditions fulfilling paragraph 6.6.2. and not covered by paragraphs 6.4.4.1. ~~and~~ or 6.4.4.2."

Paragraph 9.2.3, amend to read

- "9.2.3. **at least [1] tyre once every [fourth] years in order to verify conformity of the performance of the snow tyres for use in severe snow conditions fulfilling paragraph 6.6.2. and covered by paragraphs 6.4.4.1. or 6.4.4.2." This requirement can be fulfilled through the analysis either of the test results requested in paragraph 6.4.4.1.c or the report(s) requested in paragraph 6.4.4.2.c.**"

Paragraph 9.4., amend to read:

- "9.4. The authority which has approved the retreading production unit may at any time verify the conformity control methods applied in each production facility **including among others the prescriptions defined in the paragraph 6.4.4.1.c and 6.4.4.2.c.** For each productionand tested as prescribed in this Regulation:"

Paragraph 9.4.2., amend to read:

- "9.4.2. at least **[1]** tyre once every [two] years in order to verify conformity of the performance of the snow tyres for use in severe snow conditions fulfilling paragraph 6.6.2. and not covered by paragraphs 6.4.4.1. ~~and~~ or 6.4.4.2."

Insert a new paragraph 9.4.3., to read:

"9.4.3. at least [1] tyre once every [fourth] years in order to verify conformity of the performance of the snow tyres for use in severe snow conditions fulfilling paragraph 6.6.2. and covered by paragraphs 6.4.4.1. or 6.4.4.2. This requirement can be fulfilled through the analysis either of the test results requested in paragraph 6.4.4.1.c or the report(s) requested in paragraph 6.4.4.2.c."

II. Justification

1. Doc GRRF/2015/3 is amended to take into account the reserves made by some Parties at the 78th session of GRRF on the conformity of production.

2. When the retreader demonstrates that his snow tires classified as "snow tire for use in severe snow conditions" and produced from pre-cured tread patterns, fulfil the requirements of para.7.2 through the reports provided by the manufacturer or the supplier of the pre-cured material (see para. 6.4.4.1 (a)), he also must get from this manufacturer or supplier all the information concerning the follow-up of the conformity of production of the pre-cured material (e.g. control plan) as requested in para. 6.4.4.1 (c). The knowledge of the measures taken by the manufacturer or the supplier of the pre-cured patterns, including the controls of the follow-up of the performances on snow by tests, establish essential elements for issuing the extension of the certificate of the retreader according to the retreaded snow tires with alpine symbol.

3. In para. 6.4.4.2 (c), "last report" is replaced by "reports" because any reports can be used and not necessarily the last one. The essential element to know here is to bring the proof that the process of COP exists and is living.

4. In para. 9.2.2 and para. 9.4.2:

- Brackets have been added for the minimum number of tires to be checked in order to have the same construction of the first sentences than those worded in the new para. 9.2.3 and 9.4.3. having the

- "and" is replaced by "or" because the tires cannot be covered by the both cases but by only one at once.

5. As explained in para. II.2. above, some data concerning the conformity of production are provided by the manufacturer or the supplier of the pre-cured tread patterns. Accordingly the paragraph 9.4 has been modified to allow the authority which has approved the retreading production unit to check them at any time. This has been extended to the case when the retreader resorts to the para. 6.4.4.2 (c).

6. para. 9.2. 3 and para. 9.4.3 are news and identical. They define the rules to be applied to check the conformity of production according to the performance of tires on snow in the cases where the tyres manufactured by the holder of the approval comply with the provisions defined in the para. 6.4.4.1 or 6.4.4.2. The wording of these paragraphs are respectively similar to the para. 9.2.2 and para. 9.2.3 where the tyres manufactured by the retreader do not comply with the provisions defined in the para. 6.4.4.1 or 6.4.4.2 except the value of frequency of the controls [fourth] instead [two]. A second sentence has been added to offer the possibility for the retreader to use the tests reports provided by the supplier or manufacturer such as defined in para. 6.4.4.1 (c) and para. 6.4.4.2 (c).

As para. 9.2.1, 9.2.2, 9.4.1 and 9.4.2 these new paragraphs 9.2.3 and 9.4.3 have been introduced to be in line with the provisions of the 1958 Agreement (Appendix 2 -para. 2).