

Proposal for amendments to draft new UN Regulation on the uniform provisions concerning the approval of studded tyres with regard to their snow performance

The changes compared to document ECE/TRANS/WP.29/GRBP/2021/5/Rev.1 are highlighted in **bold** for added text and strike through for deleted text, all in red font.

I. Proposal:

4. Markings

Paragraph 4.4.1., amend to read:

- 4.4.1. The ~~markings~~ **marking referred to in paragraph 4.3.2. and the approval mark shall** be situated in the lower area of the tyre on at least one of its side walls. However, in the case of tyres identified by the tyre to rim fitment configuration symbol "A" or "U", the marking may be located anywhere on the outside side wall of the tyre.

8. Conformity of production

Paragraph 8.2., amend to read:

- 8.2. The authority which has granted type approval may at any time verify the conformity control methods applied **by the manufacturer in each production facility. In general, the conformity control methods should take into consideration the production volumes of the type of studded tyre at each manufacturing facility. For each production facility, the** The normal frequency of these verifications shall be at least once every two years.

Insert a new paragraph 8.3., to read:

- 8.3. Verification tests shall be carried out on random samples of tyres bearing the approval mark required by this Regulation taken from the series production. The Type Approval Authority shall satisfy itself that all tyres falling within an approved type comply with the approval requirement.**

Former paragraph 8.3., renumber as 8.3.1. and amend to read:

- ~~8.3.~~ **8.3.1. Verification tests with regard to approvals** In the case of verification tests with regard to approvals in accordance with paragraph 6. of this Regulation, these shall be carried out using the same **testing** method (see Annex 7 of UN Regulation No. 117) as that adopted for original approval as declared in item 8 of the communication form.

Paragraph 8.4., amend to read:

- 8.4. Production shall be deemed to conform to the requirements of this Regulation if the levels measured comply with the limits prescribed in ~~section~~ **paragraph** 6. of this Regulation.

II. Justification

Paragraph 4.4.1.:

This proposal aligns with the “Alpine symbol” location that is not restricted to the lower area of the tyre as prescribed in UN Regulation No. 117, especially considering the larger dimensions of the “Snow Grip Marking for Studded Tyres”.

Paragraphs 8.2., 8.3., 8.3.1.:

The proposed changes align with the proposal for a Supplement to the 02 series of amendments to UN Regulation No. 117, also submitted by the experts from ETRTO at the 74th GRBP (working document ECE/TRANS/WP.29/GRBP/2021/17).

Paragraphs 8.4.:

Editorial correction.
