



Automobilclub von Deutschland (AvD) (German Auto Club) stance on stakeholder consultation for planned revisions to the Energy Labelling Directive 92/75/EEC of 22 September 1992

Introduction

The AvD welcomes and fundamentally supports the intentions of the European commission to set up a more reliable and clearer labelling system to help achieve the ambitious targets for reduced CO₂ emissions.

Stance of the AvD

The AvD, however, emphatically rejects the plans to include tyres in the revised Energy Labelling Directive 92/75/EEC.

The EU Commission's aim is to adapt the revision to ease the purchasing decisions of consumers by making the energy labels as simple and clear as possible. The complex underlying physics simply cannot be clarified on a single label designed to show energy usage. Such a label would thus mislead consumers buying tyres – at the expense of their safety on the road.

Justification for this stance

The fundamental purpose of a tyre is to transfer the motive and braking power from the vehicle to the road, while ensuring the highest level of roadholding. A tyre accomplishes this key task with as high a grip as possible under diverse road surfaces and driving conditions. In other words, tyres play a very critical role in road safety.

The European Commission requires vehicles to be outfitted with a host of advanced safety technologies such as ESP, ABS, automated braking systems, antiskid systems, etc. For these technologies to work effectively, it is necessary to optimise the contact between the road and tyres. That is achieved with tyres that offer good road grip characteristics.



From a physics standpoint, however, there is a conflict between the grip characteristics of a tyre and its rolling resistance. Tyres optimised to provide the best road grip for safety reasons, cannot be simultaneously optimised to offer the lowest rolling resistance. Consequently, one needs to balance road safety versus environmental protection and energy savings.

The overriding political charter of the EU Commission, charged with the road safety program of 2001, is to cut in half the number of casualties on European roads between 2000 and 2010. Hence, the road grip characteristics of tyres must be assigned the highest priority. The AvD, therefore, proposes that reduction of the CO₂ footprint must play a subordinate role here.

Contact

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