



Brussels, 30 October 2018

Comments on the EC proposal to revise the Tyres Labelling Regulation

ECOS welcomes the proposal of the Commission to revise the Tyres Labelling Regulation. In particular, we support several critical improvements such as the provisions to better display the Label to end-users that should help increase awareness and confidence in the Label, the obligation to register tyre models in the EU product database, and the rescaling of the Label.

ECOS would like to raise a series of suggestions, with a view to improve the current proposal:

- **Abrasion and mileage**

Tyres are the first source of microplastics in Europe. 8.6% of the global releases of primary microplastics to the world oceans come from the abrasion of tyres in Europe¹. It is therefore essential for the European Union to take action.

The option to add information on the Tyres Label on essential performance parameters such as abrasion and mileage has been dismissed because of a lack of agreed measurement methods. However, we firmly believe that informing consumers on these parameters would help transform the market, pulling the competition upwards.

To be consistent with its plastics and circular economy strategies, the Commission should as soon as possible and at the very least issue a standardisation request to European Standardisation Bodies to urge them to develop robust methods on both topics within a limited timeframe. This would avoid having to face exactly the same situation for the next revision.

In addition, these parameters could be added to the Label as part of the current revision, with an entry into force in a few years' time. This would allow adopting transitional measurement methods, as foreseen by the Energy Label regulation 2017/1369 in its recital 35: *"In the absence of published standards at the time of application of product-specific requirements, the Commission should publish, in the Official Journal of the European Union, transitional measurement and calculation methods in relation to those product-specific requirements"*.

¹ Boucher, J., & Friot, D. (2017). *Primary microplastics in the oceans: a global evaluation of sources*. Gland, Switzerland: IUCN.

Allowing consumers to compare products also on their resource efficiency performance would set a great legal precedent. The Commission is currently more focused on Ecodesign to integrate circularity measures on products, but ECOS believes there is a crucial role for the Energy Label to play to bring consumers and manufacturers towards longer-lasting, less-polluting products. By supporting the introduction of mileage and abrasion on the Tyres Labelling, the European Parliament would be sending a strong political message to the European Commission on the need to inform consumers on these aspects too.

- **Third-party verification**

We regret that third-party certification/verification has been ruled out. It is currently only mentioned in the evaluation clause, which is insufficient. At present, there is no requirement for public authorities to ensure third-party verification, and the Label parameters are assessed by means of self-declaration by manufacturers. As the rate of technical non-compliance seems to be significant, third party certification/verification would contribute to a level playing field much more than the current scheme. The Commission is currently looking at the appropriateness of third-party compliance assessment under the Ecodesign Regulation for solid fuel boilers and local space heaters. This could serve as inspiration for other products with the aim to give confidence to all interested parties that a product, process or service fulfils specified requirements.

- **Rescaling**

The current proposal foresees to move the Label scale one class up at the top of the scale. We believe that aiming for two classes instead would stimulate innovation and ensure that the new Label remains valid for a decade or more, as foreseen by the Energy Labelling Framework Regulation.

Also, in line with the provisions set in the revised Energy Labelling Regulation, ECOS supports that **class A is left empty** to encourage technological progress, provide regulatory stability, limit the frequency of rescaling and enable ever more efficient products to be developed and recognised.

- **Label display**

The obligation to show the Label to customers buying new cars sold with tyres is welcome in principle, although we wonder how impactful it will be if it comes alone. Indeed, the proposal does not clarify what will happen in case a car is sold with tyres of poor energy class. Could the consumer request the car dealer to provide better tyres? Will the car dealer be allowed to charge a dissuasive extra for this? This provision should be better framed and complemented so that the end-user can make an informed choice thanks to the Label information. In our opinion, it should be mandatory for car dealers to only supply models with tyres of the top energy classes or allow the end-user to freely choose the tyres at no extra cost.

Contact:

ECOS – European Environmental Citizens' Organisation for Standardisation

Nerea Ruiz, nerea.ruiz@ecostandard.org