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Consultation on the revision of the Energy Labelling Directive

We recommend extending the scope of the labelling Directive to include tyres. The labelling should, in addition to rolling resistance (CO₂), include noise to the exterior, and possibly wet grip. An A-G scale should be used for all parameters.

We would like to add a comment regarding the question of possible trade-offs in the chapter on tyres in Appendix 2 to the Impact assessment study. The possible interaction of fuel efficiency with other characteristics of a tyre is discussed in paras 4.101 to 4.106 (including Figure 4.5).

With reference to the workshop held at the International Energy Agency (IEA) in 2005, it is stated that “the trade off between energy efficiency and other characteristics seems to be very much reduced at least for the “base” tyres. Significant differences remain for high performance tyres”. The figure reproduced as Figure 4.5 on page 69 of Appendix 3 was shown in the presentation of D.G. Duleep of Energy and Environmental Analysis¹ at the IEA workshop, carrying a GM logo.

Later in the workshop, in the session devoted to trade-offs, Dominique Aimon of Michelin presented the results of major study of tyres purchased on the European market(<http://www.iea.org/Textbase/work/2005/EnerEffTyre/aimon.pdf>). The study comprises 183 tyre lines, in 12 different segments, including high performance segments. *His conclusion was that safety and long wear life are compatible with fuel efficient tyres, provided technology is introduced in the tyres to improve their overall performances.*

¹ <http://www.eea-inc.com/showkeystaff.html>