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Working Party on Brakes and Running Gear (GRRF)  
(Fiftieth session, 10-12 September 2001,  
agenda item 6.6.)

PROPOSAL FOR DRAFT AMENDMENT TO REGULATION No. 108  
(Retreated pneumatic tyres)

Revision 1

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 tyres with speed ratings above 300 km/h.

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

**A. PROPOSAL**

Paragraph 1.2., amend to read:

"1.2. Retreaded tyres with a speed capability below 120 km/h or above 300 km/h."

Paragraph 6.1., amend to read:

" ..... until 1 January 2010 at the latest.

Note: Non "E" or "e" marked tyres may be accepted for retreading provided they have been approved by an internationally recognised authority and their suitability can be established."

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**B. JUSTIFICATION**

Re. para. 1.2.:

At the time when the Regulations were constructed, tyres with speed ratings above 240 km/h were a relatively new concept and represented a small proportion of the market. However, this market has increased considerably and is expected to continue to do so. United Kingdom figures show that VR and ZR speed rated tyres represented around 10 per cent of the market in 1994 and by 1998 this had risen to 20 per cent. This restriction prohibits the retreader from supplying to a significant and growing customer base.

Many countries are demanding 'like for like' when tyres are replaced e.g. replace 'Z' rated with 'Z' rated etc'.

New concepts and initiatives are continually being developed. It is, therefore, commercially restrictive not to permit the production of retreaded tyres to 300 km/h. Assurance for safety and suitability of the product is established under Conformity of Production testing requirements by the Approval Authorities.

Environmentally the restriction adds to the used tyre problem and goes against environmental policy of reuse, recovery and recycling. Retreading is one of the recognized methods of extending the life of the original tyre. If the tyres are not permitted to be retreaded this will add considerably to the problem of achieving the 100% recovery target necessary as a result of the new Landfill Directive.

Re. para. 6.1.:

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.30 drum testing schedules.

BIPAVER'S conviction is reinforced after the results of the drum test successfully carried out on retreaded tyres using non- "E" or "e" marked casings, following the Regulation No. 30 procedure. BIPAVER could make available the results of these tests to GRRF experts interested in them.

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