

PROPOSED AMENDMENTS TO REGULATION No.109

Transmitted by the expert from the Bureau International Permanent des Associations des
Vendeurs et Rechapeurs de Pneumatiques (BIPAVÉR)

Documents concerned: TRANS/WP.29/GRRF/2002/19/Rev.1, TRANS/WP.29/GRRF/2003/20, TRANS/WP.29/GRRF/2004/3 and TRANS/WP.29/GRRF/2004/13. BIPAVÉR fully support these being forwarded to WP.29 either as individual documents or in a consolidated form prepared by the Secretariat.

The Association continues to strive for retreaded tyres to be considered as alternatives to newly manufactured tyres and retreaded tyres are currently being specified as original equipment by some trailer manufacturer's and for certain special truck applications. This is in addition, of course, to their widespread use as in-service replacements, particularly for truck and trailer applications. The introduction of the Regulations Nos. 108 and 109 has been very helpful in this respect.

To further support the position of BIPAVÉR, it is important to maintain the principle that the same regulatory standards should apply to retreaded tyres as to newly manufactured tyres. Consideration is being given therefore, to making an outline presentation to the next session of WP.29 seeking the allocation of a work programme to develop similar provisions to those given in TRANS/WP.29/1032, concerning Rolling Sound Emissions for newly manufactured tyres, to apply to retreaded tyres. The draft presentation will be transmitted as soon as possible.
