



Brussels, 11 March 2026

European Commission DG Internal Market, Industry, Entrepreneurship and SMEs (DG GROW)

**RE: Euro 7 abrasion test methods – Recommendations for GRBP meeting (17 March)**

Dear Director-General Jorna, Deputy Director-General Moutarlier, Director Nunes De Almeida, and Head of Unit Nicklas,

We are writing to you because it is a critical moment in the negotiations to set a new standard for tyre abrasion with the UNECE process. To uphold the high ambition set in the Euro 7 regulation, we urge the European Commission to stay firm in the upcoming and likely final discussions within the UNECE Working Party on Pollution and Energy (WP-GRBP) and its subsidiary body Task Force on Tyre Abrasion (TF TA).

A globally harmonised UN regulation to measure and limit tyre abrasion is an ideal outcome yet it cannot come at the cost of lower ambition and potential risks of allowing under-performing (and high polluting) tyres to remain on the market. **Test methods must be representative of abrasion in real-world conditions to effectively phase out worst-performing tyres from the market** and ensure the limits adopted in the regulation will effectively lead to a reduction of microplastic emissions from tyres. Therefore, there must be strict equivalence between the two methods (the previously validated circuit method and the newer and less described drum method) that ensure reliability and replicability.

As noted in the previous letter from Pew, ECOS, EEB and T&E dated 14 November 2025, we have several concerns regarding the timeline and lack of transparency of the process. At this moment, however, we urge the EC negotiators to focus primarily on the remaining open points to be decided at the meetings in mid-March 2026. These points are outlined below.

## **What we ask from you – maintain high ambition**

To ensure that the ambition laid down in the Euro 7 regulation can be implemented, strict criteria must be included to ensure correlation between the two methods to measure tyre abrasion. We support the European Commission's current proposal (dated 27 February 2026) of annex 4.

Specifically, we urge the Commission to stay strong on the following two points:

- The **coefficient for the generic transfer function must remain at or above 1.5**. A lower transfer function coefficient would not reflect real world emissions conditions, and risks allowing higher polluting tyres to be placed on the market. This would undermine the ambition of Euro 7, limiting its effectiveness.
- The **"abrasion index", or specific transfer function, must be as close to 1 as possible**, which is consistent with Commission and JRC research. This allows a wide enough range of abrasion when comparing the drum method with real world conditions while making the comparisons reliable.

## Why this matters

The meetings in March present the final opportunity to confirm a UN test method that will uphold the Euro 7 regulation. Should these negotiations fail, the Commission must then proceed under Article 11(6) with drafting delegated act(s) in time for the first application dates for C1 tyres to comply with the regulation (1 July 2028).

The EU Zero Pollution Action Plan aims to reduce microplastic releases by 30% by 2030. Microplastics from tyres are the second largest source of microplastic pollution within Europe, with 360,000-540,000 tonnes entering the environment each year. Tyre wear particles are not only a source of microplastic pollution in waterways and soils — they are also a significant and often overlooked contributor to air pollution and its associated human health impacts.

By establishing an EU legal framework to control tyre-wear emission, Euro 7 plays a critical role advancing the EU Commission objective to address microplastic pollution and associated health impacts in the EU. **It is crucial to avoid a situation whereby the adopted methodologies and/or limits fail to effectively reduce microplastic emission levels.**

Thank you for your attention to these important details. We are available for a short meeting in advance of the meetings to discuss further.

Sincerely,

**Emily Best, Senior Programme Manager – ECOS**

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On behalf of:

- ECOS
- Pew Charitable Trusts
- European Federation for Transport and Environment
- The European Environmental Bureau
- Rethink Plastic alliance
- Seas at Risk
- Gallifrey Foundation
- No Plastic in My Sea
- Ocean. Now!