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## A Standardisation Request on tyres abrasion methodology

Dear Emmanuelle,

We are writing to you to urge the European Commission to issue a Standardisation Request on tyre abrasion as foreseen in Regulation (EU) 2020/740<sup>1</sup> on the labelling of tyres and take action for a timely availability of an appropriate method.

The 2020 Circular Economy Action Plan states that the Commission will seek to address various sources of microplastics emissions by “developing labelling, standardisation, certification and regulatory measures on unintentional release of microplastics, including measures to increase the capture of microplastics at all relevant stages of products’ lifecycle”. Tyres are the main contributor of unintentional microplastics release into the environment<sup>2</sup>, leading to 250,000 to 500,000 tons of microplastics pollution every year in the EU<sup>3</sup>. Specifically, tyre abrasion during use is a significant source of microplastics. The new labelling rules for car and truck tyres will need to include information on their abrasion rate by 2025 at the latest. While addressing microplastics from tyres requires a mix of different instruments and involvement of a variety of stakeholders, this remains a step in the right direction and will bring substantial benefits to human health and the environment.

Regulation 2020/740 states that “the Commission is [...] empower to adopt delegated acts [...] in order to include parameters or information requirements for tyre abrasion and mileage, as soon as reliable, accurate and reproducible methods to test and measure tyre abrasion and mileage are available for use by European or international organisation [...]”. A variety of methods are already available, and the Commission should act quickly to help consumers choose tyres that shed less microplastics.

The "[Uniform Tire Quality Grading](#)" (UTQG) is a system developed by the US Department of Transportation to rate tyres on tread wear, traction and temperature and inform consumers on those

<sup>1</sup> Regulation (EU) 2020/740 of the European Parliament and of the Council of 25 May 2020 on the labelling of tyres with respect to fuel efficiency and other parameters, amending Regulation (EU) 2017/1369 and repealing Regulation (EC) No 1222/2009.

<sup>2</sup> Parker-Jurd, F. N. F. Napper, I. E. Abbott, G. D. Hann, S. Wright, S. L. Thompson, R. C. (2020). Investigating the sources and pathways of synthetic fibre and vehicle tyre wear contamination into the marine environment. Report prepared for the Department for Environment Food and Rural Affairs (project code ME5435).

<sup>3</sup> Boucher, J., & Friot, D. (2017). Primary microplastics in the oceans: a global evaluation of sources. Gland, Switzerland: IUCN; Hann, Simon, et al. (2017) Investigating options for reducing releases in the aquatic environment of microplastics emitted by (but not intentionally added in) products.

characteristics. It comprises a targeted definition and methodology for establishing the rate of tyre wear and has been used in the US for over 40 years. UTQG's treadwear grade is a comparative rating based on the wear rate of the tyre when tested under controlled conditions on a specified government test course. Many companies are aware and familiar with this methodology and are already using UTQG ratings in the US market. A very similar methodology to measure tread wear and tear is also used by the General German Automotive Club (Allgemeiner Deutscher Automobil-Club e.V., ADAC). These methods could be used as basis to develop a suitable harmonised test method to measure tyre abrasion.

**We are therefore calling on the Commission to request the appropriate standardisation organisations to swiftly develop harmonised test methods for the measurement of tyre abrasion, with a view to establishing a suitable test method as soon as possible and at the latest by 2023.** This method is of crucial importance since it represents the backbone for abrasion to be included in the tyre label. It will then be important for the Commission to set a legal threshold for tyre wear so that the most wearing tyres are excluded from the EU market and their abrasive properties are incrementally raised over time.

We would be happy to meet with you or a member of your unit to discuss this at your earliest convenience and remain at your disposal for any questions you may have.

Yours sincerely,



Justin Wilkes  
Executive Director