Transmitted by the expert from ETRTO

Informal document **GRBP-69-10**
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agenda item 7(c))

EU Tyre Industry comments on document ECE/TRANS/WP.29/GRB/2019/6

January 22nd, 2019

Document presented by France (GRB-2019-06)

Introductory comments from European Tyre Industry

- European Tyre Industry acknowledges the input from France concerning the wet grip performance during the whole tyre life. Nonetheless to this respect the Tyre Industry considers that the current regulatory framework (R117) has introduced substantial benefits for both environmental and safety aspects (and is used by many non-UN 1958 agreement Contracting Parties) and has not shown any evidence of criticalities.
- The current regulatory logic is that all tyre performances are addressed at regulatory level when the tyre is in the new state, taking into consideration the change in performance during the tyre legal service life. It is acknowledged that different tyres can perform differently in the worn state.
- For various reasons, some consumers tend to replace tyres before reaching min tread depth limit, while some others drive below the min tread depth limit. The picture is complex and needs further assessment.

EU Tyre Industry comments

Working document GRB-2019-06 justifications

1. *UN Regulation N° 117 defines the minimum thresholds on both environmental (noise and rolling resistance) and safety (wet adhesion) performances that tyres must pass to be type-approved.*
2. *Today, performance tests are conducted on new tyres, and while this represents the worst case for both noise and rolling resistance, wet adhesion performance decreases with wear. This decrease (which corresponds to an increase in braking distance) can vary significantly from one tyre to another, and cannot be induced by wet adhesion performance at new state.*

Comment:

Currently, R117-wet adhesion performance decreases with wear. A deep assessment is needed to document how the worn tyre wet performance is linked, or not, to new state wet adhesion performance and how the rate of performance loss changes from one tyre to another.

The WD GRB-2019-06 does not provide any supporting elements to this respect.

EU Tyre Industry comments on document presented by France

Working document GRB-2019-06 justifications & content

3. A threshold at worn state for wet adhesion would improve braking distance, thus impact road safety, while also testing hydroplaning, which is not evaluated in the current test at new state. It would also avoid environmental and economic waste, since many drivers replace their tyres before the minimum legal tread depth limit, in order to try to limit this loss of adhesion.

Comment: Any value of minimum threshold for worn tyres has to be well technically analyzed and defined. The industry sees the necessity to further deepen the assessment towards a regulatory approach. This requires time and resources to be allocated to this assessment.

Industry Recommendation: To get an understanding of the postulated impact of premature replacement of tyres, industry calls for a study on the reasons why the consumers change tyres and calls for assessing the worn wet grip performance of tyres currently on the market.

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4. To avoid early removal of tyres and its environmental and economic consequences, while also improving road safety, France proposes to amend this Regulation by introducing a wet adhesion requirement for C1 tyres at worn state. The worn state is obtained by buffing the tyres at the minimum tread depth limit following a standardized method. This would ensure that type approval requirements are as representative of the real-use conditions as possible.

Comment: It is not proven that introducing a Wet grip requirement for worn tyres will avoid an early removal of tyres. Industry calls for a study to identify the root causes why the consumers change tyres, as well as impact potential. Industry recognizes that this requirement could lead to improving road safety.
On the other hand, it must still be demonstrated that the proposed procedure correctly represents the worn state performance.

Industry Recommendation: The methodologies for the preparation of worn tyres and for the Wet Grip test of worn tyres need to be deeply assessed to ensure repeatability and reproducibility.
Other aspects to be considered:

- Representativeness of real usage
- Availability and affordability of test equipment
- Regulatory framework (e.g. family approach)
- Applicability and Enforceability

Conclusions/1

- The European Tyre Industry considers that the document of France might offer an opportunity to further improve the existing regulatory framework.

- Fact-based solid evidence should be established, including consumer survey why and when tyres are replaced, as well as of potential road safety, environmental and economic impacts. Such analysis is essential for proportionate and robust rules. Also, it should be representative of *inter alia* geographies and consumer groups where R117 is applied.

- The Tyre Industry is questioning the timeframe and the urgency to issue those new provisions and calls for a more in-depth assessment of the content of the Working Document from France:
  - to properly define a “worn” tyre and the representativeness of the test procedure to replicate the real worn tyres performance
  - to issue a robust methodology for evaluating the worn tyre Wet Grip performance
  - to verify the regulatory feasibility as well as the environmental & safety impacts
  - to understand the root reasons why consumers replace their tyres

  This assessment will need appropriate time and resources due to the complexity of the matter. As an example, the Tyre Industry further questions the impact of worn tyres requirements to be established in all R117-relevant safety conditions, that would mean wet and snow, C1 or more, …

Conclusion/2

- To assign the work, including the above assessment, to a Contracting Party within a Task Force
- ETRTO is open to participate to the above assessments with its technical expertise
- The Tyre Industry would have preferred to see such a proposal as an informal document to be able to discuss the many open items.

Thank you