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Enclosure(s)
Tyres in Europe

Date July 14, 2017
Subject Regulation (EC) No 661/2009: tightening of tyre limits and
further suggestions

Dear Mrs. Lowri Evans,

With pleasure I send you the document 'Tyres in Europe'. The main conclusion of the report is that the tightening of European tyre limits would lead to major societal benefits for climate, safety and noise. I am writing to you now before the holiday season starts for it is the intention to present the document in Geneva at the meeting of the UNECE Working Group on Noise 2-4 September. I would appreciate if the Commission could give a first comment at that meeting.

Last year, 13 January 2016, our DG Environment Mr Chris Kuijpers wrote you a letter on the tightening of tyre noise limits. As of 1 August 2017 Chris has accepted the position of Director-General Government and Housing at the Ministry of Internal Affairs which is why I am writing you.

By letter dated 10 February 2016 you invited the Dutch authorities to give a presentation to the experts of the Technical Committee – Motor Vehicles. On the 5th of July, Mr de Graaff and Mr Sliggers were invited to give presentations to the Motor Vehicle Working Group on the tightening tyre noise limits. They presented information to tighten all three tyre limits: fuel efficiency, wet grip and noise.

Since that presentation work on tyres in the Netherlands has continued. With this letter, I have enclosed the background document 'Tyres in Europe, tightening of tyre limits and further suggestions for improvement'. This document suggests stricter limits for tyres and gives figures of the benefits to be gained by practically everyone. Better tyres do not cost more and are widely available. For the whole EU a next stage of tyre limits would reduce:

- CO2 emissions by 21 Mton of CO2;
- the number of fatalities by 1300;
- the number of serious and slight injuries by 6000 and 10.000 respectively;
- the number of people annoyed and disturbed in their sleep by noise by 6 and 3 million.

For the longer term with stricter limits these benefits could be doubled.

Better tyres and proper tyre inflation would reduce fuel consumption by €100-150 a year for an average car owner. For a long-haul truck, the fuel savings could rise to as much as €2000.



Besides the tightening of the tyres limits, the benefit potential on tyres can be bigger. What is underestimated, is the problem of the under inflation of tyres. In the Netherlands more than 60% of the cars have at least one tyre with 10% under inflation. Assuming the same 60% under inflation in the EU 12 Mton of CO2 is emitted unnecessarily: 5 billion litres fuel are burned heating up the tyres instead of moving the car forward. An average car driver could save €90 a year on fuel and tyre wear by keeping his tyres at the proper pressure.

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The background document also analyses tyre wear. The bits of rubber produced by tyre wear are categorized as 'microplastics'. Reducing these emissions will be difficult. Nevertheless, the background document gives some suggestions that may be useful. It first deals with the tightening of tyre limits and then analyses many issues related to tyres. The document also suggests ways to improve the issues analysed. By sending you this letter and background document I invite you to take at hand the tightening of tyre limits under the Regulation on General Safety (EC) No 661/2009. Furthermore, I would like to ask the European Commission to look into the further issues raised in the background document and see if the suggested solutions might work for the Commission.

It is my conviction that at a time the EU is not taken for granted the European Commission could win the hearts and minds of European citizens with appropriate tyre measures.

Since this letter and background document deal with more issues than the tightening of tyre limits - and not all are under the responsibility of your Directorate-General - I will send a copy of this letter to your colleagues dealing with the other issues mentioned in the background document.

DEPUTY DIRECTOR-GENERAL FOR THE ENVIRONMENT AND INTERNATIONAL AFFAIRS,

Anita van den Ende

CC:

Dominique Ristori, Director-General DG Energy, Regulation Tyre Labelling (EC 2009/1222)

Daniel Calleja, Director-General DG ENVIRONMENT, Road surface labelling

Henrik Hololei, Director-General DG Mobility and Transport, Directive on Periodic Roadworthiness Tests (EU/2014/45) and Clean Vehicles Directive (EC/2009/33)