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Sustainable Growth and EU 2020
Sustainable Mobility and Automotive Industry

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From: Peter Broertjes

To: Participants to the Ad Hoc meeting, GRRF

Topic: Ad Hoc meeting on R117 C2 and C3 tyres Wet Grip thresholds

Location: OICA offices, Paris, France

Date: 21 November 2013

Participants: Mr Hidenobu Kubota (vice-chairman of GRRF), DK, NL, DE, UK, IT, ES, FR, SE, JPN, KOR, 1 representative of vehicle manufacturers (OICA), 4 representatives of tyre manufacturers (ETRTO), and the undersigned.

Background:

The EC, FR and ETRTO are looking to ensure the current level of safety of commercial vehicle tyres in wet road conditions on public roads. The tyre industry has supported and proposed minimum levels of Wet Grip performance in line with the market situation today. Presently, there is no issue to this respect, however, as a result of reducing commercial tyre rolling resistance for better fuel economy of trucks, the Wet Grip performance may suffer in the future (i.e. better rolling resistance = poorer braking and cornering on wet roads). The proposed values reflect today's situation and are compatible with the EU tyre labelling scheme.

A number of EU Member States (notably DK, NL, DE and UK) have called for the introduction of higher Wet Grip indices than proposed, but did not provide data to justify such proposal, while others (IT, ES, FR, SE, supported by ETRTO, JPN) support the thesis. The undersigned noted that this would create an unjustified additional burden for the tyre industry which is furthermore to a large extent not compatible with the mandatory EU labelling scheme. A vote on the proposed values at the level of WP.29, working document ECE/TRANS/WP.29/2013/66, was postponed as a result of the disagreement on EU level.

Despite repeated calls for supporting evidence, no representative has put forward any written information that would justify adopting higher levels than proposed by ETRTO and EC during any of the last three sessions of GRRF.

Summary:

ETRTO presented document GRRF-75-02 to refresh the memory of the attendees concerning the state-of-play. The working document proposes a WG index of 0.65 for all C3 tyres (i.e. normal, traction, snow, etc). The values proposed for C2 were not further discussed and did therefore not appear to be an issue for most participants, except NL, UK and maybe others who have not (yet) expressed this.

DK stated that also the EC, FR and ETRTO original proposal is already not fully in line with the EU tyre labelling scheme, because the latter allows a value grading below 0.65 which is now trimmed off. He also stated that in any case, the EU tyre labelling scheme should not prevent regulators from making sensible rules in Regulation No 117. Also it cannot be said with such certainty that there is no issue with C3 tyres having low wet grip, as has been stated by others.

The DK delegate (supported by DE, NL and UK) stated that it is not a question about raising a level, but about fixing a level. Therefore everybody, also the delegates suggesting 0.65 as the value, should put forward supporting evidence for this value. ETRTO and EC noted that since no additional engineering costs are introduced in establishing the 'safety net' threshold at 0.65, no cost/benefit analysis is provided (i.e. not necessary). However, as it was according to DK not possible to make cost/benefit analyses on establishing higher thresholds than proposed, the decision should be based on common sense. Since the friction coefficients of tyres for trucks and busses in accidents are not registered and therefore cannot be found in accident statistics, nobody can tell if trucks with low wet grip tyres are more frequently involved in accidents where they do not succeed to brake a halt before colliding or to running off the lane due to too little friction available from the tyres.

The DK delegate (supported by DE, NL and UK) stated that fixing the value at 0.65 or 0.80, or even 0.95, could not ensure 100% that the average wet grip level (at present 'state-of-the-art' about 1.05 to 1.10) would be maintained, because the actual future values would be allowed to be lowered towards the limit value. Based on common sense it could therefore be reasonable at least to fix the limit (for all excluding winter tyres) to 0.80. This would mean that very, very few of today's tyres would be eliminated from the market.

JPN stated that they are strongly considering acceding to R117 in the near future. They provided numbers indicating 0.65 – 0.80 tyres represent in sales volume in 2012 162.000 normal tyres, 931.000 traction, snow or special tyres. In addition, no issues are noted in the field in Japan and thus raising the WG level is not supported by them. ETRTO confirmed that there are no such numbers available for the EU.

EC stressed the fact that the proposal seeks to harmonise Wet Grip values for C2 and C3 tyres as applied in South Korea (for C2), Brazil (for C2 and C3), Saudi Arabia (to be applied for C2 and C3). EC requested feedback concerning the position of Contracting Parties on the potential dis-harmonisation and barriers to trade implications. NL and DK stated that this was a non-issue for them. UK stated also to be mindful of the possible implications.

SE stated that its participation in GRRF is not only the technical and safety aspects, but environmental and economic aspects as well. SE is worried about possible increase of

cost. SE reminded that cost/benefit (impact assessment) should be taken on board too. Diverting investment to WG improvement is to the detriment to environmental progress.

DE stated to 'freeze' the current safety standard in the EU and not to prioritise to harmonise with 'lower levels' that might be applicable in other regions. DE pointed out that based on the data, which was submitted by ETRTO, 0.65 for all C3 tyres does not reflect the state-of-the-art. DE stated that there is no intention to increase the current level of wet grip, but just to fix the current level.

JPN stresses the importance of cost/benefit and safety benefit when introducing a higher level than currently proposed.

It was highlighted by ETRTO that the level at 0.65 will mean that this would be the case for the so-called worst case tyre of the approved family and that due to the safety margin of +0.08 a realistic nominal value of at least 0.73 would be applicable for the so-called worst performing tyre of the family. FR confirmed that this is the practice.

DK suggested that if the level would be raised to 0.80, except for winter tyres, almost no tyres on the market today would need to be excluded from the market. This was subsequently contested by ETRTO. DK stated that this was in line with WTO which notes that a technical standard should not have significant and unnecessary effect to trade. It was noted by EC, FR and ETRTO that in such a case as an effect, this would in reality still mean that tyres with 0.86 (nominal) performance would in such a case also be rejected from the market (i.e. due to safety margin needed for type-approval as explained) and thus posing a further unjustified negative effect.

ETRTO reminded that the values as declared and tested represent those of a family, so there is a larger effect on tyres which would be well above the limit. The issue of selecting a representative tyre for a family, in principle the worst-case tyre, was further clarified. ETRTO explained how the elimination of the 'tail' of the tyre Wet Grip distribution would lead to a re-certification of some whole tyre families in terms of RR and noise certification due to the probable elimination of the worst case tyre representing the family and raise cost and burden for the industry, without an appropriate effectiveness analysis.

UK noted that for instance the RUS proposal concerning particle emissions from tyres may cause a shift to lower WG indices.

It was agreed to narrow the options for the way forward down to four choices:

- a. DK, NL, DE and UK proposal as stated in the 75th session of GRRF (i.e. 0.80 for normal C3 tyres, including traction tyres, 0.65 for all other C3 tyres);
- b. Compromise solution (i.e. 0.80 for normal C3 (non-traction) tyres, 0.65 for all other C3 tyres);
- c. Revised ETRTO, FR and EC proposal (i.e. 0.65 across the board, but with a "revision clause" for normal C3 (non-traction) tyres).
- d. Retract proposal or remove limits, but maintaining the testing method only.

Option a) supported by DE, NL, DK and UK would review this option.

Option b) was supported by DK, to a lesser extent by DE, FR, NL and UK would review this option.

Option c) was supported by ES, IT, JPN, OICA, FR, ETRTO, SE and UK would review this option.

Option d) was not supported.

Action points:

It was agreed that EC would provide this information for the next session of GRRF and that a draft proposal text incorporating the preferred selection would be circulated for verification with the participants.

An informal document based on option c) is submitted to GRRF for review at the 76th session. This document is at the same time submitted to WP.29 as an informal document for its 162nd session to allow the EU voting process to commence.

Note:

The submitted report is provided by EC and as a result reflects its views, taking into account further input by those participants which have provided it. The undersigned will be pleased to provide a presentation at the 76th session of GRRF.

Peter Broertjes
Legislative Officer