

I. Proposal to amend documents ECE/TRANS/WP.29/GRBP/2025/27

The changes are marked in **bold** for added text and **strike through** for deleted text, all in red font.

I. Proposal

Paragraph 6.1.1., amend to read:

- "6.1.1. The abrasion index of the candidate tyre **determined with the vehicle test method on public open roads described in paragraph 1. of Annex 3 to this Regulation** shall not exceed the values given below:

Category of use	Abrasion index (AICT)
Normal tyre	±1.00
Snow tyre	±1.00
Special use tyre	[Not defined]

Note: The limits shall be adjusted for the following specific tyre groups as follows

Tyre group	Stage 1	Stage 2
Standard load tyres	—	±0.05/0.10 [-0.10]
Reinforced or extra load tyres	+0.10	±0.05/0.10 [0]
Tyres for use in severe snow conditions (3PMSF)	+0.10	[+0.10]
Tyres with a nominal aspect ratio ≤ 40 and a speed category ≥ 300 km/h (speed-category symbol Y)	+0.10	± [+0.10]
Tyres with low load index (LI < 77)	+0.10	± [+0.10]

The adjustments for specific tyre groups are cumulative, e.g., if a candidate tyre is a reinforced snow tyre for use in severe snow conditions, the limit shall be [1.20] for stage 1 and ~~±0.05~~[1.10] for stage 2. "

Add a new paragraph 6.1.1.1., to read:

- "6.1.1.1. The abrasion index of a candidate tyre determined with the indoor drum test method described in paragraph 2. of Annex 3 to this Regulation may be used as alternative provided its equivalence to the vehicle test method on public open roads is demonstrated to the competent Type Approval Authority."**

Paragraph 8.4., amend to read:

- "8.4. Production shall be deemed to conform to the requirements of this Regulation if the abrasion index complies with the limits prescribed in paragraph 6.1. of

this Regulation, with an additional allowance of [0.20-0.25] for considering possible mass production variations."

Paragraph 12.6., amend to read:

"12.6. ~~Until [30 June 2032]~~ **Notwithstanding paragraph 12.5**, Contracting Parties applying this Regulation and mandatorily requiring the approval pursuant to **stage 1 of this Regulation** ~~of all types of class C1 tyres~~ shall continue to allow **for a period of 24 months from the date of requiring the approval for all types of class C1 tyres** the fitting on a vehicle in use of new class C1 tyres manufactured prior to ~~[30 June 2030]~~ **the date of requiring the approval pursuant to stage 1 for all types of class C1 tyres** and not type approved pursuant to this Regulation."

Add a new paragraph 12.7., to read:

"12.7 Notwithstanding paragraph 12.5, Contracting Parties applying this Regulation and mandatorily requiring the approval pursuant to stage 2 of this Regulation shall continue to allow for a period of 24 months from the date of requiring the approval for all types of class C1 tyres the fitting on a vehicle in use of new class C1 tyres manufactured prior to the date of requiring the approval pursuant to stage 2 for all types of class C1 tyres and not type approved pursuant to stage 2 of this Regulation."

Annex 3, paragraph 1.11.13.5., amend to read:

"1.11.13.5. [...]"

A_{margin} is the dimensionless abrasion margin, which accounts for the complexities of the abrasion level measurement methods, and **is equal to [0.20-0.25].**[...]"

Annex 3, paragraph 2.8., amend to read:

"2.8. [...]"

A_{margin} is the dimensionless abrasion margin, which accounts for the complexities of the abrasion level measurement methods, and **is equal to [0.20-0.25].**[...]"

II. Justification

1. Extra load tyres:

It has been demonstrated that the test conditions set for the extra load tyres (290 kPa instead of 250 kPa) have a physical impact on the tyre abrasion level and index. The needs of the requested allowance of 0.10 has been also demonstrated. Therefore, the allowance of 0.10 versus standard load tyres must be kept over time. (see document TA-37-8 for reference).

2. Tyres with a nominal aspect ratio ≤ 40 and suitable for speeds ≥ 300 km/h:

These tyres represent the 7,2% of the EU market (9 tyres in the have been tested for the market assessment). This type of tyres is also subject to other requirements, regulated or not, to comply with the vehicle requirements in terms of performances balance. Therefore, the allowance of 0.10 is needed and must be kept over time. (see document TA-33-8 for reference).

3. Conformity of production:

Based on the correlation/validation test campaign data, ETRTO proposes to set the a Conformity of production allowance equal to 0.25.

4. Drum test method:

ETRTO expressed in TFTA its concern of having the drum test method applicable for type approval since the entry into force of the tyre abrasion regulation, because its correlation with the vehicle test method on public open roads is questionable. (see document TA-32-9 for reference)

ETRTO preferred option is to start by allowing the type-approval only with the vehicle test method on public open roads and to continue working on the improvement of the correlation between the two methods; however this option was challenged by TFTA. As a compromise solution, ETRTO proposes to amend paragraph 6.1.1. and to add the paragraph 6.1.1.1. to allow the use of the drum test methods provided that its equivalence to the vehicle test method on public open roads is demonstrated by the applicant to the competent Type Approval Authority.

When a reliable correlation between the two methods will be found and agreed by TFTA members, the paragraph 6.1.1 will be amended by re-establishing the wording of the original document ECE/TRANS/WP.29/GRBP/2025/27 and by cancelling the paragraph 6.1.1.1.

5. Introductory provisions:

ETRTO proposes to revise the introductory provision given at paragraph 12.6 by linking it not to a specific date of application of the stage 1, but to the date of requiring the mandatory approval pursuant stage 1 for all types of class C1 tyres, which could be different among the various contracting parties applying this regulation,

Additionally, ETRTO proposes to introduce same introductory provision for stage 2. Both amendments are proposed to reflect the complexity of the tyre market where the tyres, once placed on the market, are directed to mounting centres, third party consignment stocks, wholesalers, regional distributors or to retailers and garages, where they may remain up to 30 months prior to being fitted on the vehicles of the final consumers.

Without this introductory provisions, this would lead to unnecessary scrapping millions of tyres after the implementation date of both stage 1 and stage 2.

A similar transitional provision was introduced in the 04 series of amendments to the UN Regulation No. 117.