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Working Party on Brakes and Running Gear (GRRF)
(Forty-eighth session, 11-13 September 2000,
agenda item 5.4.)

PROPOSAL FOR DRAFT AMENDMENT TO REGULATION No. 109
(Retreated pneumatic tyres for commercial vehicles)

Transmitted by the Expert from the Bureau international permanent des
associations de vendeurs et rechapeurs de pneumatiques (BIPAVÉR)

Note: The text reproduced below was prepared by the expert from BIPAVÉR in order to take into account that besides approved tyres those conforming to a recognized standard could be retreaded.

Note: This document is distributed to the Experts on Brakes and Running Gear only.

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A. PROPOSAL

Paragraph 6.1., amend to read:

" at the latest.

Note: Non "E" or "e" marked tyres may be accepted for first retread provided they conform to an internationally recognized standard and their suitability can be established."

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B. JUSTIFICATION

Non "E" marked tyres from America, Japan, etc., produced under National standards, are currently retreaded in substantial quantities. The retread industry finds that such tyres, when considered as a raw material, are of equal standard to 'E' or 'e' marked tyres and have a greater remaining tread depth. They are also available in sizes suitable for a global market.

The restriction on the use of these tyres has several implications:

- it will increase the cost of 'E' or 'e' marked tyre casings, thus placing additional raw material costs on the industry
- it will have implications for the environment as high quality retreadable casings will be unnecessarily disposed of
- it represents a barrier to trade to other countries who currently supply casings to the retread industry in substantial quantities.

Technology continues to produce new concepts and initiatives globally. The requirement to only retread "E" or "e" marked casings could seriously restrict the retreader from producing and supplying into future markets and is, therefore, commercially restrictive. The safety and suitability of the product would be established under Conformity of Production requirements by the Approval Authorities which calls for testing to ECE Regulation No.54 drum testing schedules.
