

ETRTO comments to documents ECE/TRANS/WP.29/GRBP/2021/15 and ECE/TRANS/WP.29/GRBP/2021/16

ETRTO appreciated the amendment proposals prepared by BIPAVÉR, France and Netherland, that align the test procedures for retreaded tyres with the latest amendments to R30, R54 and R117.

BIPAVÉR, France and Netherland proposal:

ETRTO would like to express its concern in the amendment proposals to provide the compound specification that are proposed as following:

ECE/TRANS/WP.29/GRBP/2021/15:

6.6.3.1: *(d) In case of mould cure product, the material manufacturer(s) or the material supplier(s) shall provide, in addition: the drawing(s) of the tread pattern(s) and the compound specification to demonstrate that the compound and pattern design of the tread are technically identical to the pre-cured version;"*

6.6.3.2: ~~(ii)~~(c) *The drawing(s) of the tread pattern(s) covered by the UN Regulation No. 117 certificate(s) and the compound specification;*

"The drawing(s) of the tread pattern(s) covered by the UN Regulation No 117 certificate(s) and compound specification":

6.6.3.3: *(d) The drawing(s) of the tread pattern(s) and the compound specification.*

ECE/TRANS/WP.29/GRBP/2021/16:

6.4.4.2: ~~(ii)~~(c) *The drawing(s) of the tread pattern(s) covered by the UN Regulation No 117 certificate(s) and compound specification;*

6.4.4.3: *(d) The drawing(s) of the tread pattern(s) and the compound specification.*

ETRTO comments:

Currently R108 and R109 (and R117) are referring to ‘same major features including tread pattern’ when characterizing snow performance between retread products and new tires. Compound is one the ‘major features’ and is up to the manufacturer to validate if the changes are significantly affecting the snow performance.

Any regulation, including these ones, shall not be linked to different technologies but rather to performance targets and technology neutrality.

ETRTO believes, that it is the retread tire / precure tread manufacturer’s responsibility to ensure that all retread products marked as such fulfill the snow performance requirements, independently of the technology embedded in the material.

For this reason, ETRTO is strongly opposed and don’t see the need to extend this reference by adding the ‘same compound specification’ as recently proposed.

ETRTO is convinced, that the current definition of ‘same major features’ is sufficient to qualify the 3PMSF tyres in an accurate way.

It is the retread tire / precure tread manufacturer’s responsibility to ensure that all retread products marked 3PMSF fulfill the snow performance requirements.
