

Small group on retreaded tyre regulation split

Proposal

Background and participants and meetings

- Background: presented with GRBP-76-03
- Participants:
 - France, Netherlands, ETRTO, BIPAVER
- Meetings:
 - 7 June 2022
 - 6 July 2022
 - 14 October 2022
 - 19 December 2022
 - 17 January 2023
 - 27 March 2023
 - 21 April 2023
 - 9 June 2023
 - 24 August 2023

EU retread market at a glance

- Approx. 400 active retreading facilities in EU
- Production Range from 1.500 tyres/year to > 400.000 tyres/year
- Market Shares /replacement: PC < 1%; CV ~ 23% (~4.6 Mio. In 2021)
- Hot/Mould-Cure and Cold/Pre-Cure process (estm. 60:40 ratio)
- Mainly SME-businesses with mostly regionally concentrated
- > 10 retreading system/material providers from all over the world
- Retreading is a perfect example of Circular Economy:
A Retreaded CV tyre enable savings.... 70% Ressource extraction – 29% Land use – 24% CO2 emissions – 21 % Air pollution
19% Water consumption ...compared to low-end non-retreadable tyre Source: EY Study « The socio-economic impact of
truck tyre retreading in Europe »
- CV Retreading activity in EU: ~ 30.000 employees (mostly SME)

Small Group proposal: concept

PROCESS	TYPE APPROVED PRODUCT	TYPE APPROVAL OWNER	TYPE APPROVAL NUMBER AND 3PMSF MARKING	TREAD FEATURES SPECIFICATION		TYPE APPROVAL AND CONFORMITY OF PRODUCTION SNOW TESTING	
				TREAD PATTERN DESIGN	GREEN TREAD MATERIAL	ALTERNATIVES	RESPONSIBILITY
HOT RETREADING	Retreaded tyre produced by using mold cure process	Retreader	Retreader on tyre sidewall	New Tyre manufacturer	Independent supplier	Testing on tyre retreaded with mold cure process	Retreader (4.4.1.) and (8.2.1.)
					New Tyre manufacturer	<ol style="list-style-type: none"> 1. Reference to Tyre Manufacturer Reg. 117 Type Approval possible 2. Reference to pre-cured tread material supplier Reg. [X] Type Approval possible if same tread major features 3. Testing on tyre retreaded with pre-cure tread material possible if same tread major features 4. Testing on tyre retreaded with mold cure process 	<ol style="list-style-type: none"> 1. New Tyre manufacturer (4.4.2.) and (8.2.3.1.) 2. Pre-cured tread material manufacturer (4.4.3.) and (8.2.1.1.) 3. Retreader (4.4.1.) and (6.1. plus footnote 5) and (8.2.1.1.) 4. Retreader (4.4.1.) and (8.2.1.)
				independent manufacturer	independent supplier	<ol style="list-style-type: none"> 1. Reference to pre-cured tread material supplier Reg. [X] Type Approval possible if same tread major features 2. Testing on tyre retreaded with pre-cure tread material possible if same tread major features 3. Testing on tyre retreaded with mold cure process 	<ol style="list-style-type: none"> 1. Pre-cured tread material manufacturer (4.4.3.) and (8.2.1.1.) 2. Retreader (4.4.1.) and (6.1. plus footnote 5) and (8.2.1.1.) 3. Retreader (4.4.1.) and (8.2.1.)
					New Tyre manufacturer	Testing on tyre retreaded with mold cure process	Retreader (4.4.1.) and (8.2.1.)
				Retreader	independent supplier	Testing on tyre retreaded with mold cure process	Retreader (4.4.1.) and (8.2.1.)
					New Tyre manufacturer	Testing on tyre retreaded with mold cure process	Retreader (4.4.1.) and (8.2.1.)
COLD RETREADING	Pre-cured tread material	Pre-cured tread material manufacturer	Pre-cured tread material manufacturer on package label	New Tyre manufacturer	independent supplier	Testing on tyre retreaded with pre-cured tread material	Pre-cured tread material manufacturer (4.4.1.) and (8.2.2.)
					New Tyre manufacturer	<ol style="list-style-type: none"> 1. Reference to Tyre Manufacturer Reg. 117 Type Approval possible 2. Testing on tyre retreaded with mold cure process possible if same tread major features 3. Testing on tyre retreaded with precured tread material 	<ol style="list-style-type: none"> 1. New Tyre manufacturer (4.4.2.) and (8.2.3.1.) 2. Retreader (4.4.1.) and (6.1. plus footnote 5) and (8.2.1.1.) 3. Pre-cured tread material manufacturer (4.4.1.) and (8.2.2.)
			Retreader on tyre sidewall	independent manufacturer	independent supplier	<ol style="list-style-type: none"> 1. Testing on tyre retreaded with pre-cured tread material 2. Testing on tyre retreaded with mold cure process possible if same tread major features 	<ol style="list-style-type: none"> 1. Pre-cured tread material manufacturer (4.4.1.) and (8.2.2.) 2. Retreader (4.4.1.) and (6.1. plus footnote 5) and (8.2.1.1.)
				Retreader	independent supplier	<ol style="list-style-type: none"> 1. Testing on tyre retreaded with pre-cured tread material 2. Testing on tyre retreaded with mold cure process possible if same tread major features 	<ol style="list-style-type: none"> 1. Retreader as Pre-cured tread material manufacturer (4.4.1.) and (8.2.2.) 2. Retreader (4.4.1.) and (6.1. plus footnote 5) and (8.2.1.1.)

Note: in parenthesis are referred the applicable paragraphs of the new Regulation No. [X].

Informal documents and next steps

Small group has prepared 2 Informal Documents:

- New UN Regulation: Uniform provisions concerning the approval of pre-cured tread materials which are used for producing retreaded tyres or the approval of retreaded tyres produced by using mould cure process with regard to their **snow performance**.
→ **No change in the technical requirements comparing to current UN Regulation 109**
- **01 Series of Amendment** to UN Regulation 109
→ rationale: to make the administrative requirements clear after a certain period (with adequate transitional provisions). Similar approach was done for TPMS moved out of R64 → R141.

Next steps

- 01 Series of Amendment to UN Regulation 108 will be prepared in analogy with R109.
- Further investigation on Type definition

Working Documents for consideration during GRBP 79th session.

Thank you for your attention!