

PROPOSAL FOR COLLECTIVE AMENDMENTS TO
- REGULATIONS Nos. 30, 54, 75, 108 and 109 (Part I.)
- REGULATIONS Nos. 78 and 90 (Part II.)

(Clarification of the scopes of the Regulations)

Note: This document has been prepared by ETRTO taking into consideration European Commission proposal TRANS/WP.29/GRRF/2005/19 and Informal document No. GRRF-57-09.

The ETRTO proposal and justification to the EC proposal have been added here.

PART I. (TYRES)

A.1. PROPOSAL

Regulation No. 30 – Pneumatic tyres (motor vehicles and their trailers)

Paragraph 1., amend to read (including the deletion of footnote */ and the third sentence of the paragraph):

"1. SCOPE

This Regulation **applies to new pneumatic tyres for vehicles of category M₁, O₁ and O₂ with a maximum design speed of not more than 300 km/h.**

It does not apply for tyres designed for:

- (a) the equipment for vintage cars
- (b) competitions."

ETRTO PROPOSAL

1. To analyze with OICA and the EC the current applications of Reg.No.30 type approve tyres and properly review the vehicle categories.
2. Maintain the current approval for tyres with speed capabilities above 300km/h as per Supplement 10 to 02 series of amendment of Reg.No.30 (11 Feb. 2000 - Addendum 29 Rev2 Amendment 1 of Reg. No.30)

JUSTIFICATION

1. a) Our understanding it is just the reverse, the meaning being that the tyres are designed 'primarily for ..', but can be used also on other vehicles if appropriate. The wording reflects the scopes of ISO/TC31 subcommittees. Moreover the EU directive 92/23 annex II item 2.32 reads the same!

b) The proposal "This Regulation covers new pneumatic tyres designed and manufactured for vehicles in categories M₁, O₁ and O₂...." (without footnote), is acceptable but somewhere it shall be requested the recognition that they can fit also other vehicles such as, for example N1 (e.g. years ago there was a long debate in France – UTAC to permit reg.30 type approved tyres on passenger vehicles derivatives classified as N1) or L5 or L6 and L7 (quadricycles, 'motorcycle' vehicles with four wheels, e.g. small cars with small engines not requiring a driving license or small vehicles to transport goods – Piaggio Poker, etc).

2. The EC is referring to an old version of Reg.30. Right now and since many years, tyres over 300km/h are included in Reg.30 as indicated by the size designation's speed code marking listed on it (ZR with speed code Y between brackets). Moreover the EU directive 92/23 also permit the type approval of tyres for vehicles with max speed exciding 300km/h (ZR speed category tyres)!

A.2. PROPOSAL

Regulation No. 54 – Pneumatic tyres (commercial vehicles and their trailers)

Paragraph 1., amend to read (including the deletion of footnote */):

"1. SCOPE

This Regulation **applies to new pneumatic tyres for vehicles of category M₂, M₃, N, O₃ and O₄**. However, it does not apply to tyre types identified by speed category symbols corresponding to speeds below 80 km/h."

ETRTO PROPOSAL

1. To analyze with OICA and the EC the current applications of Reg.No.54 type approve tyres and properly review the vehicle categories.

JUSTIFICATION

1. Ref. comments for Reg. 30 especially for L6 and L7 'quadricycles for transport of goods'. In addition there are also other types of vehicles, such as MotorCaravans and small busses up to 8 passengers (classified as M1 but fitted with Reg. 54 tyres), Mobile Cranes and other vehicles for transport of persons or goods but limited in speed and at present not covered by an EU type approval procedure. Moreover the EU directive 92/23 annex II item 2.33 reads the same!

2. Ref. to the limitation to tyres with speed capability same or above 80km/h, the statement is such as to avoid type approvals of tyres not destined to Commercial Vehicles, such as Agricultural tyres (covered by ECE 106) or EM tyres, and Industrial tyres having no type approval requirement. Typically 80 km/h (i.e. speed symbol 'F') is the lower limit of tyres for Commercial vehicle applications.

A.3. PROPOSAL

Regulation No. 75 – Pneumatic tyres (motorcycles and mopeds)

Paragraph 1., amend to read (including the deletion of footnote */ and the last sentence of the paragraph):

"1. SCOPE

This Regulation **applies to new pneumatic tyres for vehicles of category L₁, L₂, L₃, L₄, L₅, L₆ and L₇**.

However, it does not apply to tyre types designed exclusively for the "off-road" use, which are marked "NHS" (Not for Highway Service) and to tyre types designed exclusively for competitions.

Because of the design characteristics of moped and motorcycle tyres, and particularly those of the tread, a substantial number of different types of tyres of the same nominal dimensions are available on the market."

ETRTO PROPOSAL

1. To analyze with IMMA and the EC the current applications of Reg.No.75 type approve tyres and properly review the vehicle categories.

JUSTIFICATION

1. For the first and second sentence, ref. previous justifications on Reg. No. 30 and Reg. No. 54., actually categories L5, L6 and L7 are regularly equipped with tyres type approved to Reg. No. 30 or Reg. No. 54 respectively.
3. The last sentence expresses a wish and in fact, this paragraph has only historical reasons and was added when there was no unique requirement on vehicle type approvals. It was intended to inform the vehicle manufacturer that not only tread type A tyres were available on the market, but also tread type B and tread type C tyres, and those had to be considered in case of replacement. Today with some exceptions (especially rim diameters 12 and below) most tyres are tread type B.

A.4. PROPOSAL

Regulation No. 108 – Retreaded pneumatic tyres for motor vehicles and their trailers

Paragraph 1., amend to read:

"1. SCOPE

This Regulation applies to the production of retreaded tyres **for vehicles of category M₁, O₁ and O₂**. It does however not apply to the production of:"

Paragraphs 1.1. ~~to~~ and 1.3., should be deleted.

Paragraphs 1.4. to 1.8. (former), renumber as paragraphs 1.1. to 1.5.

ETRTO PROPOSAL

1. It always meant tyres previously type approved to ECE reg.30 and corresponding applications.
This can be solved by specifying in the scope that the regulation applies to the retreading facilities dealing with tyres originally type approved to ECE 30. Only exceptions 1.7 and 1.8 shall remain
2. Paragraph 1.2 should remain

JUSTIFICATION

Will expressed verbally.

A.5. PROPOSAL

Regulation No. 109 – Retreaded pneumatic tyres for commercial vehicles and their trailers

Paragraph 1., amend to read:

"1. SCOPE

This Regulation applies to the production of retreaded tyres **for vehicles of category M₂, M₃, N, O₃ and O₄.** It does however not apply to the production of:"

Paragraphs 1.1. ~~to~~ and 1.3., should be deleted.

Paragraphs 1.4. and 1.5 ~~to 1.8.~~ (former), renumber as paragraphs 1.1. to 1.5.

B.5. JUSTIFICATION

ETRTO PROPOSAL and JUSTIFICATION

1. It always meant tyres previously type approved to ECE reg.54 and corresponding applications. This can be solved by specifying in the scope that the regulation applies to the retreading facilities dealing with tyres originally type approved to ECE 54. Only exception 1.2 shall remain as those retreaded tyres will only equip vehicles for use outside the public roads. Then 1.2, 1.4 and 1.5 should be renumbered.
