

**PROPOSAL FOR A DRAFT AMENDMENT TO REGULATION No. 109
(Uniform Provisions Concerning The Approval For The Production Of Retreaded
Pneumatic Tyres For Commercial Vehicles And Their Trailers)**

A. PROPOSAL

Paragraph 6.5.1., amend to read:

"6.5.1. After curing, whilst a degree of heat is retained in a tyre, each retreaded tyre shall be examined to ensure that it is free from any apparent defects. **When the tyre presents a visible defect, it has to be the subject of a specific examination to determine the appropriate action on the tyre. ~~During or after retreading the tyre must be inflated to at least 1.5 bar for examination. Where there is any apparent defect in the profile of the tyre (e.g. blister, depression, etc.) the tyre shall be specifically examined to determine the cause of this defect.~~**"

B. JUSTIFICATION

When Regulation No. 109 was originally written the only viable method of examining a retreaded truck tyre was a visual inspection in a slightly inflated state. In the intervening years, technical progress has allowed the verification of retreaded tyres by new means, such as shearography, x-ray inspection, ultrasonic verification, etc., that do not require the tyre to be inflated and visually examined. In order to allow this technological progress to be fully reflected in the retreading process, we propose to eliminate the restrictive inflated visual examination. The inflated state examination thus remains as one of several possible alternatives, depending on the organisation of the plant. It should be noted that the requirement described in paragraph 6.5.2. for a test of the structural integrity of the retreaded tyre is **not** modified by this proposed amendment.

In addition, an investigation into the cause of any defect discovered should not be part of a Regulation.
