

Meeting report

From
S.M.P. Maas

Subject
Study on some safety-related aspects of tyres use.
Summary of the stakeholder consultation meeting.

Transport & Mobility

Steenovenweg 1
5708 HN Helmond
P.O. Box 756
5700 AT Helmond
The Netherlands

www.tno.nl

T +31 88 866 57 29
F +31 88 866 88 62

Date

July 28, 2014

Our reference

2014-TM-SUM-0100105720

Direct dialling

+31 88 866 57 43

Direct fax

+31 88 866 88 62

This document contains a summary of the stakeholder consultation meeting organised as part of the “Study on some safety-related aspects of tyre use (MOVE/C4/2013-270-1)” and held on June 10 2014 in Brussels. This summary is not intended to capture all the details of the discussions held during the meeting, but serves to reflect the main topics discussed and the opinions of the stakeholders that were present during that meeting. The attendees of the consultation meeting are listed in Appendix A.

The meeting was structured according to the final version of the agenda which is attached to this document.

1. Introduction and welcome by the Commission.

The Commission representative opened the meeting and explains the targets of the consultation.

2. Presentation of the project objectives and project team

TNO, the consortium leader, presented the study work programme and study team.

3. Current use of tyres in relation to safety

A generic overview of tyres and the usage of tyres in relation to safety was given, by TNO, including accident causation facts from the GIDAS database presented by VUFO. A wide variety of topics was discussed with stakeholders on the content of the presentations. Various stakeholders felt the presentation was not properly referenced and/or documented and that it did not adequately reflect the role of tyres concerning road safety. They requested that the final report be drafted with particular attention to this aspect.

Stakeholders pointed out to the following:

- The right tyre for the right weather condition should be used.
- Proper inflation pressure monitoring and maintenance is essential for tyre safety performance.

Date

July 28, 2014

Our reference

2014-TM-SUM-0100105720

Page

2/9

- The study on accident causation should focus on grip related cases and not extreme cases like tyre failure¹. From the GIDAS database it can be concluded that that only a small share of accidents with personal injuries are caused by tyre failure. Furthermore the tyre conditions prior to failure are difficult to assess.
- Motorcycle accidents are different from passenger car accidents. The impression of some attendants is that motorcycles are driven closer towards the grip limit and tyre related issues are probably important, but this is not backed-up by studies. It is however mentioned that at the end of the summer season more motorcyclists experience reduced grip at low road temperatures or cold tyres. Few motorcyclists drive in winter conditions so the issues around winter tyres seem less relevant.
- In the report the references to sources should be clearly referred to in order to allow verification of the results.
- For the GIDAS database it should be explained how these results can be translated into conclusions applicable EU-wide.

4. Tyre Inflation pressure and tyre aging

An introductory presentation was provided by TNO and a set of four questions was posed to stakeholders. The answers can be summarised as follows:

1. How can consumers be better informed and made aware about tyre inflation pressure?

- For various stakeholders, Members States could/should be more active in their support on making consumers aware of the relevance of tyre inflation pressure.
- It was felt that users do not always know where to find the correct tyre inflation pressure for their car, e.g. summer and winter tyres, loaded or unloaded.
- There was agreement that TPMS is an important safety device. Anyhow drivers must still check their tyres regularly and have access to inflation gauges to inflate them. TPMS will enhance driver awareness but will not eliminate the need for regular (monthly) tyre inflation checks.

2. Are tyre inflating facilities available today sufficient?

- Stakeholders pointed out that the current inflating facilities are not always available or in good condition, e.g. not properly calibrated.
- Some stakeholders informed that sometimes consumers had to pay for the use of inflating equipment and this was an additional barrier for proper tyre inflation.
- Other stakeholders underlined that some drivers do not know how to or cannot inflate their tyres (e.g. elderly people). Some drivers have never even tried it and do not feel comfortable with this operation.

¹ Tyre failure in this context means failure resulting in desintegration of the tyre

Date

July 28, 2014

Our reference

2014-TM-SUM-0100105720

Page

3/9

3. Should tyre inflation pressure monitoring systems requirements be revised?

- The majority of stakeholders advises to revise the requirements for TPMS in cars due to the improvement of technology. It was pointed out that UNECE Regulation 64 (R64) was an important step and it has just been implemented. However general consensus seemed that a second phase of R64 should be developed to increase the performance level, but several stakeholders strongly advise that evaluation of the current legislation (e.g. by collecting field data) is made before making changes.
- Some stakeholders advised to include TPMS under the periodic technical inspection (PTI). Others pointed out that PTIs can only play a minor role since they are performed yearly and that only after a first period of two to four years.
- Some stakeholders felt that TPMS should also have a fail-safe function so the driver would not be allowed to reset it to an inflation pressure that is dangerously low.
- Some stakeholders reiterated the need that, for consistency in legislation, the TPMS obligations are extended also to commercial vehicles.
- Consumer acceptance of the technology is an important aspect to consider, both in terms of use and cost.

4. Should tyre label inform about tyre aging performance?

- There was consensus amongst stakeholders that tyre age is not a safety issue.
- Agreement was also general that age is only a component of “tyre service life” which depends on various factors such as storage time, exposure to environment, speed, inflation pressure, use pattern etc. Therefore the safety issue is more related to proper tyre maintenance than “tyre service life”.
- Stakeholders would support that Member States put more effort on tyre inspection and enforcement of the existing rules (e.g. the 1.6 mm minimum tread depth).
- One stakeholder informed of the request by customers to be informed on tyre mileage or duration.

5. 'Summer' and 'winter' tyres

An introductory presentation was provided by TNO and a set of four questions was posed to stakeholders. The answers can be summarised as follows:

1. Is a new 'winter' tyre category required in addition to the snow tyre category?

- Most stakeholders felt there is no need for a new winter tyre category in addition to the existing 3PMSF².

² Three peak mountain snowflake or 'snow tyres for severe snow conditions'

Date

July 28, 2014

Our reference

2014-TM-SUM-0100105720

Page

4/9

2. Should all winter tyres be based on a standard test?

- Most stakeholders do not recommend new tests for winter tyres.
- A common definition is useful and the 3PMSF test (according to UNECE R117.2) should be used

3. Should a common definition of winter tyres be applied across the EU?

- Most stakeholders would support that the EU requires Member States to refer to a common definition to avoid confusion when traveling across various Member States. The existing definition of 3PMSF suffices although some useful aspects in some regions (e.g. grip on ice) are not included in that test.
- EU-wide legislation concerning the weather conditions of the period of the year when winter tyres should be fitted is not advised by most stakeholders. Winter tyre definition should be EU-wide, the application as to when winter tyres should be fitted mandatorily should be left to the member states in order to match local requirements and weather conditions. The general advice should be "the right tyres for the right weather conditions".
- Most stakeholders recognise that a special variant is the "Nordic tyre" which is used in some Scandinavian countries. This is a specific market with specific information, and therefore EU-wide regulation is not deemed useful. Relevant information is already given by manufactures but not in a harmonised way. An idea would be to supplement the tyre label with optional pictogram such as "grip on ice". The industry is already working on a test method for ice performance, but it is even more complicated than wet grip testing.

4. Should tyre labels inform about winter/summer performance?

- There is room for improvement on information to customers to add this to the label (e.g. ice grip). But complexity should be avoided. Moreover, key conditions should be met beforehand, such as the development of a uniform and reliable ice grip test method, as well as the establishment for a minimum required ice grip threshold.
- Some stakeholders emphasised that the label scheme is still very recent and it might be too early to change it again before assessing the results of the existing label.
- A harmonized way to test the performance in Nordic winter conditions is a precondition for possible label adaptation to such tyres; this topic is already on the working programme from DG ENERGY.

Date

July 28, 2014

Our reference

2014-TM-SUM-0100105720

Page

5/9

6. Tyre tread depth

An introductory presentation was provided by TNO and a set of four questions was posed to stakeholders. The answers can be summarised as follows:

1. Should the minimum tread depth (1.6mm for passenger cars) be revised?

- There was consensus amongst the stakeholders that there was no evidence presented of a decrease in accidents when tyres are used above the existing limit. Therefore they do not see for any need to change minimum tread depth for passenger cars.
- Most stakeholders believe there is room for improvement by simply enforcing this minimum by means of roadside inspections and periodic technical inspections.

2. Should goods vehicles and buses be included under the tread depth requirements?

- There was no strong position on this particular point but nevertheless some stakeholders thought harmonizing the minimum tread depth to 1.6 mm to good vehicles and buses would be positive to ensure a level playing field in traffic across the EU. Currently the legislation differs among Member States and some have no minimum at all. Should a measure of this kind be proposed, sufficient lead time should be allowed for its implementation.
- Cross border traffic: harmonisation would be beneficial to facilitate the free movement of goods across borders.
- It was also pointed out that a thorough study would be needed to confirm that requiring a minimum makes sense. Some stakeholders underline that goods vehicle accidents seemed to be caused more often by other aspects (e.g. load distribution) than tread depth or other tyre-related aspects.

Date

July 28, 2014

Our reference

2014-TM-SUM-0100105720

Page

6/9

3. Should specific tread depth requirements for winter tyres be established at EU level?

- This could well be, but a more thorough study is needed because there are a lot of contributing effects. For example, performance in the snow and winter decreases with wear and there are other aspects that come into play, such as costs and environmental impact, but so far there is no consistent technical data to indicate at which level a threshold for tyres in winter conditions should be established. Moreover, there are various other important aspects for grip, beyond the tread depth, such as type of tyres and vehicles, load, driving style etc. Moreover, an impact study on minimum tread depth for winter should take into account other key elements such as costs, environmental impact (including used tyres consequences), etc...

4. Are "recommendations" useful, next to the legal minimum requirements?

- Consensus from the industry is that a recommendation from the manufacturers or other parties is fine, but that it makes no sense to have a "legal" recommendation: safety legislation should be obligatory and not optional to avoid confusion concerning the rules; rules should be easy to follow and easy to enforce.

6. Cost Benefit Analysis

TML, member of the consortium, presented some preliminary options for measures to be considered for the cost-benefit analysis. The Commission and the consultant acknowledged that some of the options which had been considered for the presentation would be revised as a result of the stakeholders meeting.

A discussion followed on the policy options presented for each one of the topics described above.

The following table represents scenarios suggested by stakeholders as input for a Cost Benefit Analysis (CBA). These scenarios are not to be taken as policy recommendations; their suitability for policy depends heavily on the outcome of the CBA.

Date

July 28, 2014

Our reference

2014-TM-SUM-0100105720

Page

7/9

Table 1: Cost benefit analyses options (note that considered specific aspects are NOT by definition agreed upon by stakeholders, see conclusions)

Options	Tread	Inflation pressure and TPMS	Winter/summer tyres	Ageing
No change	Existing legislation, including already accepted future changes in relevant legislation. This means that the current situation for individual Member States' legislation remains as it is.			
Consumer awareness	Voluntary take-up through improved information providing by Member States about the importance of maintenance.			
Advise to Member States	Improved enforcement on existing legislation: annual periodic checks and police inspections.			
			Countries with relevant winter conditions should apply rules on winter tyres during a set period defined based on wintery conditions, and a harmonized definition of winter tyres should be used therefor	
Legislation	<ul style="list-style-type: none"> Extend scope of 1.6mm minimum to HGV Define specific minimum tread depth for winter tyres. 	<ul style="list-style-type: none"> Availability of properly calibrated tyre inflation facilities at petrol stations free of charge. Implement second phase of TPMS regulation (higher performance requirements) Extend the obligation for TPMS mandatory fitment to commercial vehicles 	Winter tyres require to comply to 3PMSF approval procedure and tyre marked M+S only are no longer considered a winter tyre	No legislation suitable for this aspect

Date

June 10, 2014

Our reference

2014-TM-SUM-0100008527

Page

8/9

Summary of conclusions

The main conclusions resulting from opinions of stakeholders expressed in the answers to the questions listed above can be summarized as follows:

- Stakeholders request that the final report of the study should be very precise in terms of properly referencing and justifying the assumptions presented which will be the basis for the final report.
- Stakeholders (with few exceptions) do not consider the need to increase the current minimum tread depth in order to improve road safety concerns. Instead the current minimum of 1.6 mm for car tyres should be properly enforced across all the EU countries. There might be room for extending the scope of the minimum tread depth requirements for goods vehicles and buses, at 1.6mm, particularly in view of setting a level playing field across the EU. After further study there could be room to establish a different minimum tread depth for use of winter tyres in winter conditions. Any proposal to this effect should be clearly justified by a thorough impact assessment taking into account all aspects.
- Stakeholders emphasize that correct tyre inflation pressure is an essential safety factor. It would be advisable to improve the performance requirements for Tyre Pressure Monitoring Systems (TPMS), along the line with improvements in technology. There was no conclusion and no consensus among the stakeholders to increase the warning level before getting experience from the field. However, TPMS cannot replace the user's awareness and action. In order to facilitate the task for the user, there is room for improvement concerning the information on adequate tyre inflation pressure and especially concerning the availability and correct functioning of tyre inflating facilities. The need for mandatory TPMS also for commercial vehicles should be thoroughly assessed.
- Stakeholders conclude there is no need for a new winter tyre test or definition. The current 'snow tyre for severe snow conditions' or 3PMSF, is sufficient. For some stakeholders it would be desirable that Member States, whenever establishing national regulations on the use of 'winter tyres', refer to 3PMSF tested tyres. For the Nordic region, additional information on ice performance (i.e. additional ice pictogram on sticker) will also be of help to inform consumers sufficiently. To that end, the necessary test procedures and performance requirements are still to be developed.
- Stakeholders do not consider tyre age to be a safety issue. The only meaningful concept of ageing is 'tyre service life' which depends on many different factors and it is therefore too complex to be regulated.

Date

June 10, 2014

Our reference

2014-TM-SUM-0100008527

Page

9/9

Appendix A: Attendees of the consultation meeting

Status	Organisation	Surname	Name	mail
Consultant, EU Government, Private				
C	TML	Akkermans	Lars	lars.akkermans@tmleuven.be
C	TNO	Jansen	Sven	sven.jansen@tno.nl
C	TNO	Maas	Sander	sander.maas@tno.nl
C	TNO	Schmeitz	Antoine	antoine.schmeitz@tno.nl
C	VUFO	Hannawald	Lars	Lars.Hannawald@vufo.de
EU	European Commission DG MOVE	Schmidt	Szabolcs	Szabolcs.Schmidt@ec.europa.eu
EU	European Commission DG MOVE	Ferravante	Roberto	Roberto.Ferravante@ec.europa.eu
EU	European Commission DG MOVE	Lopez Benitez	Casto	Casto.Lopez-Benitez@ec.europa.eu
EU	European Commission DG ENER	Moreno Acedo	Juan	Juan.Moreno-Acedo@ec.europa.eu
G	BIVV-IBSR	Gaillet	Jean-François	Jean-Francois.Gaillet@ibsr.be
G	Finnish Transport Safety Agency	Kuikka	Keijo	keijo.kuikka@trafi.fi
G	Icelandic Transport Authority	Kristófersson	Kristófer Ágúst	kristoferak@samgongustofa.is
G	Ministry of Transport Italy	Erario	Antonio	antonio.erario@mit.gov.it
G	Swedish Transport Agency	Olov Norén	Hans	hans.noren@transportstyrelsen.se
G	Trafikstyrelsen (Danish Transport Agency)	Hollnagel	Victor	vho@trafikstyrelsen.dk
G	TU Delft	Scarpas	Athanasios	a.scarpas@tudelft.nl
P	Arcturus group	Basset	Ludovic	lbasset@arcturus-group.com
P	Assogomma	Bertolotti	Fabio	f.bertolotti@federazionegommaplastica.it
P	Bridgestone Europe	Giovannotti	Riccardo	riccardo.giovannotti@bridgestone.eu
P	Bridgestone Europe	Tosatti	Gianluca	Gianluca.tosatti@bridgestone.eu
P	Continental AG	Burfiën	Joerg	joerg.burfiën@conti.de
P	Continental AG	Collins	Desmond	des.collins@conti.de
P	Dunlop Tech side	Stohrer	Tobias	tobias.stohrer@dunloptech.de
P	ETRMA	Cinaralp	Fazilet	f.cinaralp@etrma.org
P	FEMA - Federation of European Motorcyclists Associations	Delhaye	Aline	general.secretary@fema-online.eu
P	FIA Region I	Krid	Laurianne	lkrid@fia.com
P	German road safety council	Lacroix	Jacqueline	jlacroix@dvt.de
P	Good Year Dunlop	Shchuryk	Martina	Martina_Shchuryk@goodyear.com
P	Institute of Dynamics and Vibration Research, Leibniz Universität Hannover	Wangenheim	Matthias	wangenheim@ids.uni-hannover.de
P	MICHELIN	Goyeneche	Fabienne	fabienne.goyeneche@be.michelin.com
P	MICHELIN	Ott	Guy	guy.ott@fr.michelin.com
P	NIRA Dynamics	Sturmhoebel	Jorg	jorg.sturmhoebel@niradynamics.se
P	Nokian Tyres plc	Huovila	Teppo	teppo.huovila@nokiantyres.com
P	Pirelli Tyre SpA	Pomarico	Antonio	antonio.pomarico@pirelli.com
P	RDW	Top	Bert	btop@rdw.nl
P	Schrader Electronics Ltd.	Arbousse-Bastide	Frederic	farboussebastide@schrader.com.uk
P	Smithers Rapra	Crutchley	Gary S.	gcrutchley@smithers.com
P	The Danish Tyre Council	Nitz	Volker	vn@dbfr.dk
P	University of Twente	Dierkes	Wilma	w.k.Dierkes@utwente.nl