

Transmitted by the expert from Germany

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agenda item 6)

REGULATION No. 117
(Tyre rolling noise and wet grip adhesion)

German position on proposals for amendments to Regulation No. 117 with regard to snow
tyres

Germany would like to inform the experts of GRB on the position regarding snow tyres. According to the current proposal to amend regulation No. 117 (document ECE/TRANS/WP.29/2012/54) a “snow tyre” has to be marked with "M+S" or "M.S" or "M&S". If a “snow tyre” is classified as "snow tyre for use in severe snow conditions", the “Alpine” symbol **may** be added.

This would finally lead to the situation that “snow tyres” and “snow tyres for use in severe snow conditions” cannot be differentiated as the decision to mark the tyre with the “Alpine” symbol is up to the manufacturer. This is a situation which Germany would like to prevent in any circumstance as it could lead to legal problems for contracting parties if the use of a tyre classified as “snow tyre” or "snow tyre for use in severe snow conditions" is made mandatory in the national law.

It has to be emphasized, that a “snow tyre” marked with "M+S" or "M.S" or "M&S" **does not fulfill any objective test procedure** to be classified as “snow tyre”. The definition of a "Snow tyre" reads: “Snow tyre” means a tyre whose tread pattern, tread compound or structure is primarily designed to achieve in snow conditions a performance better than that of a normal tyre with regard to its ability to initiate or maintain vehicle motion."

Germany is proposing to introduce the "M+S" or "M.S" or "M&S" only in combination with the “Alpine” symbol on a mandatory basis if the tyre shall be classified as a “snow tyre for use in severe snow conditions”. According to the understanding of Germany a snow tyre has to fulfill objective requirements to be classified as a “snow tyre for use in severe snow conditions”. By introducing both markings for this tyre class on a mandatory basis, this tyre can then be clearly identified by the marking "M+S" (or "M.S" or "M&S") in conjunction with the “Alpine” symbol.

This proposal leaves the opportunity to add further specific definitions for snow tyres designed and tested for the use in other conditions (e.g. severe ice conditions) by implementing a new symbol in conjunction with the marking "M+S" or "M.S" or "M&S".

Germany will submit proposal to amend regulation No. 117 according to the explanation above for the upcoming session of GRRF and the next session of GRB.
