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Submitted by the experts of ETRTO

Informal document GRBP-72-26-Rev.1  
72nd GRBP, 7-9 September 2020,  
agenda item 5 (e)



# **ETRTO comments on Document GRBP-72-02 (EC)**

GRBP 72<sup>nd</sup> session September 2020

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ETRTO reviewed the Informal document **GRB-72-02 EC** that is proposing to extend the scope of the IWG WGWT to C2 and C3 tyres and providing the following justification:

6. The future amendment to UN Regulation No. 117 will apply to new pneumatic tyres of **classes C1, C2 and C3**.

**Justification:** wet grip performance of C2 and C3 tyres in worn state is also important for vehicles safety. It is also of relevance to the Regulation (EU) 2019/2144 (General Safety Regulation), which includes in its requirements the wet grip of such tyres at worn state with reference to UNECE Regulation No 117. IWG WGWT was informed on this proposal at its 11<sup>th</sup> session of 26/5/2020.

ETRTO would like to address the following comments for GRBP consideration:



- C1: the initial purpose from France: C1 wet grip condition test in new state are not sufficient. Tyres have also to be tested in the worn state because wet grip (braking) **tyre ranking in the worn state can be different than ranking in the new state**, due in particular to the hydroplaning mechanism important in the worn state
- C2 and C3: due to the higher ground pressure and lower speed in field conditions the mechanism is different than for C1, and **C2 and C3 tyres are less or not subject to hydroplaning** in the regulatory test (C2 and C3 wet grip test from 60 kph to 20 kph while for C1 it is from 80 kph to 20 kph). Due to less hydroplaning contribution in the wet grip test of worn C2 and C3 tyres, the wet grip performance loss according to the test conditions between new and worn state for C2 and C3 is much lower compared to C1.
- **Industry experience** is that there is **no significant difference** in wet grip (braking) performance ranking between new and worn state for C2 and C3. Because of this, the testing of new tyres is sufficient to ensure the wet grip performance in worn state.



- In addition, the Tyre Industry believes that together with these technical arguments the EC should be prompted about the need for an impact assessment. A study on the rationale for wet grip (braking) performance will help demonstrate why C2 and C3 should not be in the scope
- Tyre industry believes that an assessment (Tyre Industry preliminary data, segmentation C2 and C3, assesment of available testing procedures, ....) is needed prior validation the possible extension of the scope.
- The tyre industry is willing to support this assessment by generating preliminary data.
- In case the assessment confirms that there is no significant change in wet grip (braking) performance ranking between new and worn C2 and C3 tyres, IWG WGWT will inform GRBP on the assessment that should be taken into consideration by GRBP to respond to EC.



- Independent from the outcome of the assessment tyre Industry believes that keeping the same timeline as for C1 for the development of robust and repeatable testmethod for a future regulation on C2 and C3 is not feasible, based on the workplan experience acquired for C1 activities.



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Thank you

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