

## Proposal for amendments to ECE/TRANS/WP.29/GRBP/2020/15

The changes compared to document ECE/TRANS/WP.29/GRBP/2020/15 are marked in red.

### I. Proposal

*Paragraph 2.18.13., amend to read:*

“2.18.13. The letters ‘LS’ after the nominal rim diameter marking in case of **log-skidder** tyres for forestry machines<sup>2</sup>

...

<sup>2</sup> This marking shall only be mandatory for tyre types approved to this Regulation after the entry into force of Supplement 18 to the Regulation.”

*Paragraph 3.3., amend to read:*

“3.3. ~~All~~ **The markings referred to in paragraph 3.1. and the approval mark prescribed in paragraph 5.4. of this Regulation shall be clearly legible, indelible and raised above or sunk below the tyre surface. and legibly moulded and produced as part of the process during manufacture. The use of branding or other methods of marking after completion of the original manufacturing process is not permitted.**”

*Insert a new paragraph 3.4.1. to read:*

“3.4.1. **In the case that the date of manufacture is not moulded, it shall be applied not later than 24 hours after the tyre is removed from the mould.**”

### II. Justification

1. As presented in Informal document GRBP-71-08, the use of wording “moulded” is a technical limitation linked to the technology available at the time of the first issue of the Regulations, but now is only one of the various technical solution.

2. The removal of this technical limitation would be advisable following the principle of not stopping the technical innovations.

3. ETRTO proposes to amend the UN Regulations on tyres in order to allow tyre marking methods other than moulding by keeping the following criteria:

- Any technical solution alternative to the "moulding" shall guarantee that the markings on the tyre sidewall is clearly legible and indelible.
- It shall be made sure that the marking of the manufacturing date will be done within 24 hours after de-moulding of the tyre (like in the United States of America Code of Federal Regulations 49 CFR 574.5).
- 4. **The word “log-skidder” is added in the paragraph 2.18.13 in order to not conflict with paragraph 3.1.15. in which the inscriptions "HF - 1", "HF - 2", "HF - 3", or "HF - 4"**

are required in the case of high-flotation tyres for forestry machines listed in Annex 5  
Table 7.

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