

ETRTO considerations on document GRBP/2025/26

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- Document GRBP/2025/26 addresses a real-life situation that is not considered by current ice grip test conditions in UN Regulation No. 117: the *wet ice* (or *black ice*) conditions.
- The physical phenomena driving ice grip performance in the proposed additional upper temperature range (-5°C / -2°C) differ from those driving the low temperature range (-15°C / -5°C), dry ice conditions, as highlighted at point 3 of the justifications.
- When surface temperature is approaching zero degrees, the test surface stability will rapidly deteriorate, and dispersion of ice grip test results will grow.

- **The current temperature range** is based on the results of a consistent test plan with the aim to **provide a reliable segregation between** ice grip tyres* (**Nordic winter tyres**) and tyres for use in severe snow conditions (**central European winter tyres**).

* in Regulation (EU) 2020/740 on the labelling of tyres states, in paragraph 4 of Annex IV: “Suppliers and distributors shall also, where relevant, make available on their websites a statement highlighting the fact that **ice grip tyres** are specifically designed for road surfaces covered with ice and compact snow, and **should only be used in very severe climate conditions** (e.g. cold temperatures) and that using ice grip tyres in less severe climate conditions (e.g. wet conditions or warmer temperatures) could result in sub-optimal performance, in particular for wet grip, handling and wear.”

- Good 3PMSF wet grip tyres benefit of *wet ice* conditions more than ice grip tyres.
- Central European winter tyres (3PMSF) may fulfil the ice grip requirements when tested above -5° C, bear the ice grip marking and be used at low temperatures, without the same safety level of the current ice grip tyres (Nordic winter tyres).

Reminder of note in previous page: [...] **ice grip** [...] **should only be used in very severe climate conditions.**

To avoid any confusion with current ice grip tyres, ETRTO may consider the evaluation of *wet ice* performance in the framework of UN Regulation No.117 **in a separated annex and with a specific pictogram, provided that technical assessment and test development are first completed in respective ISO Working Group 11**

Thank you!