



# JATMA's Position on Tyre Abrasion Regulation as UN Regulations

83<sup>rd</sup> GRBP  
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The Japan Automobile Tyre Manufacturers Association, Inc.

# Commitment: Development of abrasion test method

**JATMA has contributed to the development of indoor drum test method.**

## Background

- Microplastic - Tyre and Road Wear Particles (TRWP) is considered one of the major sources.
- Reducing TRWP can reduce microplastics and make the environment better.

## Initiative

- JATMA worked on developing the indoor drum test method to focus on:
  - Fair, reliable and affordable.
  - Reflecting real world's condition of Contracting Party of the 1958 Agreement.
  - Low environmental burden.

# Stance: To the Adoption of Test Methods

**Fair adoption of the indoor drum test method is necessary.**

## **Rationale/Position**

- In the R117-04 series, adopted WP.29 in 2024 by consensus, both test methods have already been introduced under equal conditions.
- The indoor drum test method is environmentally low burden because it is possible to collect the tyre wear particles in indoor drum test system.
- Correlation with the vehicle test method has been confirmed through COVA test. The causes of most outliers in the MA test have been identified, and further frosty conditions are anticipated.

# Stance: To the Adoption of Test Methods

## Rationale/Position

- The drum test method has already been updated to enhance its accuracy. This enables us to obtain a robust correlation between drum test method and vehicle test method.
- Therefore, there are no technical barriers to adopting the drum test method under equal conditions with the vehicle test method. Both test methods can be operated under equal conditions for type approval.
- At the TF TA, 3 criteria proposals were submitted from Japan, EC, and ETRTO. JATMA supports proposal from Japan. This proposal is highly effective in avoiding distortion.

## Position on EC's criteria proposal

- The EC criteria proposal only imposes excessively strict obligations to ensure equivalence on the drum test method, despite the vehicle test method exhibiting greater variability.

	Vehicle	Drum
Standard deviation	0.12	0.08
Coefficient of Variation	11%	8%

- Test condition and circuit for vehicle test method is European oriented. Despite being signatories to the 1958 Agreement, Japan is unable to implement the vehicle test method and may be in the same situation in Asian countries.
- This creates an unjustified technical barrier and lacks methodological neutrality.
- Not adopting the drum test method will create a bottleneck in the capacity of approval testing. Delays in certification testing will postpone the release of tyres with superior abrasion performance.
- This will deprive consumers of choice, cause societal disruption, and have a negative impact on the environment.

## Stance: To the limit values

**JATMA considers the following table to be appropriate for limit values to achieve both environmental improvement and consumer benefit.**

		Stage 1	Stage 2
Normal (core limit + margin)		1.25	1.15
Snow (core limit + margin)		1.25	1.15
Sub Cluster	3PMSF	+0.1	+0.1
	Extra load	+0.1	+0.1
	Ultra High Performance	+0.1	+0.1
	Load Index <77	+0.1	+0.1
Application date	New type	July 2028	July 2033
	All type	July 2030	July 2035

JATMA requests mitigation measures for the 4 sub clusters.

Tyres with a low load index produce lower emissions, so providing a bonus would benefit for consumers.

# Stance: To the Abrasion Regulation

## Summary

- JATMA request adoption of the indoor drum test method under conditions equivalent to the vehicle test method for type approval. Both test method are necessary for abrasion regulation.
- JATMA believe it is a significant loss for this method not to be appropriately adopted, as it offers low environmental burden, high accuracy, and global feasibility.
- JATMA supports criteria proposal from Japan as Annex 4.
- JATMA supports limit values that achieve both environmental improvement and consumer benefit.
- JATMA looks forward to GRBP making technically neutral and fair decisions.

# Thank you for your attention

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