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Questionnaire on the evaluation and review of the Regulation (EC) No 1222/2009 on the labelling of tyres

Fields marked with * are mandatory.

Consultation on the evaluation and review of the Regulation (EC) No 1222/2009 on the labelling of tyres: Introduction

This questionnaire is targeted at individuals and organisations with an interest in the labelling of tyres for fuel efficiency and other parameters. Responses are particularly welcome from members of the public, public authorities, businesses, and other non-governmental organisations.

This public consultation follows an extensive series of technical consultations with industry, experts, and other organisations, as well as a comprehensive study of the Regulation carried out by an independent researcher. The results of the study in full can be found at the following link: <http://www.labellingtyres.eu> (<http://www.labellingtyres.eu>).

The results of this consultation will be used to inform the revision of the Regulation (EC) No 1222/2009 (<http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32009R1222>) on tyre labelling [1],[2]. If a revised Regulation is proposed, it will be discussed, possibly amended, and voted on by the European Parliament and the Council of the European Union.

You can skip questions to which you do not feel comfortable responding. However, replies to questions marked with an asterisk are compulsory. You can also pause at any time and continue later. Once you have submitted your answers, you will be able to download a copy of your completed questionnaire.

[1] OJ L 342, 22.12.2009, p. 46

[2] Amended by Regulations (EU) No 228/2011 (http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2011.062.01.0001.01.ENG&toc=OJ:L:2011:062:TOC) and 1235/2011 (http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2011.317.01.0017.01.ENG&toc=OJ:L:2011:317:TOC)

Information about the respondent

The questions in this section aim at collecting general information about the identity of the respondent.

*1) You are welcome to answer the questionnaire in any of the 24 official languages of the EU. Please let us know in which language you are replying:

- Bulgarian
 Estonian
 Hungarian
 Portuguese
 Croatian
 Finnish
 Italian
 Romanian
 Czech
 French
 Latvian
 Slovak
 Danish
 Gaelic
 Lithuanian
 Slovenian
 Dutch
 German
 Maltese
 Spanish
 English
 Greek
 Polish
 Swedish

*2) You are replying as/on behalf of:

- A citizen/consumer
 A Member State government
 A Member State regional or local government authority
 A market surveillance authority
 A business manufacturing or involved in the trading of tyres
 A business selling tyres to end-users
 An organisation representing industry views
 A non-governmental organisation representing societal interests (for example, environmental or consumer interests)
 Other (please state):

*Please provide the full name of your administration/organisation:

Ministry of Infrastructure and Water Management

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*3) Please provide your full name (Name SURNAME): All public surveys (/eusurvey/home/publicsurveys/runner)

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*4) Please give your email address in case we have questions about your reply and need to ask for clarifications. If you do not have an email address, please write "Not available".

*5) Please select your country of residence:

- | | | | |
|--------------------------------------|-------------------------------|--|---|
| <input type="radio"/> Austria | <input type="radio"/> Finland | <input type="radio"/> Lithuania | <input type="radio"/> Slovenia |
| <input type="radio"/> Belgium | <input type="radio"/> France | <input type="radio"/> Luxembourg | <input type="radio"/> Spain |
| <input type="radio"/> Bulgaria | <input type="radio"/> Germany | <input type="radio"/> Malta | <input type="radio"/> Sweden |
| <input type="radio"/> Croatia | <input type="radio"/> Greece | <input checked="" type="radio"/> Netherlands | <input type="radio"/> United Kingdom |
| <input type="radio"/> Cyprus | <input type="radio"/> Hungary | <input type="radio"/> Poland | <input type="radio"/> Other (please specify): |
| <input type="radio"/> Czech Republic | <input type="radio"/> Ireland | <input type="radio"/> Portugal | |
| <input type="radio"/> Denmark | <input type="radio"/> Italy | <input type="radio"/> Romania | |
| <input type="radio"/> Estonia | <input type="radio"/> Latvia | <input type="radio"/> Slovak Republic | |

*6) Do you consent to the Commission publishing your replies? Note that, whatever option chosen, your answers may be subject to a request for public access to documents under Regulation (EC) N°1049/2001 (<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1499682776995&uri=CELEX:32001R1049>).

- Yes (I consent to the publication of all information in my contribution in whole or in part including my name or my organisation's name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication).
- Only anonymously (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication).
- No (I do not consent to any contribution being published but it may be used internally within the Commission).

General views and opinions on the tyre labelling Regulation (EC) 1222/2009

This section asks relatively general questions that are aimed in particular at EU citizens with no particular specialised knowledge of tyres or the labelling scheme.

7) Energy label for tyres

7a) Are you aware of the EU labelling scheme for tyres?

- Yes, and I have seen the label used as part of the process of buying or selling tyres
- Yes, although I have never seen it used in practice
- No

7b) In your opinion, is the label a helpful piece of information when deciding which tyres to buy?




- Yes
- No
- Don't know or no opinion

7c) Do you think it is a good thing that a single EU-wide label covers tyres sold in all EU countries?

- Yes
- No
- Don't know or no opinion

8) **Clarity of label.** The study found that some consumers did not understand the pictures on the label representing different characteristics of the label (see images below). Which, if any, of the images below do you think is difficult to understand?

Please tick the box(es) above the image(s), if difficult to understand:

<input checked="" type="checkbox"/> (/eusurvey/home/welcome/runner)	<input checked="" type="checkbox"/> All public surveys (/eusurvey/home/publicsurveys/runner)	<input checked="" type="checkbox"/> Login (/eusurvey/auth/login/runner) Help Language
Figure_1_-_Fuel_efficiency_pictogram.png 	Figure_2_-_Wet_grip_pictogram.png 	Figure_3_-_External_rolling_noise_pictogram.png 

9) **Visibility of tyres when purchasing.** The study also found that when people buy tyres, either alone or as part of a vehicle, they often do not see the tyre itself before purchasing it. Increasingly, in fact, people buy tyres online.

9a) When purchasing your last tyre, did you see the tyre itself beforehand?

- Yes
 No
 Don't know or can't remember

9b) Did you see the EU label ?

- Yes
 No
 Don't know or can't remember

10) **Relative importance of label characteristics.** Which of the tyre's characteristics currently shown on the label do you consider to be the most important when purchasing a tyre?

- Its wet grip performance
 Its fuel efficiency performance
 Its external rolling noise performance
 Don't know or no opinion
 Other (please state):

Other (please state):

200 character(s) maximum

It is customers choice what characteristic they find most important. In the tyre awareness campaign in the NLs the choice is often safety (wet grip).

11) **Information on all tyres.** The study found that most people are not offered a choice of tyres when purchasing a vehicle. Do you agree that businesses selling a vehicle should always provide tyre labelling information for the tyres fitted on that vehicle, including in situations when the customer is not given a choice of tyres?

- Yes
 No
 Don't know or no opinion

12) **Raising awareness.** The study found that some consumers and organisations were not aware of tyre labelling or the benefits of investing in fuel-efficient tyres. Which of the following options (if any) would you like to see included in the Regulation in order to raise awareness?

- Encourage Member States to run awareness campaigns to increase consumer knowledge of the tyre labelling scheme
 Encourage businesses to run awareness campaigns to increase consumer knowledge of the tyre labelling scheme
 Extend the label's display by ensuring more types of advertisements (for example, on billboards or in magazines) for tyres include the label
 Encourage Member States to raise awareness within their central government that they are required to purchase only tyres in the highest fuel efficiency class (Annex III of the Energy Efficiency Directive 2012/27/EU)
 Don't know or no opinion
 Other (please state):

Other (please state):

200 character(s) maximum

The NLs is facilitating a campaign to raise awareness of the importance of tyres:
www.kiesdebesteband.nl

13) **Pre-sale provision of information.** The study found that the label is often not visible to customers when they buy tyres. Which of the following options (if any) would in your opinion improve the visibility of the label to customers?

- Online labelling – the label is shown on the screen when tyres are offered for sale online
- Distributor must show each label – the tyre distributor must show the customer the label for each tyre under consideration
- Labels always on tyres – ensure that labels are always visible on the tyres for sale themselves rather than just accompanying them
- Don't know or no opinion
- Other (please state):

Other (please state):

200 character(s) maximum

Extend the information on the label. See the background document 'Tyres in Europe' that was attached to the letter to the Commission in July 2017 for an example how this can be done.

14) **Third-party verification.** At present, the testing of a tyre's performance is done by the manufacturer of the tyre. There is no requirement for public authorities to ensure independent or third-party verification of the results.

14a) Would you be more confident of the accuracy of the label's information if third-party verification of tyre test results were mandatory?

- Yes
- No
- Don't know or no opinion

14b) In your opinion, should third-party verification of tyre test results be introduced as a requirement?

- Yes, for every tyre model
- Yes, but for a representative sample of tyres
- No
- Don't know or no opinion

15) **Market surveillance.** The study found that some areas and some Member State authorities were not as good as others at checking if labels were accurate or were being shown to customers. Which of the following options (if any) would in your opinion improve market surveillance?

- Update wet grip testing – change the way wet grip of tyres is tested to make it more up-to-date with current technology and understanding
- Labels with each batch – make sure that labels are always attached to each batch of identical tyres
- Better sharing of results – when authorities inspect tyre businesses, make sure that the results are available to industry as a whole
- Other (please state):

Other (please state):

500 character(s) maximum

On testing: Fuel efficiency and noise get better when tyres wear. This is not the case with wet grip. There, the braking distance increases with wear. The standard for wet grip should include a maximum deterioration for worn tyres.
On labels on each batch: yes a new batch need new testing and possiblu a different label
On better sharing of test results: yes, have all test data in an uniform format on the internet. Site from the EC. See document Tyres in Europe for more detail.

Technical views and opinions the tyre labelling Regulation (EC) 1222/2009

This section asks more specific questions on technical aspects of tyre labelling. Although views are welcome from all stakeholders, those without specialised knowledge of tyre labelling may wish to leave the following section blank.

16) **Snow and ice performance.** The tyre label does not currently include information on tyres primarily designed to perform better in ice and/or snow conditions. Do you think that information on snow and ice performance of a tyre should be included in the label?

- Yes – it should be mandatory
- Yes – it should be voluntary

- No (/eusurvey/home/welcome/runner) All public surveys (/eusurvey/home/publicsurveys/runner)
 Don't know or no opinion

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17) **Re-treaded bus and truck/lorry tyres ("C3")**. Currently, a label is not required for re-treaded tyres. Re-treading tyres can extend the life of used tyres by replacing worn-out tyre tread, contributing to the circular economy. The study found that there was currently no widely accepted method for measuring the fuel efficiency of re-treaded tyres. Should re-treaded tyres be included in the labelling scheme?

- Yes, in all circumstances
 Yes, but only if the accuracy (for example, the reliability, repeatability, or reproducibility) of the measurement can be ensured
 No
 Don't know or no opinion

18) **Mileage**. Currently, tyre mileage information (the total distance that tyres can be expected to last for) is not included in the label. The study found that mileage in tyres is very difficult to test or monitor accurately. The tests that do exist are expensive and tend to be bad at measuring "real-life" mileage (that is, outside laboratory conditions). Should mileage information be included in the label?

- Yes, in all circumstances
 Yes, but only if the accuracy and value for money of the measurement can be ensured
 No
 Don't know or no opinion

19) **Abrasion and microplastics**. Currently, information about abrasion (the removal of material from the tyre when it interacts with the road surface) is not included in the label. Abrasion contributes to a significant percentage of microplastics (small plastic particulates) in the ocean and to air pollution through so-called tyre road wear particles. The study found that there was currently no accurate way of measuring abrasion, and that other legislation already exists to regulate the chemical content of tyre materials. Should abrasion information be included in the label?

- Yes, in all circumstances
 Yes, but only if the accuracy of the measurement can be ensured
 No, concerns about abrasion are more appropriately addressed through other forms of regulation
 No, abrasion should not be regulated at all
 Don't know or no opinion

20) **Studded tyres**. The study found that in countries where studded tyres are used frequently, national measures to ensure their safety and reduce their environmental impact already exist. In some EU Member States, studded tyres are banned. In addition, no method exists for comparing studded tyres to regular tyres for fuel efficiency and wet grip. Should studded tyres be included in the labelling scheme?

- Yes
 No
 Don't know or no opinion

21) **Digital registration database**. Currently, there is no single online platform where information provided by suppliers and distributors about tyres on the EU market can be found.

21a) Should a digital registration database providing information about tyres be set up?

- Yes
 No
 Don't know or no opinion

21b) If a digital registration database should be set up, what sort of information should it provide?

- It should provide public information about tyres to inform consumers
 It should provide information about tyres to make it easier for authorities to check that labels are correct
 It should do both of the above, as long as business confidentiality is respected
 Don't know or no opinion
 Other (please state):

22) **Further comments**. Are there further comments you would like to make on anything that is not covered above?

3000 character(s) maximum

Further comments to the Questionnaire on the Tyre Labelling Regulation (EC no 1222/2009) (eusurvey/home/questionnaire/runner/0d691fbc-d3cc-4c57-8e4c-79082831b521?drafti...)

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General remark

The evaluation and update of the Regulation on Tyre labelling is closely linked to the Regulation on General Safety (EC no 661/2009). In the Regulation on General Safety the tyre limits for fuel efficiency, wet grip and noise are set. In July 2017 the Netherlands ministry of environment sent a letter to 4 director generals of the European Commission asking to start working on strengthening of the tyre limits and interest the Commission to a number of other tyre related issues among which improving the tyre label.

Comment to various questions

Q 7b: The information on the label is limited to letters and colours. One of the reasons to start an public awareness raising campaign in the Netherlands is that the label gives very little information. We propose more information on the label to encourage a discussion between people buying tyres and retail. See the background document 'Tyres in Europe' that was attached to the letter to the Commission for an example how this can be done. Having a label as proposed by the Netherland would almost make the campaign redundant.

Q 9a/b: In the Netherlands the tyre label is mandatory both in the shops and on the internet. That is not a problem. Another thing is whether garages/workshops advise people when their car is brought for inspection/maintenance and new tyres are necessary. Then usually just a phonecall is made and information on label values is not transmitted. The customer would in most cases not be informed about the tyre label of the new tyres when picking up the car.

Q 16: See the background document Tyres in Europe attached to the letter to the Commission for an example how this can be done.

Q 18: The Netherlands is greatly concerned about microplastics in the environment. We do favour a limit on abrasion of tyres but not on mileage. And we would like to see a proposal for that from the Commission. Yet, we are very reluctant to put anything on the tyre label. The most important argument would be that the consumer would look at any indicator regarding wear/durability/abrasion as an indicator for mileage. Tyre manufacturers could get a better label when they increase the tyre tread. And as a result the emission of microplastics would increase. See for more details the document Tyres in Europe.

Q 19: See the comment to Q 18 above. An argument of a lesser importance is that the label would be more difficult to understand and to interpret. Including an indicator for snow/ice (see answer to Q16) would make five indicators on the label. A5th indicator on the tyre label would be too much information.

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