



## **T&E response to EC consultation Revision of the Energy Labelling Directive 97/75/EEC**

**Question 6: Would you like to add other products to the scope of the labeling directive than those covered at present? If yes, which products would you suggest (non-household or non energy-using products, 'energy-relevant' product, services such as holiday packages or other?)**

Energy labeling is recommended for all categories of tyres for road-going motor vehicles (summer/winter including mud+snow, C1 – cars, C2 – light vans and C3 – heavy duty vehicles). Tyre rolling resistance determines the energy efficiency of the tyres, and therefore the fuel consumption of the vehicle to some extent. The necessity of tyre energy labelling has been advocated by a wide variety of stakeholders, including the tyre industry, in a recent European Commission consultation: 'Public consultation on outline proposals for a Regulation of the European Parliament and of the Council on Advanced Safety Features and Tyres'.<sup>i</sup>

Please see T&E position paper on tyre rolling resistance submitted to the recent DG Enterprise consultation (10/2007) for more detailed recommendations:

[http://www.transportenvironment.org/tag/cars\\_and\\_co2/publications/](http://www.transportenvironment.org/tag/cars_and_co2/publications/)

In general, consumers benefit from easily understandable information on products to inform purchase decisions. At present, there is no objective information available to interested consumers or even to tyre retailers about rolling resistance. The influence of tyres on vehicle fuel economy is likely to generate substantial consumer interest. In the absence of objective information to indicate the quality, safety or environmental performance of tyres, the sales price is a major factor in purchase decisions, which could lead to dangerous and unsustainable market trends. The tendency is therefore towards competition based on price, rather than quality. A labeling system would provide a solid, objective basis for some manufacturers to demonstrate superior quality of their products.

The revision of the Energy Labelling Directive should include necessary provision to allow energy labeling for tyres, but leave further details to the Regulation currently under development by DG Enterprise, unit F1 specifically addressing tyres. This regulation will address rolling resistance, which essentially determines energy use. T&E emphasises the need to ensure a timely proposal on tyres as well as clarity of regulation in this matter. This proposed from DG Enterprise is already unacceptably delayed (due for revision in 2004) and must not be further set back.

The proposal for a regulation on tyres (and advanced vehicle safety) is expected to recommend a maximum rolling resistance (ie. minimum energy efficiency) threshold for tyres sold in the EU. However, there is a risk that the limit value will be set at a level which will only exclude a very small number of energy-inefficient models from today's

market, and have no bearing on the direction of future research and development or tyre sales, and therefore virtually no impact on fuel consumption or CO2 emissions.

An energy (/rolling resistance) labeling scheme is therefore strongly recommended (also by leading tyre manufacturers) to go above and beyond the limit value, and stimulate the market for energy efficient tyres.

Some tyre industry representatives express reservations about optimizing rolling resistance and safety performance. As this is unlikely to be the case for other products currently subject to energy labeling, this will require particular consideration. To allay these concerns, T&E advocates an integrated label – demonstrating safety (wet grip) performance, as well as rolling resistance, and one further very important environmental characteristic, noise emission, and leaving the consumer (or public procurement officer, fleet purchaser) easily-understandable information on which to base their choice.

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<sup>i</sup> Note: In the United States the discrepancy between original equipment tyres fitted to new vehicles (subject to CAFE fuel efficiency standards) and replacement tyres has been noted. In the State of California tyre fuel efficiency standards are in place accompanied by a mandatory customer information programme under bill AB844 (2003):

[http://www.energy.ca.gov/transportation/tire\\_efficiency/documents/2007-12-07\\_workshop/presentations/Tuvell\\_Holmes\\_Implementation%20of%20AB844.pdf](http://www.energy.ca.gov/transportation/tire_efficiency/documents/2007-12-07_workshop/presentations/Tuvell_Holmes_Implementation%20of%20AB844.pdf)