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The European tyre manufacturers wish to thank the European Commission for giving the possibility to present its opinion on key policy areas such as sustainable mobility of people and goods in the coming decade.

The European Union needs an ambitious transport policy able to respond to the expected increase of population and of vehicle car park while at same time reducing the negative impact on the environment and increasing safety. This represents a challenge both for the European authorities and industry.

Free Mobility is the basis of the European integration. Sustainable and effective transports are and will remain a major contribution to the economic development of the European Union, being one of the keys to its competitiveness. Thus the European Commission has to adjust the future policies which will be developed after 2010 on transport issues to allow a sustainable development. In order to achieve this, a pragmatic transport policy has to be set up. This policy should put citizens and mobility at the heart of its concerns by taking into account lifestyle changes.

Tyre is a fundamental actor of the mobility **being the sole point of contact with the road** for any motor vehicles including airplanes.

The tyre producers intensively invest in technological innovation to constantly improve the environmental and safety performances of tyres. Up to 3.5% of industry turnover is yearly spent in R&D. The new regulatory framework (EC Regulation 661/2009 and EC proposal (2009)348) that will enter into force from 2012 sets ambitious measures that will further contribute to place on the market tyres responding to safety and environmental performances set at unprecedented levels.

The European tyre manufacturers' recommendations for a sustainable future for transport are the following:

Towards more environmentally sustainable transport

The European Commission has identified a number of environmental policy objectives for which progress should be obtained in the coming decade including noise, air pollutant emissions and greenhouse gas emissions.

In this respect, the recent Regulations on vehicle and traffic passed by the European Parliament and Council are clear steps forward improving energy efficiency of transport actors.

However to achieve the required performances of the vehicles, it is crucial that tyres are used in the most optimal way in other words at the correct tyre pressure.

Driving with tyres at the right pressure is of paramount since only a properly inflated tyre holds the load, adheres to the road, consumes less fuel and produces less noise. An under-inflated tyre can further put safety at risk as it may collapse and consequently cause an accident. Low tyre pressure has an extremely negative effect on tyre durability, due to excessive stress in the tyre shoulder and heat build-up from sidewall bending. Under-inflated tyres can increase fuel consumption by up to 4%, as they require extra energy to roll. Industry surveys indicate that across EU, not less than 65% of European cars have permanent under-inflated tyres.

The mandatory fitment of accurate tyre pressure monitoring systems (TPMS) on passenger car has therefore been welcomed by the tyre industry as a key safety tool to warn drivers when any tyre is operating at a dangerously low pressure level. The EC Regulation on general safety of motor vehicles (2009/661) has included this obligation as part of its requirement. This is the first step in recognising the benefits of the tyre pressure for road safety as well as energy efficiency of the vehicle.

With regard to progress related to road noise, the tyre manufacturers wish to stress that the rolling noise limits on vehicles and tyres will only have full effect on overall traffic noise emissions when Member States will take comparable necessary measures on the road through infrastructure development.

Effective control of product compliance

Being a high-safety product, public enforcement and compliance of tyres put on the market is key for ensuring road safety. The recast of the Directive 96/96/EC of 20 December 1996 lastly amended in 2003, on the roadworthiness tests to be carried out for motor vehicles and their trailers provides a framework that could be further exploited. Amongst the tests to be carried out, tyres are cited (Annex II 5.2) but without detailing specific checks to be performed.

ETRMA recently run a survey within 7 representative Member States (Belgium, Germany, Finland, France, Italy, NL and UK) to compare how tyres have been controlled in the periodical compulsory technical checking of automobiles and commercial vehicles.

It resulted that the control of the tyres is diversely made at national level, especially 2 essential criteria are barely checked:

- Presence of EU mandatory legal type-approval marking (“E”);
- Tyre pressure.

Type approval of a tyre is a confirmation and an endorsement that the product is suitable for the purpose intended and conforms to European Regulations with respect to performance, dimensions and marking requirements. Any tyre to be placed on the European market should permanently bear the type-approval marking (“Exxxx”, followed by the reference of the verification) on one sidewall to evidence that it has been subjected to appropriate test schedules and complies with the requirements.

Recently, the Italian rubber industry association, Assogomma, performed a survey in Milano jointly with the Police on automobiles and motorcycles. It resulted that about 10% of these vehicles in circulation both cars and motorcycles, had at least one non-homologated tyre. Extrapolated at a country level such as Italy, these 10% are equivalent to 3.5 million cars and 900 000 motorcycles. Obviously these vehicles present a potential risk to the safety of their drivers and to any road users, especially in rainy conditions as the wet grip parameter might not be ensured.

Additionally, driving with tyres at the right pressure being the most important tyre parameter, it is important for road safety purposes and beneficial for encouraging new drivers’ behaviours to check the tyre pressure at each roadworthiness test.

The European tyre industry recommends that the European Commission includes in the next revision of the EC Directive on roadworthiness test, the mandatory checking of type-approval marking on the tyre sidewall and the mandatory checking of tyre pressure of motor vehicles.

To implement both requirements (Type-approved marking and tyre pressure), the tyre industry is ready to develop jointly with the European Commission guidelines to the attention of national vehicle control authorities on the fundamental and necessary tyre checking as part of vehicle compulsory technical checking.

Effective enforcement and compliance with the rules shall be performed by the regulatory authorities of the Member States.

More responsible road users' behaviours

The European Commission reported that in 2008 nearly 40 000 deaths occurred in the EU on the road. This remains far too costly in terms of human lives. As producer of a key road safety product, the European tyre manufacturers have intensified their road safety campaigns in all European countries. This is reflected in the commitment of ETRMA to the European Road Safety Charter in April 2007.

From our experience, we are convinced that the priority lies in obtaining that new (safety) behaviours are adopted by drivers and road users. To this end, dedicated events and material support including through the media should be developed to support safety messages starting with schools (future novice drivers), as a key target.

With regards to tyres, road users should be encouraged to adopt frequent, simple and more responsible behaviours such as checking their tyre pressure once every month that would lead to improving the safety on European roads.

ETRMA supports that as one priority action in the future transport policy, a joint private-public awareness programme is developed and sponsored by the European Commission with a two-pronged approach:

- 1- to alert on the importance of **monthly** checks on tyres pressure;
- 2- to install tyre pressure gauges with free access at petrol stations through a partnership with oil industry/distributors to be set up.

The European tyre industry is ready to provide the European Commission with the necessary expertise and assistance in this respect.

Tyre tread depth

Tyres must respect a tread depth of the tread surface of at least 1.6 mm (EC Directive 89/459)

Driving with proper tread depth is indeed crucial to ensuring safety of the vehicle and its passengers especially with regards to the wet braking and aquaplaning performances.

Industry led survey show that 1 in 3 drivers fail to check tyre tread depth, with potentially serious repercussions for vehicle and passenger safety. A recent study carried out by the UK tyre safety organisation, TyreSafe, in January 2009 on 60 000 cars has shown that 10% are driven with at least one illegal tyre ! Extrapolated at the country level, close to 4 million of UK drivers are not respecting the law.

Proper use of adequate tyres in particular climatic conditions.

A road is always less predictable in winter than in hot weather. Under snowy, icy and wet conditions the surface always gives relatively less grip than in summer and that consequently inevitably affects road safety.

A winter tyre is specifically designed for use in snowy conditions, in far lower temperatures than general use of tyres (less than 7 degrees) and in vastly differing road conditions.

It allows the driver to optimise adherence/grip on snow and wet roads, and provides excellent traction, thanks to a dedicated tread. Additionally, it reduces the risk of aquaplaning thanks to its specific form, which is designed to displace the water passing under the tyre. Summer tyres with chains are NOT an alternative to winter tyres !

In some European countries such as Austria, Germany, Scandinavia and Switzerland the legislator has already introduced an obligation for drivers to shift to tyres more appropriate in the winter season, usually from October/November until April.

Finally the European tyre industry recommends that all tyre-related safety behaviours are included in the mandatory requirements laid down in the EC driving license Directive (2006/126) as the best way to sensitise young drivers and to keep driving instructors properly updated on the correct tyre maintenance for enhanced safety on the road.

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The European Tyre & Rubber Manufacturers' Association tyre Corporate members are:

Bridgestone Europe, Cooper Tires, Continental, Goodyear Dunlop Tires Europe, Hankook Tire Europe, Marangoni, Michelin, Mitas, Nokian Tyres, Pirelli Tyre, Trelleborg Wheel Systems and Vredestein.