## ETRMA

The European Tyre Label: lessons learnt and further steps

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EUROPEAN
TYRE & RUBBER
manufacturers'
association



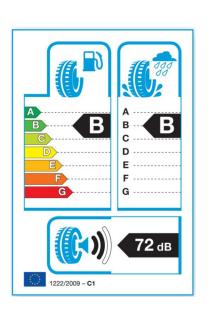
The European tyre label regulation (EU/1222/2009) will be up for revision in 2018/2019.

The presentation will cover the lessons learnt from the past 5 years and where further improvement may be needed, with a focus on "implementation rules" and "market surveillance". Among the necessary changes, are the adaptation to technical progress on test methods, like the improved wet grip test method for passenger car tyres.

The role of international <u>standardization</u> is crucial to secure both the robustness of the technical prescriptions and the global perspective behind the requirements that are at the basis of any prescription like the tyre label.

A sustainability tool, supporting the market competitiveness, based on harmonized criteria, subject to further evolutions.

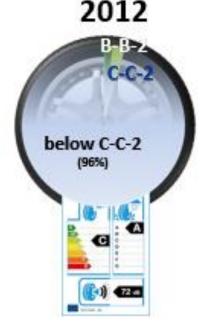
## **EUROPEAN TYRE LABEL** the key foundation element:

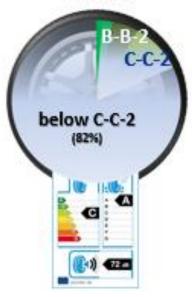


Holistic approach:
sustainability means at least
both safety and environmental
performances



No consumer information, while as of today more than 35% of consumers is receptive of tyre label information





The current
European tyre
label is STILL a
young tool

- The tyre label is a proven driver towards the market improvement: clearly tyre manufactures from 2012 have oriented their design towards better safety and environmental performances.
- Still a long path for further improvements: less than 0,3% of tyres currently is A-A-1
- A tool confronted with <u>an evolving market</u>: the latest years showed an increasing number of <u>new brands</u> on the market (+20%), especially in <u>budget segment</u> (+134% volume)
- ☐ Market Surveillance is a key element for the tool effectiveness, especially in the view of broadening the surveillance towards all the segments (trucks, SUVs,..)



# **Current Implementation** *rules* and market surveillance

_ T	est procedures for Wet Grip C1 tyres	ISO 23671: 2015
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Test procedures for Wet Grip C2, C3 tyres
 ISO 15222: 2011

Test procedures for Rolling Resistance
 ISO 28580: 2009

+ mandatory procedure for laboratory alignment updated every 2

years

Verification procedures for market surveillance authorities

Joint Market Surveillance campaign MsTyr15



http://www.mstyr15.eu/index.php/en/



CURRENT: ISO 23671: 2015

# Adaptation to technical progress WET GRIP TEST: REVISION to ISO

**Test procedure** for **Wet Grip C1** tyres

The target is to <u>improve the reproducibility</u> of the existing test method, considering its application within the current regulatory framework.

**Main items** have been revised within the procedure:

- ✓ **5.1 Track characteristics** –Verification of the <u>Track frictional properties</u>
- √ Various § in different Sections Revision of the <u>testing conditions ranges</u>
- ✓ **6.5.1 Tyre preparation and break-in** <u>Stabilization</u> of tyre performances
- ✓ 6.7 Processing of measurement results Revision of the <u>mathematical formulas</u>, defining specific <u>corrective coefficients depending on tyre typologies</u>



# Adaptation to technical progress WET GRIP TEST: REVISION to ISO

**Test procedure** for **Wet Grip C1** tyres



ISO 23671 revised test method expected to be published end-2019, that it is expected to also be embedded within UN R117

international standardization is crucial to secure both the robustness of the technical prescriptions and the global perspective behind the requirements that are at the basis of any prescription like the tyre label



### Market Surveillance: framework









The countries involed in this Joint Market Surveillance Action are Belgium, Bulgaria, Croatia, Estonia, Finland, Germany, Ireland, Latvia, Lithuania, Luxemburg, Poland, Romania, Sweden, and Turkey.

#### Learn more...

- MSTyr15: factsheet (short version)
- MSTyr15: factsheet (extended version)
- · How is a tire made? (video)
- How is natural rubber made? (video)
- How is synthetic rubber made? (video)



### Inspections per Member Country

Belgium	220
Bulgaria	900
Croatia	498
Estonia	258
Finland	1080
Germany	1238
Ireland	1080
Latvia	976
Lithuania	250
Luxembourg	501
Poland	1111
Romania	700
Spain	743
Sweden	1062
Turkey	1239
Total	11856

2879 tyres were inspected by analysis of the websites

8774 summer tyres

3164 winter tyres











## Market Surveillance: Overall results

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#### Verification of documentation

• 747 requests for documentation contacting the following economic operator (Manufacturer or Importer or Distributor)

Dealer	131
Importer	257
Manufacturer	262
Representative	97
Total	747

- For 10% of cases no documents received
- For more than 40% documents delivered after more than two weeks and after repeated requests

#### Main problems:

- Confirmation of difficulties in having the documentation in two weeks - in some cases need to wait 40 to 60 days
- WG tested according to UNECE regulation 117 instead of Regulation 1222/2009
- Not clear if tests refer to a given model or a series and which series

2

#### **Inspections results**

• Inspections on web: 627 non compliant

In 385 cases no label shown

Other non conformities: no link to Commission website (160), missing explanation of pictograms (21), faulty information (92)

Inspections on shops: 565 non compliant

In 106 cases no label shown

Other non conformities:, wrong label format (52), incomplete label (69), label not easily visible (28)



#### **Tyre Tests results**

#### 131 tyres tested

- 16 (12%) not compliant to Wet Grip
  - 3 from HR-LV, 2 BG-IE-RO, 1 DE, EE, LT, LU
- 19 (14,5%) not compliant to Rolling Resistance
  - 3 from BG-IE-SE, 2 DE, 1 BE, EE, ES, FI, HR, LU, LV, PL





### Market Surveillance: Overall results

- **Increase of inspections frequency** in the last years of all participating members, thanks also to the training developed
- Inspection actions giving more recognition and acceptance of the requirements of the **Regulation from the market operators** (dealers, distributors, etc.)
- **Increase of awareness of consumers** thanks to documentation developed in the frame of the Joint Action and specific events organized by members of the Joint Action
- Evidence that there are **problems on**:
  - correct information on shops or on the web,
  - availability of the Technical documentation,
  - suitability and completeness of the technical documentation
- For more than 1700 models letters were sent to Economic Operators for corrective actions, in nearly 30% of cases the Economic Operator took voluntary actions



## European Commission released <u>17 May 2018</u> a PROPOSAL to revise Regulation 1222/2009

#### VERY RECENTLY THE DRAFT REGULATION HAS BEEN PUBLISHED!

#### Some of the main revision items:

- New Label size/format
- Include severe snow/ice grip information

Revision to wet grip C1 test method to be aligned with UN R117 (which will reflect the

latest revision to ISO 23671)

The upper label classes are re-distributed

- Market Surveillance will be reinforced
- EC label database

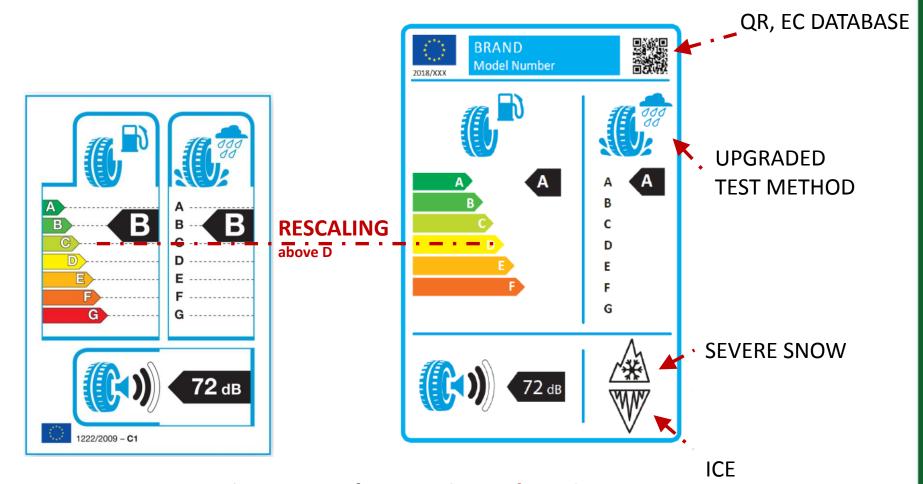
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Application timeframe to be confirmed (June 2020? TRANSITIONAL PROVISIONS NOT CLEAR YET) and the overall regulatory process might imply modifications to the current public draft in the next months

C1 tyres		C2 tyres		C3 tyres	
RRC in kg/t	Enerov efficiency class	RRC in kg/t	Fnorov efficioncy class	RRC in kg/t	Fnorov efficioncy class
$RRC \le 5,4$	A	$RRC \le 4,4$	A	$RRC \le 3,1$	A
$5,5 \le RRC \le 6,5$	В	$4,5 \le RRC \le 5,5$	В	$3,2 \le RRC \le 4,0$	В
6.6 < RRC < 7.7	C	$5.6 \le RRC \le 6.7$	C	$4.1 \le RRC \le 5.0$	C
$7.8 \le RRC \le 9.0$	D	$6,8 \le RRC \le 8,0$	D	$5, 1 \le RRC \le 6, 0$	D
$9,1 \le RRC \le 10,5$	E	$8, 1 \le RRC \le 9, 2$	E	$6, 1 \le RRC \le 7, 0$	$\boldsymbol{E}$
RRC > 10.6	F	RRC > 9.3	F	$RRC \ge 7.1$	F

C1 tyres		C2 tyres		C3 tyres	
G	Wet orip class	G	Wet orip class	G	Wet orip class
1,68 ≤ G	A	1,53 ≤ G	A	1,38 ≤ G	A
$1,55 \le G \le 1,67$	В	$1,40 \le G \le 1,52$	В	$1,25 \le G \le 1,37$	В
$1,40 \le G \le 1,54$	C	$1,25 \le G \le 1,39$	C	$1,10 \le G \le 1,24$	C
$1,25 \le G \le 1,39$	D	$1,10 \le G \le 1,24$	D	$0.95 \le G \le 1.09$	D
$1,10 \le G \le 1,24$	E	$0.95 \le G \le 1.09$	E	$0.80 \le G \le 0.94$	E
$G \le 1,09$	F	$G \le 0.94$	F	$0.65 \le G \le 0.79$	F
Empty	G	Empty	G	$G \le 0,64$	G





Application timeframe: to be confirmed



## Thank you!

