

TYRE GTR Status Paper – May 2005

Introduction

1. The Tyre GTR was proposed during the 133rd session of WP29 by France and approved by AC3. The first informal group was convened on 15 December 2004 and chaired by the UK. A further meeting was held on 27 & 28 April 2005. This paper records progress to date and seeks approval from AC2/AC3 on certain key issues.

Background.

2. In the late 1990s considerable work was undertaken by GRRF to develop a global regulation on tyres. This work was supported by several contracting parties along with the global tyre industry and was close to completing a draft regulation when specific national difficulties prompted the work to be suspended.
3. Throughout the intervening period the tyre industry has maintained their commitment to the development of a GTR and following presentations to GRRF 54th session, France proposed that work should resume but only where completion could be achieved within a three year period.
4. At the subsequent 55th GRRF session, the UK offered to chair the “kick-off” meeting of the informal group responsible for developing the GTR. The group met on 15 December at the OICA offices in Paris. Twenty seven delegates attended including several Contracting parties, the European Commission and members of the global tyre industry from Japan, Europe and the USA, and vehicle manufacturers.

Considerations

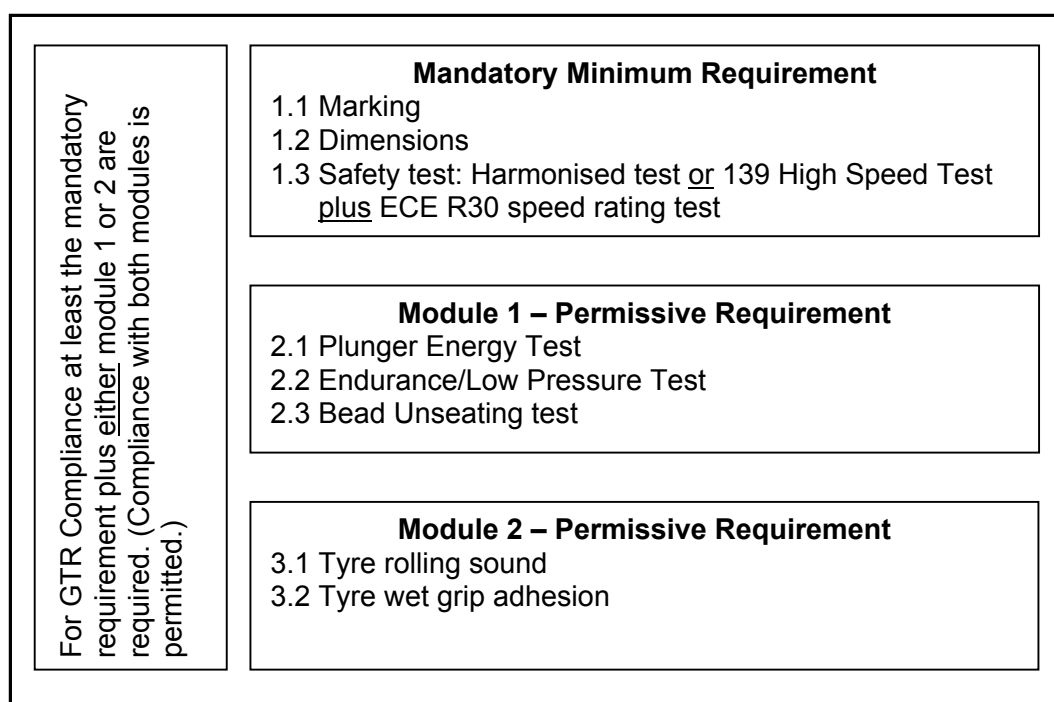
5. The December meeting took as its starting point the original work in GTR 2000 and the tyre industry proposal based upon the presentation to GRRF using the “Menu” concept.
6. The group decided that the original work carried out under GTR2000 was mostly now out of date due to the significant change in tyre regulatory provisions being implemented in the USA. The delegates agreed that some of the remaining aspects could be used in the new GTR but as many of the test requirements were being upgraded it was now simpler to start again.
7. The *Menu* approach was considered by the group. The *Menu* was supported strongly by industry representatives but some Contracting Parties felt this would have meant, in principle, the GTR becoming a compendium of tests and limit values rather than including any harmonised global requirements. The resultant regulation would have likely focused upon FMVSS 139 and ECE R30 and contracting parties would have selected the tests they required at national/regional level. The Contracting Parties were not clear how it could work in a global marketplace and with a single global marking to the tyre sidewall –

without complicating the marking with numerous potential add-on symbols/ characters/ etc. The meeting concluded that the *Menu* could not easily provide Contracting Parties with equivalent guarantees of minimum performance levels in their marketplace by using the sidewall markings as tyre identifiers.

8. As an alternative the proposal for a “*gold standard*” tyre GTR was accepted by most delegates in principle. The “*gold*” GTR would include the best tests from existing current requirements and would be a tough standard to meet. But industry felt this could be achieved without undue additional costs. However, for effective implementation in Contracting Parties, it relied upon being offered as a parallel standard to current National or Regional provisions (in the same way that the European Community accepts many ECE regulations as equivalent to EC directives). By being offered as an alternative parallel standard, the need for lengthy cost benefit and safety justifications would have been reduced or avoided.
9. The informal group concluded that the parallel “*gold*” standard provided what industry needed in terms of global product flexibility, while also providing to Contracting Parties the certainty that existing on-going standards were being met by the higher specification GTR tyres. Subsequent to that meeting, however, it became clear that the *gold* parallel standard presented difficulties for some contracting parties’ national legal positions and was deemed unworkable at a practical level.
10. Against this background the April meeting considered alternative approaches for either a fully harmonised global regulation or one that met the needs of the Contracting Parties and industry. After much deliberation the group focussed upon a modular structure for a GTR which would not be fully harmonised in all respects but instead combines a set of minimum common provisions as a basic requirement which are supplemented by at least one of two additional modules. The group reviewed the Global Agreement and, in particular, Articles 1.1.7 and 4.2 which provide for non-harmonised provisions.
11. The harmonised module will include a safety test(s), markings and dimensions (i.e. how to measure a tyre and with what it should be marked). But there was less certainty that a single harmonised safety test could be developed within the timeframe. The primary reason for this is due to recent practical experience of the considerable work undertaken in the USA to develop the 139 standard. Some delegations cautioned that developing a new composite test – harmonised at global level would take several years and was unrealistic within the stated three year timeframe. The Chairman proposed that to “qualify” under the 1998 agreement, the GTR should attempt to deliver at least one harmonised safety requirement. As a compromise, it was accepted that the current ECE R30 speed rating assessment plus the FMVSS 139 high speed test or a combined test if this can be achieved will be included.
12. The supplementary technical modules will contain requirements aimed at the two principle standards currently being used by most Contracting Parties; FMVSS 139 and ECE Regulation 30. The content of the modules reflect the different approaches of the two standards and Diagram 1 illustrates how the

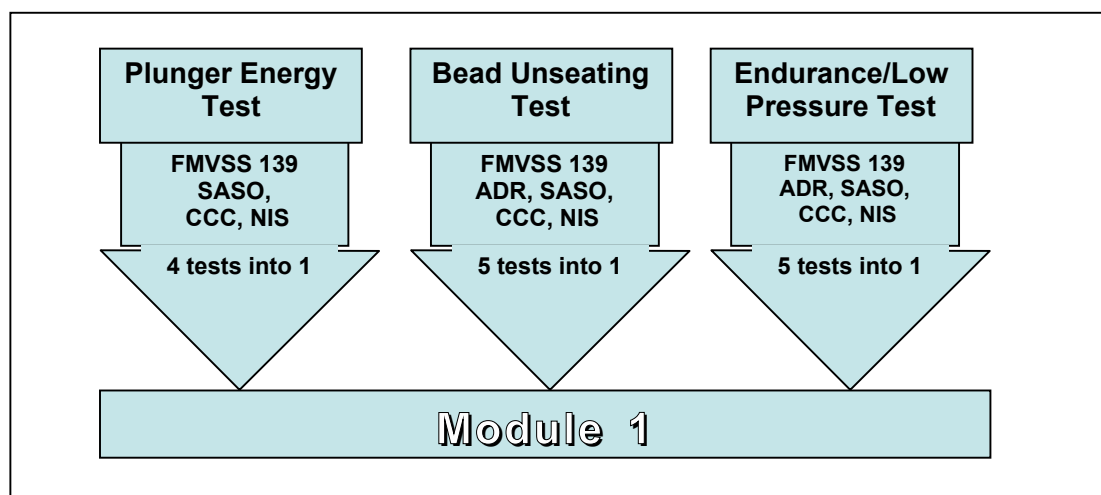
modules would be integrated to deliver the legislative requirements of the Contracting Parties and the flexibility for industry operating at a global level.

Diagram 1: GTR requirements



13. It has been pointed out by industry that considerable investigation and review will be needed to “harmonise” the technical requirements for each of the tests recorded in Module 1. Currently there are several National requirements for each of the indicated tests in module 1 and these are applied in several countries (diagram 2 refers) These are similar to the FMVSS 139 provision but to achieve a single requirement for the GTR for each test will require considerable effort. The informal group – relying heavily upon industry's input – believe this is achievable within the 3 year timeframe.

Diagram 2: Test Harmonisation



14. For Module 2 only a single test exists for each element. These tests are currently either in place or being finalised for implementation within the European Community and for ECE Regulation No 117. There is no further work expected under the GTR for these tests.
15. The informal group has taken completion date as December 2007/January 2008 – three years from the first informal group meeting in December 2004.

Decision.

16. AC2/AC3 is requested by the informal group to approve the concept of a modular GTR for tyres at the 137th session (June 2005). The basis for the decision are the components set out in diagram 1 supported by the further work required in diagram 2. Implicit in the decision is that a modular GTR would be acceptable, in principle, in the jurisdictions of the Contracting Parties to the 1998 agreement.

**Ian Yarnold –UK DfT
Chairman of the informal Group
Tyre GTR**