

PROPOSAL CONCERNING PRACTICAL REALIZATION OF THE TYRE GTR
IN TERMS OF MARKING PROVISIONS

1. Background

The draft tyre GTR proposes common global tyre marking taking into account the level of requirements (compulsory and optional), which tyre complies with, and the conformity assessment procedure (type approval or self-certification).

The WP.29 secretariat during the 64th GRRF session in September 2008 raised concerns about the insertion into the draft GTR of new provisions for a global tyre marking. It has been noted that, the Contracting Parties to the 1998 Agreement would have to transpose the provisions of the GTR without any change into their national legislation. In addition it has been noted that, the provisions of the GTR would have to be adopted as a new UNECE Regulation or the corresponding Regulations (Nos. 30, 54 and 117) would have to be merged and amended to reflect exactly the same provisions as those in the GTR (ECE/TRANS/WP.29/GRRF/64, para.33).

2. The Russian Federation Position

The Russian Federation supports development of the tyre GTR including proposed provisions with respect to the global tyre marking.

The Russian Federation assumes that for the Contracting Parties of the 1958 Geneva Agreement, including the Russian Federation, the acceptable solution for the practical realization of the GTR provisions about the tyre global marking would be a harmonization of provisions of the UNECE Regulations Nos. 30, 54 and 117, with those of the GTR, first of all, with respect to tyre marking, since the UNECE Regulations are already applied in the national legislation.

The Russian Federation considers it necessary to note that after adoption of the tyre GTR no parallel technical provisions of the UNECE Regulations will have to exist, since they should be merged with the appropriate GTR provisions. The precedents of the harmonization of the UNECE Regulations and adopted GTR already exist, in particular, GTR No.3 and Regulation No.78 (motorcycle braking performance), GTR No.8 and Regulation No.13-H (electronic stability control systems – ESC). Therefore the Russian Federation does not see within the framework WP.29 any administrative obstacle for merging the UNECE Regulations Nos. 30, 54 and 117 with the provisions of the tyre GTR.

The Russian Federation proposes to include into the plans of the working groups GRRF and GRB the works on the harmonization with the GTR provisions, in the first order, the provisions of the UNECE Regulations Nos. 30, and 117, and, in the second order - the provisions of the UNECE Regulation No.54. This work, first of all, should include a modification of the provisions of the UNECE Regulations with respect to tyre marking. Furthermore, the tyre GTR, for the purpose of harmonization with the revised Regulation No.117, should include the provisions related to the measurement of the tyre rolling resistance coefficient in accordance with the last proposals of the Russian Federation, introduced to the 49th GRB session.

The experts of the Russian Federation would be ready to submit the appropriate proposals to GRRF and GRB.